Lime Down
Solar Park

Environmental Statement

Volume 3, Appendix 1-2: Scoping Opinion Response Table (Tracked)

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Revision ~~1~~2

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Schedule of Changes

Revision	Section Reference	Description of Changes	Reason for Revision
2	Table 1	Updated to include scoping ID numbers from the Scoping Opinion.	Updated for Deadline 1 of Examination in response to the Planning Inspectorate's comments in the Section 55 Checklist.

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1.1 Overview

1.1.1 This technical appendix of the Environmental Statement (ES) summarises the issues raised in the Secretary of State's Scoping Opinion. **Table 1** sets out how the views of the Planning Inspectorate and other consultation bodies have been taken into account in the environmental studies and ongoing design of the Scheme.

Table 1: Scoping Opinion Response Table

Consultee	Topic	Matter Raised	Applicant Response
Planning Inspectorate ID: 2.1.1	Description of the Proposed Development: Maximum Design Parameters	At this stage of development, the number and locations of project elements such as Battery Energy Storage System (BESS) and on-site substation(s) have not been determined. The Inspectorate notes the Applicant's intention to apply a 'Rochdale Envelope' approach to maintain flexibility within the design of the Proposed Development. The Inspectorate expects that at the point an application is made, the description of the Proposed Development will be sufficiently detailed to include the design, size, capacity, technology, and locations of the different elements of the Proposed Development or where details are not yet known, will set out the assumptions applied to the assessment in relation to these aspects. This should include the footprint and heights of the structures (relevant to existing ground levels), as well as land-use requirements for all elements and phases of the development. The description should be supported (as necessary) by figures, cross-sections, and drawings which should be clearly and appropriately referenced. Where flexibility is sought, the ES should clearly set out and justify the maximum design parameters that would apply for each option assessed and how these have been used to inform an adequate assessment in the ES. The Inspectorate advises that each aspect chapter includes a section that outlines the relevant parameters / commitments that have informed the assessment.	**ES Volume 1, Chapter 3: The Scheme [EN010168/APP/6.1]** sets out how the 'Rochdale Envelope' approach has been applied the Scheme to maintain flexibility through the use of defined maximum design parameters. The worst-case scenarios have been defined for the environmental topics assessments and are reported in **ES Volume 1, Chapter 7 to 20 [EN010168/APP/6.1]**.
Planning Inspectorate ID: 2.1.2	Description of the Proposed Development: Electricity export connection to Melksham Substation	The Scoping Report does not identify whether any works would be required at the Melksham Substation that would be included in the DCO works. The likely significant effects from such works should be assessed within the ES, either as part of the Proposed Development, or in the cumulative effects assessment if they are to be consented separately.	The Existing National Grid Melksham Substation is included within the Order Limits and would require minor modification works. **ES Volume 1, Chapter 3: The Scheme [EN010168/APP/6.1]** sets out the works required at the Existing National Grid Melksham Substation which are assessed in **ES Volume 1, Chapter 7 to 20 [EN010168/APP/6.1]**.
Planning Inspectorate ID: 2.1.3	Description of the Proposed Development: Panels	The Scoping Report states that there are two options for the proposed panels: static or tracking, or a combination thereof. Where possible the Inspectorate recommends this decision is made prior to submission of the DCO application. If this is not possible, the ES should identify and assess the worst-case scenario for applicable topics (including Landscape and Visual, Cultural Heritage and Glint and Glare) during operation. If tracking panels are to be used, the ES should assess the potential for significant noise effects on ecological and human receptors during operation.	**ES Volume 1, Chapter 3: The Scheme [EN010168/APP/6.1]** sets out how the 'Rochdale Envelope' approach has been applied the Scheme to maintain flexibility, including considering both Tracking Solar PV Tables and Fixed Solar PV Tables. Maximum design parameters have been defined for each of these options. The worst-case scenarios for all topics (including Landscape and Visual, Cultural Heritage and Glint and Glare) have been defined for the environmental topics assessments and are reported in **ES Volume 1, Chapter 7 to 20 [EN010168/APP/6.1]**. The noise associated with tracking panels was considered as part of the noise assessment presented in **ES Volume 1, Chapter 14: Noise and Vibration [EN010168/APP/6.1],** however this was scoped out of the operational noise assessment as the predicted noise levels would be unlikely to be perceptible at sensitive receptors.
Planning Inspectorate ID: 2.1.4	Description of the Proposed Development: Lighting	The Scoping Report states that temporary site lighting will be required during construction which will be designed as far as practical so as not to cause nuisance outside the site. The ES should describe the location, type and hours of use of lighting required for all phases of the Proposed Development. Impacts resulting from the introduction	**ES Volume 1, Chapter 3: The Scheme [EN010168/APP/6.1]** sets out the lighting proposals for the construction phase including temporary site lighting Measures to control lighting are set out in the **Outline CEMP [EN010168/APP/7.12].** Lighting is not required within the Solar PV Sites during the operation and maintenance phase of the Scheme. All routine maintenance activities would be scheduled for daylight hours as far as is practicable. Focussed task specific lighting would only be required in the event of emergency works or equipment failure requiring night-

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		of lighting during construction, operation and decommissioning which are likely to result in significant effects should be assessed in the ES.	time working. Motion sensing security lighting would be provided within substations and within the BESS Area to maintain safe working conditions in winter months, for security purposes, and for maintenance activities. The lighting commitments for the operation and maintenance phase are set out in the Outline OEMP [EN010168/APP/7.13], including details on lighting design to minimise light spill. **ES Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1]** reports the assessment of the effects of lighting during construction, operation and decommissioning.
Planning Inspectorate ID: 2.1.5	Description of the Proposed Development: Watercourse crossings	The Scoping Report identifies several watercourses. The methods to be employed for watercourse crossings should be detailed within the ES. Should trenchless installation be relied upon to mitigate potential significant effects, the Applicant should ensure this construction method is demonstrably secured.	The methods to be employed for watercourse crossings are contained within Table 5 of **ES Volume 3, Flood Risk Assessment and Drainage Strategy [EN010168/APP/6.3]** and within the **Outline Construction Environmental Management Plan (CEMP) [EN010168/APP/7.12]** and is secured by Requirement 13 of the **Draft Development Consent Order (DCO) [EN010168/APP/3.1]**.
Planning Inspectorate ID: 2.1.6	Description of the Proposed Development: Construction and phasing	The Scoping Report does not at this stage detail anticipated construction activities/methodologies. The ES should clearly describe the construction activities insofar as is reasonably possible; this will be particularly pertinent for the Noise and Vibration assessment. The anticipated numbers of construction vehicles and workers should also be stated.	**ES Volume 1, Chapter 3: The Scheme [EN010168/APP/6.1]**, **ES Volume 3, Appendix 3-1: Battery Energy Storage System and Substation Description [EN010168/APP/6.3]** and **Appendix 3-2: Cable Route Corridor Construction Method Statement [EN010168/APP/6.3]** set out the use of anticipated construction activities/methodologies, construction vehicles and workers which have been taken into account in **ES Volume 1, Chapter 14: Noise and Vibration [EN010168/APP/6.1]**.
Planning Inspectorate ID: 2.1.7	Description of the Proposed Development: Temporary construction compounds	The Scoping Report states that temporary construction compounds will be required. The ES should confirm the locations and sizes of the construction compounds and where possible, show detailed layouts. Any mitigation measures proposed to avoid or minimise impacts relating to the use of compounds should be described in the ES.	**ES Volume 1, Chapter 3: The Scheme [EN010168/APP/6.1]** provides a description of the construction compounds (including size). The location of the compounds are shown within **ES Volume 2, Figure 3-2: Key Construction Phase Features [EN010168/APP/6.2].** The **Outline CEMP [EN010168/APP/7.12]** sets out the mitigation measures proposed to avoid or minimise impacts relating to the use of compounds.
Planning Inspectorate ID: 2.1.8	Description of the Proposed Development: Construction working hours	Scoping Report paragraph 4.3.4 states that construction activities will be carried out Monday to Friday 07:00-18:00 and between 08:00 and 13:30 on Saturdays. Paragraph 14.4.9 states that noise effects due to construction activities would generally occur during daytime hours (07:00 to 23:00). The ES should provide consistent details of the anticipated construction working hours (including any night-time working required) in the ES, which should be consistent with the working hours specified in the DCO.	**ES Volume 1, Chapter 3: The Scheme [EN010168/APP/6.1]** outlines the core construction working hours which are Monday to Friday from 07:00 to 18:00, Saturday from 08:00 to 13:30 and no Sunday or Bank Holiday working unless crucial to construction or in an emergency
Planning Inspectorate ID: 2.1.9	Description of the Proposed Development: Operation	The ES should describe the potential scope and duration of maintenance works that would be required during operation of the Proposed Development, including predicted vehicle movements and staffing numbers. Details should also be provided on any monitoring to be undertaken.	**ES Volume 1, Chapter 3: The Scheme [EN010168/APP/6.1]** provides a description of the scope and duration of maintenance works and monitoring that would be required during operation of the Scheme, including predicted vehicle movements and staffing numbers. In terms of monitoring equipment, this would typically be accessed remotely.
Planning Inspectorate ID: 2.1.10	Description of the Proposed Development: Assessment of decommissioning	The Scoping Report states that the effects of decommissioning will be considered in relevant sections of the report. An assessment of decommissioning should be undertaken wherever significant effects are likely to occur. Aspect specific comments are provided in Section 3 of this Opinion, where the Applicant has requested to scope out specific matters.	The decommissioning phase of the Scheme is assessed in the topic chapters within **ES Volume 1, Chapter 7 to 20 [EN010168/APP/6.1]**.
Planning Inspectorate ID: 2.1.11	Description of the Proposed Development: Materials and waste	The ES should include a description of the nature and quantity of materials and natural resources used in the Proposed Development, including expected quantities and types of any waste that would be generated during construction, operation and decommissioning. The ES should describe the assumptions made in the assessment with regards to likely exportation of waste. The Inspectorate notes Section 21.5.4 of the Scoping Report, which confirms that no separate	**ES Volume 1, Chapter 3: The Scheme [EN010168/APP/6.1]** provides a description of materials and natural resources used in the construction of the Scheme. The Materials and Waste section within **ES Volume 1, Chapter 20: Other Environmental Matters [EN010168/APP/6.1]** provides an assessment of effects

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		waste aspect chapter is to be produced but that a Site Waste Management Plan (SWMP) would detail quantities of waste and management as an appendix to the ES. Although the Inspectorate is content with this approach, an assessment of effects relating to waste should be provided in the relevant aspect chapters where significant effects are likely to occur, including in relation to transport effects arising from the movement of waste.	relating to waste and sets out the quantity of wastes assumed for that assessment. **ES Volume 1, Chapter 13: Transport and Access [EN010168/APP/6.1]** provides an assessment of transport effects arising from the movement of waste. **An Outline Site Waste Management Plan [EN010168/APP/7.16]** has also been submitted with the DCO Application.
Planning Inspectorate ID: 2.2.1	Environmental Impact Assessment (EIA) Methodology and Scope of Assessment: Cumulative Effects Assessment (CEA)	The ES should include information on the location of the developments included in the CEA and the distance from the Proposed Development. This should be supported by a figure depicting the locations and extent of cumulative developments in relation to the Proposed Development.	**ES Chapter 21: Cumulative Effects and Interactions [EN010168/APP/6.1]** presents the shortlist of schemes considered within the Cumulative Effects Assessment (CEA); this includes the distance of cumulative developments from the Order limits at the closest point. **Figure 21-1 [EN010168/APP/6.2]** also presents the locations of these developments in context of the Lime Down Order limits.
Planning Inspectorate ID: 2.2.2	EIA Methodology and Scope of Assessment: Reporting of significant effects	The Scoping Report states that the ES "*will highlight residual effects which remain following the implementation of suitable mitigation measures*". The Inspectorate considers that the significance of effects prior to the implementation of mitigation measures should also be reported. This is to enable an understanding of the anticipated effectiveness of mitigation measures.	**ES Volume 1, Chapter 7 to 20 [EN010168/APP/6.1]** report the significance of effect prior to and following the implementation of the secured additional mitigation (where identified). This was agreed with the Planning Inspectorate on 8 October 2024.
Planning Inspectorate ID: 2.2.3	EIA Methodology and Scope of Assessment: Mitigation	The Inspectorate notes that various outline management plans, which will contain proposed mitigation measures, will be submitted with the DCO application. The outline plans should be sufficiently detailed to provide confidence in the delivery of mitigation, particularly that relied upon within the ES to avoid or reduce significant effects.	The Outline Plans submitted as part of the DCO Application are listed below. Each is sufficiently detailed to provide confidence in the delivery of mitigation identified in the ES. **Outline Construction Environmental Management Plan (CEMP) [EN010168/APP/7.12]** **Outline Operational Environmental Management Plan (OEMP) [EN010168/APP/7.13]** **Outline Decommissioning Strategy [EN010168/APP/7.14]** **Outline Soil Resources Management Plan (SRMP) [EN010168/APP/7.15]** **Outline Site Waste Management Plan** [**EN010168/APP/7.16**] **Outline Public Rights of Way Management Plan (PRoWMP) [EN010168/APP/7.17]** **Outline Landscape and Ecological Management Plan (LEMP) [EN010168/APP/7.18]** **Outline Ecological Protection and Mitigation Strategy (EPMS) [EN010168/APP/7.19]** **Outline Skills, Supply Chain and Employment Plan [EN010168/APP/7.20]** **Outline Battery Safety Management Plan (BSMP) [EN010168/APP/7.21]** **Outline Construction Traffic Management Plan (CTMP) [EN010168/APP/7.22]** **Outline Water Resources Strategy [EN010168/APP/7.25]**
Planning Inspectorate ID: 2.2.4	EIA Methodology and Scope of Assessment: Competent experts	The ES should contain details of the competent experts used in the preparation of the ES	Details of the competent experts who carried out the EIA are set out in **ES Volume 3, Appendix 1-1: Statement of Competence [EN010168/APP/6.3]**.
Planning Inspectorate ID: 2.2.5	EIA Methodology and Scope of Assessment: Scoping Table	The Inspectorate advises the use of a table to set out the key changes in parameters/options of the Proposed Development presented in the Scoping Report to that presented in the ES. It is also recommended that a table is provided demonstrating how the matters raised in the Scoping Opinion have been addressed in the ES.	Table 3.1 of **ES Volume 1, Chapter 3: The Scheme [EN010168/APP/6.1]** sets out the parameters used in EIA of the Scheme. The design parameters for the Scheme have evolved from Scoping, to PEIR and then to DCO Application Submission to adapt to new information, technical considerations and changes in design. **Design Approach Document [EN010168/APP/7.3]** summarises the evolution of the design parameters. This Appendix (Appendix 1-2) provides a table which demonstrates how the matters raised in the Scoping Opinion have been addressed in the ES.

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Planning Inspectorate ID: 2.2.6	EIA Methodology and Scope of Assessment: Baseline conditions	The Inspectorate notes that a number of surveys have been undertaken which have informed the Scoping Report but have not been appended or included. Any information relied upon for the assessments in the ES should be appended to the ES to allow the Inspectorate to gain a full understanding of issues.	Noted. All information relied upon for the assessments in the ES have been appended, including a number of baseline ecology reports see **ES Volume 3: Appendix 9-1 to Appendix 9-7 [EN010168/APP/6.1].**
Planning Inspectorate ID: 2.2.7	EIA Methodology and Scope of Assessment: Transboundary	The Inspectorate on behalf of the SoS has considered the Proposed Development and concludes that the Proposed Development is unlikely to have a significant effect either alone or cumulatively on the environment in a European Economic Area State. In reaching this conclusion the Inspectorate has identified and considered the Proposed Development's likely impacts including consideration of potential pathways and the extent, magnitude, probability, duration, frequency and reversibility of the impacts. The Inspectorate considers that the likelihood of transboundary effects resulting from the Proposed Development is so low that it does not warrant the issue of a detailed transboundary screening. However, this position will remain under review and will have regard to any new or materially different information coming to light which may alter that decision. Note: The SoS' duty under Regulation 32 of the 2017 EIA Regulations continues throughout the application process. The Inspectorate's screening of transboundary issues is based on the relevant considerations specified in the Annex to its Advice Note Twelve, links for which can be found in paragraph 1.0.7 above.	Noted.
Planning Inspectorate ID: 3.1.1	Climate Change: sea level rise	The Scoping Report states that the Proposed Development is not located in an area that is susceptible to sea level rise. The Inspectorate agrees that significant effects are not likely to occur and an assessment of sea level rise in the in-combination climate change impact assessment and climate change resilience assessment can be scoped out of further assessment.	Noted. Sea level rise has been scoped out of **ES Volume 1, Chapter 7: Climate Change [EN010168/APP/6.1].**
Planning Inspectorate ID: 3.1.2	Climate Change: in-combination climate change impact assessment	The Applicant proposes to scope out an in-combination climate change impact assessment from the climate chapter of the ES on the basis that climate change impacts relevant to the Proposed Development will be assessed through the other relevant topics of the ES. Given that climate change impacts relevant to the Proposed Development will be assessed through the other relevant topics of the ES, the Inspectorate agrees to scope out an in-combination climate change impact assessment from the climate change chapter. The climate change chapter should signpost where in the ES the relevant climate change factors have been assessed.	Noted. The relevant climate change factors, increased flooding events, have been assessed in **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [EN010168/APP/6.1]**, impacts on watercourses and associated sensitive habitats, and Ground Conditions have been assessed in **ES Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1]** and interactions with groundwater and soil stability have been assessed in **ES Volume 1, Chapter 19: Ground Conditions and Contamination [EN010168/APP/6.1]. ES Volume 1, Chapter 7: Climate Change [EN010168/APP/6.1]** summarise these findings.
Planning Inspectorate ID: 3.1.3	Climate Change: mitigation	Limited information has been provided with regard to mitigation measures. Any relevant mitigation measures identified from the assessment should be clearly described in the ES and secured through the DCO.	Embedded mitigation is included within **ES Volume 1, Chapter 7: Climate Change [EN010168/APP/6.1]** (See Section 7.9). Topic Scoped in.
Planning Inspectorate ID: 3.1.4	Climate Change: greenhouse gas (GHG) impact assessment assumptions	The GHG impact assessment within the ES should clearly describe any assumptions made in determining the quantification of any emissions reduction resulting from the Proposed Development such as the displacement of fossil fuel power generation.	Assumptions regarding the GHG impact assessment are included within **ES Volume 1, Chapter 7: Climate Change [EN010168/APP/6.1]** (See Section 7.4, the Future Baseline in Section 7.7, the assessment itself in Section 7.10 and the Appendix). Topic scoped in.
Planning Inspectorate ID: 3.1.5	Climate Change: GHG emissions	The Inspectorate notes that the Scoping Report does not provide the calculation methods for GHG emissions. For the avoidance of doubt, the ES should specify the methods used to quantify GHG emissions relating to the Proposed Development.	A detailed methodology is provided in **ES Volume 1, Chapter 7: Climate Change [EN010168/APP/6**.1] (see Section 7.6).
Planning Inspectorate ID: 3.1.6	Climate Change: assessment methodology – climate	The Scoping Report does not provide a description of the methodology to be used in the climate change resilience assessment. The ES should explain how the climate change resilience impacts have been identified and the methodology that	A detailed methodology is provided in **ES Volume 1, Chapter 7: Climate Change [EN010168/APP/6.1]** which aligns with industry standard good practice

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	change resilience assessment	will be used to determine the significance of effects. Any use of professional judgement to assess significance should be fully justified within the ES.	methodology from the Institute of Sustainability and Environmental Professionals (ISEP) (see Section 7.6)..
Planning Inspectorate ID: 3.1.7	Climate Change: significance criteria – GHG impact assessment	The Scoping Report does not clearly set out how the level of significance for the Proposed Developments GHG emissions and potential impact to the climate will be determined. The assessment presented in the ES should address this. It should be aligned with the approach presented within the Institute of Environmental Management and Assessment (IEMA)'s 'Assessing Greenhouse Gas Emissions and Evaluating their Significance' as the basis for the assessment of effects. With reference to Scoping Opinion ID 3.1.6 above, a separate methodology and criteria should also be presented for the assessment of climate resilience.	A detailed methodology for determining the level of significance is provided in **ES Volume 1, Chapter 7: Climate Change [EN010168/APP/6.1]** which aligns with the 'Assessing Greenhouse Gas Emissions and Evaluation their Significance' methodology from the Institute of Sustainability and Environmental Professionals (ISEP) (formerly the Institute of Environmental Management and Assessment (IEMA) (see Section 7.6). A detailed methodology and criteria for climate resilience is provided in **ES Volume 1, Chapter 7: Climate Change [EN010168/APP/6.1]** which aligns with industry standard good practice methodology from the Institute of Sustainability and Environmental Professionals (ISEP) (See Section 7.6, paragraph 7.6.24 to 7.6.35). Topic scoped in.
Wiltshire Council Climate Team	GHG Assesment	It is relevant to also compare the whole life estimated GHG emissions against a BAU scenario. The BAU might be considered a continuation of current uses at the Sites. In order to consider climate commitments made by Wiltshire Council I suggest reference to the outward-facing delivery plan for the whole county of Wiltshire "Climate Strategy Delivery Plan for Wiltshire".	**ES Volume 1, Chapter 7: Climate Change [EN010168/APP/6.1]** includes the comparison with the Business As Usual (BAU) scenario (see Paragraph 7.7) and references to the outward facing delivery plan for the whole county of Wiltshire "Climate Strategy Delivery Plan for Wiltshire" (Paragraph 7.3).
Wiltshire Council Climate Team	CC Risk Assesment	Climate change is acknowledged to be a cross cutting issue in development and it is agreed that it should be addressed in technical detail within relevant sections e.g. precipitation within drainage. However, it is important that the Climate Change chapter provides non-technical summaries as indicated within Table 6.2. Chapter can also include Air Quality and Wildfires topics.	Please see **ES Volume 1, Chapter 7: Climate Change [EN010168/APP/6.1]** Climate Change Risk Assessment for details of precipitation and drainage in Section 7.10. Topic Scoped in. The ES includes a non-technical summary of Climate Change **(See ES Volume 5, ES Non-Technical Summary [EN010168/APP/6.5]).**
Planning Inspectorate ID: 3.2.1	Landscape and Visual: Landscape and Visual Impact Assessment (LVIA)	The Scoping Report proposes to scope out: • LVIA considering visual receptors with no direct, extensive, or open views within 2km of the Proposed Development; • Visual receptors over 2km from Lime Down A to E, the land at Melksham Substation and the Cable Route Search Corridor; • Visual receptors within the 5km outer study area of the Proposed Development; and • Landscape receptors over 5km from Lime Down A to E, the land at Melksham Substation and the Cable Route Search Corridor The preliminary Zone of Theoretical Visibility (ZTV) shown in Figure 7.8 shows high potential visibility of the Proposed Development up to and beyond the 5km study area boundary. On the basis of this potential visibility, and in the absence of further detailed information including agreement from relevant statutory consultees, the Inspectorate does not agree to scope these matters out of the ES. The assessment of impacts to landscape and visual amenity (including the study area, ZTV and photomontages) should be based on the relevant worst-case having regard to any parameters applicable to the Proposed Development, including panel orientation and all proposed structures such as the BESS. The ES should include an assessment of impacts on all landscape and visual receptors which are likely to result in significant effects or information demonstrating agreement with the relevant consultation bodies that this matter can be scoped out of further assessment and the absence of a likely significant effect.	As stated in **ES Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1]** the ZTVs represent a worst case scenario in terms of the visibility of the Scheme, as it does not take into account the effect that distance has on visibility as a result of atmospheric perspective where distant objects often appear blurred and less detailed, nor does the ZTV pick up more incidental vegetation, which across a large area can compile to provide additional visual screening. Winter photomontages contained within Volume 3- Appendix 8-14 [EN010168] has been prepared to assess worst case effects when vegetation has been removed . The potential visibility of the Scheme has been ground truthed on accompanied site visits with Cotswold National Landscape Board (CNLB) and Wiltshire Council (WC). No additional Viewpoints have been requested from outside the 1km study area. **ES Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1]** concludes the preliminary assessment of likely visual effects that there are no Significant effects outside of the I km study area. Further consultation with CNLB and WC has been undertaken to agree where significant effects are anticipated. The Scheme has been assessed on the parameters of the Scheme as set out in **ES Volume 1: Chapter 3: The Scheme [EN010168/APP/6.1]**
Planning Inspectorate ID: 3.2.2	Landscape and Visual: Photomontages where no significant effects are anticipated	The Scoping Report proposes to scope out the production of photomontages where no significant effects are anticipated. The Inspectorate agrees that given the nature of the proposals and the reasoning provided in the Scoping Report that this matter can be scoped out of further assessment.	The Applicant has agreed the Viewpoint locations for the production of photomontages with the relevant consultation bodies Where additional viewpoints were requested by CNL and Witshire Council, photomontages have been produced even where no significant effects where recorded. This is as a result of changes to the scheme in response to consultation.

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Planning Inspectorate ID: 3.2.3	Landscape and Visual: LVIA and Cultural Heritage Assessment	Paragraph 7.3.11 of the Scoping Report states that the LVIA will consider the findings of the Cultural Heritage ES chapter. However, there is minimal information presented in the Scoping Report on how the Landscape and Cultural Heritage assessments will be integrated. The ES should explain how the LVIA and cultural heritage assessments have been integrated and clear cross-referencing should be provided between the Cultural Heritage and Landscape and Visual Impact Assessment chapters.	ES Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1] has been in consideration of the following Chapters in ES Volume 1 [EN010168/APP/6.1]: • Chapter 9: Ecology and Biodiversity; • Chapter 10: Arboriculture; • Chapter 12: Cultural Heritage; and • Chapter 18: Glint and Glare. This has led to the coordinated landscape led approach to the development of the scheme as set out in the LEMP Figure 3-4 series Landscape and Ecology Mitigation Plan [EN010168/APP/6.2] and the Outline Landscape and Ecological Management Plan[EN010168/APP/7.18]
Planning Inspectorate ID: 3.2.4	Landscape and Visual: Preliminary Landscape Baseline	The Scoping Report states that the land at Melksham Substation is not located within any Landscape Character Assessments (LCAs) in Wiltshire. The Applicant's attention is drawn to the comments from Wiltshire Council (Appendix 2 of this Opinion) regarding the inclusion of the North and West Wiltshire LCAs within the LVIA. The baseline presented in the ES must be an accurate reflection of the existing situation.	The West Wiltshire Landscape Character Assessment was mistakenly not included in the Scoping Report. Although the Land at Melksham Substation is no longer being considered as a site for the 400 kv Substation which comprises part of the Scheme, it is still included within the Cable Route Search Corridor. The Cable Route Search Corridor is located within the West Wiltshire Landscape Character Assessment, and this has been added to **ES Volume 2, Figure 8-5: Landscape Character Areas [EN010168/APP/6.2]** and is considered in the ES.
Planning Inspectorate ID: 3.2.5	Landscape and Visual: ZTVs	The Scoping Report states that the ZTVs were based on the Scheme at 4.5m above ground level and that separate ZTVs will be provided for the substations once locations have been established. Table 4.1 of the Scoping Report states that the anticipated heights of the 400kV and 132kV substations are 13m and 7m respectively. Consequently, the ZTVs may not be representative of the full extent of visibility. In order to demonstrate that the full extent of the Proposed Development has been assessed, the ZTVs should be based on maximum design parameters to be permitted by the DCO. The ES should clearly evidence and justify the final extent of the ZTVs and ensure that any assessment of significance is based on this maximum extent	The suite of ZTVs in **ES Volume 2, Figures 8-8, and 8-9 [EN010168/APP/6.2]** have been updated to include the 400 kV and 132 kV substations at heights of 13 m and 7 m respectively. The ZTVs and the assessment of significance is based on the maximum design parameters.
Planning Inspectorate ID: 3.2.6	Landscape and Visual: Viewpoints and photomontages	Figures 7.7 to 7.7.8 of the Scoping Report set out representative viewpoints for the Proposed Development. The Inspectorate notes that most of these viewpoints are in close proximity to the Proposed Development boundary. The Applicant should justify the location of viewpoints, ensuring these capture a worst-case scenario of impacts from the Proposed Development and are representative of visual receptors. Efforts should be made to agree the number and location of viewpoints as well as the locations for photomontages with relevant consultation bodies including local authorities, Historic England and Natural England (NE). The Applicant's attention is drawn to the comments from Wiltshire Council (Appendix 2 of this Opinion) regarding the inclusion of additional representative viewpoints in the LVIA to capture any long-distance views of the Proposed Development.	The Applicant has agreed with the CNL and Wiltshire Council the representative Viewpoints and photomontages to be included within the ES. Following consultation with Wiltshire Council's Landscape Officer, three (3) additional Viewpoints have been included in the ES The three VPs WC 1, 2 and 3 are within the 1 km Study Area and are included in the ES.Following Consultation with the Cotswold National Landscape Board Planning Officer, six (6) additional Viewpoints have been included in the ES. The six VPs CNL A, B, C, D, E, F and G are all within the 1 km Study Area
Planning Inspectorate ID: 3.2.7	Landscape and Visual: LVIA Methodology	The Inspectorate notes that the LVIA methodology is set out in Appendix 7.2 of the Scoping Report. For ease of reference and consistency with other chapters, the LVIA methodology should be included in the relevant ES chapter rather than in a separate document.	The detailed LVIA methodology is included within Volume 3, Appendix 8-1 [EN010168/APP/6.3] A summary of the methodology is included in Section 6 of the LVIA in ES Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1] for consistency with other chapters.
Planning Inspectorate ID: 3.2.8	Landscape and Visual: Potential effects and mitigation	The Inspectorate notes that while the LVIA methodology (Appendix 7.2) defines the general approach to mitigation and enhancement it does not outline any specific mitigation measures or enhancement plans for the Proposed Development. The ES should describe any relevant mitigation measures identified	Specific mitigation measures and enhancement plans are included in the ES. The Landscape and Ecological Mitigation Plan (LEMP) provides details of the proposed mitigation and enhancement which are described in Section 9 of **ES Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1]** and the

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		from the LVIA assessment and explain how delivery of these measures has been secured.	Outline Landscape and Ecological Management Plan (OutlineLEMP) **[EN010168/APP/7.18]**
Planning Inspectorate ID: 3.3.1	Ecology and Biodiversity: Great crested newt survey	The Scoping Report states that District Level Licensing (DLL) for great crested newts (GCN) is currently being explored as a potential compensation option for the Proposed Development. The Inspectorate understands that the DLL approach includes strategic area assessment and the identification of risk zones and strategic opportunity area maps. The ES should include information to demonstrate whether the Proposed Development is located within a risk zone for GCN. If the Applicant enters into the DLL scheme, Natural England (NE) will undertake an impact assessment and inform the Applicant whether their scheme is within one of the amber risk zones and therefore whether the Proposed Development is likely to have a significant effect on GCN. The outcome of this assessment will be documented on an Impact Assessment and Conservation Payment Certificate (IACPC). The IACPC can be used to provide additional detail to inform the findings in the ES, including information on the Proposed Development's impact on GCN and the appropriate compensation required.	Further information on the Scheme's location in relation to NE GCN risk zones has been provided as part of the ES, most explicitly in **ES Volume 2, Figures 9.5.4 to 9.5.6: Natural England GCN Risk Zones [EN010168/APP/6.2].** Registration of the Cable Route Corridor under DLL will be sought for the Scheme, with Natural England confirming there is a very good supply of compensation ponds in Swindon and Wiltshire for DLL (**See Table 9-2 in Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1]** refers).
Planning Inspectorate ID: 3.3.2	Ecology and Biodiversity: Species specific surveys of brown hare, hedgehog, polecat, dormice, harvest mice, reptiles and terrestrial or aquatic invertebrates	The Scoping Report does not propose to conduct any species-specific surveys of brown hare, hedgehog, polecat, dormice, harvest mice, reptiles and invertebrates for all site areas. The Scoping Report states that their presence on-site within all suitable habitat has been assumed and will be considered within the ES assessment. Without certainty on the extent and presence of these species, and without confidence that mitigation through avoidance would be adequate, the Inspectorate does not agree that a detailed assessment of impacts on brown hare, hedgehog, polecat, dormice, harvest mice, reptiles and terrestrial or aquatic invertebrates can be scoped out of further assessment. The Applicant's attention is also drawn to the Environment Agency's (EA's) response to consultation (Appendix 2 of this Opinion) with regard to the potential presence of white-clawed crayfish on site. The Applicant should seek to agree the scope of the ecological impact assessment with relevant consultation bodies including the EA.	Impacts to these species/species groups remain scoped into the assessment, with an assessment of impacts and mitigation considerations provided in sections 9.10 and 9.12. Specific surveys have not been undertaken on the basis that an adequate assessment can be made taking into consideration the extent and location of suitable habitat and the likely impacts of the proposals. The survey scope for the Solar PV Sites has been agreed with relevant stakeholders including the EA as set out in **Table 9-2 Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1]**.
Planning Inspectorate ID: 3.3.3	Ecology and Biodiversity: Impacts of Electric and Magnetic Fields (EMFs) resulting from cables within the sites and interconnecting cables – all phases	The Scoping Report proposes to scope out impacts of EMFs resulting from cables within the sites and interconnecting cables on ecological receptors on the basis that the voltage of the cables within the site and the interconnecting cables would be between 33 to 132kV and that the risk of EMFs resulting in significant impacts is considered highly unlikely due to the burial, sheathing and relatively low voltage of cabling within and between Lime Down A to E. The Inspectorate agrees that given the nature of the proposals and the reasoning provided in the Scoping Report significant environmental effects are unlikely and this matter can be scoped out of further assessment.	Noted. Impacts of EMFs on wildlife from Solar PV Sites cables and interconnecting cables remain scoped out of the assessment presented in **ES Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1]**.
Planning Inspectorate ID: 3.3.4	Ecology and Biodiversity: Impacts of EMFs on terrestrial species resulting from the Primary Cable Route – all phases	The Scoping Report proposes to scope out impacts of EMFs resulting from cables within the sites and interconnecting cables on ecological receptors on the basis that the voltage of the cables within the site and the interconnecting cables would be between 33 to 132kV and that the risk of EMFs resulting in significant impacts is considered highly unlikely due to the burial, sheathing and relatively low voltage of cabling within and between Lime Down A to E. The Inspectorate agrees that given the nature of the proposals and the reasoning provided in the Scoping Report significant environmental effects are unlikely and this matter can be scoped out of further assessment.	Noted. Impacts of EMFs on terrestrial wildlife from On-Site cables and Interconnecting Cables remain scoped out of the assessment presented in **ES Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1]**.
Planning Inspectorate ID: 3.3.5	Ecology and Biodiversity: Impacts to the Severn	Impacts to the Severn Estuary SPA and Ramsar are proposed to be scoped out of the ES on the basis that the Proposed Development site is located approximately 24km from the Severn Estuary. The Scoping Report states that the site encompasses habitat different to those cited within the relevant designations	The Severn Estuary SPA and Severn Estuary Ramsar have been scoped into the assessment, with impacts on these sites assessed in Section 9.10 within **ES Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1]**.

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	Estuary Special Protection Area (SPA) and Ramsar	which is not considered to represent functionally linked land to the Severn Estuary SPA and Ramsar. It is further stated that there is not considered to be a hydrological linkage. The Applicant's attention is drawn to the EA's response to consultation (Appendix 2 of this Opinion) which details that the Avon Bristol Rural Operational Catchment is hydrologically connected to the Severn Estuary and that there is potential for pollutants from the Proposed Development to enter the Severn Estuary. Their response further states that the site is functionally linked to the Severn Estuary Ramsar and the Severn Estuary Site of Special Scientific Interest (SSSI) due to the presence of European eel in watercourses within the Proposed Development site. In the absence of evidence demonstrating clear agreement with relevant statutory bodies, the Inspectorate is not in a position to agree to scope these matters out of assessment. Accordingly, the ES should include an assessment of these matters or the information demonstrating agreement with the relevant consultation bodies and the absence of likely significant effect.	
Planning Inspectorate ID: 3.3.6	Ecology and Biodiversity: Impacts to the Salisbury Plain SPA	Impacts to the Salisbury Plain SPA are proposed to be scoped out of the ES on the basis that the Proposed Development site is located approximately 19km from the Salisbury Plain SPA and the site consists of enclosed and largely arable farmland, which is disconsonant with the open chalk grassland which characterises the Salisbury Plain. It is further stated that land within the site is not considered to represent functionally linked land for the qualifying bird species of the Salisbury Plain SPA. On the basis of the separation distance and given that the site consists of enclosed and largely arable farmland, the Inspectorate agrees that significant effects on the Salisbury Plain SPA are unlikely and can be scoped out of further assessment.	Salisbury Plain SPA remains scoped out of the assessment presented in **ES Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1]**.
Planning Inspectorate ID: 3.3.7	Ecology and Biodiversity: Impacts to the Mells Valley Special Area of Conservation (SAC)	Impacts to the Mells Valley SAC are proposed to be scoped out of the ES on the basis that due to the separation distance from the Proposed Development (approximately 28.44km at the closest point and 42km from the array areas) and given that there are no known breeding or hibernating roosts for the greater horseshoe bats supported by the SAC, the Proposed Development site would not be expected to represent functionally linked land for the horseshoe bats supported by the SAC, with summer home ranges of this species typically being less than 10km from roost sites. The Inspectorate agrees that given the separation distance, significant effects on the Mells Valley SAC are unlikely and can be scoped out of further assessment.	Mells Valley SAC remains scoped out of the assessment presented in **ES Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1]**.
Planning Inspectorate ID: 3.3.8	Ecology and Biodiversity: National Statutorily Designated Sites within 5km of the site, designated solely for geological interest	The Scoping Report proposes to scope out impacts to National Statutorily Designated sites within 5km of the site which have been designated solely for the geological interest. Paragraphs 8.3.21 and 8.3.22 identify that two Sites of Special Scientific Interest (SSSI) are located within 5km of the Proposed Development site (Stanton St Quintin Quarry and Motorway Cutting SSSI and Corsham Railway Cutting SSSI). These sites are located approximately 1.73km and 2.98km from the Proposed Development site respectively. The Inspectorate agrees that due to the distance from the Proposed Development and on the basis of their reasons for designation, significant effects on these SSSI's are unlikely and can be scoped out of further assessment.	Stanton St Quintin Quarry SSSI and Corsham Railway Cutting SSSI, both of which are within 5 km of the Solar PV Sites and are designated solely for geological interest, remain scoped out of the assessment presented in **ES Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1]**.
Planning Inspectorate ID: 3.3.9	Ecology and Biodiversity: Field surveys	Tables 8.1 and 8.2 provide the field survey scope and schedule for Lime Down A to E and Land at Melksham Substation respectively. Paragraph 8.3.14 provides the indicative survey scope for the Cable Route Corridor. Paragraph 8.3.12 states that Land at Melksham Substation lies within 500m of the consultation zone associated with Bath and Bradford on Avon Bats SAC, and a detailed bat survey	Beavers have been scoped into the assessment, with impacts on this species assessed in 9.10 of the assessment presented in **ES Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1]**. The survey scope and methodology for bats at the Solar PV Sites (Lime Down A to E) has been agreed with Natural England and is considered adequate to inform the assessment of impacts.

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		scope has been proposed to reflect this. The Inspectorate notes that a detailed bat survey has not been proposed for Lime Down A to E. Responses to consultation from the EA and Wiltshire Council (Appendix 2 of this Opinion) highlight the presence of beavers within the Bristol Avon catchment and the potential for presence in proximity to the site boundary. The ES should assess significant effects on ecological receptors where they are likely to occur. The ES should ensure the ecological baseline is robust and justify the extent and scale of surveys undertaken. As noted above, the Inspectorate considers that the Applicant should seek agreement from the relevant consultation bodies on the scale and extent of any surveys undertaken, evidence of which should be provided within the DCO application.	**Table 9-2** of the assessment presented in **ES Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1]** sets out where survey scope has been agreed with relevant stakeholders.
Planning Inspectorate ID: 3.3.10	Ecology and Biodiversity: Fish	Table 8.6 identifies ecological receptors likely to be sensitive to construction, operational and decommissioning impacts. The Inspectorate notes the EA's response to consultation (Appendix 2 of this Opinion) and considers that fish should be included as a potential receptor for each source of impact. Where the cable routes cross watercourses full details which specify any mitigation required to avoid adverse impacts on fish should be detailed within the CEMP and ES.	Fish have been included as a potential receptor for each source of impact, with an assessment of impacts on fish, including identification of mitigation measures, provided in section 9.10 and 9.12 of **ES Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1]**. The **Outline Ecological Protection and Mitigation Strategy (Outline EPMS) [EN010168/APP/7.19]** prescribes specific mitigation measures to avoid adverse impacts on fish. The **Outline EPMS** specifically deals with the protection of habitats and species (including fish) during the construction phase whereas the **Outline Construction Environmental Management Plan (Outline CEMP) [EN010168/APP/7.12]** includes more general information relating to the management of wider environmental issues.
Planning Inspectorate ID: 3.3.11	Ecology and Biodiversity: Buffer zones	The Inspectorate draws the Applicant's attention to the consultation response from the EA (Appendix 2 of this Opinion). Appropriate buffer zone distances should be defined in the ES, with reference to how this is secured through the DCO. The Applicant should make effort to agree these details with the relevant consultation bodies.	Buffer zone distances are described in Section 9.9 of **ES Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1]**. Table 9-2 sets out where buffer zones have been agreed through consultation with relevant stakeholders.
Planning Inspectorate ID: 3.3.12	Ecology and Biodiversity: Invasive Non-native Species (INNS)	The Inspectorate draws the Applicant's attention to the consultation responses from the EA (Appendix 2 of this Opinion) regarding records of INNS within the site. The ES should detail and secure mitigation/biosecurity measures during all phases of the Proposed Development to avoid/control the spread and introduction of INNS.	Baseline information on INNS are described in Section 9.7 of **ES Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1]** and in **ES Volume 3, Appendix 9.1: Ecological Baseline Report [EN010168/APP/6.3].** Measures to ensure the prevention of spread of INNS by the Scheme are described in Section 9.10 and are included in the **Outline Ecological Protection and Mitigation Strategy (Outline EPMS) [EN010168/APP/7.19].**
Planning Inspectorate ID: 3.3.13	Ecology and Biodiversity: Confidential annexes	Public bodies have a responsibility to avoid releasing environmental information that could bring about harm to sensitive or vulnerable ecological features. Specific survey and assessment data relating to the presence and locations of species such as badgers, rare birds and plants that could be subject to disturbance, damage, persecution, or commercial exploitation resulting from publication of the information, should be provided in the ES as a confidential annex. All other assessment information should be included in an ES chapter, as normal, with a placeholder explaining that a confidential annex has been submitted to the Inspectorate and may be made available subject to request.	Survey and assessment data relating to sensitive species at risk of persecution or exploitation, namely badgers, are provided are provided within a confidential annex in **ES Volume 3, Appendix 9-2: Badger Survey Report [EN010168/APP/6.3].**
Planning Inspectorate ID: 3.4.1	Arboriculture: Impacts to trees in Lime Down A to E and Land at Melksham Substation – all phases	The Scoping Report proposes to scope out impacts to trees in Lime Down A to E and Land at Melksham Substation for all phases on the basis that no significant effects are considered likely due to embedded mitigation to avoid impacts on trees and further mitigation to be included within the outline CEMP being in place. The Inspectorate notes that the ground level tree surveys of Lime Down A to E and Land at Melksham Substation have identified 36 veteran trees to date. The Scoping Report states that a full tree survey in accordance with BS 5837:2012 is being undertaken at Land at Melksham Substation and other targeted areas within Lime Down A to E and the Cable Route Corridor where the potential exists for arboricultural impacts.	The ES scopes out arboricultural impacts across Sites Lime Down A-E except for effects on ancient and veteran trees and ancient woodlands which are assessed separately. A full baseline tree survey has been untaken where required and mitigation measures and securing mechanisms are described in the ES and furthermore at section 10.9 of **ES Volume 1, Chapter 10: Arboriculture [EN010168/APP/6.1]**, where arboricultural mitigation is described).

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		The Inspectorate agrees that significant effects are not likely to occur on the basis that suitable mitigation would be in place and a full tree survey would be undertaken where the potential exists for arboricultural impacts. As such, the Inspectorate agrees to scope this matter out for all phases. However, the ES should describe the mitigation which has been relied on to avoid significant effects and explain how this has been secured.	
Planning Inspectorate ID: 3.4.2	Arboriculture: Cable Route Corridor	The Scoping Report states that given that the Cable Route Search Area is still to be refined and the potential for arboricultural impacts from construction activities, it is not proposed to scope out the impacts to trees within the Cable Route Area (once refined) at this point. It is further stated that this will be kept under review and due to proposed mitigation and refinement of the route, the potential for impacts may be unlikely and there is potential for the Cable Route to be scoped out of the ES. The Inspectorate considers that the ES should provide an assessment of arboricultural impacts within the cable route where there is potential for likely significant effects to occur or demonstrate the absence of likely significant effects supported by appropriate survey data and with agreement from the relevant consultation bodies.	A full tree survey has been completed in all accessible areas of the Cable Route Corridor so that arboricultural constraints and potential impacts could be fully considered. This approach has been discussed and agreed with the Local Planning Authority Wiltshire Council and anticipated arboricultural impacts and effects are assessed at section 10.10 of **ES Volume 1, Chapter 10: Arboriculture [EN010168/APP/6.1].**
Planning Inspectorate ID: 3.4.3	Arboriculture: Study area	The Scoping Report proposes an arboriculture study area of the entirety of the site with a 15m buffer from the boundary. The ES should fully justify why a 15m buffer is considered to be sufficient with agreement if possible, from the relevant consultation bodies.	The 15m buffer proposed at EIA scoping accounts for maximum RPA (Root Protection Area) constraints as per BS5837:2012 and the minimum ancient woodland protective buffer as per standing government advice. For the purpose of ES submission, the study area has been increased to encompass the DCO Order Limits and a 50m buffer beyond it's extents. Tree surveys have been undertaken as required within the Order Limits and within a 15m buffer of the Order Limits and a desktop study of the full study area has been completed to inform the arboriculture assessment. Details of the study area and assessment methodologies are described at sections 10.5 and 10.6 of **ES Volume 1, Chapter 10: Arboriculture [EN010168/APP/6.1].**
Planning Inspectorate ID: 3.5.1	Hydrology, Flood Risk and Drainage: Impacts on water quality and flow regimes of receiving watercourses from increased silted/nutrient loaded surface water runoff volumes due to earthworks – construction	The Scoping Report proposes to scope out impacts of increased silted/nutrient loaded surface water runoff volumes due to stripping of soil, compound preparation, soil storage and other earthworks on the water quality and flow regimes of receiving watercourses within all site areas during construction. The basis for scoping this matter out of further assessment is that runoff from work site areas would be managed using suitable sustainable drainage systems (SuDS) which would be described and secured through the CEMP. The Inspectorate does not consider enough evidence regarding the final design and control measures has been provided to scope out impacts on water quality and flow regimes of receiving watercourses during construction. In the absence of information such as evidence demonstrating clear agreement with relevant consultation bodies, the Inspectorate is not in a position to agree to scope out these matters from the assessment. Accordingly, the ES should include an assessment of these matters or the information referred to demonstrating agreement with the relevant consultation bodies and the absence of a likely significant effect.	**ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [EN010168/APP/6.1]**, assesses the potential impacts on water quality from construction-phase surface water runoff, as noted in **Section 11.10**. Although this was proposed to be scoped out, the Inspectorate requested further evidence which has since been incorporated. Runoff will be managed through measures set out in the **Outline Construction Environmental Management Plan (CEMP) [EN010168/APP/7.12],** which relates specifically to construction activities during the construction phase. These include measures such as silt fencing, temporary attenuation, and designated washdown areas, developed in line with Environment Agency (EA) and Construction Industry Research and Information Association (CIRIA) guidance. **ES Volume 3, Appendix 11-1: Flood Risk Assessment (FRA) and Drainage Strategy [EN010168/APP/6.3]** confirm these controls, and consultation with the EA and Wiltshire Council supports this approach. No likely significant effects are anticipated.
Planning Inspectorate ID: 3.5.2	Hydrology, Flood Risk and Drainage: Direct adverse impact on water quality due to the release of any site substances as the result of an accidental spill, leading to harm to aquatic ecology – all phases	The Scoping Report proposes to scope this matter out for all phases on the basis that any accidental spills causing pollution would be reduced through suitable mitigation measures that would be adopted and secured within the CEMP. The Inspectorate does not consider enough evidence regarding the final design and control measures has been provided to scope out impacts on water quality due to the release of any site substances on aquatic ecology during construction. The Applicant's attention is drawn to comments from the EA (Appendix 2 of this Opinion) regarding aquatic ecological species potentially present within the site. In the absence of information such as evidence demonstrating clear agreement with	**ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [EN010168/APP/6.1]** assesses the potential for impacts on water quality from accidental spills during all phases (**Sections 11.9 and 11.10**). Although this was proposed to be scoped out, the Inspectorate requested further assessment. Spill risks will be managed through design measures summarised in the **Outline CEMP [EN010168/APP/7.12],** which relates to construction activities during the construction phase, and secured through the operational drainage design.

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		relevant consultation bodies, the Inspectorate is not in a position to agree to scope these matters from the assessment. Accordingly, the ES should include an assessment of these matters or the information referred to demonstrating agreement with the relevant consultation bodies and the absence of a likely significant effect.	**ES Volume 3, Appendix 11-1: FRA and Drainage Strategy [EN010168/APP/6.3]** confirms that infrastructure such as substations and BESS areas include lined drainage systems, bunding, self-actuating valves, and designated refuelling and storage areas. These measures will prevent the release of contaminants to surrounding watercourses. No likely significant effects are anticipated.
Planning Inspectorate ID: 3.5.3	Hydrology, Flood Risk and Drainage: Contamination of groundwater - construction	The Scoping Report proposes to scope out contamination of groundwater if contaminants are mobilised during construction on the basis that the potential impact pathway would be removed by adoption of good practice pollution prevention techniques that would be secured by the CEMP. In the absence of information such as evidence demonstrating clear agreement with relevant consultation bodies, and further detail of potential impacts to groundwater and details of specific mitigation, the Inspectorate considers that there is insufficient evidence to agree that mobilisation of ground contamination should be scoped out at this stage. Accordingly, the ES should include an assessment of these matters or the information referred to demonstrating agreement with the relevant consultation bodies and the absence of a likely significant effect.	**ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [EN010168/APP/6.1]** assesses the potential for construction-phase impacts on groundwater quality. Although this was proposed to be scoped out, the Inspectorate requested further assessment. Risk of contaminant mobilisation will be managed through good practice pollution prevention techniques summarised in the **Outline CEMP [EN010168/APP/7.12]**, which relates to construction activities during the construction phase. **ES Volume 3, Appendix 11-1: FRA and Drainage Strategy [EN010168/APP/6.3]** confirms that these techniques include use of designated refuelling areas, impermeable surfaces for storage, spill response kits, and supervision of earthworks in sensitive areas. No likely significant effects on groundwater are anticipated based on the underlying geology and the embedded mitigation.
Planning Inspectorate ID: 3.5.4	Hydrology, Flood Risk and Drainage: Impacts on groundwater flow paths and levels along the cable route - operation	The Scoping Report proposes to scope out impacts on groundwater flow paths and levels along the cable route as a consequence of cable installation and presence of the cable during operation of the Proposed Development. This is on the basis that groundwater flows are not expected to be impacted due to the depth of the cable installation and predominance of non-aquifer superficial deposits within the Cable Route Search Corridor. The Applicant's attention is drawn to the response to consultation from the EA (Appendix 2 of this Opinion) which raises concerns about the accuracy of the Scoping Report's statement on the predominance of non-aquifer superficial deposits present within the Cable Route Search Corridor. In the absence of information such as evidence demonstrating clear agreement with relevant consultation bodies, the Inspectorate is not in a position to agree to scope these matters from the assessment. Accordingly, the ES should include an assessment of these matters or the information referred to demonstrating agreement with the relevant consultation bodies and the absence of a likely significant effect.	**ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [EN010168/APP/6.1]** addresses the potential operational impacts on groundwater associated with the cable route in **Section 11.10.** **ES Volume 3, Appendix 11-1: FRA and Drainage Strategy [EN010168/APP/6.3]** confirms that while parts of the corridor are underlain by Secondary A aquifers, cables will be installed at shallow depths and will not intercept groundwater. Trenchless techniques such as Horizontal Directional Drilling (HDD) will be used at sensitive locations to avoid surface-level impacts. HDD is not used as a groundwater mitigation measure, and its design will be controlled to avoid groundwater strike. Use of bentonite slurry will be managed to prevent discharge to groundwater, and no permanent effects on groundwater flow are anticipated. Further assessment of hydrogeological risk, including HDD-related considerations, is provided in **ES Volume 1, Chapter 19: Ground Conditions and Contamination [EN010168/APP/6.1]**, which confirms that no likely significant effects are anticipated. Consultation with the EA has informed this approach. No permanent effects on groundwater flow are anticipated, and consultation with the EA has informed the approach. In terms of the comment regarding the accuracy of the Scoping Report's statement on the predominance of non-aquifer superficial deposits present within the Cable Route Search Corridor, since the scoping stage, the geological baseline has been updated and is presented in **ES Volume 3, Appendices 19-1 to 19-8: Lime Down Desk Studies [EN010168/APP/6.3].** A full assessment of potential impacts on groundwater has been undertaken within **ES Volume 1, Chapter 19: Ground Conditions [EN010168/APP/6.1]**, taking into account the updated baseline conditions. This assessment concludes that, with the implementation of the mitigation measures set out in the **Outline OEMP [EN010168/APP/7.13]**, there are not considered to be any significant impacts on groundwater during the operational phase of the Scheme.

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Planning Inspectorate ID: 3.5.5	Hydrology, Flood Risk and Drainage: Impacts on water quality from surface water runoff or drainage - operation	The Scoping Report proposes to scope this matter out on the basis that surface water runoff from the BESS would be subject to treatment using suitable SuDS prior to release into the receiving water environment and runoff from the sites and cable corridor would be 'clean' rainfall runoff, with no detriment to its quality. Given the advice from the EA in relation to the baseline (Appendix 2 of this Opinion), the presence of a Drinking Water Groundwater Safeguard Zone within the central part of the BESS site and the limited information provided regarding mitigation to prevent surface water runoff from causing pollution, the Inspectorate considers that there is insufficient evidence to agree to scope this matter out of further assessment. Accordingly, the ES should include an assessment of these matters or information demonstrating agreement with the relevant consultation bodies and the absence of a likely significant effect. The Applicant's attention is drawn to comments from the EA regarding how firewater will be managed and contained.	**ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [EN010168/APP/6.1]** assesses the potential impacts on water quality from operational surface water runoff in **Section 11.10**. Drainage from the BESS Area will be managed using lined, permeable SuDS with pollution controls including filter media and self-actuating valves to contain spills and firewater. Runoff from panelled areas and the cable corridor route will consist of direct rainfall falling onto clean surfaces. These areas do not contain any pollutant sources and do not require treatment. Runoff will either infiltrate or discharge at greenfield rates, as confirmed in **ES Volume 3, Appendix 11-1: FRA and Drainage Strategy [EN010168/APP/6.3]**. Measures have been informed by consultation with the EA and LLFA. No likely significant effects on water quality are anticipated.
Planning Inspectorate ID: 3.5.6	Hydrology, Flood Risk and Drainage: Baseline	The Applicant's attention is drawn to advice from the EA (Appendix 2 of this Opinion) raising concerns with the description of the baseline within the Scoping Report, the PRAs for the Land at Melksham Substation and Lime Down A to E. The Applicant should ensure that the baseline presented within the ES is accurate, consistent and utilises appropriate guidance. The baseline and receptors should be agreed wherever possible with the relevant consultation bodies.	**ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [EN010168/APP/6.1]** presents a revised and consistent baseline for all site areas, including Lime Down A to E and the Melksham Substation in **Section 11.7.** **ES Volume 3, Appendix 11-1: FRA and Drainage Strategy [EN010168/APP/6.3]** and supporting appendices will ensure alignment with EA guidance. Baseline characterisation has been informed by consultation with the EA and LLFA.
Planning Inspectorate ID: 3.5.7	Hydrology, Flood Risk and Drainage: Hydraulic modelling	The Scoping Report states that the analysis of flood extents is reliant on the accuracy of the published EA Flood Map for Planning and ES flood data. It is further stated that no new hydraulic modelling will be undertaken as part of the study. The Applicant's attention is drawn to the EA's response to consultation (Appendix 2 of this Opinion) which states that the EA do not hold any detailed hydraulic modelling for the main rivers and ordinary watercourses which bisect the order limits for the Proposed Development. The response further highlights that there are ordinary watercourses that bisect the site which have no associated Flood Zones due to the small size of their respective catchments but may have associated flood risk. Furthermore, Wiltshire Council's response to consultation (Appendix 2 of this Opinion) highlights the need for detailed pluvial modelling utilising site-specific topographical surveys. The Inspectorate considers that the assessment of flood risk, including climate change, associated with these watercourses must be adequately assessed. The methodology should be agreed with the relevant consultation bodies and described within the ES.	**ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [EN010168/APP/6.1]** outlines the approach to assessing flood risk, including surface water and fluvial risks in **Section 11.6**. Site-specific hydraulic modelling was undertaken only for the Gauze Brook at Lime Down D, due to the extent of Flood Zone 3 and overland flow risk identified in this location. Elsewhere, the assessment relied on the Environment Agency Flood Map for Planning, the latest NaFRA2 surface water flood mapping, and LiDAR-derived site-specific topographic survey data. Where no detailed EA modelled data was available for ordinary watercourses, conservative assumptions were applied based on catchment areas, topographic gradients, and proximity to flow paths. Manning's-based calculations were used in selected areas to assess indicative channel capacities and flow depths. No surface water or fluvial hydraulic modelling was undertaken outside Lime Down D. **ES Volume 3, Appendix 11-1 – 11-9: FRA and Drainage Strategy [EN010168/APP/6.3]** describes this methodology**.** The methodology was informed by engagement with the Environment Agency and Wiltshire Council and is considered proportionate to the scale and nature of the Scheme. No likely significant effects are expected. **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [EN010168/APP/6.1]** assesses the impact of climate change on flood risk using the latest Environment Agency guidance (Flood Risk Assessments: Climate Change Allowances, Environment Agency, February 2023) in **Section 11.6**.
Planning Inspectorate ID: 3.5.8	Hydrology, Flood Risk and Drainage: Construction phase assessment of fluvial flooding	Paragraph 10.6.2 of the Scoping Report highlights that works may affect the hydromorphology of rivers. However, the risk of fluvial flooding and impacts to the site, along with the potential risk to third parties, during the construction phase has not been scoped in. The Inspectorate considers that the ES should provide an assessment of fluvial flood risk for the construction phase where there is potential for likely significant effects to occur or demonstrate the absence of likely significant effects with agreement from the relevant consultation bodies.	**ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [EN010168/APP/6.1]** includes an assessment of construction phase fluvial flood risk along with the potential risk to third parties in **Section 11.6**. **ES Volume 3, Appendix 11-1 – 11-9: FRA and Drainage Strategy [EN010168/APP/6.3]** details the baseline flood risk, the potential for temporary obstruction of flow paths, and the mitigation measures to be implemented during construction in **Section 11.7**. The approach has been informed by consultation with the Environment Agency and Wiltshire Council as the Lead Local Flood Authority.

Consultee	Topic	Matter Raised	Applicant Response
Planning Inspectorate ID: 3.5.9	Hydrology, Flood Risk and Drainage: Groundwater flood risk	The Applicant's attention is drawn to Wiltshire Council's advice (Appendix 2 of this Opinion) regarding historic groundwater flooding and the need for groundwater monitoring to establish the peak seasonal groundwater levels. The Inspectorate considers that the assessment within the ES should include groundwater flood risk. The scope of the assessment and methodology utilised should be agreed wherever possible with the relevant consultation bodies.	Groundwater flood risk has been assessed within the ES and supporting technical reports. **ES Volume 3, Appendix 11-1: Flood Risk Assessment and Drainage Strategy [EN010168/APP/6.3]** identifies areas across the Scheme boundary where the Environment Agency's mapping indicates some susceptibility to groundwater flooding. The assessment notes that the risk is generally associated with localised emergence during periods of sustained rainfall and elevated groundwater tables, particularly in lower-lying topographic areas. Further baseline information is provided in **ES Volume 1, Chapter 19: Ground Conditions [EN010168/APP/6.1**], which describes the underlying geology and hydrogeology, including the presence of Secondary A aquifers within superficial deposits in parts of the Site. The Chapter also identifies historical records of groundwater flooding in the wider area. Mitigation measures to manage any potential risk have been incorporated through the **Outline Construction Environmental Management Plan [EN010168/APP/7.12]**, which includes protocols for managing excavations, groundwater ingress, and dewatering where required, alongside monitoring to identify any unexpected groundwater issues during works. Given the nature of the development, the limited extent of excavations, and the proposed mitigation, the residual risk of groundwater flooding impacting the Scheme or third parties is considered low. No likely significant effects are anticipated.
Planning Inspectorate ID: 3.5.10	Hydrology, Flood Risk and Drainage: Water quality monitoring	From the information contained within the Scoping Report it is unclear if any water quality sampling/ monitoring is proposed. Given that there are waterbodies within the site boundary, the Proposed Development site is located within multiple Water Framework Directive (WFD) catchments, and construction impacts may alter water quality, surface and ground water quality sampling should be undertaken to inform the baseline. The results should be reported in the ES. The Applicant's attention is drawn to Wiltshire Council's consultation response (Appendix 2 of this Scoping Opinion) regarding the establishment of a monitoring program, for the construction and operation of the Proposed Development.	**ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [EN010168/APP/6.1]** describes baseline surface water and groundwater quality using available WFD and EA datasets in **Section 11.7**. The Site lies within multiple WFD catchments which contain waterbodies. The potential for construction activities to affect water quality has been assessed in the ES. Measures to manage these risks will be secured through the **Outline CEMP [EN010168/APP/7.12]**, which relates to construction activities during the construction phase. Operational phase monitoring commitments are secured through the **Outline OEMP [EN010168/APP/7.14],** where relevant, and will be developed in consultation with the Environment Agency and Wiltshire Council. The Outline CEMP and OEMP set out the scope, frequency, and reporting arrangements for any water quality monitoring considered necessary, proportionate to the scale and nature of the Scheme. The need for additional sampling to inform the baseline has been reviewed and is not considered necessary based on the available datasets and nature of the Scheme. This position was discussed with the Environment Agency and Wiltshire Council at the June 2025 meeting, and both parties were comfortable with the approach.
Planning Inspectorate ID: 3.5.11	Hydrology, Flood Risk and Drainage: Hydrogeological Risk Assessment	The Applicant's attention is drawn to Wessex Water's response to consultation (Appendix 2 of this Opinion) with regard to the presence of the Great Oolite aquifer within the site boundary and the potential for impacts to this aquifer from polluting substances derived from the construction and operation of the Proposed Development. The Inspectorate considers that a Hydrogeological Risk Assessment should be undertaken of the potential pollution sources arising from the Proposed Development and the potential pathways through to the aquifer. The scope of the assessment should be agreed with the relevant consultation bodies and should consider the use of buried fluid filled cables if they form part of the proposal and potential usage of perfluoroalkyl substances (PFAS) in the components of the	**ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [EN010168/APP/6.1]** considers the potential risks to underlying aquifers, with reference to the **ES Volume 3, Appendix 11-1 - 11-9: FRA and Drainage Strategy [EN010168/APP/6.3]**. That assessment confirms that infrastructure such as BESS, substations, and buried cables will not result in uncontrolled discharges, with pollution control measures incorporated into the drainage design. All photovoltaic arrays/ panels will be certified as PFAS free, meaning there is no risk of mobilisation of PFAS coatings on the panels being leached or otherwise mobilised and entering ground or surface water. Oil filled cables will not be used. Both of these mitigation measures are secured.

Consultee	Topic	Matter Raised	Applicant Response
		Proposed Development. Cross reference should be made to the Ground Conditions and Contamination ES Chapter.	An assessment of potential impacts of the Scheme on hydrogeological receptors has been undertaken and is presented in **ES Volume 1, Chapter 19: Ground Conditions and Contamination [EN010168/APP/6.1].** That chapter also addresses the geological sensitivity of the site, pollutant pathways, and aquifer protection measures.
Planning Inspectorate ID: 3.5.12	Hydrology, Flood Risk and Drainage: Climate change	Limited information has been provided within the Scoping Report regarding the impacts of climate change on flood risk. The ES and associated Flood Risk Assessment (FRA) should use the latest climate change projections available and explain how they have been applied. Efforts should be made to agree the approach with the relevant consultation bodies.	**ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [EN010168/APP/6.1]** assesses the impact of climate change on flood risk using the latest Environment Agency guidance (Flood Risk Assessments: Climate Change Allowances, Environment Agency, February 2023) in **Section 11.6**. **ES Volume 3, Appendix 11-1 - 11-9: FRA and Drainage Strategy [EN010168/APP/6.3]** submitted with the ES applied a +45% uplift to peak rainfall intensity for surface water drainage design. This represents the upper end allowance for a "2080s" lifetime scenario for essential infrastructure in the Severn River Basin District. For fluvial flood risk, the 1% Annual Exceedance Probability (AEP) event was modelled using 35% and 70% climate change uplifts to test the design sensitivity, in line with EA guidance for the development's Flood Zone context and vulnerability classification. Drainage measures have been sized to contain the 1 in 100-year rainfall event plus 45% climate change uplift without uncontrolled runoff. The approach has been informed through consultation with the EA and Wiltshire Council as Lead Local Flood Authority and is considered proportionate to the scale and nature of the Scheme.
Planning Inspectorate ID: 3.5.13	Hydrology, Flood Risk and Drainage: Private water supplies	The Scoping Report does not refer to private groundwater supplies. For the avoidance of doubt, any potentially impacted permitted or private water supplies should be identified and included in the assessment where there is the potential for likely significant effects to occur.	**ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [EN010168/APP/6.1]** considers the potential for impacts on private water supplies, where relevant. **ES Volume 1, Chapter 19: Ground Conditions [EN010168/APP/6.1]** states that there are no licensed groundwater abstractions located within or immediately adjacent to the Site, with the exception of three located within 2000m of Cable Link E-Rail. The closest abstraction point is approximately 896m west. Source Protection Zones exist around these private and public groundwater abstractions. Works associated with the construction, operation and decommissioning of the Scheme could impact the quality and safety of those supplies. Measures to manage this risk will be secured through the **Outline CEMP [EN010168/APP/7.12]**, the **Outline OEMP [EN010168/APP/7.14]**, and **ES Volume 3, Appendix 11-1 to 11-9 FRA and Drainage Strategy ([EN010168/APP/6.3]),** which describe pollution prevention controls, spill response procedures and drainage measures to prevent contamination of groundwater. The outcome of this review is reported in **ES Volume 1, Chapter 19: Ground Conditions and Contamination [EN010168/APP/6.1**] (Section 19.7 and **Table 19-12**). This confirms that further assessment is not required. No significant effects are anticipated on private water supplies or underlying aquifers, given the separation distances from abstraction points and the embedded pollution prevention measures secured through the **Outline CEMP [EN010168/APP/7.12], Outline OEMP [EN010168/APP/7.13],** and **FRA and Drainage Strategy [EN010168/APP/6.3]**.
Planning Inspectorate ID: 3.5.14	Hydrology, Flood Risk and Drainage: Water resources	The Scoping Report does not consider the consumption of water during the construction and operation phases. The ES should provide details relating to water supply and demand requirements during construction and operation (including in the context of BESS fire risk). The	Water consumption and supply requirements during construction and operation is addressed in the **Outline Water Resources Strategy [EN010168/APP/7.26]**.

Consultee	Topic	Matter Raised	Applicant Response
		Inspectorate considers that water resources should be classed as a receptor in the ES where significant effects are likely to occur.	This includes expected construction-phase demand (e.g. welfare and dust suppression) and consideration of operational requirements, including any relevant to BESS fire protection systems. Water resources are considered as a potential receptor in Section 11.8 **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [EN010168/APP/6.1]** where a pathway for significant effects may exist.
Planning Inspectorate ID: 3.5.15	Hydrology, Flood Risk and Drainage: Reservoirs	The Scoping Report does not refer to the risk of flooding from reservoirs. This should be assessed within the ES where there is potential for likely significant effects to occur.	**ES Volume 3, Appendix 11-1 - 11-9: FRA and Drainage Strategy [EN010168/APP/6.3]** submitted with the ES reviewed EA Risk of Flooding from Reservoirs mapping and did not identify any areas of the site at risk. On this basis, the risk of flooding from reservoirs is not considered likely to result in significant effects.
Planning Inspectorate ID: 3.6.1	Ground Conditions and Contamination: Ground conditions and contamination assessment for Lime Down A to E and Land at Melksham Substation – all phases	The Scoping Report seeks to scope out an assessment of ground conditions and contamination at Lime Down A to E and Land at Melksham Substation on the basis of the findings of the Preliminary Risk Assessments (PRAs) and through implementation of a detailed outline Construction Environmental Management Plan (CEMP). The Inspectorate notes that the PRAs for Lime Down A to E (Appendix 11.3) and Land at Melksham Substation (Appendix 11.1) identify potential geohazards and make recommendations for further investigation including a geotechnical site investigation. Given the potential geohazards, concerns with the baseline highlighted by the EA (Appendix 2 of this Opinion), the Inspectorate does not consider that there is sufficient information at this time to scope out an assessment of ground conditions and contamination. In addition, the Inspectorate notes that a PRA has not yet been undertaken for the Cable Route Corridor. The Applicant proposes to produce a PRA for the Cable Route Corridor which would be summarised within the Other Environmental Matters ES Chapter. The PRA for the cable route corridor would be provided within an appendix to the chapter. This appears to contradict Scoping Report paragraph 11.4.22 which states that the PRA would be provided within the Ground Conditions and Contamination ES Chapter. Although unclear, from the information provided it appears that the Applicant is requesting to scope out a Ground Conditions and Contamination ES Chapter. The Inspectorate considers that there are a number of unresolved and uncertain matters identified in the Scoping Report material and on this basis a Ground Conditions and Contamination ES Chapter prepared in accordance with relevant guidance should be included in the ES. The PRA for the Cable Route Corridor should be provided as an appendix to the Ground Conditions and Contamination ES Chapter with the results presented within the ES Chapter. Where the PRA for the Cable Route Corridor identifies the potential for likely significant effects, an assessment of these matters should be provided within the ES. Where matters have been scoped out of assessment, the ES should still include an explanation as to how the conclusion of no likely significant effects has been reached. The Inspectorate advises that the outline CEMP should be submitted with the DCO application.	**ES Volume 1, Chapter 19: Ground Conditions [EN010168/APP/6.1]** is provided in line with the Inspectorate's recommendation. This chapter presents the findings of the Preliminary Risk Assessments (PRAs) for Lime Down A to E, as well as a PRA covering the Cable Route Corridor. The Cable Route PRA is provided within **ES Volume 3, Appendix 19-1 - Appendix 19-8 [EN010168/APP/6.3]**. The assessment also responds to the concerns raised by the Environment Agency and addresses the potential for geohazards within the Order limits. An **Outline Construction Environmental Management Plan (CEMP) [EN010168/APP/7.12]** has been submitted as part of the DCO application and includes commitments relating to ground investigation, risk management, and mitigation measures to manage any contamination risk or unforeseen ground conditions that may be encountered during construction.
Planning Inspectorate ID: 3.6.2	Ground Conditions and Contamination: Exposure to contamination through direct contact/ingestion and inhalation of dust, vapours and asbestos fibres (construction workers, future site users and adjacent site	The Scoping Report seeks to scope these matters out on the basis of the same rationale detailed above at ID 3.6.1. Given the findings of the PRAs and proposed mitigation measures, the Inspectorate agrees that significant effects are not likely to occur and agrees to scope these matters out from further assessment for all phases at Lime Down A to E and Land at Melksham Substation. As set out within ID 3.6.1, the provision of a PRA for the Cable Route Corridor as an appendix to the Ground Conditions and Contamination ES Chapter is acceptable in principle. Should the PRA identify the	**ES Volume 3, Appendix 19-1 to 19-8: Lime Down Desk Studies [EN010168/APP/6.3]** consider historic sources of contamination and exposure of historic contamination to impact receptors including construction workers, future site users, adjacent site users and adjacent residents in **Section 19.9 of ES Volume 1, Chapter 19: Ground Conditions [EN010168/APP/6.1].** The risk of pollutant linkages related to them have been considered in Table 19-1 of **ES Volume 1, Chapter 19: Ground Conditions [EN010168/APP/6.1]**. Where the cable route may intersect with ground impacted by contamination, that

Consultee	Topic	Matter Raised	Applicant Response
	users and adjacent residents) – all phases	potential for likely significant effects of exposure to contamination on construction workers, future site users, adjacent site users and adjacent residents an assessment of these matters should be provided within the ES. If this matter is ultimately scoped out of assessment, the ES should still include a justification as to how the conclusion of no likely significant effects has been reached.	material will be remediated though the Discovery and Inspection Strategy (as secured via the **Outline CEMP [EN010168/APP/7.12])**, reducing the risk of the cable route acting as a preferential pathway for contamination present in the ground.
Planning Inspectorate ID: 3.6.3	Ground Conditions and Contamination: Mobilisation of existing contamination to controlled waters – construction and decommissioning	The Scoping Report seeks to scope these matters out on the basis of the same rationale detailed above at ID 3.6.1. Given the concerns about the baseline highlighted by the EA (Appendix 2 of this Opinion), the Inspectorate does not consider that there is sufficient information at this time to scope out an assessment of these matters. Accordingly, the ES should include an assessment of these matters or the information demonstrating agreement with the relevant consultation bodies and the absence of likely significant effects. As set out within ID 3.6.1, the provision of a PRA for the Cable Route Corridor as an appendix to the Ground Conditions and Contamination ES Chapter is acceptable in principle. Should the PRA identify the potential for mobilisation of existing contamination to controlled waters to occur, an assessment of these matters should be provided within the ES. If this matter is ultimately scoped out of assessment, the ES should still include a justification as to how the conclusion of no likely significant effects has been reached. The Scoping Report does not state whether this matter would be considered during operation. The Inspectorate is content that significant effects as a result of the mobilisation of existing contamination to controlled waters is unlikely to occur during operation and considers that this matter can be scoped out of further assessment during operation.	The Preliminary Risk Assessment (PRA) which is presented in Table 19-1 of **ES Volume 1, Chapter 19: Ground Conditions [EN010168/APP/6.1]** has identified controlled waters receptors such as Source Protection Zones, which could potentially be at risk from contaminant sources (see Table 19-4). However, no significant risks are anticipated once suitable mitigation is applied (see Table 19-5), given the absence of confirmed sources of potential mobile contaminants within the scheme area. Where unexpected contamination is encountered, a Discovery & Inspection strategy will be employed, as described in the **Outline CEMP [EN010168/APP/7.12]**. Construction, Operational and Decommissioning phases impacts to controlled waters will be mitigated through the, Outline CEMP, **Outline OEMP [EN010168/APP/7.13]** and **Outline Decommissioning Strategy [EN010168/APP/7.14]**, respectively. Additional detail has been provided to justify addressing residual impacts through the CEMP.
Planning Inspectorate ID: 3.6.4	Ground Conditions and Contamination: Spillages or leakages of fuels and chemicals to controlled waters – all phases	The Scoping Report seeks to scope these matters out on the basis of the same rationale detailed above at ID 3.6.1. Given the concerns about the baseline highlighted by the EA (Appendix 2 of this Opinion), the Inspectorate does not consider that there is sufficient information at this time to scope out an assessment of these matters. Accordingly, the ES should include an assessment of these matters or the information demonstrating agreement with the relevant consultation bodies and the absence of likely significant effects. As set out within ID 3.6.1, the provision of a PRA for the Cable Route Corridor as an appendix to the Ground Conditions and Contamination ES Chapter is acceptable in principle. Should the PRA identify the potential for spillages or leakages of fuels and chemicals to controlled waters to occur, an assessment of these matters should be provided within the ES. If this matter is ultimately scoped out, the ES should still include an explanation as to how the conclusion of no likely significant effects has been reached.	The Preliminary Risk Assessment (PRA) which is presented in Table 19-1 of **ES Volume 1, Chapter 19: Ground Conditions [EN010168/APP/6.1]** has identified controlled waters receptors such as Source Protection Zones, which could potentially be at risk from contaminant sources (see Table 19-4). However, no significant risks are anticipated once suitable mitigation is applied (see Table 19-5), given the absence of confirmed sources of potential mobile contaminants within the scheme area. Where unexpected contamination is encountered, a Discovery & Inspection strategy will be employed, as described in the **Outline CEMP [EN010168/APP/7.12]**. Construction, Operational and Decommissioning phases impacts to controlled waters will be mitigated through the, Outline CEMP, , **Outline OEMP [EN010168/APP/7.13] and Outline Decommissioning Strategy [EN010168/APP/7.14]**, respectively. Additional detail has been provided to justify addressing residual impacts through the CEMP.
Planning Inspectorate ID: 3.6.5	Ground Conditions and Contamination: Accumulation and migration into buildings of hazardous ground gases on future site users and built environment - operation	The Scoping Report seeks to scope these matters out on the basis of the same rationale detailed above at ID 3.6.1. Given the concerns about the baseline highlighted by the EA (Appendix 2 of this Opinion), the Inspectorate does not consider that there is sufficient information at this time to scope out an assessment of these matters. Accordingly, the ES should include an assessment of these matters or information demonstrating agreement with the relevant consultation bodies and the absence of likely significant effects. As set out within ID 3.6.1, the provision of a PRA for the Cable Route Corridor as an appendix to the Ground Conditions and Contamination ES Chapter is acceptable in principle. Should the PRA identify the potential for hazardous ground gases to accumulate and migrate into buildings, enclosed spaces and sub-floor voids, an assessment of this matter should be provided within the ES. If this	This topic has been scoped in and consideration of ground gas posed has been included in Table 19-4 of **ES Volume 1, Chapter 19: Ground Conditions [EN010168/APP/6.1]**.

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		matter is ultimately scoped out, the ES should still include an explanation as to how the conclusion of no likely significant effects has been reached.	
Planning Inspectorate ID: 3.6.6	Ground Conditions and Contamination: Definition of significant effects	Scoping Report Table 11.3 provides the combination of receptor sensitivity and magnitude of impact but does not explain which effects will be considered significant or how it will be determined whether an effect is significant if the outcome has potential to be either minor or moderate or either moderate or major etc. The ES should clearly set out how significant effects are defined and describe how any decisions are made where there is potential for an effect to either be significant or not.	Consideration of significance has been included in Tables 19-5 and 19-6 of **ES Volume 1, Chapter 19: Ground Conditions [EN010168/APP/6.1]**.
Planning Inspectorate ID: 3.6.7	Ground Conditions and Contamination: Baseline	The Applicant's attention is drawn to comments at ID 3.5.6 with regard to the inconsistencies and factual inaccuracies of the description of the baseline within the Scoping Report and key receptors missing from the presented baseline.	In preparing **ES Volume 1, Chapter 19: Ground Conditions [EN010168/APP/6.1]** and **ES Volume 3, Appendix 19-1 to 19-8: Lime Down Desk Studies [EN010168/APP/6.3]** the baseline assessments have been reviewed and updated to ensure consistency.
Planning Inspectorate ID: 3.6.8	Ground Conditions and Contamination: Drilling fluid breakout plan	The Scoping Report details that Horizontal Directional Drilling (HDD) may be utilised. This has not been discussed in the context of groundwater and land contamination. The ES should confirm where HDD will be employed and should this have potential to impact groundwater or take place in land affected by contamination, appropriate mitigation, such as measures to be included in a drilling fluid breakout plan, should be described in the ES and appropriately secured.	This has been considered within the ES and potential impacts mitigated through the **Outline CEMP [EN010168/APP/7.12].** Where HDD is currently intended, this has been considered in the assessments within **ES Volume 1, Chapter 19: Ground Conditions [EN010168/APP/6.1]** and associated studies. Location-specific risk assessments will be undertaken prior to commencement of trenchless techniques and BS5930: 2015 Code of Practice for Ground Investigations and BS EN 16228-3 Drilling and foundation equipment – Safety – Part 3: Horizontal directional drilling equipment will be followed as good practice. Where Trenchless techniques will be employed and have the potential to impact groundwater or take place in land affected by contamination, appropriate mitigation, such as measures to be included in a drilling fluid breakout plan will be required, which is secured through via the **Outline CEMP.**
Planning Inspectorate ID: 3.7.1	Cultural Heritage: Impact to archaeological remains during the operation and decommissioning phases	The Scoping Report proposes to scope this matter out on the basis that activities associated with the operation and decommissioning phases are not considered to cause further impact to buried archaeological remains beyond that which will occur during the construction phase. Table 12.5 recommends that mitigation measures are considered to ensure archaeological remains are adequately protected during the operation and decommissioning phases. The Inspectorate considers that potential indirect impacts to archaeology remaining in situ during the operation may include impacts from alteration of drainage patterns as a result of the existence of the Proposed Development. Furthermore, there is potential for ground disturbance during decommissioning and effects are likely to be similar to those experienced during construction. Accordingly, the ES should include an assessment of this matter or demonstrate the absence of likely significant effects with agreement from the relevant consultation bodies.	This matter is addressed at **Section 12.8** of **ES Volume 1, Chapter 12: Cultural Heritage [EN010168/APP/6.1]**. Once the Scheme is operational, no further direct adverse effects on buried archaeological remains are anticipated. An assessment has been undertaken to identify the potential for impact to archaeological remains during the operation and maintenance, and decommissioning phases, including impacts as a result of changes to drainage patterns.
Planning Inspectorate ID: 3.7.2	Cultural Heritage: Heritage receptors	The Scoping Report identifies designated heritage assets which have the potential to be affected by the Proposed Development. The Applicant's attention is drawn to Historic England's consultation response (Appendix 2 of this Opinion) with regard to designated and non-designated receptors which should be considered within the assessment. The Applicant should seek to agree the heritage assets for inclusion and exclusion within the assessment with the relevant consultation bodies and provide evidence of this consultation within the application documents.	The Applicant has sought to agree the heritage assets for inclusion and exclusion within the assessment with relevant consultation bodies. Please see **Table 12-2 of ES Volume 1, Chapter 12: Cultural Heritage [EN010168/APP/6.1]**, which details consultation with Historic England and Wiltshire Council. Please see Annex A of **ES Volume 3, Appendix 12-1: Heritage Statement [EN010168/APP/6.3]**, which identifies the heritage assets that were taken forward for assessment.
Planning Inspectorate ID: 3.7.3	Cultural Heritage: Study area	The Scoping Report proposes a study area of 2km for designated heritage assets and Conservation Areas with the option of assessing designated assets beyond the 2km study area where there is potential for impacts to occur. A study area of 1km is proposed for records of non-designated heritage assets and a 250m study	Please see **Table 12-2 of ES Volume 1, Chapter 12: Cultural Heritage [EN010168/APP/6.1]**, which details consultation with Historic England and Wiltshire Council, including the methodology used to define the ZOI.

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		area is proposed for designated and non-designated assets along the Cable Route Corridor. The ES should establish the study area with reference to the extent of the likely impacts which should be informed by fieldwork and the ZOI. The Applicant should agree this study area with relevant consultation bodies where possible. The Inspectorate also considers that the setting influence of assets may extend beyond their strict designation boundary and that the wider landscape context should be considered in the assessment (in conjunction with assessments in the Landscape and Visual ES Chapter). The Applicant should make efforts to agree the approach with the relevant consultation bodies.	**Section 12.5** of **ES Volume 1, Chapter 12: Cultural Heritage [EN010168/APP/6.1]** details study areas for both designated and non-designated heritage assets, which take into consideration that the setting of an asset may extend beyond a designation boundary and reflects the need for wider historic landscape context. While the LVIA and Cultural Heritage ES Chapters have not been integrated, the ZTVs produced in the Landscape and Visual Chapter have been considered as part of the assessment. **Section 12.6** of **ES Volume 1, Chapter 12: Cultural Heritage [EN010168/APP/6.1** details the sources of information, including the fieldwork undertaken.
Planning Inspectorate ID: 3.7.4	Cultural Heritage: Trial trenching	Where trial trenching is proposed to inform the baseline for the assessment, the need for, methodology, extent and coverage of trial trenches should be agreed in advance with the relevant consultation bodies. The extent of trial trenching activity should be agreed as part of a Written Scheme of Investigation with Wiltshire Council, where possible.	Please see **Table 12-2** of **ES Volume 1, Chapter 12: Cultural Heritage [EN010168/APP/6.1]**, which details consultation with Wiltshire County Council. A Written Scheme of Investigation (WSI) for evaluation trial trenching was agreed in October 2024. Site works commenced in November 2024 and were completed in June 2025. Interim reports with the results of the evaluation trial trenching are provided in **ES Volume 3, Appendix 12-5: Interim Evaluation Trial Trenching Reports [EN010168/APP/6.3]**.
Planning Inspectorate ID: 3.8.1	Transport and Access: Assessment of transport impacts during the operational and decommissioning phases	The Scoping Report estimates 4 vehicle movements per month during operation which will not trigger the screening thresholds specified in the Institute of Environmental Management and Assessment (IEMA) Guidelines – Environmental Assessment of Traffic and Movement (2023). On this basis, the Inspectorate is content that this matter can be scoped out of further assessment. However, the ES should confirm the operational vehicle types and numbers (with reference to thresholds within guidance) to justify this position. The Scoping Report states that transport impacts during the decommissioning phase will be equivalent to or less than those during the construction phase and proposes to scope this matter out. Indicative traffic numbers for the construction or decommissioning phases are not provided within the Scoping Report. As such, the Inspectorate is not in a position to scope this matter out at this stage. The ES should provide information on the likely trip generation during decommissioning and confirm the assessment conclusions for the decommissioning phase, based on reasonable assumptions. Further details on the specific mitigation measures required to avoid likely significant effects should also be provided.	Operation and maintenance vehicle types and movements are quantified in Section 13.10 of **ES Volume 1, Chapter 13: Transport and Access [EN010168/APP/6.1]**. They will not give rise to any residual significant effects, in line with relevant thresholds set out in the IEMA Guidelines 2023 Indicative construction vehicle numbers are quantified in Section 13.10 of **ES Volume 1, Chapter 13: Transport and Access [EN010168/APP/6.1]**. The vehicular movements associated with the decommissioning phase are not anticipated to be greater than during the construction phase. **ES Volume 1, Chapter 13: Transport and Access [EN010168/APP/6.1]** includes additional details regarding mitigation measures.in Section 13.9 and 13.11.
Planning Inspectorate ID: 3.8.2	Transport and Access: Study area - roads	It would assist the reader if the roads set out in Paragraph 13.3.2 of the Scoping Report were identified on Figure 13.1 and a version of this figure is provided in the ES.	Proposed construction vehicle routes are identified in Section 13.10 of **ES Volume 1, Chapter 13: Transport and Access [EN010168/APP/6.1]** and illustrated in **ES Volume 2, Figure 13-1 Study Area - Solar PV Sites [EN010168/APP/6.2]** for the Solar PV Sites and **ES Volume 2, Figure 13-2 Study Area - Cable Route Corridor [EN010168/APP/6.2]** for the Cable Route Corridor.
Planning Inspectorate ID: 3.8.3	Transport and Access: Indicative Study Area – Traffic and Transport	Paragraph 13.3.4 of the Scoping Report states that the study area for the Traffic and Transport assessment is shown on Figure 13.1. However, Figure 13.1 only shows proposed construction vehicle routes. The ES should explain how the study area for the Traffic and Transport assessment has been defined, with reference to the extent of likely impacts. The ES should document any consultation undertaken with relevant highways authorities with regards to the scope of the proposed assessment, including matters agreed/not agreed. A plan illustrating the extent of the study area, the expected route(s) of construction traffic and the anticipated numbers of vehicle movements (including vehicle type, peak hour and daily movements) should be included in the ES.	The Study Area for the transport and access assessment is based on the construction vehicle routes and the Order Limits. The construction vehicle routes to the Order Limits will be secured through a Construction Traffic Management Plan (CTMP) which will be in substantial accord with the **Outline CTMP [EN010168/APP/7.22]** submitted as part of the DCO Application. There will not be likely significant transport and access effects outside these construction vehicle routes. The Study Area, expected routes, and anticipated construction vehicle numbers are set out in **Section 13.10** of **ES Volume 1, Chapter 13: Transport and Access [EN010168/APP/6.1] and ES Volume 2, Figure 13-1 Study Area: Solar PV Sites [EN010168/APP/6.2] and ES Volume 2 Figure 13-2 Study Area:Cable Route Corridor[EN010168/APP/6.2]** Consultation with the relevant highways authorities has taken place (see Table 13-2 of **ES Volume 1, Chapter 13: Transport and Access [EN010168/APP/6.1]**).

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Planning Inspectorate ID: 3.8.4	Transport and Access: Abnormal Indivisible Loads (AILs)	The Scoping Report states that the transformers will be classified as an Abnormal Indivisible Load (AIL) and an additional assessment will be undertaken by an AIL specialist to identify suitable routes. The impacts on safety from the delivery of AILs should be assessed within the ES where significant effects are likely to arise. Appropriate measures to ensure safe transportation of hazardous loads (if any) should be included within the AIL Transport Management Plan.	The transportation of transformers will be classified as an Abnormal Indivisible Load (AIL). An assessment of the impact of AIL is set out in Section 13.10.7 of **ES Volume 1, Chapter 13: Transport and Access [EN010168/APP/6.1]**.Appropriate mitigation measures to managed AIL movements are set out within the **Outline CTMP [EN010168/APP/7.22]**. There are no hazardous loads expected, only large loads and these are covered in the AIL reporting
Planning Inspectorate ID: 3.8.5	Transport and Access: Impacts on the Strategic Roads Network (SRN)	Paragraph 13.3.2 of the Scoping Report states that the study area for the assessment of significant effects on transport and access "will consist of all PRoW within the Sites and the roads that comprise the construction vehicle routes from Junctions 17 and 18 of the M4" however does not discuss likely significant effects on the M4 itself. Given that construction vehicles are likely to access the Proposed Development via the M4 the ES should include an assessment of traffic impacts on the SRN (including the M4 and associated junctions) during construction and decommissioning which are likely to result in significant effects. The applicant's attention is drawn to the consultation response from National Highways in relation to potential effects on the M4 (Appendix 2 of the Scoping Opinion).	The M4 is part of the Strategic Road Network. The impact of construction traffic on mainline flows will be non-material with the most notable impact likely to be at junctions/off-slips. Therefore, an assessment of likely significant transport and access effects on Junction 17 and 18 of the M4 is set out in Section 13.10 of **ES Volume 1, Chapter 13: Transport and Access [EN010168/APP/6.1]**. The submission is also supported by an **Outline CTMP [EN010168/APP/7.22]** which specifically considers the construction phase of the development and **ES Volume 3, Appendix 13-1: Transport Assessment [EN010168/APP/6.3]** which considers the impact on the M4 and associated junctions. Further consultation with National Highways has taken place including a meeting on 17 June 2025.
Planning Inspectorate ID: 3.9.1	Noise and Vibration: Assessment of vibration impacts from solar PV arrays during the operation phase	The Scoping Report proposes to scope out an assessment of vibration impacts during the operation phase on the basis that solar PV arrays do not use plant or equipment that generate significant vibration levels. Considering the nature of the Proposed Development during operation the Inspectorate is content to scope this matter out of further assessment.	The Applicant notes the Planning Inspectorate is content to scope out an assessment of vibration impacts during the operation and maintenance phase of the Scheme.
Planning Inspectorate ID: 3.9.2	Noise and Vibration: Assessment of noise and vibration impacts from operational traffic	The Scoping Report proposes to scope out an assessment of noise and vibration impacts from operational traffic on the basis that minimal road traffic movements (4 per month) would occur during operation. On this basis, the Inspectorate is content that this matter can be scoped out of further assessment. However, the ES should confirm the operational vehicle types and numbers (with reference to thresholds within guidance) to justify this position.	The Applicant notes the Planning Inspectorate is content to scope out an assessment of noise and vibration impacts from operational traffic. Section 14.10 of **ES Volume 1, Chapter 14: Noise and Vibration [EN010168/APP/6.1]** has considered vehicle types and numbers and assesses operational traffic in comparison to construction traffic.
Planning Inspectorate ID: 3.9.3	Noise and Vibration: Study area	Paragraph 14.4.1 of the Scoping Report states that the study area for the Noise and Vibration assessment is shown on Figure 14.1. Figure 14.1 only shows the site boundary and proposed long term monitoring locations. A plan illustrating both the extent of the study area and the expected route(s) of construction traffic should be included in the ES.	**ES Volume 2, Figure 14-1: Noise Monitoring and Sensitive Receptor Locations [EN010168/APP/6.2]** shows the Study Area extents (500m from the Order Limits) and **ES Volume 2, Figure 13-1: Study Area – Solar PV Sites [EN010168/APP/6.2]** and **ES Volume 2, Figure 13-2: Study Area – Cable Route Corridor [EN010168/APP/6.2]** show the expected construction traffic routes.
Planning Inspectorate ID: 3.9.4	Noise and Vibration: Long term monitoring locations	Appendix 14.1 of the Scoping Report sets out "long term monitoring locations" for the Proposed Development. Paragraph 14.4.4 states that monitoring locations have been selected to be representative of baseline noise conditions at sensitive receptor locations and communities in proximity to the Scheme. The Inspectorate notes that all monitoring locations are in close proximity to Lime Down A to E and Melksham Substation and no monitoring has been undertaken in proximity to the Cable Route Corridor. The ES should include an assessment of noise impacts at all locations where significant effects are likely or otherwise present a justification in the ES as to why significant effects are not likely to occur.	Baseline noise monitoring at 12 locations across the extent of the Cable Route Corridor has been carried out following discussion with Wiltshire Council. Results of the baseline noise monitoring are presented in **ES Volume 3, Appendix 14-3: Baseline Noise Survey Results [EN010168/APP/6.3]**. The construction noise and vibration assessment also consider potential significant effects in proximity to the Cable Route Corridor. The results of this assessment are presented in Section 14.10 of **ES Volume 1, Chapter 14: Noise and Vibration [EN010168/APP/6.1]**.
Planning Inspectorate ID: 3.9.5	Noise and Vibration: Study area	The study area for noise and vibration is defined in Scoping Report paragraph 14.4.1 using an arbitrary distance of 500m from the Proposed Development however this distance is not justified. The ES should explain how the study area and sensitive receptors have been selected with reference to the extent of likely impacts and relevant supporting evidence such as modelling and/or relevant	The 500m Study Area from the Order Limits was agreed with Wiltshire Council in November 2024 and confirmed again in March 2025, on the basis that effects beyond this distance would be negligible. The method used for selecting sensitive receptors considered in the noise and vibration assessment included those with the potential to be subject to significant effects. Further detail is provided in

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		guidance. Effort should be made to agree the study area(s) with relevant consultation bodies.	Sections 14.5 and 14.6 of **ES Volume 1, Chapter 14: Noise and Vibration [EN010168/APP/6.1]**.
Planning Inspectorate ID: 3.9.6	Noise and Vibration: Baseline noise and vibration surveys – Lime Down C	Paragraph 14.4.5 of the Scoping Report states that "*baseline condition surveys for the extension of Lime Down C have not been completed prior to the submission of this Scoping Report*". All works that have the potential of being required and to be permitted by the DCO should be described and assessed in the ES.	Baseline noise surveys for the extension of Lime Down C have since been carried out. Monitoring locations LT8 to LT11, as described in Section 14.7 of **ES Volume 1, Chapter 14: Noise and Vibration [EN010168/APP/6.1]**, are representative of Lime Down C.
Planning Inspectorate ID: 3.9.7	Noise and Vibration: Operational effects	The Scoping Report states that operational effects will cease completely when operation of the scheme ceases and are therefore temporary. The Inspectorate acknowledges that operational noise effects would cease upon decommissioning, however given the design life of the Proposed Development is expected to be 60 years, care should be taken in the assessment not to underplay potential operational effects in this regard.	Operational effects are assessed in **ES Volume 1, Chapter 14: Noise and Vibration [EN010168/APP/6.1]** using methodologies applicable to the assessment of permanent effects. Further detail regarding the method and results is provided in Section 14.6 and 14.10 in **ES Volume 1, Chapter 14: Noise and Vibration [EN010168/APP/6.1]**, respectively.
Planning Inspectorate ID: 3.9.8	Noise and Vibration: Mitigation	The Scoping Report states that during the construction and operation stages of the development embedded mitigation in the form of a CEMP and OEMP will be used and therefore, no additional mitigation is expected to be required. For the avoidance of doubt, any measures that are envisaged to mitigate likely significant effects, embedded or otherwise, should be described within the ES.	All measures that would mitigate likely significant effects are described in Section 14.9 of **ES Volume 1, Chapter 14: Noise and Vibration [EN010168/APP/6.1],Outline CEMP [EN010168/APP/7.12]** and **Outline OEMP [EN010168/APP/7.13].**
Planning Inspectorate ID: 3.10.1	Glint and Glare: Assessment of glint and glare effects – land at Melksham Substation and Cable Route Corridor	The Scoping Report proposes to scope out an assessment of glint and glare effects to aviation, railway, road and residential receptors from the Land at Melksham Substation and Cable Route Search Corridor as no solar panels will be sited within these areas. Considering the nature of the Proposed Development the Inspectorate is content to scope this matter out of further assessment.	Comment noted. The Applicant can confirm an assessment of glint and glare effects to aviation, railway, road and residential receptors from the Land at Melksham Substation and Cable Route Search Corridor has been scoped out.
Planning Inspectorate ID: 3.10.2	Glint and Glare: Assessment of glint and glare to aviation, railway, road and residential receptors from Lime Down A to E	The Scoping Report proposes that the assessment of glint and glare effects will be set out in full in a Technical Appendix to the ES and summarised within the 'Other Environmental Matters' chapter of the ES. The Inspectorate is content with this approach. The 'Other Environmental Matters' chapter of the ES should identify any significant effects resulting from glint and glare. ES aspect chapters (such as LVIA and Cultural Heritage) should cross refer to the Glint and Glare assessment where relevant.	Comment noted. The assessment of Glint and Glare is presented within **ES Volume 3, Appendix 20-4: Glint and Glare Assessment [EN010168/APP/6.3]** and summarised within **ES Volume 1, Chapter 20: Other Environmental Matters [EN010168/APP/6.1].** Other ES chapters such as **ES Volume 1, Chapter 8: Landscape and Visual Impact Assessment [EN010168/APP/6.1]** and **Chapter 16: Cultural Heritage [EN010168/APP/6.1]** refer to the Glint and Glare assessment as relevant.
Planning Inspectorate ID: 3.10.3	Glint and Glare: Glint and glare impacts on users of Public Rights of Way (PRoW)	The Scoping Report considers the potential for glint and glare impacts on road and residential receptors but there is no consideration of recreational users of PRoW. The Glint and Glare assessment should include an assessment of the potential impact of the Proposed Development on receptors located on PRoW. The Applicant's attention is drawn to the comments from the Cotswolds National Landscape Board (Appendix 2 of this Opinion) regarding the assessment of potential glint and glare impacts of the Proposed Development upon receptors located on PRoW within the Cotswolds National Landscape (CNL) or with views back towards the CNL.	**ES Volume 3, Appendix 20-4: Glint and Glare Assessment [EN010168/APP/6.3]** includes an assessment of the potential impact of the Scheme on receptors located on PRoW. **ES Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1]** also considers the conclusions of the Glint and Glare Assessment in association within the assessment of the magnitude of Landscape and Visual impacts on PRoW within the scheme and the surrounding landscape (including the CNL).
Planning Inspectorate ID: 3.11.1	Electromagnetic Fields: Assessment of Electromagnetic Fields (EMF) from the BESS, substations, transformers and PV inverters	The Scoping Report proposes to scope out an assessment of EMF from the BESS, substations, transformers, and PV inverters as these will be housed in protective enclosures, and the substations and BESS will be situated at least 100m from residences and workplaces. It is therefore considered in the Scoping Report that there would be no significant EMF impacts. On this basis and subject to the provision of technical reporting to demonstrate that relevant design standards have been met the Inspectorate is content to scope out consideration of EMF from the BESS, substations, transformers and PV inverters.	A full assessment of EMF from the BESS, substations, transformers and PV inverters has not been included in this chapter as per agreement to scope this out with the Planning Inspectorate. A high-level assessment is provided for information in **ES Volume 3, Appendix 20-5: High Level Electromagnetic Field Assessment [EN010168/APP/6.3]** which confirms these elements will not result in any significant effects.

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Planning Inspectorate ID: 3.11.2	Electromagnetic Fields: Assessment of EMF from the Cable Route Corridor during construction and operation	The Scoping Report proposes that the assessment of EMF associated with the Cable Route Corridor will be summarised within the 'Other Environmental Matters' chapter of the ES. The Inspectorate is content with this approach. The 'Other Environmental Matters' chapter of the ES should identify any significant effects resulting from EMF. ES aspect chapters (such as Human Health) should cross refer to the EMF assessment where relevant. The Scoping Report proposes that the assessment of EMF impacts associated with the Cable Route Corridor on fish will be addressed in Chapter 8. The Inspectorate is content with this approach.	Noted. The assessment of Electromagnetic Fields will be presented within **ES Volume 3, Appendix 20-5: High Level Electromagnetic Field Assessment [EN010168/APP/6.3]** and summarised within **ES Volume 1, Chapter 20: Other Environmental Matters [EN010168/APP/6.1].** The potential impacts of EMF on fish have been addressed in **ES Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1**]. Other ES chapters such as **ES Volume 1, Chapter 18: Human Health** and **ES Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1**] refer to the EMF assessment as relevant.
Planning Inspectorate ID: 3.12.1	Air Quality: Assessment of dust emissions during the construction and decommissioning phase	The Scoping Report proposes to scope out an assessment of dust emissions during the construction phase on the basis that a construction dust risk assessment will be undertaken to determine the risk of dust impacts to human and ecological receptors and identify appropriate mitigation measures that would be incorporated into the CEMP. Paragraph 17.6.1 of the Scoping Report proposes to scope out an assessment of dust emissions during the decommissioning phase on the basis that mitigation measures incorporated into the CEMP to manage fugitive dust emissions during construction will also be adopted for the decommissioning phase. Limited information has been provided in the Scoping Report regarding the likely significant effects associated with dust emissions during construction and decommissioning and on this basis the Inspectorate does not agree to scope this matter out at this stage. The ES should include an assessment of dust emissions arising from activities during construction and decommissioning which are likely to result in significant effects or otherwise present a justification in the ES as to why significant effects are not likely to occur. It should be clear how all mitigation measures would be delivered and secured, through cross reference to the outline CEMP and DCO.	A construction dust assessment has been undertaken for the Scheme for the construction phase, as outlined in Sections 15.6, 15.8 and 15.10 of **ES Volume 1, Chapter 15: Air Quality [EN010168/APP/6.1]** and mitigation measures have been proposed where required to ensure the effects are not significant (Section 15.9). These measures have been incorporated into the **Outline Construction Environmental Management Plan (CEMP) [EN010168/APP/7.12], which are secured by a requirement within Schedule 2 of the Draft DCO [EN010168/APP/3.1]**. The potential effects on air quality associated with the decommissioning phase are considered to be similar or less than those risks identified during the construction phase. As such, the assessment undertaken for construction dust for the construction phase is considered applicable in relation to decommissioning.
Planning Inspectorate ID: 3.12.2	Air Quality: Assessment of emissions from non-road mobile machinery (NRMM) during the construction phase	The Scoping Report proposes to scope out an assessment of emissions from non-road mobile machinery during the construction phase on the basis that while there may be an increase in emissions from NRMM impacts are likely to be minimal and temporary in nature and controlled through a CEMP. Limited information has been provided in the Scoping Report regarding the likely use of NRMM. Specifically, no information has been provided as to the type, number, location or operational hours of such machinery and likely emissions, other than references to the minimal and temporary nature of NRMM use. On this basis the Inspectorate is unable to scope this matter out of further assessment. The ES should include an assessment of NRMM emissions during construction which are likely to result in significant effects or otherwise present a justification in the ES as to why significant effects are not likely to occur.	NRMM effects have been considered in **ES Volume 1, Chapter 15: Air Quality [EN010168/APP/6.1**], based on professional judgement and guidance (Sections 15.6, 15.8 and 15.10), and mitigation measures have been proposed where required to ensure the effects are not significant (Section 15.9). These measures have been incorporated into the **Outline CEMP [EN010168/APP/7.12]** submitted as part of the DCO Application.
Planning Inspectorate ID: 3.12.3	Air Quality: Assessment of traffic emissions during the construction, operation and decommissioning phases	Table 21.1 of the Scoping Report proposes to scope out an assessment of traffic emissions during the construction phase. This appears to contradict paragraph 17.5.5 which states that "*the number of vehicles associated with the construction phase is not yet confirmed and detailed assessment of construction vehicle emissions will be scoped in until traffic flows are available to consider if the traffic flows have the potential to significantly alter congestion*", meaning the Applicant's proposed approach is unclear. In the absence of information on the likely number and type of vehicles required for construction, the Inspectorate does not agree to scope this matter out at this stage. The ES should include an assessment of road traffic emissions during construction which are likely to result in significant effects or otherwise present a justification in the ES as to why significant effects are not likely to occur.	Vehicle emission effects for each phase have been considered in **ES Volume 1, Chapter 15: Air Quality [EN010168/APP/6.1]**, as presented in Sections 15.6, 15.8 and 15.10, and mitigation measures have been proposed where required to ensure the effects are not significant (Section 15.9). Vehicle movements for each phase of the Scheme were below the Institute of Air Quality Management and Environmental Protection UK screening criteria, therefore detailed assessment was not required. **ES Volume 1, Chapter 3: The Scheme [EN010168/APP/6.1]** sets out the likely number of vehicles for the construction phase of the Scheme, **ES Volume 1, Chapter 13: Transport and Access [EN010168/APP/6.1]** outlines the movements for all phases of the Scheme in more detail.

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		Paragraph 17.5.7 of the Scoping Report proposes to scope out an assessment of traffic emissions during operation on the basis that minimal road traffic movements (4 per month) would occur, and air quality impacts will be negligible. On this basis, the Inspectorate is content that this matter can be scoped out of further assessment. However, the ES should confirm the operational vehicle types and numbers (with reference to thresholds within guidance) to justify this position. Paragraph 17.5.2 of the Scoping Report proposes to scope out an assessment of traffic emissions during decommissioning on the basis that effects are likely to be short term and similar to construction phase impacts. In the absence of evidence demonstrating that decommissioning activities would not result in road traffic emission effects greater than construction, the Inspectorate is not in a position to agree to scope this matter out. The ES should include an assessment of road traffic emissions during decommissioning which are likely to result in significant effects or otherwise present a justification in the ES as to why significant effects are not likely to occur. The Project Description chapter of the ES should clearly set out the likely number and type of vehicles required for construction, operation and decommissioning.	
Planning Inspectorate ID: 3.12.4	Air Quality: Baseline data	Paragraph 17.4.3 of the Scoping Report proposes to characterise baseline ambient air quality by way of a desk study. Paragraph 17.4.6 states that the closest monitoring site is located approximately 8km south of the application site. The Applicant should ensure that the baseline can be adequately characterised through a desk study and effort should be made to reach agreement with relevant consultation bodies, including the local authorities, as to whether any additional survey or monitoring work is required.	The baseline conditions have been identified based on desktop studies, and in line with good practice guidance as presented in **ES Volume 1, Chapter 15: Air Quality [EN010168/APP/6.1]** (Section 15.7). Additional surveys or monitoring work were not required to inform the baseline. The proposed approach has been agreed with Wiltshire Council.
Planning Inspectorate ID: 3.12.5	Air Quality: Study area	The Scoping Report states that the Study Area for the Proposed Development includes an area "*up to 250m from the Sites, Cable Route Search Corridor, and Land at Melksham Substation presented in Figure 3.1*". The ES should include an explanation of the study areas used to identify potential for significant air quality effects on human and ecological receptors. This should be supported by appropriate figures. The assessment methodology and selection of study areas should be discussed and agreed with relevant consultation bodies.	The Study Areas are detailed in **ES Volume 1, Chapter 15: Air Quality [EN010168/APP/6.1]** (Section 15.5) and have been defined following the relevant best practice guidance. The Study Areas are presented in: • **ES Volume 2, Figure 15-1: Construction Dust Emissions Study Area [EN010168/APP/6.2];** • **Figure 15-3: Non-Road Mobile Machinery (NRMM) Emissions Study Area [EN010168/APP/6.2];** • **Figure 15-4: Back-Up Generator Emissions Study Area [EN010168/APP/6.2];** • **Figure 15-5: BESS Fire Emissions Study Area, Receptors and Modelled BESS Locations [EN010168/APP/6.2].** The guidance and methodology used to define the assessment Study Areas for the ES have been agreed with Wilshire County Council Environmental Health Officers (EHOs) as detailed in Table 15-2 of **ES Volume 1, Chapter 15: Air Quality [EN010168/APP/6.1]**.
Planning Inspectorate ID: 3.13.1	Socio-Economics, Tourism and Recreation: Assessment of socio-economic impacts for decommissioning other than those explicitly scoped in	The Scoping Report proposes to scope out an assessment of socio-economic impacts during decommissioning (apart from employment) on the basis that these will be no more significant than those assessed for construction, and difficulties associated with providing a meaningful assessment of potential impact for a 2089 future baseline date. The Inspectorate acknowledges these potential limitations but does not agree that decommissioning can be excluded from the ES given that likely significant effects have been identified for the construction phase. The ES should provide information on the socioeconomic impacts during decommissioning based on reasonable assumptions where likely significant effects may occur.	The Applicant has included the assessment of all socio-economic impacts at decommissioning as requested. These are presented in Section 16.10 of **ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [EN010168/APP/6.1]**. Assumptions on future baseline conditions for socio-economic receptors have been made based on the most up-to-date existing conditions and future projections, where available.
Planning Inspectorate ID: 3.13.2	Socio-Economics, Tourism and Recreation: Assessment	The Scoping Report proposes to scope out an assessment of tourism and recreation impacts during the decommissioning phase on the basis that these will	The Applicant has included the assessment of all tourism and recreation impacts at decommissioning as requested. These are presented in Section 16.10 of **ES**

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	of tourism and recreation impacts during the decommissioning phase	be short to medium term and no more significant than those assessed for construction. The Inspectorate does not agree that decommissioning can be scoped out at this stage given that likely significant effects on PRoW and heritage assets have been identified for the construction phase. The ES should provide information on tourism and recreation impacts during decommissioning based on reasonable assumptions where likely significant effects may occur.	**Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [EN010168/APP/6.1]**. Assumptions on future baseline conditions for tourism and recreation impacts have been made based on the most up-to-date existing conditions and future projections, where available.
Planning Inspectorate ID: 3.13.3	Socio-Economics, Tourism and Recreation: Assessment of impacts to property value and crime – all project phases	The Scoping Report proposes to scope out an assessment of impacts to property value and crime for all project phases on the basis that there is little evidence that property value or levels of crime or safety are significantly affected by the development of solar farms. The Inspectorate agrees that significant effects are not likely in relation to crime and safety or property value and is content to scope these matters out. The ES should provide details on security proposed during construction and operation (such as installation of security fencing, CCTV, and lighting).	The Applicant notes these comments, and as such the assessment of significant effects in relation to crime and safety or property value have been scoped out of **ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [EN010168/APP/6.1]** . The Applicant has, as requested, provided details of security infrastructure in **ES Volume 1, Chapter 3: The Scheme [EN010168/APP/6.1]**
Planning Inspectorate ID: 3.13.4	Socio-Economics, Tourism and Recreation: Workforce	Paragraph 18.5.1 of the Scoping Report states that the Proposed Development will provide increased access to employment opportunities, increased workplace population, and increased direct and indirect economic activity. The ES should provide the anticipated number of jobs proposed to be created for each of the phases of the Proposed Development and consider the potential impact of construction workers on capacity of local accommodation and services.	The Applicant notes these comments and has provided details of anticipated employment at construction, operation and maintenance, a peak replacement scenario, and during decommissioning in Section 16.10 of **ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [EN010168/APP/6.1]**. Assessment of impacts on accommodation required for each development stage has been included in Section 16.10 of **ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [EN010168/APP/6.1]**
Planning Inspectorate ID: 3.13.5	Socio-Economics, Tourism and Recreation: Study area	The Scoping Report states that a 20km study area has been adopted for the socio-economic, tourism and recreation assessment, with "*detailed assessment of impacts on individual tourism and recreation assets focussed to within an approximately 2km impact area (or as dictated by zones of theoretical visibility) to define the extent to which these impacts are likely to be felt*". The ES should include a clear justification as to how the study areas for the socio-economic, tourism and recreation assessment have been defined. The study areas and receptors should be depicted on corresponding figures to aid understanding. It should be clear how the selected study areas relate to the extent of the likely impacts from the Proposed Development.	The Study Areas for the socio-economic, tourism and recreation assessment have been set out and justified in Section 16.5 of **ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [EN010168/APP/6.1]**. This sets out how the selected study areas have been determined based on the likely geographical area over which the Scheme is likely to influence socio-economic, tourism and recreation, and within which likely significant effects from the Scheme are anticipated to be experienced. The Study Areas have also been depicted in **ES Volume 2, Figure 16-1** to **ES Volume 2, Figure 16-3 [EN010168/APP/6.2]**.
Planning Inspectorate ID: 3.13.6	Socio-Economics, Tourism and Recreation: Local Impact Area and relevant local authorities	Plate 18.1 of the Scoping Report is not clearly legible at the scale currently provided. The ES must include clear and appropriate figures to support the impact assessment. Figures should be of an appropriate scale and shading to allow each element on the figure to be clearly distinguishable and include clear keys/legends and labels. It would assist the reader if the red line boundary for the Proposed Development could be shown on this figure.	The Applicant notes these comments and has provided **ES Volume 2: Figure 16-1** to **16-3 [EN010168/APP/6.2]** (in place of Plate 18.1 of the Scoping Report) to address matters of legibility and clarity. All figures shown the Scheme's red line boundary (Order limits).
Planning Inspectorate ID: 3.14.1	Human Health and Wellbeing: Human Health and wellbeing matters	The Scoping Report proposes to scope out an assessment of impacts to the following matters: • physical activity (all project phases); • risk taking behaviour (all project phases); • diet and nutrition (all project phases); • housing (operation) • relocation (all project phases); • transport modes, access and connections (operation);	The Applicant acknowledges a typological error in Table 22.1 of the Scoping Report and confirms that 'health and social care services (construction and decommissioning)' is scoped in and 'health and social care services (operation)' is scoped out of the assessment presented in Section 18.10 of **ES Volume 1, Chapter 18: Human Health [EN010168/APP/6.1]**. This matches the scope set out in Tables 19.5 and 19.6 of the Scoping Report. For the avoidance of doubt assessment of health and social care services at all stages of the development have been assessed in **Section 18.10** of **ES Volume 1, Chapter 18: Human Health [EN010168/APP/6.1]**.

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		• community safety (all project phases); • social participation, interaction and support (all project phases); • climate change mitigation and adaptation (construction and decommissioning); • radiation (all project phases); • health and social care services (construction and decommissioning); • built environment (construction and decommissioning); and • wider societal infrastructure and resources (construction and decommissioning). Regarding impacts on health and social care services during construction and decommissioning, the Inspectorate notes that this matter is listed in both the 'Proposed Elements to be scoped in' and 'Proposed Elements to be Scoped out' columns of Table 21.1, meaning the Applicant's proposed approach is unclear. For the avoidance of doubt, the Inspectorate considers that this matter should be scoped in for all stages of the Proposed Development where likely significant effects could occur, or a justification should be presented in the ES as to why significant effects are not likely to occur. Given the nature of the Proposed Development and the information provided within the Scoping Report, the Inspectorate agrees that all other human health and wellbeing matters listed at 3.14.1 can be scoped out of further assessment.	All other human health and wellbeing matters listed have been scoped out of the assessment.
Planning Inspectorate ID: 3.14.2	Human Health and Wellbeing: Human health and wellbeing assessment	The Scoping Report proposes to assess impacts to the following human health and wellbeing matters in other topic chapters and summarise findings in the 'Other Environmental Matters' ES Chapter: • housing (construction and decommissioning); • open space, leisure and play (all phases); • transport modes, access and connections (construction and decommissioning); • community identity, culture, resilience and influence; • education and training; • employment and income; • climate change mitigation and adaptation (operation); • air quality; • water quality or availability; • land quality; • noise and vibration; • health and social care services (construction and decommissioning); and • wider societal infrastructure and resources (operation). The Inspectorate is content with this approach. The EIA Methodology ES chapter should provide clear cross-referencing to where the relevant impacts on human health are considered. Consideration should be given to direct and indirect impacts on human health receptors.	The Applicant notes these comments but has scoped in and assessed human health matters in a standalone ES chapter, rather than as part of **ES Volume 1, Chapter 20: Other Environmental Matters [EN010168/APP/6.1]**. This has been done for ease of reference, completeness, and to provide a single location for the assessment of human health effects. The list of all human health matters scoped into this assessment is provided at paragraph 18.6.7 of **ES Volume 1, Chapter 18: Human Health [EN010168/APP/6.1]**. Cross-referencing to baseline and initial assessments in other topic chapters has been included where they inform or are relied upon for the assessment of human health effects in **ES Volume 1, Chapter 18: Human Health [EN010168/APP/6.1]**. The assessment scope therein considers direct and indirect impacts on human health receptors as requested and as prescribed in industry guidance for assessment of health impacts from development.
Planning Inspectorate ID: 3.14.3	Human Health and Wellbeing: Zone of Influence (ZoI) / Study area	The Scoping Report states that the Local Impact Area (LIA) for socio-economic impacts has been used for the human health and wellbeing assessment to ensure the worst-case impact area is included. The Inspectorate notes that limited information has been provided to explain how the study area was selected. The study area for the human health and wellbeing assessment and its extent should be clearly explained in the ES and justification	The Study Area for human health have been set out and justified in Section 18.5 of **ES Volume 1, Chapter 18: Human Health [EN010168/APP/6.1]** and is illustrated in **ES Volume 2, Figure 18-1: Study Areas for Human Health [EN010168/APP/6.2]**. Additional opportunities to consult and agree the assessment methodology and selection of Study Areas with relevant consultation bodies (Wiltshire Council's

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		provided. The assessment methodology and selection of study areas should be discussed and agreed with relevant consultation bodies.	Public Health team and the Office for Health Improvement and Disparities) was undertaken throughout the pre-application stage with no changes to the Study Areas requested by the host authority or other statutory bodies.
Planning Inspectorate ID: 3.14.4	Human Health and Wellbeing: Human health and wellbeing assessment	The Scoping Report proposes to assess impacts to the following human health and wellbeing matters in the Socio-Economics, Tourism and Recreation Chapter of the ES: • requirement for temporary accommodation for the construction workforce and potential health effects on existing residents; • impacts on tourism and recreation facilities; • education and training opportunities; and • impacts on employment and income opportunities. The Inspectorate is content with this approach. The EIA Methodology ES chapter should provide clear cross-referencing to where the relevant impacts on human health are considered. Consideration should be given to direct and indirect impacts on human health receptors	The Applicant confirms that assessment of requirement for temporary accommodation, impacts on tourism and recreation facilities, education and training opportunities, and impacts on employment and income opportunities have been undertaken in **ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [EN010168/APP/6.1]** and its supporting **appendices [EN010168/APP/6.3]**. Resultant health and wellbeing impacts based on residual effects to these socio-economic, tourism and recreation receptors have been assessed in **Section 18.10** of **ES Volume 1, Chapter 18: Human Health [EN010168/APP/6.1]**, including appropriate cross-references.
Planning Inspectorate ID: 3.15.1	Agriculture and Soils: Direct effects on soil resources and agricultural land - operation	The Inspectorate agrees that effects on soil and agricultural land during the operational phase of the Proposed Development can be scoped out on the basis that significant effects on soil and agricultural land are likely to be restricted to the construction and decommissioning phases.	Effects are assessed for the construction and decommissioning phases in Section 17.10 of **ES Volume 1, Chapter 17: Soils and Agriculture [EN010168/APP/6.1]**. Although effects during operation are scoped out, clarification on issues arising during the scoping process are also included in Section 17.10.
Planning Inspectorate ID: 3.15.2	Agriculture and Soils: Individual owner-occupied farm holdings – construction and operation	The Scoping Report proposes to scope out impacts on individual owner-occupied farm holdings on the basis that landowners that form part of the Proposed Development have signed up to a voluntary agreement and have considered the potential effects on the viability of farm holdings. The Inspectorate is content to scope out impacts on individual owner-occupied farm holdings, subject to providing evidence of such agreements. Where such agreements have not been reached then the ES should include an assessment of the effects on individual farm holdings.	Option agreements have been entered into with landowners within the Option Areas. Agreements with landowners on the cable route are pending, with Heads of Terms expected to be agreed post-submission. See Land and Rights Negotiations Tracker [**APP-4.4**] for full details.
Planning Inspectorate ID: 3.15.3	Agriculture and Soils: Baseline	The Inspectorate welcomes the provision of a plan that identifies the provisional Agricultural Land Classification (ALC) of land within the site. The ES should quantify the areas of land according to Grades 1 to 5 of the ALC, including differentiating between Grades 3a and 3b.	The areas of each ALC grade (1 to 5) are set out in Section 17.7 of **ES Volume 1, Chapter 17: Soils and Agriculture [EN010168/APP/6.1].**
Planning Inspectorate ID: 3.15.4	Agriculture and Soils: Agricultural Land Classification (ALC)	The Scoping Report states that soil and ALC surveys have been undertaken at an observation density of one per 2ha, supported by soil pit data and laboratory analysis. The ES should contain a clear tabulation of the areas of land in each Best Most Versatile (BMV) classification to be temporarily or permanently lost as a result of the Proposed Development, with reference to accompanying map(s) depicting the grades. Specific justification for the use of the land by grade should be provided. The Applicant should ensure that the approach is justified, aligns with relevant guidance and/or standards (e.g., Natural England Technical Information Note TIN049, 2012), and/or is agreed with the relevant consultation bodies.	The areas of each ALC grade affected by the Scheme are set out in Section 17.7 of **ES Volume 1, Chapter 17: Soils and Agriculture [EN010168/APP/6.1].** The ALC grades are mapped in **ES Volume 2, Figure 17-2 [EN010168/APP/6.2].** The use of land by grade has been considered in the scheme design, with details set out in **ES Volume 1, Chapter 4: Alternatives and Design Evolution [EN010168/APP/6.1]**. The survey aligns with guidance stated in Section 17.3 and the scope and methodology has been agreed with Natural England.
Planning Inspectorate ID: 3.15.5	Agriculture and Soils: Grazing during operation	The Scoping Report states that subject to demand, agricultural uses including sheep grazing may resume within the solar PV arrays once construction is complete. Where the ES relies upon grazing and other agricultural usages as mitigation, it should be demonstrated that the land is not subject to restrictive covenants that would prevent such use and that such mitigation is secured in respect of the operation of the Proposed Development.	Mitigation is discussed in Section 17.9 of **ES Volume 1, Chapter 17: Soils and Agriculture [EN010168/APP/6.1].** The impact assessment assumes that vegetation maintenance would be by machinery and does not rely on grazing to mitigate any effects on agriculture. However, there are no known landowner restrictive covenants or other reasons that would prevent continued agricultural use such as sheep grazing among the panels.

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Planning Inspectorate ID: 3.15.6	Agriculture and Soils: Soil Management Plan (SMP)	The Scoping Report states that an outline SMP and overarching outline CEMP will incorporate best practice measures to ensure adverse effects on agricultural land and soil are minimised wherever possible. For clarity, a draft/ outline version should be provided with the application and appropriately secured via the dDCO.	An Outline SRMP is provided at **ES Volume 7 [EN010168/APP/7.15].** Schedule 2 of the **Draft DCO [EN010168/APP/3.1]** contains a requirement that secures the need for a detailed SRMP, which must be substantially in accordance with the Outline SRMP. The **ES Volume 7**, **Outline CEMP [EN010168/APP/7.12]** sets out best practice measures to ensure adverse effects on agricultural land and soil are minimised. Requirement 13 of the **Draft DCO [EN010168/APP/3.1]** secures a detailed CEMP, which must be substantially in accordance with the Outline CEMP.
Planning Inspectorate ID: 3.16.1	Other Environmental Matters: N/A	No matters have been proposed to be scoped out of the assessment	Noted.
Planning Inspectorate ID: 3.16.2	Other Environmental Matters: Aspects to be considered within the 'Other Environmental Matters' Chapter of the ES	The Scoping Report proposes that the following aspects will be considered within the 'Other Environmental Matters' Chapter of the ES: • ground conditions and contamination; • glint and glare; • EMFs; • human health; • major accidents and disasters; • light pollution; • minerals; • waste; and • telecommunications, utilities and television. Regarding Ground Conditions and Contamination, the Inspectorate considers that there are a number of unresolved and uncertain matters identified in the scoping material and on this basis a Ground Conditions and Contamination chapter prepared in accordance with relevant guidance should be included in the ES. Please refer to the Inspectorate's comments at ID 3.6.1 of this Scoping Opinion. Regarding all other aspects set out at paragraph 21.7.1, the Inspectorate has considered this approach and agrees that a standalone chapter is not necessary for these matters.	Noted. A stand-alone chapter has been produced for within **ES Volume 1, Chapter 18: Human Health** and **Chapter 19: Ground Conditions and Contamination [EN010168/APP/6.1]**. Light pollution is considered within **ES Volume 1, Chapter 8: Landscape and Visual** and **Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1]**. Other aspects are considered within **ES Volume 1, Chapter 20: Other Environmental Matters [EN010168/APP/6.1]**.
Atworth Parish Council	Cumulative Impact	Such impact must be a major aspect of the evaluation of Lime Down and the environmental damage it would cause. Atworth Parish Council are concerned that the proposed application does not properly consider the position of a number of villages in this small area that are becoming surrounded by renewable development industrialization which is dramatically changing the environment in which we live. We recently agreed to one more development in our village at Studley Farm, but in an area that is already contributing greatly to renewable targets, the Cumulative impact of any new sites will disproportionately tip the balance in terms of environmental damage and acceptability	The cumulative assessment of the Scheme with other development is summarised within ES Volume 1, **Chapter 21: Cumulative and In-Combination Effects [EN010168/APP/6.1]**. The short-list of cumulative developments presented in Chapter 21 includes all recent renewable planning applications within Atworth Parish. These include PL/2023/01914, PL/2021/08690, and 20/06517/SCR.
Atworth Parish Council	Landscape and Visual	There will be significant landscape and visual receptor damage. The proposed BESS (incorrectly described as being in Melksham village and land at Melksham sub-station) is on prominent agricultural land in the neighbouring village to us of Whitley and any further development there would clearly have a significant impact on the surrounding landscape character. Local walkers seeking a more tranquil rural place to walk have effectively been kettled into the area east of the wine cellars, north of Atworth and west of Whitley. This area is very popular and attracts visitors from further afield to walk. A 60-year life is not temporary but a lifetime, and any screening would take 15 years or more to be effective but we question whether screening on such a prominent site can be achieved at all.	The BESS Site at Whitley has been removed from the Scheme due to the potential significant landscape and visual effects which are difficult to mitigate on the sloping site. Please refer to **ES Volume 1: Chapter 04. Alternatives and Design Evolution [EN010168/APP/6.1**] where this removal is explained. The likely impacts on the tourism and visitor economy, as well as on individual tourism destinations (including public rights of way) are assessed in **ES Volume 1, ES Chapter 16: Socio-Economics, Tourism and Recreation**. The selection of receptors to be assessed is based on likely impacts on use, visual impacts, traffic impacts, and changes to amenity for users.

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		Given the unique characteristics of Whitley and nearby settlements, the review area for designated and non-designated assets should extend to 3km and 4km respectively. The method to assess impacts on any Conservation Area with close proximity to the site should be expanded.	
Atworth Parish Council	Noise and Vibration	The Atworth Parish boundary is extremely close to the proposed BESS in Whitley.' Assessment of noise and vibration during the construction, operation and decommissioning phases must be fully scoped in.	The BESS has since been moved to within Lime Down D and, therefore, a BESS at Whitley is no longer proposed as part of the Scheme. The impact of the Scheme on noise and vibration is assessed within **ES Volume 1, Chapter 14: Noise and Vibration [EN010168/APP/6.1]**.
Atworth Parish Council	Air Quality	Dust emissions during construction, operation and decommissioning and reference of the risk and impact of BESS fires to the Health and Safety Executive with an assessment under Control of Major Accident Regulations 2015 (COMAH) must be scoped in.	Dust emissions and the impact of a BESS fire are assessed **in ES Volume 1, Chapter 15: Air Quality [EN010168/APP/6.1]**. The assessment concludes no significant effects are expected with embedded mitigation. The Scheme is not subject to the COMAH Regulations (2015), and there are no sites recorded on the HSE's Public Information about Establishments that are covered by the Control of Major Accident Hazards (COMAH) Regulations 2015.
Atworth Parish Council	Transport and Access	Atworth already has a high volume of heavy traffic passing along the A365 and is often a popular diversion route when works on the A350 or A4 are present. Construction, operational and any decommissioning additional traffic could last for 60 years and with other increased industrialization in the locality, the impact is not acceptable and this consideration must also be scoped in.	The BESS Area at Whitley is no longer proposed as part of the Scheme. Therefore, the only traffic associated with Scheme in the Atworth area will relate to the installation of the Grid Connection Cables during the construction phase. Details of the construction effects from the installation of the Grid Connection Cables are set out in **ES Volume 1, Chapter 13: Transport and Access [EN010168/APP/6.1]**. Effects are concluded to be temporary, short-term and not significant.
Atworth Parish Council	Other Environmental Issues	The BESS would present clear environmental risks on the proposed site during build, operation and running, all of which should be properly considered as part of the EIA. This should cover; • potential surface water contamination, including silt, sediment, nutrients and chemical spills during and after construction. • groundwater contamination, which is a notable risk given that the area is a groundwater protection zone. • dust emissions during construction and the effects of toxic gas releases in the event of a fire. the potential release of toxic fluids from high voltage cables	The potential effect of the Scheme on surface water is assessed within **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [EN010168/APP/6.1]**. The assessment concludes no significant effects are expected with mitigation. The potential effect of the Scheme on ground water is assessed within **ES Volume 1, Chapter 19: Ground Conditions and Contamination [EN010168/APP/6.1]** which concludes no significant effects are expected with mitigation. The potential effect of the Scheme on dust and potential release of toxics to the air are assessed within **ES Volume 1, Chapter 15: Air Quality [EN010168/APP/6.1]**. The assessment concludes no significant effects are expected with embedded mitigation. There are no fluids used within the high voltage cables. Further details of the cables used within the Scheme are provided in **ES Volume 3, Appendix 3-2: Cable Route Construction Method Statement [EN010168/APP/6.3]**.
Atworth Parish Council	Human Health and Wellbeing	The impacts upon the local community, landscape, ecology and hydrogeology will be profound. Wanting to live in and be surrounded by a rural community and to enjoy the freedom, tranquility and beauty of our natural habitats should not have to be earned and fought for when the rewards of such change and industrialisation lie purely in the hands of the landowners and investors. Physical and mental wellbeing of local parishioners will be under threat with no benefits realisation to any of the local parish communities.	The Applicant acknowledges there will always be some impact to the community feeling towards changes in their surroundings and the potential this has for mental health impacts. The impact of the Scheme on human health (which includes the impacts on local community and landscape) has been assessed in Section 18.10 of **ES Volume 1, Chapter 18: Human Health [EN010168/APP/6.1]**. The Applicant is committed to ensuring sufficient mitigation measures are put in place to minimise adverse impacts, as set out in Section 18.9 of **ES Volume 1, Chapter 18: Human Health [EN010168/APP/6.1]**. **ES Volume 1, Chapter 18: Human Health [EN010168/APP/6.1]** should be read in conjunction with: • **Chapter 7: Climate Change;** • **Chapter 8: Landscape and Visual Impact;** • **Chapter 11: Hydrology, Flood Risk and Drainage;** • **Chapter 13: Transport and Access;**

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			• **Chapter 14: Noise and Vibration;** • **Chapter 15: Air Quality;** • **Chapter 16: Socio-Economics, Tourism and Recreation;** • **Chapter 19: Ground Conditions; and** • **Chapter 20: Other Environmental Matters.** The Scheme design integrates a 15 m buffer from PRoW which provides opportunities for mitigation to reduce the effects to users and provides additional or alternative permissive paths provided to increase PRoW network connectivity. This aims to ensure access to the countryside, and opportunities for physical and resultant mental benefits are maintained throughout the lifetime of the Scheme. This is secured through the **Outline PRoWMP [EN010168/APP/7.17]**. Ecology impacts on local habitats and wildlife are assessed in **ES Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1]**. The Scheme provides an opportunity to benefit local biodiversity, particularly when located on current arable land, through establishment and maintenance of higher value habitats and features for wildlife. **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [EN010168/APP/6.1]** assesses the impact of the Scheme on hydrology, flood risk and drainage within the Order Limits and surrounding area. It concludes no significant effects are expected with mitigation to be implemented as part of the Scheme.
Bath & North East Somerset Council	Transport and Access	The submitted EIA Scoping Report considers the potential Transport and Access Impacts associated with the development proposals at Chapter 13. Paragraph 13.3.2 of the document presents the proposed transport assessment study area, and it is noted that the M4 junctions 17 and 18 would both be used by construction traffic. However, it is unclear which parts of the local highway network would be used to provide access to Junction 18 and whilst the A46 is listed, it is not clear whether the A420 and/or A4 would be used to provide a connection to parts of the development. Given the scale of the proposal, there appears to be some potential for significant transport impacts throughout the construction and decommissioning phases, and the A4 corridor (part of which is maintained by the local highway authority) should be included within the Environmental Statement. The B&NES Highway Authority is content that there would not be a significant impact upon the B&NES authority highway network during the operational development phase.	The routes that construction vehicles will use are set out within **ES Volume 1, Chapter 13: Transport and Access [EN010168/APP/6.1]** and will be controlled through a CTMP (prepared in substantial accord with the **Outline CTMP [EN010168/APP/7.22]**). No roads within the jurisdiction of Bath and North-East Somerset Council will form part of the construction vehicle routes. General construction traffic will enter and exit at Junction 17 and 18 via the M4 and will not use other sections of the A420, A4 and A46 to those shown on the routing plans.
Bremhill Parish Council	Landscape/biodiversity/loss of land suitable for food production	Bremhill Parish Council Neighbourhood Plan supports the development of solar energy infrastructure in the right places. The scale and location of Lime Down Solar Park raises concerns about the detrimental impact on the rural Cotswold landscape and its historic villages, biodiversity and the loss of land suitable for food production and hence the impact on the country's food security. We note that the Scoping Report discusses mitigation measures and proposes monitoring arrangements. It does not say who will do the monitoring and whether it will be independently reviewed. In terms of the 10% net gain for biodiversity the monitoring should be species specific.	The potential effect of the Scheme on Cotswold National Landscape has been assessed within **ES Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1]**. The potential effect of the Scheme on agricultural land is assessed within **ES Volume 1, Chapter 17: Soils and Agriculture [EN010168/APP/6.1]** which concludes temporary significant effects during the construction phase. No significant effects on Soils and Agriculture are expected to arise during the operational phase of the Scheme. There is expected to be a moderate beneficial effect which is significant due to temporary benefits to soil health realised at decommissioning. The impacts of the Scheme on cultural heritage are assessed within **ES Volume 1, Chapter 12: Cultural Heritage [EN010168/APP/6.1].** The assessment concludes no significant effects are expected with mitigation. The impact of the Scheme on biodiversity is assessed within **ES Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1].** The assessment concludes significant effects due to the temporary loss of hedgerows and displacement of ground-nesting birds in the construction and decommissioning phase, however during operation there is expected to be significant beneficial

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			effects for 15 important ecological features including breeding birds, woodland and hedgerows. Along with the commitments in other management plans, the **Outline Landscape and Ecological Management Plan (LEMP) [EN010168/APP/7.18]** details a comprehensive and long-term ecological monitoring strategy, designed to audit new and retain habitats as well as of the operational development by target wildlife species. Requirement 7 of the **Draft DCO [EN010168/APP/3.1]** secures a detailed LEMP, which must be substantially in accordance with the Outline CEMP and submitted to and approved by Wiltshire Council.
Calne Without Parish Council	N/A	Thank you for the invitation to make comments. We would like to confirm that Calne Without Parish Council offers no comment on the EIA assessment.	Noted.
Chippenham Without Parish Council	N/A	As a preamble, the Parish Council feel that not knowing the totality of subjects applicable to the proposal they cannot say they are confident that all that needs to be covered in an EIA are, or will be covered and that, perhaps, there is or should be a Government List/Schedule of prescribed subjects to be addressed by the Scoping Study and EIA?	As stated in **ES Volume 1, Chapter 1: Introduction [EN010168/APP/6.1]** Schedule 4 of the EIA Regulations sets out the information which is required to be included in an ES. Table 1-2 summarises where the requirements of Schedule 4 of the EIA Regulations have been addressed in the ES.
Chippenham Without Parish Council	EIA requirement to consider alternatives to the proposal: Alternative Sites	The Scoping Opinion should include a survey and assessment of alternative physical locations within the same radial distance from the proposed grid connection point at Melksham. Comment; The Council is unsure if examples are required, or can be given, but if it is acceptable then it is aware of a Salisbury Plain alternative. This could be used in conjunction with the disused chalk quarry at Westbury, Wiltshire and the new incinerator at Westbury that will be laying a connection to Frome for the electricity that it generates. This cable is not yet in place and may already have planning consent. This being so, a Solar Farm sited on Salisbury Plain could utilise the incinerator's National Grid connection at Frome or ensure that when the cable is laid that it is capable of taking the Solar Park's input. A Scoping Report evaluation could/should be made of the Lime Down proposals that generate 500 MW and covers 900 hectares (2240 acres) with the old cement works site at Westbury covering 31 hectares (77 acres) that could be a contributory site in a Salisbury Plain proposal.	**ES Volume 1, Chapter 4: Alternatives and Design Evolution [EN010168/APP/6.1]** sets out the site selection process for the Scheme, including where it has had regard to the Salisbury Plain, the disused chalk quarry at Westbury, and the old cement works site at Westbury.
Chippenham Without Parish Council	EIA requirement to consider alternatives to the proposal: Alternative technologies	The Scoping Opinion should include an assessment of alternative technologies to include; • The use of the Lime Down area as a site for wind turbines. An onshore wind turbine has a blade height of 50 metres and generates 2.5-3 MW. If the turbines had an individual capacity of 2.5 MW then 200 would be required (166 at 3 MW). Given that NPPF is to be amended to allow onshore wind turbines, this needs to be evaluated.	As set out in **ES Chapter 4: Alternatives and Design Evolution [EN010168/APP/6.1]** the Applicant is a solar PV and energy storage developer. On that basis, alternative types of low carbon electricity generation have not been considered by the Applicant in the development of the Scheme. However, it is considered that the Site could be suitable for other forms of renewable electricity generation at the same scale as the Scheme and the relevant technologies are considered in section 4.10 of **ES Chapter 4: Alternatives and Design Evolution [EN010168/APP/6.1]**. Further details on various alternative generation technologies, and the role they play in the UK's wider energy portfolio, is contained within the **Statement of Need [EN010168/APP/7.1].** Due to the Scheme's location away from the coast, tidal power and offshore wind are deemed unviable. Onshore wind is not considered to be a suitable alternative because the flat topography of the Site would likely give rise to greater adverse visual effects due to the height of the wind turbines, and the proximity to residential dwellings may give rise to adverse effects associated with shadow flicker and turbine noise. It is also considered that onshore wind would have a greater impact on the setting of the CNL than the Solar PV Panels proposed for the Scheme. Section 7.7 of the **Statement of Need [EN010168/APP/7.1]** provides evidence that energy production from land under solar is of a similar order of magnitude to energy production from the same land under onshore wind while the environmental effects of solar schemes may be significantly lower.

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Chippenham Without Parish Council	EIA requirement to consider alternatives to the proposal: Alternative technologies	The Scoping Opinion should include an assessment of alternative technologies to include; • The use of the Lime Down area (part) as a site for small scale nuclear power plants. Small scale nuclear power plants as currently being proposed/developed by Rolls Royce, with a Government decision on the future scheduled for the autumn, need to be evaluated as an alternative. One small scale nuclear power plant generates 475MW. Its location is far more flexible. If located at Westbury, for example, it would have the advantage of a rail link.	As set out in **ES Chapter 4: Alternatives and Design Evolution [EN010168/APP/6.1]** nuclear power is not considered a suitable alternative for the Scheme given the length of time it would take to plan and build a nuclear plant at the site, which is not currently listed as a site on which nuclear power development is permitted. Section 6.6 of the **Statement of Need [EN010168/APP/7.1],** explains that although Small Modular Reactors (SMRs) may bring decarbonisation and energy security benefits to the UK, 2029 is being targeted for a Financial Investment Decision for the first SMR units being planned for the UK. SMRs are therefore very unlikely to be operational in the UK within a decade, while in contrast, the Scheme, if consented, is expected to be built and operational by 2029.
Chippenham Without Parish Council	EIA requirement to consider alternatives to the proposal: Alternative technologies	The Scoping Opinion should include an assessment of alternative technologies to include; • The use of the Lime Down area to use grass, via anaerobic digestion, as a means of generating renewable energy. This technology is promoted by Ecotricity, for example see: Britain's Greenest Energy Supplier | Ecotricity. The advantage of this technology if employed at the Lime Down site is that it would enable the area to retain its present rural character of open field grass harvesting, and the CO2 released by anaerobic digestion (AD) would be reabsorbed by the continual regrowth of the grass. The methane generated by the AD process could either be converted on site into electricity or even supplied to the Gas Grid. The Scoping Opinion needs a full evaluation of this alternative, along with organic agricultural principles for growing the grass as organic principles will result in carbon sequestration (increased retention of carbon in the soil that has been drawn down from the atmosphere).	**ES Chapter 4: Alternatives and Design Evolution [EN010168/APP/6.1]** sets out detail on the alternative technologies considered as part of the assessment of alternatives undertaken. The use of Lime Down to use grass via anaerobic digestion was not considered. Section 7.7 of the **Statement of Need [EN010168/APP/7.1]** provides evidence that energy production from land under solar is likely to produce a greater quantity of low carbon electricity per acre than the output from a crop-based application.
Chippenham Without Parish Council	EIA requirement to consider alternatives to the proposal: Alternative technologies	The Scoping Opinion should include an assessment of alternative technologies to include; The use of the Lime Down area as a site for a mix of the above three suggestions.	As set out in **ES Volume 1, Chapter 4: Alternatives and Design Evolution [EN010168/APP/6.1]** whilst there may be opportunities to "co-locate" different renewable generation technologies, the Scheme instead includes a Battery Energy Storage System (BESS), which can store electricity including that generated from the solar panels at times when it may not immediately be needed for later dispatch to meet consumer demand. BESS therefore supports the operation of the Solar PV Panels and also enhances grid resilience and stability, as described at Section 6.11 of the **Statement of Need [EN010168/APP/7.1]**. The Applicant's response to the above three suggestions along with an assessment of the benefits arising from the development of a co-located Solar PV and BESS facility at the site provides support to the Applicant's view that Solar PV Panels, co-located with BESS, is the preferred energy generating solution for the Site.
Chippenham Without Parish Council	EIA requirement to consider the Evaluation of Historic Assets	The EIA needs to consider all of the proposed Solar Park area for the possible existence of archaeological assets, and the impact of excavation for cables and foundations upon all such possible assets. An assumption is made that an EIA will consider the impact on the Cotswold Area of Outstanding Natural Beauty, but the Council wishes to ensure that this is the case. NPPF policy/guidance require planning applications to safeguard the whole country's Historic Assets. The land identified by this proposal is adjacent to the Roman Fosse Way, and at one point incorporates the Fosse Way within the installation. The EIA therefore needs to undertake a full evaluation of the historic assets, often archaeological remains, in the proposed Solar Park area throughout all eras of human settlement. In the case of Roman presence in the area there is a Romano-British settlement and Scheduled Monument at Easton Grey, near Malmesbury, Wiltshire, see: https://historicengland.org.uk/listing/the-list/list-entry/1013354	**ES Volume 1, Chapter 12: Cultural Heritage [EN010168/APP/6.1],** supported by appendices in **ES Volume 3: Appendix 12.1 to 12.6 [EN010168/APP/6.3]** has assessed the potential impact of the Scheme on identified archaeological and built heritage assets, and where required appropriate mitigation is proposed (see **ES Volume 3 Appendix 12.6 Archaeological Mitigation Strategy (EN010168/APP/6.3).** The assessment concludes no significant effects are expected with mitigation. The potential effect of the Scheme on Cotswold Area of Outstanding Natural Beauty (now referred to as a National Landscape) is assessed within **ES Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1].** As stated in **ES Volume 1, Chapter 12: Cultural Heritage [EN010168/APP/6.1],** no impact was identified as a result of the Scheme to the Scheduled Romano-British settlement, earthwork enclosure and a section of the Fosse Way, 415m west of Whatley Manor (NHLE reference 1013354).

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Chippenham Without Parish Council	EIA requirement to consider Grade of Agricultural Land	The EIA needs to include a comprehensive, scientifically conducted survey conducted by a qualified professional consultancy. Solar Parks should be on land at Grade 3b and below, and not on Grade 3a land and above. Therefore the EIA needs to establish the agricultural soil grading of each field at the grade that it currently is. This must not be an ad hoc assessment based on hearsay or similarly weak evidence, but on clear scientific methodology conducted objectively. An example of such a professional consultant is Land Research Associates, see: http://www.lra.co.uk/services/soil-survey-soil-mapping/agricultural-land-grades#:~:text=Land%20grades%20are%20determined	**ES Volume 1, Chapter 17: Soils and Agriculture [EN010168/APP/6.1]** and **ES Volume 3, Appendix 17.1 [EN010168/APP/6.3]** set out the scope, methodology and findings of the ALC survey which was undertaken by a professional consultancy with over 50 years' experience of undertaking these surveys. A Statement of Competence is provided at **ES Volume 3, Appendix 1-1: Statement of Competence [EN010168/APP/6.3]** outlining the relevant expertise and qualifications of the experts who prepared the ES. The survey approach and findings have been discussed and agreed with Natural England. **ES Volume 2, Figure 17.1 [EN010168/APP/6.2]** shows the location of survey observations and **Figure 17.2 [EN010168/APP/6.2]** shows the distribution of ALC grades.
Chippenham Without Parish Council	EIA requirement to consider Grade of Agricultural Land	The EIA needs to include a comprehensive, scientifically conducted survey conducted by a qualified professional consultancy. Solar Parks/Farms should be limited to brownfield land and poorer quality unproductive land. The statement made by the Secretary for Energy & Net Zero, on 15 May 2024 made clear the need to balance both the need for energy security and food production and said the use of Best and Most Versatile agricultural land should be avoided where possible. It also said "the Government is aware of concerns about the perceived inaccuracy and unfairness of soil surveys undertaken as part of the planning process for solar development. The Government will address this by supporting independent certification by an appropriate certifying body, subject to relevant business case approval, to ensure Agricultural Land Classification Soil Surveys are of a high standard, requiring surveyors to demonstrate meeting an agreed minimum requirement of training/experience. We will also seek to ensure consistency in how data is recorded and presented, so that reports on agricultural land classification are consistent, authoritative and objective."	**ES Volume 1, Chapter 17: Soils and Agriculture [EN010168/APP/6.1]** and **ES Volume 3, Appendix 17.1 [EN010168/APP/6.3]** set out the scope, methodology and findings of the ALC survey that was undertaken by a professional consultancy with over 50 years' experience of undertaking these surveys. A Statement of Competence is provided at **ES Volume 3, Appendix 1-1: Statement of Competence [EN010168/APP/6.3]** outlining the relevant expertise and qualifications of the experts who prepared the ES. The survey approach and findings have been discussed and agreed with Natural England. **ES Volume 2, Figure 17.1 [EN010168/APP/6.2]** shows the location of survey observations and **Figure 17.2 [EN010168/APP/6.2]** shows the distribution of ALC grades. In terms of the comment that solar parks/farms should be limited to brownfield land and poorer quality unproductive land, **The Statement of Need [EN010168/APP/7.1]** sets out the need for the Proposed Development. The Proposed Development is defined as CNP infrastructure (as per Paragraph 4.2.5 of NPS EN-1) and in summary, the Proposed Development will provide a significant amount of low carbon electricity over its 60-year lifetime, supporting resilience, security, and affordability of electricity supplies. It would be a critical part of the national portfolio of renewable energy generation that is required to decarbonise UK energy supply quickly.
Chippenham Without Parish Council	EIA requirement to consider the Evaluation of Biodiversity	A development project has to include an uplift in biodiversity. Uplift is generally defined as a 10% improvement. In order for this aspect of the Applicant's EIA to be valid, it has to: • Conduct a thorough biodiversity census in all areas of the proposed development of all animals (including birds and insects) and plant species, their level of presence (density), and the areas in which they are to be found. Significant hotspots need to be identified. • Conduct a thorough habitat census within the planned development area and establish the link between the habitat census and the presence and prevalence of the animal and plant species identified. In short, the EIA needs to be using the ecosystem-based means of assessment, which reveals ecological structure and integration. A habitat census will include soil - structure and life living in it - as well as all features above soil, extending from field character, hedgerows, trees, wildlife corridors, and the access for aerial species to the land territory that they require in order to breed and forage. Habitat also includes land character e.g. areas of water and their permanence, an essential dimension of overall ecological character and structure. Conduct a thorough census of soil health at the mini- and micro- levels for animals, fungi and other microscopic life forms. This needs to be done on a field	A full biodiversity net gain assessment has been prepared and is contained within **Biodiversity Net Gain Assessment Report [EN010168/APP/7.8]** and completed **Statutory Biodiversity Metric [EN010168/APP/7.9].** This demonstrates that the Scheme is expected to deliver an uplift of 34.75%, 12.31% and 20.08% in habitat units, hedgerow unit and watercourse units respectively. A comprehensive suite of ecological surveys has been undertaken to underpin the assessment on Ecology and Biodiversity contained within **ES Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1].** This includes a survey to classify all habitats within the Order Limits, which is detailed in **ES Volume 3, Appendix 9-1 Ecological Baseline Report [EN010168/APP/6.3].** A comprehensive and proportionate survey effort for botany as well as wide range of protected/notable species of fauna has been undertaken. Full details of these can be found in **Appendices 9-1 to 9-7 [EN010168/APP/6.3].**

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		by field basis. Soil health is vital to the existence of habitat and thus to a full record of the ecological structure of the area and the biodiversity that it supports.	
Chippenham Without Parish Council	EIA requirement to consider the Evaluation of Biodiversity	A development project has to include an uplift in biodiversity. Having produced this thorough biodiversity survey, the EIA then needs to examine and record: • The level of adverse impact that the development, and operation throughout its lifetime, will have on the existing biodiversity, its abundance and its habitat availability. As the development has to demonstrate 'biodiversity uplift', the existing character of biodiversity, abundance and habitat availability needs to be quantified - both before (actual) and after (predicted) development of the Solar Park. The nature of the biodiversity 'uplift' has to be quantified in precisely the same way. It needs to predict the full range of animals and plants that will be present, their abundance, and the availability of the habitats that they require. In short, the EIA needs to demonstrate how biodiversity 'uplift' (10% improvement) will be accomplished against all these parameters.	The uplift in biodiversity anticipated to occur as a result of the Proposed Development has been quantified using the Statutory Biodiversity Metric published by DEFRA. The **Biodiversity Net Gain (BNG) Assessment Report [EN010168/APP/7.8]** provides full details on how the baseline and post-development biodiversity units have been calculated. The assessment concludes the Scheme is expected to deliver an uplift of 34.75%, 12.31% and 20.08% in habitat units, hedgerow unit and watercourse units respectively . An assessment of the impact of the Proposed Development on biodiversity is contained within in **ES Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1]** which concludes temporary significant adverse effects during construction and decommissioning for hedgerows and breeding birds, however significant beneficial effects for 15 Important Ecological Features including hedgerows, breeding birds during operation.
Christian Malford Parish Council	N/A	Christian Malford Parish Council is not antisolar but we do support solar in proportion around the country and in the right places – we do not feel that this development meets these criteria, for example: Wiltshire has already met it's 2030 carbon neutral of 500mWh by currently producing 827mWh. We recognise that this is a very complex overly long, technical, scientific and policy led document. However, as a team of Councillors with engineering, scientific, farming, commerce and civil service experience we have commented to the best of our combined experience on the scoping consultation, especially with regard to significant omissions, as follows:	**ES Volume 1, Chapter 4: Alternatives and Design Evolution [EN010168/APP/6.1]** describes the consideration of alternatives and the design evolution of the Proposed Development. The report concludes there were no alternative technologies or sites studied by the Applicant that could deliver the Design Vision, noting the availability of grid connections for the National Grid. A full explanation of site selection is set out in **Appendix A: Site Selection Report of the Planning Statement [EN010168/APP/7.2].** The report concludes that the location of the Proposed Development comprises a suitable site taking into account planning and environmental constraints and operational considerations. Regarding Wiltshire's energy consumption, the Applicant's understanding is that In 2023, Wiltshire used 11.2TWh of energy (oil, gas, wood, electricity; 2.1TWh of that was from electricity). Renewable electricity generation in Wiltshire in 2023 totalled 0.6TWh, i.e. approximately 30% of current electricity demand. Wiltshire's carbon emissions in 2023 were 2.9MTCO2e, of which 0.4MT were from electricity production. Electricity demand in Wiltshire will grow as electricity is used as a substitute for fossil fuels in heating, transport and industrial application. The data suggests that Wiltshire will need to go further than its current 2030 carbon neutral targets to reduce its carbon emissions to achieve Net Zero (a national legal target). New large-scale renewable generation schemes will help reduce carbon emissions both locally and nationally, by (a) getting electricity clean, and (b) using abundant clean electricity to reduce emissions from other sectors.
Christian Malford Parish Council	Cumulative Effect of the scale of the development	This is of considerable significance in the case of Lime Down. Whilst presented as a single NSIP by IGP it is, in effect, six projects (the underground powerline joining Lime Down to Melksham, plus areas A, B, C. D and E). Each of these six projects would qualify as NSIPs in their own right. It is the massive cumulative impact of IGP's proposals that singles it out from other Solar Park applications and justifies scoping into the EIA. Government policy and legal precedent support our position on this. The Government's NPPF states that planning authorities should take into account the cumulative impacts from individual sites and/or from a number of sites in a locality.	All aspects of the Scheme are assessed within the ES, including where different areas and components which make up the Scheme interact.**ES Volume 1, Chapter 6: EIA Methodology** and **Chapter 21: Cumulative and In-Combination Effects [EN010168/APP/6.1]** set out the method followed for the CEA, including where it has regard to national policy, and provide an assessment of cumulative effects with other developments.
Christian Malford Parish Council	Habitat Loss and Fragmentation	Large-scale solar farms require extensive land areas, which can lead to the clearing of trees and vegetation and the displacement of wildlife. This habitat disruption can have significant consequences for local biodiversity, potentially	Impacts on local habitats and wildlife are assessed in **ES Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1]**. The Scheme provides an opportunity to benefit local biodiversity, particularly when located on current arable

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		threatening species that rely on the affected areas. The document identifies impact on 138 conservation areas.	land, through establishment and maintenance of higher value habitats and features for wildlife.
Christian Malford Parish Council	Soil and Water Resources	Construction and maintenance activities can lead to soil erosion and compaction, affecting soil health and lead to an increased risk of flooding and water contamination.	An assessment on Soils is included within **ES Volume 1, Chapter 17: Soils and Agriculture [EN010168/APP/6.1].** The potential effects of construction and maintenance activities (including soil erosion and compaction) on soils will be minimised through adherence to measures contained within a Soil Resources Management Plan. An **Outline Soil Resources Management Plan [EN010168/APP/7.15]** has been submitted as part of the DCO Application.
Christian Malford Parish Council	Microclimate Changes	The installation of extensive solar panels can alter local microclimates by changing surface albedo (reflectivity) and temperature.	**ES Volume 1, Chapter 7: Climate Change [EN010168/APP/6.1]** assesses the impact of GHG emissions arising as a result of the Proposed Development on the climate and provides a review of the resilience of the Proposed Development to projected future climate change impacts. The potential for a microclimate to be created by solar panels is extremely unlikely, and far lower risk than from other projects such as power stations etc.
Christian Malford Parish Council	Chemical Use and Pollution	Solar panel manufacturing and maintenance may involve the use of chemicals that could contaminate soil and water if not managed properly. This includes potential leaks or spills of coolant fluids, cleaning agents, or other chemicals used in panel upkeep. The projected lifespan of the site indicates that both solar panels and batteries will have to be replaced at least once during the life. There are still many unknown factors regarding the disposal and recycling of these components.	**ES Volume 1, Chapter 3: The Scheme [EN010168/APP/6.1]** provides a description of the activities associated with construction and operation of the Scheme, including the cleaning of panels which would use water only. The potential effects of the Scheme on surface water and ground water are assessed within **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage** and **Chapter 19: Ground Conditions and Contamination [EN010168/APP/6.1]** respectively. Pollution prevention measures are included within the **Outline CEMP [EN010168/APP/7.12], Outline OEMP [EN010168/APP/7.13] and Outline Decommissioning Strategy [EN010168/APP/7.14].** In terms of the disposal and recycling of components, a waste and materials assessment is contained within Section 20 of **ES Volume 1, Chapter 14: Other Environmental Matters [EN010168/APP/6.1]**, which confirms no significant effects. The **Outline OEMP [EN010168/APP/7.12]** and **Outline Decommissioning Strategy [EN010168/APP/7.14],** secured within the draft DCO, sets out the commitment of the Applicant to maximise recycling and reuse of the Scheme components at the end of their life.
Christian Malford Parish Council	Impact on Wildlife	The development will have an impact on dormice, which are a protected species. Birds and insects may be affected by the presence of solar panels. Birds can sometimes mistake reflective panels for water and collide with them. Insects attracted to the heat or light emitted by the panels can also be impacted, potentially disrupting local ecosystems.	Impacts on dormice, birds and invertebrates are assessed in **ES Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1].** The assessment concludes no significant effects on dormice or terrestrial invertebrates, however a temporary adverse significant effect during the construction phase is predicted for Breeding Birds (Ground Nesting Birds of Open Habitat), although this is through loss of open sightlines rather than through collision with panels. There is very little evidence of impacts on birds via collision with panels in the UK. Once the Proposed Development is operational, a significant beneficial effect is predicted for Breeding Birds of Open Habitats and Breeding Birds of Boundary Habitats due to habitat creation and management outlined in the **Outline LEMP [EN010168/APP/7.18]**. There is also predicted to be a significant beneficial effect on invertebrates during the operational phase due to cessation/reduction in arable farming and habitat creation and management as outlined in the **Outline LEMP EN010168/APP/7.18].**
Christian Malford Parish Council	Land Use Change	Converting agricultural or natural land to solar farms can alter the landscape significantly, potentially reducing land available for farming or conservation. This change can affect food production and natural land reserves.	**ES Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1]** assesses the impact of the Scheme on the landscape. The Applicant recognises that there are concerns relating to the potential for the Proposed Development to impact upon agricultural production. This is considered in **ES Volume 1, Chapter 17: Soils and Agriculture [EN010168/APP/6.1]**. The Applicant has sought to minimise the use of Best and Most Versatile land, and the Proposed Development is not considered to have an impact on food security.

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			There may be opportunity for continued agricultural use (sheep grazing) among the panels, noting that there are no known landowner restrictive covenants or other reasons that would prevent such use. In terms of conservation, as outlined in the **Outline LEMP [EN010168/APP/7.18]** the Proposed Development includes a number of habitat creation and enhancement opportunities.
Christian Malford Parish Council	Noise and Light Pollution	During construction and maintenance, solar farms will generate noise and light pollution, which will disturb local wildlife and human populations. Nighttime lighting for security will disrupt nocturnal animals and contribute to light pollution.	Construction noise and vibration impacts have been assessed within **ES Volume 1, Chapter 14: Noise and Vibration [EN010168/APP/6.1]**. Through the implementation of mitigation measures and best practicable means, as outlined in Section 14.9 of the ES, significant effects on the human population are not expected. **ES Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1]** assesses the landscape and visual effects of the scheme including security lighting. Impacts on ecological features are assessed within **ES Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1]**, including on wildlife from artificial lighting at night. The assessment concludes there would be no significant impact on nocturnal wildlife as resulting from new lighting associated with the Scheme.
Christian Malford Parish Council	Public Rights of Way	The proposal impacts multiple footpaths, byways and long distance paths (Cotswold Way, McMillan Way), which will deter walkers from using this area and impacting the local economy.	Measures within the **Outline PRoWMP [EN010168/APP/7.17]** will be implemented to minimise the effect of the Scheme on PRoW users. This includes setting back Solar PV Panels at least 15 m from PRoW and new permissive paths created to allow for better connectivity.
Christian Malford Parish Council	Landscape	The Cotswolds and Avon Vale are described in the document as areas of “open and expansive landscape”. Clearly 2000 acres of 4.5m high solar panels is a complete anathema to this description. There is no assessment of the impact to archaeological remains during the operation and decommissioning phases	Expansive views from the scarp slope across the Severn and Avon Vales to the west are referred to in the National Character Area profile for the Cotswolds. The Scheme is located to the east of the scarp where there is a more undulating landscape on the dip slope. The Scheme consists of five dispersed sites and there are limited places where more than one site is visible in combination with another site. A full Landscape and Visual assessment has been carried out which is contained within **ES Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1].** **ES Volume 1, Chapter 12: Cultural Heritage [EN010168/APP/6.1],** supported by appendices in **Volume 3 (12.1 to 12.6)** has assessed the potential impact of the scheme on identified archaeological and built heritage assets, and where required appropriate mitigation is proposed (see **ES Volume 3 Appendix 12.6 Archaeological Mitigation Strategy (EN010168/APP/6.3).**
Christian Malford Parish Council	Property Prices	There will be a detrimental impact on property prices, despite the report’s claims that they are “very unlikely to be significantly affected by the Scheme”.	The Applicant acknowledges that impacts to property prices are a concern for neighbouring residents and businesses. Throughout the pre-application stage, the Applicant has sought to assess potential effects to neighbouring properties and consult with local residents and provide sufficient information to ensure stakeholders to understand the likely impacts of the Scheme. The results of the assessments, along with proposed mitigations, are presented in the Environmental Statement **[EN010168/APP/6.1] to [EN010168/APP/6.3]**. The Applicant is confident that published research and evidence to date to suggest that solar farms have a significant adverse long-term effect to nearby property values.
Christian Malford Parish Council	Mitigation	Mitigating these effects requires careful planning and implementation of best practices, such as choosing less ecologically sensitive sites, employing wildlife corridors, using less water-intensive cleaning methods, mitigating the impact on the local economy through reduced tourism and implementing effective waste management and recycling programs for old panels. Additionally, integrating solar	Details of how the Proposed Development has been sited are provided within **ES Volume 1, Chapter 4: Alternatives and Design Evolution [EN010168/APP/6.1]** and within **ES Volume 3, Appendix 4-1: Site Selection Assessment Report [EN010168/APP/6.3].** The ecology assessment presented within **ES Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1]** includes details of embedded mitigation

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		development with agricultural activities (agrivoltaics) can help balance energy production with environmental conservation and local land use needs.	measures that have been designed into the scheme such as buffer zones to protect the most valuable habitats during the lifetime of the Scheme. In terms of water usage, this is assessed **within ES Volume 1, Hydrology, Flood Risk and Drainage [EN010168/APP/6.1].** Further details are also provided in the **Outline Water Resources Strategy [EN010168/APP/7.26].** In terms of the impact on the local economy and tourism, this is assessed within **ES Volume 1, Chapter 16: Socio-economics, Tourism and Recreation [EN010168/APP/6.1].** Waste management and recycling of old panels is detailed in the Materials and Waste section within **ES Volume 1, Chapter 20: Other Environmental Matters [EN010168/APP/6.1]**. In response to the comment regarding integrating energy production with agricultural activities, as stated in **ES Volume 1, Chapter 17: Soils and Agriculture [EN010168/APP/6.1]** there may be an opportunity to continue some agricultural use (sheep grazing) around the panel areas, although agrivoltaics are not currently being considered.
Corsham Town Council	Incorporation of Local Plans	Corsham Town Council feels strongly that the Corsham Neighbourhood Plan and Corsham Batscape Strategy should be included as part of the local planning policies considered relevant to the Scheme which are identified in section 5.5 on page 47. The Corsham Batscape Strategy clearly shows the Drew's Pond Wood Direct Migration Route crossing the site (pages 32 and 33 of the Corsham Batscape Strategy) and the Corsham Neighbourhood Plan should be included as the proposed cable route corridor goes through the Neighbourhood Plan Area.	The Corsham Neighbourhood Plan has been included as part of the local planning policies relevant to the Scheme, and the Scheme's compliance with the policies in the Neighbourhood Plan is set out in the **Planning Statement [EN01068/APP/7.2].** The Corsham Batscape Strategy has been reviewed as part of the assessment of impacts within **ES Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1]** with particular reference to the Cable Route Corridor. The assessment concludes there would be no significant impact on foraging/commuting bats as a result of the Scheme.
Corsham Town Council	Alternative Sites	The Town Council would like the Planning Inspectorate to ensure that the possible use of alternative sites has been fully explored and that if this site was felt to be the most sustainable, that the opportunity to upgrade the existing sub-station at Minety should be investigated as, if this were possible, then the cabling to the Whitley substation would be unnecessary, thus reducing the environmental impact of the proposal.	As set out in **ES Volume 1, Chapter 4: Alternatives and Design Evolution [EN010168/APP/6.1]** the Applicant has undertaken an assessment of alternatives that meets the legislative requirements for alternatives. As set out in section 4.3, alternative sites have been assessed, including using the Minety Substation as an alternative point of connection to Melksham Substation. **ES Volume 1, Chapter 4: Alternatives and Design Evolution [EN010168/APP/6.1]** concludes that a range of connection options were explored for the Scheme and the Existing National Grid Melksham Substation was identified as having available capacity for a utility scale energy project such as the Scheme. A grid connection has been agreed at the Existing National Grid Melksham Substation, as set out in the Grid Connection Agreement **[EN010168/APP/7.5]**.
Corsham Town Council	Agricultural land and landowners	The Town Council asks that the impact on agricultural land in our parish is fully assessed including compensation for landowners.	The impacts on agricultural land are set out in **ES Volume 1, Chapter 17: Soils and Agriculture [EN010168/APP/6.1].** The assessment concludes significant adverse effects during construction on agricultural land, BMV agricultural land and soil resources, however a significant beneficial effect during operation due to benefits to soil health.
Corsham Town Council	Impacts on existing ground uses/users	We would also seek assurance that impact on existing minerals permissions, mining, tunnels and existing businesses which use the underground will be fully assessed.	**ES Volume 1, Chapter 20: Other Environmental Matters [EN010168/APP/6.1].** contains a mineral resource assessment which considers the impacts on mineral resources and permitted mineral workings. Impacts on ground conditions are dealt addressed in **ES Volume 1, Chapter 19: Ground Conditions and Contamination [EN010168/APP/6.1].** As preliminary effects on mineral resources are not anticipated to be significant, assessment of the economic impact on mineral extraction was not scoped into the assessment in **ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [EN010168/APP/6.1]**. Further, it is not anticipated that any

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			businesses that use underground infrastructure will be significantly adversely affected by the Scheme.
Cotswold District Council	Limited information	The authority notes that the proposed Solar Park is contained wholly within the Wiltshire Council administrative area. The authority has no specific comments to make on the Scoping Report which appears comprehensive. The authority's main concern would be with construction traffic using local roads within this District to access the development sites. The diagrams at Appendix 13.1 provide limited information at this stage on this aspect. At this stage I cannot give any comments in the absence of a location plan showing the site and its extent.	Proposed construction vehicles routes are set out within **ES Volume 1, Chapter 13: Transport and Access [EN010168/APP/6.1]**. These will be controlled through a CTMP which will be in substantial accord with the **Outline CTMP [EN010168/APP/7.22]** and is secured under a requirement of the **Draft DCO [EN010168/APP/3.1]**. No roads within the jurisdiction of Cotswold District Council will form part of the proposed construction vehicle routes. The location and extent of the Order Limits is illustrated within **ES Volume 2, Figure 1-2: The Order Limits [EN010168/APP/6.2]**.
Cotswolds National Landscape Board	Overarching comment	After reviewing the Applicant's Environmental Impact Assessment ('EIA') Scoping Report and its appendices and having visited the proposed Lime Down sites, the Board considers that the proposal has the potential to give rise to significant environmental effects upon the Cotswolds National Landscape designation and its setting.	Consultation between Cotswold National Landscape (CNL) Board and Wiltshire Council has taken place following the PEIR submission. A buffer to the CNL of at least one field is provided to protect the setting of the CNL.
Cotswolds National Landscape Board		Annex 1 below provides the Board's assessment of the Applicant's EIA Scoping Report in respect of landscape and visual impact, cumulative impacts and glint and glare. We also make a number of recommendations for amendments or additions to the Applicant's Preliminary Environmental Information Report ('PEIR') and Environmental Statement ('ES') in order that the potential effects of the proposal upon the CNL and its setting are adequately assessed. These include: • We recommend that Viewpoint 6 which lies on the CNL's boundary is relocated c.150m eastwards to the junction of the unnamed lane with bridleway SHER16 where a clearer view of the site is available and is a location more likely to be used by walkers and riders; • We recommend an additional viewpoint is provided located on footpath SHER15 at the southern boundary of field A11, looking northwards across the field towards the CNL boundary to enable an assessment of the impact of the proposal on views back towards the CNL; • Viewpoint 30 should be extended westwards or an additional viewpoint provided to incorporate the clear view across the site to the CNL including the spire of St Giles' church at Alderton; • We recommend that photomontages of the proposal are provided from viewpoints 3, 4, the recommended additional viewpoint located on footpath SHER15 at the southern boundary of field A11 looking northwards across the field towards the CNL boundary, 6 (amended location referred to above), 25, 26, 27b, 30 (amended orientation referred to above) and 31 to enable an accurate assessment of the potential impacts of the proposal on the CNL; The Glint and Glare Assessment is expanded to incorporate an assessment of the potential impact of the proposal upon receptors located on Public Rights of Way within the CNL or with views back towards the CNL (i.e. viewpoints 2, 3, 4, 5, 6 (amended location referred to above), the recommended additional viewpoint located on footpath SHER15 at the southern boundary of field A11 looking	The recommendations listed in the comment have been incorporated into **ES Volume 1: Chapter 8: Landscape and Visual [EN010168/APP/6.1]**. The additional Viewpoints are included in Section 8.7. and Table 8-7: Proposed Viewpoint Locations. Both winter and summer photography have been included in **Figure 8-14 Baseline Photography and Photomontages [EN010168/APP/6.2]**.

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		northwards across the field towards the CNL boundary, 25, 26, 27b, 30 (amended orientation referred to above), 31, 32, 33).	
Cotswolds National Landscape Board	Preamble	The Board has previously responded to the Applicant's non-statutory Phase One Consultation in April 2024, having had our attention brought to the proposal by a third party. Contrary to the implied engagement mentioned at paragraph 1.5.1 of the Applicant's EIA Scoping Report, the Applicant has not, to date, met with or contacted the Board to discuss the proposal. The Board would welcome the opportunity to discuss the proposal with the Applicant. This response has been informed by a site visit conducted by the Board's Planning Officer in August 2024.	As stated within **ES Volume 1: Chapter 8: Landscape and Visual [EN010168/APP/6.1]** a remote meeting with the Planning Officer at Cotswold National Landscape Board (CNL) took place on 17 September 2024. The Applicant has also undertaken Site visits with the CNL Board to discuss the proposals.
Cotswolds National Landscape Board Annexe 1	NPS EN-1	Section 5.10 of the National Policy Statement for Energy ('NPS EN-1') identifies that virtually all NSIPs will have adverse effects on the landscape, but there may also be beneficial landscape character impacts arising from mitigation. Projects need to be designed carefully, taking account of the potential impact on the landscape. Having regard to siting, operational and other relevant constraints the aim should be to minimise harm to the landscape, providing reasonable mitigation where possible and appropriate.	As stated within **ES Volume 1: Chapter 8: Landscape and Visual [EN010168/APP/6.1]** the Scheme design has been landscape led and has followed the mitigation hierarchy to avoid, reduce and mitigate effects to minimise harm to the landscape and visual experience of the landscape.
Cotswolds National Landscape Board Annexe 1	NPS EN-1	Landscape effects arise not only from the sensitivity of the landscape but also the nature and magnitude of change proposed by the development, whose specific siting and design make the assessment a caseby-case judgement.	As stated within **ES Volume 1: Chapter 8: Landscape and Visual [EN010168/APP/6.1]** the LVIA Methodology follows the Landscape Institute and Institute of Environmental Management and Assessment (2013) Guidelines for Landscape and Visual Impact Assessment, Third Edition. The effects of the Scheme on all identified landscape and visual receptors (on a case-by-case basis) have been assessed by combining judgement on the sensitivity of the receptor and the nature and magnitude of change caused as a result of the scheme.
Cotswolds National Landscape Board Annexe 1	NPS EN-1	NPS EN-1 states that National Landscapes (AONBs) have been confirmed by the government as having the highest status of protection in relation to landscape and natural beauty. Each of these designated areas has specific statutory purposes. Projects should be designed sensitively given the various siting, operational, and other relevant constraints	The assessment presented in **ES Volume 1: Chapter 8: Landscape and Visual [EN010168/APP/6.1]** has recognised the High value of the CNL in all judgements on Landscape and Visual Sensitivity. The specific statutory purposes of the CNL and its special qualities have been fully assessed in the LVIA and specifically within **ES Volume 3, Appendix 8.6: Assessment of Effects on the Special Qualities of the Cotswold National Landscape [EN010168/APP/6.3].**
Cotswolds National Landscape Board Annexe 1	NPS EN-1	Paragraph 5.10.8 states that the duty to seek to further the purposes of nationally designated landscapes also applies when considering applications for projects outside the boundaries of these areas which may have impacts within them. In these locations, projects should be designed sensitively given the various siting, operational, and other relevant constraints. The Secretary of State should be satisfied that measures which seek to further the purposes of the designation are sufficient, appropriate and proportionate to the type and scale of the development.	As set out within **ES Volume 1: Chapter 8: Landscape and Visual [EN010168/APP/6.1]** the duty to seek to further the purposes of the CNL within the Scheme (where it is within the setting of the CNL) has been informed by the Mitigation Hierarchy to prevent/ avoid, mitigate and restore and enhance. Discussions with the CNL on positive enhancement measures which seek to further the purposes of the designation have been undertaken. The Scheme provides significant opportunities for positive enhancement which has been informed by the Cotswolds National Landscape Management Plan, the Cotswolds Nature Recovery Plan and the 'special qualities' of the National Landscape - those aspects of the area's natural beauty which make the area distinctive and which are considered valuable, especially at a national scale.
Cotswolds National Landscape Board Annexe 1	NPS EN-1	Paragraph 5.10.34 also confirms that the duty to seek to further the purposes of nationally designated landscapes also applies when considering applications for projects outside the boundaries of these areas, which may have impacts within them. The aim should be to avoid harming the purposes of designation or to minimise adverse effects on designated landscapes, and such projects should be designed sensitively given the various siting, operational, and other relevant constraints. The fact that a proposed project will be visible from within a designated area should not in itself be a reason for the Secretary of State to refuse consent.	It is recognised that Site A, B and C or parts thereof are within the setting of the CNL. As set out within **ES Volume 1: Chapter 8: Landscape and Visual [EN010168/APP/6.1]** consultation with the Cotswolds National Landscape Board have led to the removal of panels in Sites A, B and C to avoid harm to the National Landscape. Mitigation measures have been proposed to provide both positive enhancement in these areas and to reduce the visual effects of areas where development is proposed.
Cotswolds National Landscape Board	NPS EN-1	For projects which may affect a National Landscape, the Applicant's assessment should include effects on the natural beauty and special qualities of these areas (paragraph 5.10.20). The assessment should include the visibility and	The assessment presented in **ES Volume 1: Chapter 8: Landscape and Visual [EN010168/APP/6.1]** has fully considered the effects of the CNL's natural beauty and special qualities during construction, operation and decommissioning.

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Annexe 1		conspicuousness of the project during construction and of the presence and operation of the project and potential impacts on views and visual amenity. This should include light pollution effects, including on dark skies, local amenity, and nature conservation (paragraph 5.10.21). The assessment should also address the landscape and visual effects of noise and light pollution, and other emissions, from construction and operational activities on residential amenity and on sensitive locations, receptors and views, how these will be minimised (paragraph 5.10.22).	Transport, Public and Private receptors to be assessed have been agreed with the Board. The assessment is supported by verified photomontages from agreed viewpoints. Refer to **Volume 3, Appendix 8.6: Assessment of Effects on the Special Qualities of the Cotswold National Landscape [EN010168/APP/6.1]** for further information.
Cotswolds National Landscape Board Annexe 1	NPS EN-3	Chapter 2.10 of National Policy Statement for Renewable Energy Infrastructure ('NPS EN-3') deals with solar photovoltaic generation projects and paragraph 2.10.96 states that landscape and visual impacts should be considered carefully pre-application. Potential impacts on the statutory purposes of nationally designated landscapes should form a part of the preapplication process.	As set out in **ES Volume 1: Chapter 8: Landscape and Visual [EN010168/APP/6.1]** the CNL Board has been consulted to consider the pre-application layout. As a result of the preliminary assessment of effects and collaborative site work with the CNL the layout has evolved to reduce the potential impacts on the statutory purposes on the CNL through further avoidance measures (removal of panels where significant effects were identified).
Cotswolds National Landscape Board Annexe 1	NPS EN-3	Applicants should carry out a landscape and visual assessment and report it in the ES. Visualisations may be required to demonstrate the effects of a proposed solar farm on the setting of heritage assets and any nearby residential areas or viewpoints (paragraph 2.10.97).	A landscape and visual assessment is contained within **ES Volume 1: Chapter 8: Landscape and Visual [EN010168/APP/6.1]** Visualisations demonstrate the visual effects of the Proposed Development are contained within **ES Volume 2: Figure 8-14 Viewpoint Photography [EN010168/APP/6.2]**. The effects on the setting of heritage assets has been assessed in **ES Volume 1: Chapter 12: Cultural Heritage [EN010168/APP/6.1].** Information from Chapter 12 has been referenced in **ES Volume 3, Appendix 8.6: Assessment of Effects on the Special Qualities of the Cotswold National Landscape of the LVIA [EN010168/APP/6.3].**
Cotswolds National Landscape Board Annexe 1	NPS EN-3	Applicants should follow the criteria for good design set out in Section 4.7 of EN-1 when developing projects and will be expected to direct considerable effort towards minimising the landscape and visual impact of solar PV arrays especially within nationally designated landscapes. Whilst there is an acknowledged need to ensure solar PV installation are adequately secured, required security measures such as fencing should consider the need to minimise the impact on the landscape and visual impact. The Applicant should consider as part of the design, layout, construction, and future maintenance plans how to protect and retain, wherever possible, the growth of vegetation on site boundaries, as well as the growth of existing hedges, established vegetation, including mature trees within boundaries.	The proposed scheme has followed the criteria for good design set out in Section 4.7 of EN-1. In relation to the CNL, the mitigation hierarchy has been used in the first instance to avoid harm to the CNL. As set out in **ES Volume 1: Chapter 8: Landscape and Visual [EN010168/APP/6.1]** the Scheme has retained where practicable, existing hedgerows, established vegetation, including mature trees within boundaries and these will be protected within buffers incorporated into the scheme design to minimise impacts. Mitigation measures and areas of positive enhancement within the setting of the CNL have been maximised and an **Outline Landscape and Ecological Management Plan (LEMP) [EN010168/APP/7.18]** has been prepared to ensure future maintenance.
Cotswolds National Landscape Board Annexe 1	Development within the setting of the Cotswolds National Landscape	It is understood that the proposed solar park extends to a total of 901ha comprising five sites along with further land at Melksham substation identified for a Battery Energy Storage System and a large Cable Route Search Corridor between the sites and the substation. Three of the five sites, Lime Down A, Lime Down B and Lime Down C, are either located directly adjacent to the CNL boundary or extend to within 200m of the CNL's boundary at their closest point. Accordingly, the Board considers that these three sites (A, B and C) as well as part of the Cable Route Search Corridor are located within the setting of the CNL	The applicant motes this comment.
Cotswolds National Landscape Board Annexe 1	Development within the setting of the Cotswolds National Landscape	In addition to the National Policy Statements discussed above, paragraphs 180 and 182 of the National Planning Policy Framework ('NPPF') provide the highest status of protection for the landscape and scenic beauty of National Landscapes. Paragraph 180 states that planning decisions should both contribute to and enhance the natural environment by protecting and enhancing valued landscapes in a manner commensurate with their statutory status or identified quality in the development plan.	As set out in **ES Volume 1: Chapter 8: Landscape and Visual [EN010168/APP/6.1]** and **ES Volume 3, Appendix 8.6: Assessment of Effects on the Special Qualities of the Cotswold National Landscape of the LVIA [EN010168/APP/6.3],** although the Site is not within the CNL, it has been recognised that some areas of Sites A, B and C are within the setting of the CNL.

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Cotswolds National Landscape Board Annexe 1	Development within the setting of the Cotswolds National Landscape	Paragraph 182 then outlines the 'great weight' to be given to the conservation and enhancement of the landscape and scenic beauty of National Landscapes. This 'great weight' is relevant in this instance as the site forms part of the National Landscape's setting and a development of the scale proposed could, in the view of the Board, potentially have a significant adverse impact on its landscape and visual character and quality.	As set out in **ES Volume 1: Chapter 8: Landscape and Visual [EN010168/APP/6.1]** and **ES Volume 3, Appendix 8.6: Assessment of Effects on the Special Qualities of the Cotswold National Landscape of the LVIA [EN010168/APP/6.3]**, although the Order Limits are not within the CNL, it has been recognised that Sites A, B and C are within the setting of the CNL. The Scheme has been informed by the Mitigation Hierarchy to prevent/ avoid, mitigate and restore and enhance to avoid significant adverse impacts on the CNL's landscape and visual character and quality.
Cotswolds National Landscape Board Annexe 1	Development within the setting of the Cotswolds National Landscape	Furthermore, the requirement that development within the setting of National Landscapes "should be sensitively located and designed to avoid and minimise adverse impacts on the designated areas" was also added into what is now paragraph 182 with the July 2021 publication of the NPPF.	The Applicant acknowledges that paragraph numbering in the NPPF has changed between the July 2021 and December 2023 versions and that development within the setting of National Landscapes "should be sensitively located and designed to avoid and minimise adverse impacts on the designated areas". This has been considered within the landscape led approach to the Scheme as set out in **ES Volume 1: Chapter 8: Landscape and Visual [EN010168/APP/6.1]** and **ES Volume 3, Appendix 8.6: Assessment of Effects on the Special Qualities of the Cotswold National Landscape of the LVIA [EN010168/APP/6.3]**, although the Order Limits are not within the CNL, it has been recognised that Sites A, B and C are within the setting of the CNL. The Scheme has been informed by the Mitigation Hierarchy to prevent/ avoid, mitigate and restore and enhance to avoid significant adverse impacts on the CNL's landscape and visual character and quality.
Cotswolds National Landscape Board Annexe 1	Development within the setting of the Cotswolds National Landscape	Notably, mention of this requirement is omitted in the discussion of paragraph 182 at paragraph 7.4.15 of the EIA Scoping report and we wish to highlight this requirement of national planning policy to the Applicant.	The Applicant acknowledges that paragraph numbering in the NPPF has changed between the July 2021 and December 2023 versions. The reference to paragraph 182 in the Scoping Report relates to the July 2021 NPPF, which has since been superseded. The equivalent requirement is now contained within paragraph 189 of the December 2023 NPPF, which states that development within the setting of National Landscapes should be sensitively located and designed to avoid and minimise adverse impacts on designated areas. This requirement has been addressed within **ES Chapter 8: Landscape and Visual [EN010168/APP/6.1]** and **ES Appendix 8.6: Assessment of Effects on the Special Qualities of the Cotswold National Landscape [EN010168/APP/6.3]**, where the Scheme design has applied the mitigation hierarchy to avoid significant adverse effects on the landscape and special qualities of the Cotswolds National Landscape.
Cotswolds National Landscape Board Annexe 1	Development within the setting of the Cotswolds National Landscape	Notwithstanding, any adverse effects on the National Landscape need to be assessed properly and fully taken into account when determining this application, with the appropriate weighting applied in the decision. The specific statutory purposes of the CNL and its special qualities will be fully assessed in the LVIA.	**ES Volume 1: Chapter 8: Landscape and Visual [EN010168/APP/6.1]** and **ES Volume 3, Appendix 8.6: Assessment of Effects on the Special Qualities of the Cotswold National Landscape of the LVIA [EN010168/APP/6.3]** has fully assessed the specific statutory purposes of the CNL and its special qualities.
Cotswolds National Landscape Board Annexe 1	Development within the setting of the Cotswolds National Landscape	The Board's Position Statement on Development in the Setting of the AONB referred to above outlines how the surroundings of the Cotswolds National Landscape are also important to its landscape character and quality. Development proposals that affect both views into and out of the National Landscape need to be carefully assessed to ensure that they conserve and enhance the natural beauty and landscape character of the National Landscape.	Views into and out of the CNL have been assessed in **ES Volume 1: Chapter 8: Landscape and Visual [EN010168/APP/6.1].**
Cotswolds National Landscape Board Annexe 1	Development within the setting of the Cotswolds National Landscape	The National Planning Policy Guidance ('NPPG', 2014, Paragraph: 039 Reference ID: 8-039-20190721) also confirms in relation to the former Section 85 duty5 (that relevant authorities 'shall have regard' to their purposes for which these areas are designated) that "This duty is particularly important to the delivery of the statutory purposes of protected areas. It applies to all local planning authorities, not just National Park authorities, and is relevant in considering development proposals that are situated outside National Park or Area of Outstanding Natural Beauty	Noted.

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		boundaries, but which might have an impact on their setting or protection." Although the Section 85 duty has now been superseded by the duty at Section 245 of the Levelling Up and Regeneration Act, until the NPPG is updated the Board considers the NPPG to be equally relevant to the new duty in this respect.	
Cotswolds National Landscape Board Annexe 1	Development within the setting of the Cotswolds National Landscape	A High Court decision (Stroud District Council v Secretary of State for Communities and Local Government (Gladman Development Ltd) February 2015) helps to confirm the application of what is now paragraph 182 of the NPPF as far as 'great weight' is concerned. Mr Justice Ouseley stated in this case that paragraph 115 (now paragraph 182) of the NPPF "certainly covers the impact on the scenic beauty of the land actually within the AONB. It seems to me that it would be unduly restrictive to say that it could not cover the impact of land viewed in conjunction with the AONB from the AONB. But to go so far as to say that it must also cover land from which the AONB can be seen and great weight must be given to the conservation of beauty in the AONB by reference to that impact reads too much into paragraph 115."	Noted. The Applicant acknowledges that paragraph numbering in the NPPF has changed between the July 2021 and December 2023 versions
Cotswolds National Landscape Board Annexe 1	Development within the setting of the Cotswolds National Landscape	The above decision helps to clarify that there are differing ways of assessing impacts on the setting of the National Landscape which require the application of different policies and guidance: (i) harm directly to land in the designated National Landscape itself from views out of the National Landscape and between parts of the National Landscape towards new development in its setting (where paragraph 182 of the NPPF is relevant) and: (ii) as a separate material consideration, harm to land outside the designated National Landscape, for example views of new development in the context or backdrop of the National Landscape (where paragraphs 182 or 183 is not relevant).	Noted. **ES Volume 1: Chapter 8: Landscape and Visual [EN010168/APP/6.1]** has considered views from the National Landscape and views of new development in the context or backdrop of the National Landscape.
Cotswolds National Landscape Board Annexe 1	Development within the setting of the Cotswolds National Landscape	Any impact upon views back towards the National Landscape, from outside the National Landscape, may be a separate material consideration and subject to separate policy and guidance, for example paragraph 180 of the NPPF also states that planning decisions should contribute to and enhance the natural environment by protecting and enhancing valued landscapes in a manner commensurate with their statutory status or identified quality in the development plan.	**ES Volume 1: Chapter 8: Landscape and Visual [EN010168/APP/6.1]** has considered both views to and from the CNL.
Cotswolds National Landscape Board Annexe 1	The Board's position on large-scale solar energy proposals	The Board's Vision, outlined at Section 2 of the Cotswolds National Landscape Management Plan 2023- 2025, was drawn up in the light of the interlinked issues of the climate emergency, nature's decline and the ecological crisis and health and societal changes. Outcome 1 of the Management Plan relates to climate action, stating that the National Landscape is a place that is mitigating and adapting to climate change, and has a clearly defined pathway towards net zero emissions. Section 3 of the Management Plan clearly outlines that some climate change mitigation and adaptation measures have the potential to adversely affect the natural beauty of the National Landscape, but with careful design and implementation, many of these measures can not only conserve but also enhance natural beauty. The challenge is to develop a pathway to net zero which also conserves and enhances natural beauty.	Noted. Mitigation measures and areas of positive enhancement within the setting of the CNL have been maximised and an **Outline Landscape and Ecological Management Plan (LEMP) [EN010168/APP/7.18]** has been prepared to ensure future maintenance.
Cotswolds National Landscape Board Annexe 1	The Board's position on large-scale solar energy proposals	Management Plan policy CC1 advocates 'generating energy from low carbon sources in a manner consistent with the purpose of National Landscape (AONB) designation'. This is expanded upon within the Board's Renewable Energy Position Statement, wherein paragraph 3.4.4.13 details the Board's present position on large-scale solar energy proposals such as this. It states that "In principle, the Board would not be supportive of solar energy schemes larger than five hectares in size. For larger schemes that might be put forward, Applicants should be required to demonstrate that the scheme could be accommodated without significantly affecting the natural beauty of the CNL".	**ES Volume 1: Chapter 8: Landscape and Visual [EN010168/APP/6.1]** has assessed the impact of the Scheme on the natural beauty of the CNL. Refer to **Volume 3, Appendix 8.6: Assessment of Effects on the Special Qualities of the Cotswold National Landscape [EN010168/APP/6.3].**

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Cotswolds National Landscape Board Annexe 1	The Board's position on large-scale solar energy proposals	As such, the Board considers that it is essential that the ES prepared in support of the DCO application demonstrates that the scheme can be accommodated without significantly affecting the natural beauty of the CNL and at the same time seeks to further the purpose of the National Landscape's designation.	**ES Volume 1: Chapter 8: Landscape and Visual [EN010168/APP/6.1]** has assessed the impact of the Scheme on the natural beauty of the CNL and includes details of how the scheme seeks to further the purpose of the National Landscape's designation. Refer to **ES Volume 3, Appendix 8.6: Assessment of Effects on the Special Qualities of the Cotswold National Landscape [EN010168/APP/6.3].**
Cotswolds National Landscape Board Annexe 1	Landscape and Visual Impact	We agree with the Applicant's assessment that landscape and visual matters are to be 'scoped into' the ES.	The landscape and visual assessment is contained within **ES Volume 1: Chapter 8: Landscape and Visual [EN010168/APP/6.1].**
Cotswolds National Landscape Board Annexe 1	Landscape and Visual Impact	Any Landscape and Visual Impact Assessment ('LVIA') prepared as part of an Environmental Statement should include a detailed consideration of the landscape and visual impact of the proposed solar park upon the National Landscape and its setting, including the potential impacts upon local landscape character (including land within the setting of the CNL which may complement the character of the CNL landscape) and impacts upon views from within the National Landscape or towards the National Landscape.	**ES Volume 1: Chapter 8: Landscape and Visual [EN010168/APP/6.1]** assesses the impact of the Scheme on the CNL and on land within its setting. Refer to **ES Volume 3, Appendix 8.6: Assessment of Effects on the Special Qualities of the Cotswold National Landscape [EN010168/APP/6.3]**.
Cotswolds National Landscape Board Annexe 1	Landscape and Visual Impact	For avoidance of doubt, we also agree with the Applicant's assessment that: • The northern boundary of three field parcels (Fields A1, A11 and A12) within Lime Down A adjoin the boundary of the CNL south and southeast of Sherston; • The CNL boundary follows Foxley Road to the north of Lime Down B, however a combination of topography and strong hedgerow limits intervisibility; • The CNL boundary adjoins the western edge of Lime Down C at Fields C1, C6, C8 and C10 along an unnamed road to the east of Alderton. • Lime Down D has no landscape and visual relationship with the Cotswolds National Landscape; • Lime Down E has no landscape and visual relationship with the Cotswolds National Landscape; • Land at Melksham Substation has no landscape and visual relationship with the Cotswolds National Landscape; • The Cable Route Search Corridor is located either close to or adjacent to the Cotswolds National Landscape boundary near Sherston, Alderton, Grittleton, Yatton Keynell and Biddlestone. Therefore, and as outlined above, we consider that sites A, B and C and parts of the Cable Route Search Corridor are located within the setting of the Cotswolds National Landscape. We consider that sites D, E, and the land at Melksham Substation are not located within the setting of the Cotswolds National Landscape.	The applicant notes the comment.. **ES Volume 1: Chapter 8: Landscape and Visual [EN010168/APP/6.1]** assesses the impact of the Scheme on the CNL and on land within its setting. Refer to **ES Volume 3, Appendix 8.6: Assessment of Effects on the Special Qualities of the Cotswold National Landscape [EN010168/APP/6.3].**
Cotswolds National Landscape Board Annexe 1	Landscape and Visual Impact	Having reviewed the Landscape and Visual chapter of the EIA Scoping Report and its associated Appendices, including the proposed LVIA methodology outlined at Section 7.3 and Appendix 7.2 of the EIA Scoping Report, much of its scope and content is appropriate	Noted. The full assessment is contained within **ES Volume 1: Chapter 8: Landscape and Visual [EN010168/APP/6.1]**.
Cotswolds National Landscape Board Annexe 1	Landscape and Visual Impact	In respect of paragraph 7.8.4 and Appendix 7.4, we agree that the Cotswolds National Landscape including its special qualities are to be scoped into the EIA, along with NCA107 Cotswolds, LCTs 11 Dip Slope Lowland and 14 Cornbrash Lowlands and LCAs 11A South and Mid Cotswolds Lowlands and 14B West Malmesbury Lowland Farmland from the Cotswolds AONB Landscape Character Assessment. In particular, we note and agree that: • The assessment will consider all built development and infrastructure associated with the scheme and not just the solar panel arrays;	A standalone assessment on the Special Qualities of the CNL is included in the Assessment. Refer to **Volume 3 Appendix 8-6: LVIA Assessment of the Special Qualities of Cotswold National Landscape [EN010168/APP/6.3].**

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		• The assessment of the magnitude of impact and significance of effect will be made against wintertime conditions at construction, operation at year 1, operation at year 15 and decommissioning. Photography is to be taken in both summer and winter to ensure a worstcase scenario is assessed and illustrated; • The LVIA will consider the construction, operational and decommissioning lighting strategy for the Scheme including details of directionality and intermittent lighting. It will also describe any landscape measures necessary to avoid or mitigate lighting effects. We note that paragraph 4.2.18 of the EIA Scoping report states that lighting is not required within the solar arrays for the operational period of the scheme but that lighting may be required during construction and decommissioning; • For the purposes of the LVIA process, the Scheme is assessed as a long-term duration (paragraph 1.7.29); • National Landscapes are considered to have a 'high' landscape value (Table 7.2.1.3, paragraph 1.6.6) and likely to have a 'high' landscape sensitivity (Table 7.2.1.5); • Views from and within National Landscapes have a 'high' visual value (Table 7.2.1.9); • Views from well used public rights of way and visitors to protected landscapes where views of the surroundings are an important contributor to the experience are of 'high' visual susceptibility (Table 7.2.1.10); In accordance with Infrastructure Planning (Environmental Impact Assessment) Regulations 2017, it is important to determine whether the predicted landscape and visual effects arising from the Scheme are likely to be significant. Landscape and visual effects which result in a Major, Major to Moderate, and Moderate landscape or visual effect are considered to be significant (paragraph 1.9.4).	
Cotswolds National Landscape Board Annexe 1	Landscape and Visual Impact	We wish to make a number of comments on the proposed viewpoints identified at Figures 7.7 and 7.10 and the viewpoint photography shown at Appendix 7.3. The Board's Planning Officer has visited these viewpoints which are located within or oriented back towards the CNL during August 2024. We also have recommendations for additional viewpoints which should be included within the ES:	Noted.
Cotswolds National Landscape Board Annexe 1	Landscape and Visual Impact Lime Down A	We agree with the location and orientation of Viewpoints 2, 3, 4 and 5;	Noted.
Cotswolds National Landscape Board Annexe 1	Landscape and Visual Impact Lime Down A	We recommend that Viewpoint 6 is relocated c.150m eastwards to the junction of the unnamed lane with bridleway SHER16 (shown on the photograph below) where a clearer view of the site is available and is a location more likely to be used by walkers and riders.	This viewpoint has been moved as requested and is still named VP6.

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Cotswolds National Landscape Board Annexe 1	Landscape and Visual Impact Lime Down A	We recommend an additional viewpoint is provided located on footpath SHER15 at the southern boundary of field A11, looking northwards across the field towards the CNL boundary to enable an assessment of the impact of the proposal on views back towards the CNL.	This Viewpoint has been added and named CNL C.
Cotswolds National Landscape Board Annexe 1	Landscape and Visual Impact Lime Down B	We agree that Viewpoint 18 provides a representative view of the site from the CNL boundary.	Noted.
Cotswolds National Landscape Board Annexe 1	Landscape and Visual Impact Lime Down C	We agree with the location and orientation of Viewpoints 25, 26, 27b, 31, 32 and 33.	Noted.
Cotswolds National Landscape Board Annexe 1	Landscape and Visual Impact Lime Down C	Viewpoint 30 should be extended westwards or an additional viewpoint provided to incorporate the clear view across the site to the CNL including the spire of St Giles' church at Alderton as shown in the photograph below: 	In the ES, Viewpoint 30 is presented to show the spire of St Giles' church at Alderton.

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Cotswolds National Landscape Board Annexe 1	Landscape and Visual Impact Lime Down C	Based on the preliminary site visit by the Board's Planning Officer, we recommend that photomontages of the proposal are provided from the following viewpoints to enable an accurate assessment of the potential impacts of the proposal on the CNL: • Viewpoint 3 • Viewpoint 4 • Additional viewpoint located on footpath SHER15 at the southern boundary of field A11, looking northwards across the field towards the CNL boundary • Viewpoint 6 (amended location referred to above) • Viewpoint 25 • Viewpoint 26 • Viewpoint 27b • Viewpoint 30 (amended orientation referred to above) Viewpoint 31	In the ES, photomontages of the proposals at AVR3 are provided for these Viewpoints. Refer to ES Volume 3: Figure 8-14 Baseline Photography and Photomontages (including figure series 8-14-1 to 8-14-56) [EN010168/APP/6.2]
Cotswolds National Landscape Board Annexe 1	Landscape and Visual Impact Lime Down C	We also request that view cones are added to the viewpoint locations shown at Figures 7.7 and 7.10 to help readers to interpret the orientation and direction of the viewpoints.	Although view cones have not been added to the ES Volume 3 :Figure 8-10series-Viewpoints, they are included on all the Viewpoint photography sheets in ES Volume 2: Figure 8-14 Baseline Photography and Photomontage [EN010168/APP/6.2]
Cotswolds National Landscape Board Annexe 1	Landscape and Visual Impact Cumulative impacts	We note and agree that cumulative impacts are to be scoped into the ES and that an assessment of the in-combination landscape and visual effects of Lime Down A to E will be undertaken to determine the effects of the Scheme as a whole. A cumulative assessment will be undertaken, assessing both the cumulative landscape and visual effects of the Scheme ('Cumulative Sites') and of the Scheme in conjunction with other local developments ('Cumulative Developments') within the Cumulative Effects chapter of the ES.	Noted.
Cotswolds National Landscape Board Annexe 1	Landscape and Visual Impact Glint & Glare	Paragraph 5.2 of the Board's Tranquillity Position Statement referred to above identifies heliographic effect as a factor that an adversely influence the tranquillity of the CNL which is one of its identified 'special qualities'. The Board recommends that measures should be taken to avoid or minimise the reflection of sunlight off surfaces such as solar panels, agricultural buildings or industrial buildings, for example, by using a less reflective surface and by positioning relevant developments in a less intrusive position and / or location.	As stated within Section 20.1 Glint and Glare within **ES Volume 1, Other Environmental Matters [EN010168/APP/6.1], t**he Scheme has been designed, as far as practicable, to avoid and reduce impacts and effects on Glint and Glare this includes setbacks from dwellings were possible, committing to the use of single axis tracking Solar PV Panels where required, and committing to the use of 2.5m 1P fixed south-facing panels where required. Planting has been proposed across the Scheme to screen views from sensitive receptors, as shown within the **Outline Landscape and Ecological Management Plan [EN010168/APP/7.18].**
Cotswolds National Landscape Board Annexe 1	Landscape and Visual Impact Glint & Glare	Sections 11.4 and 14.4 of the Cotswolds AONB Landscape Strategy and Guidelines also referred to above advises that a glint/glare assessment is undertaken to determine the heliographic impact on receptors.	The heliographic impact on receptors has been considered in **ES Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1]** with reference to Section 20.1 Glint and Glare within **ES Volume 1, Other Environmental Matters [EN010168/APP/6.1].**
Cotswolds National Landscape Board Annexe 1	Landscape and Visual Impact Glint & Glare	The Applicant's Glint and Glare Receptor Scoping and Methodology is included at Appendix 15.1 and does not consider the potential impact upon receptors located within the CNL or looking back towards the CNL (for example users of public rights of way). We therefore recommend that the Glint and Glare Assessment is expanded to incorporate an assessment of the potential impact of the proposal upon receptors at the viewpoint locations discussed above.	Section 20.1 Glint and Glare within **ES Volume 1, Other Environmental Matters [EN010168/APP/6.1]** includes an assessment of all viewpoints looking into and out of the CNL. Reference to the Glint and Glare Assessment has been made when assessing the effects of the Scheme on the special qualities of the CNL, refer to **ES Volume 3, Appendix 8.6: Assessment of Effects on the Special Qualities of the Cotswold National Landscape [EN010168/APP/6.3]**.
Dauntsey Parish Council	Preamble	As a preamble, the Parish Council feel that not knowing the totality of subjects applicable to the proposal they cannot say they are confident that all that needs to be covered in an EIA are, or will be covered and that, perhaps, there is or should be a Government List/Schedule of prescribed subjects to be addressed by the Scoping Study and EIA?	As stated in **ES Volume 1, Chapter 1: Introduction [EN010168/APP/6.1]** Schedule 4 of the EIA Regulations sets out the information which is required to be included in an ES. Table 1-2 summarises where the requirements of Schedule 4 of the EIA Regulations have been addressed in the ES.

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		The Council consider that as this is a huge project in its embryonic stage, with a potential decision timescale some three years hence, then it is important that all possible matters are covered to avoid any potential loopholes occurring. Being mindful of this, the Council considers that the following matters need consideration and inclusion in any Scoping Opinion provided:	
Dauntsey Parish Council	EIA requirement to consider alternatives to the proposal: Alternative Sites	The Scoping Opinion should include a survey and assessment of alternative physical locations within the same radial distance from the proposed grid connection point at Melksham. Comment; The Council is unsure if examples are required, or can be given, but if it is acceptable then it is aware of a Salisbury Plain alternative. This could be used in conjunction with the disused chalk quarry at Westbury, Wiltshire and the new incinerator at Westbury that will be laying a connection to Frome for the electricity that it generates. This cable is not yet in place and may already have planning consent. This being so, a Solar Farm sited on Salisbury Plain could utilise the incinerator's National Grid connection at Frome or ensure that when the cable is laid that it is capable of taking the Solar Park's input. A Scoping Report evaluation could/should be made of the Lime Down proposals that generate 500 MW and covers 900 hectares (2240 acres) with the old cement works site at Westbury covering 31 hectares (77 acres) that could be a contributory site in a Salisbury Plain proposal.	**ES Volume 1, Chapter 4: Alternatives and Design Evolution [EN010168/APP/6.1]** sets out the site selection process for the Scheme, including where it has had regard to the Salisbury Plain, the disused chalk quarry at Westbury, and the old cement works site at Westbury.
Dauntsey Parish Council	EIA requirement to consider alternatives to the proposal: Alternative Technologies	The Scoping Opinion should include an assessment of alternative technologies to include; • The use of the Lime Down area as a site for wind turbines. Comment; An onshore wind turbine has a blade height of 50 metres and generates 2.5-3 MW. If the turbines had an individual capacity of 2.5 MW then 200 would be required (166 at 3 MW). Given that NPPF is to be amended to allow onshore wind turbines, this needs to be evaluated.	As set out in **ES Chapter 4: Alternatives and Design Evolution [EN010168/APP/6.1]** the Applicant is a solar PV and energy storage developer. On that basis, alternative types of low carbon electricity generation have not been considered by the Applicant in the development of the Scheme. However, it is considered that the Site could be suitable for other forms of renewable electricity generation at the same scale as the Scheme and the relevant technologies are considered in section 4.10 of **ES Chapter 4: Alternatives and Design Evolution [EN010168/APP/6.1].** Further details on various alternative generation technologies, and the role they play in the UK's wider energy portfolio, is contained within the **Statement of Need [EN010168/APP/7.1].** Due to the Scheme's location away from the coast, tidal power and offshore wind are deemed unviable. Onshore wind is not considered to be a suitable alternative because the flat topography of the Site would likely give rise to greater adverse visual effects due to the height of the wind turbines, and the proximity to residential dwellings may give rise to adverse effects associated with shadow flicker and turbine noise. It is also considered that onshore wind would have a greater impact on the setting of the CNL than the Solar PV Panels proposed for the Scheme. Section 7.7 of the **Statement of Need [EN010168/APP/7.1]** provides evidence that energy production from land under solar is of a similar order of magnitude to energy production from the same land under onshore wind while the environmental effects of solar schemes may be significantly lower.
Dauntsey Parish Council	EIA requirement to consider alternatives to the proposal: Alternative Technologies	The Scoping Opinion should include an assessment of alternative technologies to include; • The use of the Lime Down area (part) as a site for small scale nuclear power plants. Comment; Small scale nuclear power plants as currently being proposed/developed by Rolls Royce, with a Government decision on the future scheduled for the autumn, need to be evaluated as an alternative. One small scale nuclear power plant generates 475MW. Its location is far more flexible. If located at Westbury, for example, it would have the advantage of a rail link.	As set out in **ES Chapter 4: Alternatives and Design Evolution [EN010168/APP/6.1]** nuclear power is not considered a suitable alternative for the Scheme given the length of time it would take to plan and build a nuclear plant at the site, which is not currently listed as a site on which nuclear power development is permitted. Section 6.6 of the **Statement of Need [EN010168/APP/7.1],** explains that although Small Modular Reactors (SMRs) may bring decarbonisation and energy security benefits to the UK, 2029 is being targeted for a Financial Investment Decision for the first SMR units being planned for the UK. SMRs are therefore very unlikely to be operational in the UK within a decade, while in contrast, the Scheme, if consented, is expected to be built and operational by 2029.

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Dauntsey Parish Council	EIA requirement to consider alternatives to the proposal: Alternative Technologies	The Scoping Opinion should include an assessment of alternative technologies to include; • The use of the Lime Down area to use grass, via anaerobic digestion, as a means of generating renewable energy. Comment; This technology is promoted by Ecotricity, for example see: https://www.ecotricity.co.uk/#:~:text=Switch%20to%20Ecotricity-,Sustai . The advantage of this technology if employed at the Lime Down site is that it would enable the area to retain its present rural character of open field grass harvesting, and the CO2 released by anaerobic digestion (AD) would be reabsorbed by the continual regrowth of the grass. The methane generated by the AD process could either be converted on site into electricity or even supplied to the Gas Grid. The Scoping Opinion needs a full evaluation of this alternative, along with organic agricultural principles for growing the grass as organic principles will result in carbon sequestration (increased retention of carbon in the soil that has been drawn down from the atmosphere).	**ES Chapter 4: Alternatives and Design Evolution [EN010168/APP/6.1]** sets out detail on the alternative technologies considered as part of the assessment of alternatives undertaken. The use of Lime Down to use grass via anaerobic digestion was not considered. Section 7.7 of the **Statement of Need [EN010168/APP/7.1]** provides evidence that energy production from land under solar is likely to produce a greater quantity of low carbon electricity per acre than the output from a crop-based application.
Dauntsey Parish Council	EIA requirement to consider alternatives to the proposal: Alternative Technologies	The Scoping Opinion should include an assessment of alternative technologies to include; The use of the Lime Down area as a site for a mix of the above three suggestions	As set out in **ES Volume 1, Chapter 4: Alternatives and Design Evolution [EN010168/APP/6.1]** whilst there may be opportunities to "co-locate" different renewable generation technologies, the Scheme instead includes a Battery Energy Storage System (BESS), which can store electricity including that generated from the solar panels at times when it may not immediately be needed for later dispatch to meet consumer demand. BESS therefore supports the operation of the Solar PV Panels and also enhances grid resilience and stability, as described at Section 6.11 of the **Statement of Need [EN010168/APP/7.1]**. The Applicant's response to the above three suggestions along with an assessment of the benefits arising from the development of a co-located Solar PV and BESS facility at the site provides support to the Applicant's view that Solar PV Panels, co-located with BESS, is the preferred energy generating solution for the Site.
Dauntsey Parish Council	EIA requirement to consider the Evaluation of Historic Assets	The EIA needs to consider all of the proposed Solar Park area for the possible existence of archaeological assets, and the impact of excavation for cables and foundations upon all such possible assets. An assumption is made that an EIA will consider the impact on the Cotswold Area of Outstanding Natural Beauty, but the Council wishes to ensure that this is the case. Comment; NPPF policy/guidance require planning applications to safeguard the whole country's Historic Assets. The land identified by this proposal is adjacent to the Roman Fosse Way, and at one point incorporates the Fosse Way within the installation. The EIA therefore needs to undertake a full evaluation of the historic assets, often archaeological remains, in the proposed Solar Park area throughout all eras of human settlement. In the case of Roman presence in the area there is a Romano-British settlement and Scheduled Monument at Easton Grey, near Malmesbury, Wiltshire, see: https://historicengland.org.uk/listing/the-list/list-entry/1013354	As the CNL (AONB) is a landscape designation the LVIA will fully consider the impact on the Cotswold Area of Outstanding Natural Beauty. **ES Volume 1, Chapter 12: Cultural Heritage [EN010168/APP/6.1],** supported by appendices in **ES Volume 3 (12.1 to 12.6)** has assessed the potential impact of the scheme on identified archaeological and built heritage assets, and where required appropriate mitigation is proposed (see **ES Volume 3 Appendix 12.6 Archaeological Mitigation Strategy (EN010168/APP/6.3).** No impact was identified as a result of the Scheme to the Scheduled Romano-British settlement, earthwork enclosure and a section of the Fosse Way, 415m west of Whatley Manor (NHLE reference 1013354).
Dauntsey Parish Council	EIA requirement to consider the Evaluation of Biodiversity	A development project has to include an uplift in biodiversity. Comment; Uplift is generally defined as a 10% improvement. In order for this aspect of the Applicant's EIA to be valid, it has to: • Conduct a thorough biodiversity census in all areas of the proposed development of all animals (including birds and insects) and plant species, their level of presence (density), and the areas in which they are to be found. Significant hotspots need to be identified. • Conduct a thorough habitat census within the planned development area and establish the link between the habitat census and the presence and prevalence of the animal and plant species identified. In short, the EIA	A full biodiversity net gain assessment has been prepared and is contained within **Biodiversity Net Gain Assessment Report [EN010168/APP/7.8]** and completed **Statutory Biodiversity Metric [EN010168/APP/7.9].** This demonstrates that the Scheme is expected to deliver an uplift of 34.75%, 12.31% and 20.08% in habitat units, hedgerow unit and watercourse units respectively. A comprehensive suite of ecological surveys has been undertaken to underpin the assessment on Ecology and Biodiversity in **ES Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1]**. This includes a survey to classify all habitats within the Order Limits, which is detailed in Appendix 9-1. A comprehensive and proportionate survey effort for botany as well as wide range of

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		needs to be using the ecosystem-based means of assessment, which reveals ecological structure and integration. A habitat census will include soil - structure and life living in it - as well as all features above soil, extending from field character, hedgerows, trees, wildlife corridors, and the access for aerial species to the land territory that they require in order to breed and forage. Habitat also includes land character e.g. areas of water and their permanence, an essential dimension of overall ecological character and structure. Conduct a thorough census of soil health at the mini- and micro- levels for animals, fungi and other microscopic life forms. This needs to be done on a field by field basis. Soil health is vital to the existence of habitat and thus to a full record of the ecological structure of the area and the biodiversity that it supports.	protected/notable species of fauna has been undertaken. Full details of these can be found in **ES Volume 3, Appendix 9.1: Ecological Baseline Report [EN010168/APP/6.3] to Appendix 9-7: Wintering Bird Survey Report [EN010168/APP/6.3].**
Dauntsey Parish Council	EIA requirement to consider the Evaluation of Biodiversity	Having produced this thorough biodiversity survey, the EIA then needs to examine and record: • The level of adverse impact that the development, and operation throughout its lifetime, will have on the existing biodiversity, its abundance and its habitat availability. As the development has to demonstrate 'biodiversity uplift', the existing character of biodiversity, abundance and habitat availability needs to be quantified - both before (actual) and after (predicted) development of the Solar Park. The nature of the biodiversity 'uplift' has to be quantified in precisely the same way. It needs to predict the full range of animals and plants that will be present, their abundance, and the availability of the habitats that they require. In short, the EIA needs to demonstrate how biodiversity 'uplift' (10% improvement) will be accomplished against all these parameters.	The uplift in biodiversity anticipated to occur as a result of the Proposed Development has been quantified using the Statutory Biodiversity Metric published by DEFRA. The **Biodiversity Net Gain (BNG) Assessment Report [EN010168/APP/7.8]** provides full details on how the baseline and post-development biodiversity units have been calculated. The assessment concludes the Scheme is expected to deliver an uplift of 34.75%, 12.31% and 20.08% in habitat units, hedgerow unit and watercourse units respectively.
Dorset and Wiltshire Fire and Rescue Service	Fire Rescue	This application falls within the area for which Dorset & Wiltshire Fire and Rescue Service (DWFRS) is responsible for delivering an operational and emergency response. Whilst Dorset & Wiltshire Fire and Rescue Service would not object in principle to the lawful development of this site it is recognised that these installations pose some specific hazards in the event of fire. Any fire involving grid scale Li-ion battery storage would be treated as a hazardous materials incident in order that specialist technical advice can be obtained at the earliest opportunity. Since these sites generally fall outside the requirements of Building Regulations due to the temporary nature of the structures, the Fire and Rescue Service (FRS) are not generally in a position to comment or make representation regarding the design of the site. We take this opportunity to make early observations and provide comments or recommendations in line with current guidance to influence the development. We are keen to work with developers to ensure we understand the new technology and potential impact it may have on the surrounding area. The Regulatory Reform (Fire Safety) Order 2005 is limited in its application to such developments due to the low life risk during normal occupation. Process fire risk is generally regulated by the HSE but in the absence of regulation under COMAH there is an expectation that fire and rescue services will initiate an emergency response in the event of an incident, in conjunction with the site operator's own plans. Due to the complexities associated with differing battery chemistry and the limited effect of firefighting jets, current firefighting tactics will focus on defensive measures to prevent fire spread to adjacent containers as apposed to extinguishing a battery fire.	The **Outline Battery Safety Management Plan [EN010168/APP/7.21]** submitted with the DCO application has been developed in consultation with the Dorset and Wiltshire Fire and Rescue Service. It includes BESS safety requirements, details on fire service guidance, fire service access, fire water and emergency planning. The BESS Area will have a robust and validated emergency response plan (ERP), developed in consultation with D&WFRS In accordance with latest NFCC revised guidance (2024) the final BSMP will include a site plan that shows all sensitive receptors within a 1 km radius of the Order Limits that could be affected by a fire. The site plan will also show main access routes for fire engines and any alternative access; access points around the perimeter of the Order Limits to assist firefighting and hydrants and water supplies. Guidance documents and standards considered by the Applicant have been used to inform the design of the scheme. There is currently limited UK specific guidance for BESS, however the Applicant has incorporated good practice from around the world.

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		Our response crews have been provided with additional training and awareness in the hazards and risk management of BESS installations and as such the risk to them is considered to be controlled, although it would be true to say that the risks cannot be eliminated completely. The following recommendations should be considered at the design stage and early contact with the FRS for site familiarisation and exercising of emergency plans is strongly advised. The proposed safety measures should cover the construction, operational and decommissioning phases of the project. Any development should not negatively impact on the Service's ability to respond to an incident. The Responsible Person must carry out and regularly review the Fire Risk Assessment and Risk Management Plan. It is our recommendation that before planning permission is granted, the layout, access and provision of a suitable water supply comply as far as is reasonably practicable with the minimum requirements under B5 of Approved Document B, The Building Regulations 2010. Please also consult the latest guidance - NFCC BESS Planning Guidance Document.	
Dorset and Wiltshire Fire and Rescue Service	Water Supplies	Fire service resources for the provision of water include standard fire engines, bulk water carriers and High Volume Pumps (HVP's) with additional resources available from neighbouring services through National Resilience capabilities if required. The delivery of water to a BESS site would inevitably require multiple vehicles for a prolonged period Specific consideration should be given to water supply resilience for manual firefighting and the terrain over which fire service vehicles may have to drive to access the site. This is particularly relevant where remote sites may have limited access to fire hydrants and where multiple vehicles may be required to ensure continuous water supply. Current guidance states the water supply should be able to provide a minimum of 1,900 l/min for at least 120 minutes. DWFRS may wish to increase this requirement dependant on location and their ability to bring supplementary supplies to site in a timely fashion. Hydrants should be subject to suitable testing and maintenance by the operator. If a suitable pressure fed water supply is not available, then an Emergency Water Supply (EWS) meeting the above standard should be incorporated into the design for example, a water storage tank or open water source. The inclusion of drenchers or fire service inlets to battery modules may be a design consideration.	The **Outline Battery Safety Management Plan [EN010168/APP/7.21**] submitted with the DCO application has been developed in consultation with the Dorset and Wiltshire Fire and Rescue Service, including the supply of water. **ES Volume 2, Figure 3-3: Indicative 400 kV and BESS Layout [EN010168/APP/6.2]** shows the potential location of the water storage tanks. The BESS Area will have a robust and validated emergency response plan (ERP), developed in consultation with D&WFRS. Fire hydrants and connections to any dry pipe systems that are installed on the BESS Area will be installed in accordance with BS 9990 Non-automatic firefighting systems in buildings code of practice (Current Edition) and should be identified in accordance with BS 3251 Indicator Plates for Fire Hydrants (Current Edition). The BESS Area will contain a minimum of two firefighting water storage units of no less than 228,000 litres in capacity, capable of delivering 1900 litres per minute for 4 hours (exceeding NFCC guidance).
Dorset and Wiltshire Fire and Rescue Service	Site Access	Suitable facilities for safely accessing the site should be provided. Site contingency plans must consider the impact of wind direction on access and egress from the site which may impose operational constraints and an inevitable delay in firefighting. Current guidance states a minimum of 2 access routes. The provision of suitable turning space and appropriately sized footprint for hard standing to enable an effective firefighting response with multiple vehicles is essential. The inclusion of additional roadways and hardstanding areas should be factored into the environmental impact assessment.	The **Outline Battery Safety Management Plan [EN010168/APP/7.21**] submitted with the DCO application has been developed in consultation with the Dorset and Wiltshire Fire and Rescue Service, including BESS area access. Access will be designed such that emergency services are able to access the BESS Area easily with access roads being clearly laid out and signed in accordance with the following: • The proposed access-route width around the BESS area will be 6 m and there are no dead-end access routes or extremes of grade (accessible in all weather conditions). • Road networks within the Order Limits will enable unobstructed access to all areas of the BESS sites, three separate D&WFRS access points to the BESS sites have been integrated to ensure firefighters do not have to drive through a smoke or gas plume to access the BESS. • Signage will be installed in a suitable and visible location on the outside of BESS enclosures identifying the presence of a BESS system. Safety signage

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			will be installed in accordance with Health and Safety (Safety Signs and Signals) Regulations 1996. A swept path analysis for emergency vehicles has been undertaken in **ES Volume 3, Appendix 13-1: Transport Assessment [EN010168/APP/6.3**] and the roads have been confirmed as suitable for emergency vehicle access
Dorset and Wiltshire Fire and Rescue Service	Access between BESS units and spacing	The NFCC guidance recommends a minimum of 6 metres between battery containers, unless suitable design features can be introduced to reduce that spacing. Any reduction in this separation distance should be considered and designed by a competent fire engineer. Individual site location and design will mean that distances between BESS units and site boundaries will vary. Proposed distances should consider risk and mitigation factors. Current guidance suggests a minimum distance of 25 metres prior to any mitigation.	As stated in The **Outline Battery Safety Management Plan [EN010168/APP/7.21**] spacing has been developed between the BESS Battery Containers and between the BESS Area and other infrastructure in accordance with the National Fire Chiefs Council guidance has been included in the Scheme design. The indicative BESS layout conforms to NFPA 855 (2023) standard allowing a separation distance of 3.5 m between BESS blocks and 4 m to ESS equipment, and 0.9 m between adjacent and back-to-back BESS enclosures. This conformity to NFPA 855 (2023) equipment spacing recommendations (if UL 9540A testing shows propagation does not occur) is considered safe practice by revised NFCC guidelines. NFCC guidelines allow reduced separation distances if suitable design features can be introduced. The BESS system will have undertaken Large Scale Fire Testing (LSFT) and utilised rigorous site-specific consequence modelling reports to demonstrate that in the event of a BESS failure loss will be safely limited to one BESS enclosure without the intervention of D&WFRS The indicative minimum separation distance between the BESS enclosures and Order Limits is 110 metres at the nearest point.
Dorset and Wiltshire Fire and Rescue Service	Site Design	Sites should be maintained in order that the risk of potential fire spread between units is reduced. This will include ensuring that combustibles are not stored adjacent to units and access is clear and maintained. Areas within 10 metres of BESS units should be cleared of combustible materials and vegetation. Automatic suppression systems which aim to prevent thermal run-away within cells are a feature of most systems however the effectiveness of these systems is variable. Alternative extinguishing media are not considered appropriate at this time. Early detection of a potential fire situation is critical and fast response detection system linked to the battery management system is considered an essential component of the design. It is considered unlikely that fire service resources would be in attendance within the timeframe required to prevent a thermal run-away event once it has begun. An Information Box should be installed at the FRS access point. This should include emergency contact information, emergency isolation points and details of the specific hazards on site.	As stated in **The Outline Battery Safety Management Plan [EN010168/APP/7.21**] the BESS has been designed to reduce the risk of potential fire spread between units. This includes separation distances between components to minimise the chance of fire spread. Other measures included within the OBSMP include restricting vegetation within 10m of BESS and clear signage detailing emergency contact information. The suppression system will be confirmed at detailed design stage within the detailed Battery Safety Management Plan.
Dorset and Wiltshire Fire and Rescue Service	Environmental Considerations	Once thermal run-away has occurred, defensive firefighting tactics would be the preferred option to allow the cell or module involved in fire to burn out and to protect surrounding modules and infrastructure. This would be undertaken on advice and with agreement from the Environment Agency and technical support services. The potential for contaminated fire water runoff is acknowledged as an area for further consideration, although the type and level of contamination is not easily quantifiable. Our default position is therefore one of containment where possible although this is very difficult to achieve for large volumes of water during a dynamic incident. Consideration should also be given to engaging with the Environment Agency in relation to protection of water sources or aquifers in the event of fire water runoff and any pollution control measures as may be appropriate. Airborne smoke and products of combustion would inevitably contain toxic effluents. Liaison with other agencies to support the air monitoring and warning	Drainage from the BESS Area will be managed using lined, permeable SuDS with pollution controls including filter media and self-actuating valves to contain spills and firewater as confirmed in **ES Volume 3, Appendix 11-1: FRA and Drainage Strategy [EN010168/APP/6.3**]. The potential impact of contaminated fire water runoff is assessed within **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [EN010168/APP/6.1]**. No likely significant effects on water quality are anticipated. The potential effect of the Scheme on dust and potential release of toxics to the air as a result of a BESS fire during the operation and maintenance phase is assessed within **ES Volume 1, Chapter 15: Air Quality [EN010168/APP/6.1]**. Taking into account the modelled results, the measures outlined in the **Outline BSMP [EN010168/APP/7.21],** and given the modelling was undertaken using worst case parameters, the effect of BESS fire emissions during the operation and maintenance phase is predicted to be not significant, in the unlikely event that a BESS fire occurs.

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		and informing of local residents would form an essential part of the emergency response. It is our experience that most site designers and operators are keen to engage with fire services to ensure that their operational plans are fit for purpose, and we have already undertaken site visits to the larger installations within our area to assist with operational planning. We also recognise the concerns of residents in relation to the impact of these sites on the local environment and whilst we cannot provide assurance that we will not experience a fire in one of these sites, we are taking steps to ensure that the impacts are reduced as far as possible.	The Environment Agency has been consulted on the Scheme, including with regards to the inclusion of BESS.
Dorset Council	N/A	Thank you for consulting Dorset Council. Dorset Council has no comments to make on this application.	Noted.
Environment Agency	Flood Risk	We acknowledge that flood risk during the operation and decommissioning phases of the development is scoped in, and that a Flood Risk Assessment (FRA) is to be completed at a later stage. However, the risk of fluvial flooding and impacts to the site, along with the potential risk to third parties, during the construction phase has not been scoped in. Paragraph 10.6.2 mentions how the works may affect the hydromorphology of rivers, but reference is not made to the impact on the fluvial floodplain which subsequently may lead to an increase in flood risk.	**ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [EN010168/APP/6.1]** includes an assessment of fluvial flood risk during construction. **ES Volume 3, Appendix 11-1 to 11-9 Flood Risk Assessment and Drainage Strategy [EN010168/APP/6.3]** considers the temporary nature of construction activities and confirms that works will avoid areas of higher fluvial flood risk where practicable. Temporary watercourse crossings and construction-phase works near floodplains will be managed through appropriate controls secured in the **Outline CEMP [EN010168/APP/7.12]**, which relates to construction activities during the construction phase. No significant change to floodplain function is anticipated, and risks to third parties will be controlled. The assessment approach has been informed through consultation with the EA and LLFA.
Environment Agency	Flood Risk	The proposed scheme is classified as 'Essential Infrastructure' as defined in Annex 3: Flood Vulnerability classification of the Planning Practice Guidance (PPG).	Agreed, the Scheme is confirmed as 'Essential Infrastructure' in **ES Volume 3, Appendix 11-1 Flood Risk Assessment and Drainage Strategy [EN010168/APP/6.3].**
Environment Agency	Flood Risk	There are some areas of the site that are situated within Flood Zones 2 and 3 which have a higher probability of flooding from rivers and/ or the sea. The Sequential Test will therefore be required to be passed, as outlined in the National Policy Statement (NPS) EN-1, and the National Planning Policy Framework (NPPF).	As stated in **ES Volume 3, Appendix 11-1: Flood Risk Assessment and Drainage Strategy [EN010168/APP/6.3]**, the Scheme is located mainly within Flood Zone 1. However, elements of Lime Down B, C, D, E and the Cable Route Search Corridor encroach into Flood Zones 2 and 3. The Sequential Test has been applied to the Scheme in accordance with the requirements of the **NPS EN-1** and the **NPPF**. The Sequential and Exception Test Report, submitted as **Annex C to the Planning Statement [EN010168/APP/7.2]**, demonstrates that the vast majority of development is located in Flood Zone 1, with only solar PV panels located within Flood Zones 2 and 3 where flood depths are less than 1 m. The most vulnerable infrastructure, such as substations and Battery Energy Storage Systems, has been located entirely within Flood Zone 1. At the individual site level, infrastructure has been sequentially located outside of higher flood risk areas wherever practicable, with resilience measures applied where necessary. At the Scheme-wide level, the Sequential Test confirms that the development cannot reasonably be located in areas of lower flood risk without undermining the project objectives, and the Exception Test confirms that the Scheme will be safe for its lifetime and will not increase flood risk elsewhere.
Environment Agency	Flood Risk	A sequential approach should be applied to the layout of the site, with all buildings, substation, and anything considered to be critical infrastructure located outside of areas at risk of flooding (Flood Zone 1). However, if solar panels and equipment need to be situated in areas at risk of flooding (Flood Zone 2 and 3),	As stated in the **Flood Risk Assessment and Drainage Strategy [EN010168/APP/6.3]**, the Sequential Test has been considered for each Site. All sensitive electrical equipment, including substations and the Battery Energy Storage System, has been located within Flood Zone 1 and outside areas of flood risk. Associated infrastructure has been designed to be flood resilient.

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		then The Exception Test must also be applied and the FRA must assess flood risk from all sources of flooding.	There is only very minor encroachment of solar PV panels into Flood Zones 2 and 3 at Lime Down D (along the Gauze Brook corridor) and Lime Down E2 (adjacent to Gabriel's Well). Panels are classed as water-compatible development under the NPPF Flood Risk Vulnerability Classification and therefore the Exception Test is not required. In these locations flood depths are very shallow, generally less than 0.3 m, and the design incorporates resilience measures so there is no increase in flood risk. The cable route also crosses small areas of flood risk, but as it will be installed below ground and is unoccupied, the impact on flood risk is negligible. Crossings of Main Rivers will be delivered using HDD, with open cut only used for minor drains where proportionate. The Sequential and Exception Test Report, submitted as **Annex C to the Planning Statement [EN010168/APP/7.2]**, confirms the Sequential Test has been satisfied for each Site and for the Scheme as a whole, in accordance with NPS EN-1 and the NPPF. This approach is consistent with the **Flood Risk Assessment and Drainage Strategy [EN010168/APP/6.3]**, which confirms that only water-compatible infrastructure is located in Flood Zones 2 and 3, and that this very minor encroachment will not increase flood risk.
Environment Agency	Flood Risk	Built development within the fluvial floodplain should be quantified to establish the need for compensatory flood storage. We understand that development within flood risk areas will predominantly be solar panel on supports, which would result in minimal loss of storage, however this should be demonstrated and quantified within the FRA.	As stated in **ES Volume 3, Appendix 11-1 to 11-9 Flood Risk Assessment and Drainage Strategy [EN010168/APP/6.3]** a quantitative assessment has been undertaken using cross sections and modelled flood depths. The assessment confirms that potential loss of floodplain volume is negligible or offset through level-for-level compensation.
Environment Agency	Flood Risk	The Scoping Report states that the project has an operational lifetime of 60 years. Please note that the PPG (Paragraph: 006 Reference ID: 7-006-20220825) states that non-residential development should include an assessment of flood risk over at least 75 years.	As stated in **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [EN010168/APP/6.1]** the Scheme is anticipated to have a 60-year design life and, therefore, a 75-year timeframe has been applied, consistent with the Government's Planning Practice Guidance. Further details can be found within **ES Volume 3, Appendix 11-1: FRA and Drainage Strategy [EN010168/APP/6.3].**
Environment Agency	Flood Risk	The impacts of climate change on flood risk have not been assessed in the Scoping Report. This assessment is necessary to understand the impacts of future flood risk to the development. Due to the lifetime of the development, we would expect the development to be assessed against the higher central and upper climate change estimates for the 2080's epoch. The higher central scenario for the 2080's epoch would constitute the design event for the scheme. The upper estimate would act as a sensitivity test. The assessment should also be able to demonstrate how proposals can be adapted over their predicted lifetimes to remain resilient to the upper climate change scenario, as required by NPS EN-1.	The advice is noted. The impacts of climate change on flood risk have been assessed within the ES, in accordance with NPS EN-1 requirements. **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [EN010168/APP/6.1] and ES Volume 3, Appendix 11-1: Flood Risk Assessment and Drainage Strategy [EN010168/APP/6.3]** confirm that the assessment used the higher central climate change scenario for the 2080s epoch as the design event, with the upper estimate applied as a sensitivity test. The assessment demonstrates that the proposed drainage and flood risk mitigation measures are resilient to these scenarios over the operational lifetime of the development and can be adapted where necessary to maintain resilience to climate change.
Environment Agency	Flood Risk	The applicant should use the 1 in 100 years plus an allowance for climate change as the design event when reviewing the necessity for floodplain compensation. Additionally, the design flood level should be used when designing finished floor levels and river crossings with an additional 600mm freeboard as the minimum height.	**ES Volume 3, Appendix 11-1: FRA and Drainage Strategy [EN010168/APP/6.3]** applies the 1 in 100-year event plus appropriate climate change uplifts (35% and 70%) in line with EA guidance. **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [EN010168/APP/6.1]** considers the need for floodplain compensation using this design event where development is proposed within the floodplain. Finished floor levels and any watercourse crossings will be designed using the relevant design flood level with an allowance for 600mm freeboard where applicable, subject to detailed design and agreement with the EA and LLFA.
Environment Agency	Flood Risk	The applicant will need to confirm operational needs for the site, i.e., will the site remain operational and will staff remain on site during a flood event. There will also need to be consideration given to access and egress from the site during flood event scenarios.	Further detail is provided in **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [EN010168/APP/6.1**] and the supporting **Flood Risk Assessment Appendices [EN010168/APP/6.3]**. The assessment confirms that the Scheme will not require staff to remain onsite during a flood event, and no critical operations would continue in such circumstances. Access and egress

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			arrangements have been assessed using Environment Agency mapping and site topography, and safe access routes are available during all modelled flood events.
Environment Agency	Flood Risk	Whilst the majority of the Lime Down B area is within Flood Zone 1, there are some small ordinary watercourses that cross this area which have no associated Flood Zone mapping.	**ES Volume 3, Appendix 11-1: FRA and Drainage Strategy [EN010168/APP/6.3]** identifies the ordinary watercourses within Lime Down B with no EA Flood Zone mapping. These have been assessed using site-specific topography and available flood mapping.
Environment Agency	Flood Risk	Whilst the majority of the Lime Down C area is within Flood Zone 1, there is a small ordinary watercourse which bisects the area which flows in an easterly direction which has no associated Flood Zone mapping.	An ordinary watercourse bisecting Lime Down C is identified in **ES Volume 3, Appendices 11-4 and 11-5: Flood Risk Assessment and Drainage Strategy – Lime Down C1 and C2 [EN010168/APP/6.3]**, see Figure 6 in each appendix. In the absence of Environment Agency flood mapping, potential fluvial flood risk has been assessed using surface water flood maps, topographic data, and Manning's open channel calculations. Further detail is provided in **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [EN010168/APP/6.1].**
Environment Agency	Flood Risk	There are two ordinary watercourses which bisect Lime Down D area which have no associated Flood Zone mapping.	Two ordinary watercourses bisect Lime Down D and are not currently mapped in the EA's Flood Map for Planning. Detailed hydraulic modelling of Gauze Brook and the lower-lying eastern section of Lime Down D has been undertaken to assess potential fluvial flood risk and climate change impacts. Further detail is included in **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [EN010168/APP/6.1].**
Environment Agency	Flood Risk	There is a small ordinary watercourse which joins the main river within Lime Down E at 392560, 182100. This watercourse has no associated Flood Zone mapping.	The unmapped watercourse identified by the EA at grid reference 392560, 182100, where it joins the main river within Lime Down E, has been acknowledged. The potential risk from this feature has been assessed using LiDAR-derived surface water flood proxies. Further detail is included in **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [EN010168/APP/6.1].**
Environment Agency	Flood Risk	This section of the scoping report briefly introduces fluvial and surface water flood risk within the Order limits. Please also consider the risk of flooding from reservoirs. Reservoir flood extents can be viewed via the long term flood risk service available online at: See flood risk on a map - Check your long term flood risk - GOV.UK (check-long-term-flood-risk.service.gov.uk).	Flood risk from reservoirs has been considered in **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [EN010168/APP/6.1].** EA reservoir flood mapping indicates that Lime Down D is not at risk of flooding from reservoirs.
Environment Agency	Flood Risk	This section describes how most of the sites are in Flood Zone 1. For information, please note that a catchment area of 3km^2 was the de minimis in the generalised 2d modelling used to determine the extent of Flood Zone 2 and 3 where no detailed hydraulic modelling is available. There may be flood risk associated with watercourses which have smaller catchments, it is just not mapped or included within the Flood Map for Planning. Please consider this when assessing flood risk to the proposed sites.	It is acknowledged that the EA's Flood Map for Planning excludes catchments smaller than 3km². Fluvial flood risk from such watercourses has been assessed using surface water flood mapping and site-specific modelling where required, such as for Gauze Brook. Further detail is included in **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [EN010168/APP/6.1].**
Environment Agency	Flood Risk	This section describes one potential location for the Battery Energy Storage System (BESS) near to Melksham Substation. This section describes how the nearest waterbody is the South Brook which is approximately 700 metres to the south. Please note, there is also an ordinary watercourse which runs south through the proposed site location and joins the South Brook. Any associated flood risk from this watercourse is not included within the Flood Map for Planning although the flow pathways are visible on the Risk of Flooding from Surface Water outputs. Depending on the final location of the BESS, it may be prudent to undertake further investigation and hydraulic modelling of this watercourse.	Flood risk associated with these unmapped ordinary watercourses was considered as part of site-specific hydraulic modelling for the BESS and nearby infrastructure where located within or near the 0.1% AEP flood extent. Further detail is included in **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [EN010168/APP/6.1].**
Environment Agency	Flood Risk	This section describes how the analysis of flood extents is reliant on the accuracy of the Environment Agency's Flood Map for Planning and EA Flood Data and that no new hydraulic modelling will be undertaken as part of the study. The Environment Agency do not hold any detailed hydraulic modelling for the main rivers and ordinary watercourses which bisect the order limits for the development.	Hydraulic modelling has been undertaken for Gauze Brook and the adjacent field drain within Lime Down D, where BESS infrastructure is proposed in proximity to potential fluvial and surface water risk areas. This includes 1D modelling of Gauze Brook and 2D direct rainfall modelling of the field drain, with climate change allowances of 35% and 70% applied in line with EA guidance.

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		The Flood Map for Planning for the watercourses which cross the Order limits is based on strategic scale 2d modelling which was undertaken in 2006 using JFlow software. Both the Flood Map for Planning and Risk of Flooding from Surface Water products do not consider the effects of climate change. Furthermore, it is important to note that there are ordinary watercourses which bisect the proposed solar panel areas and battery energy storage locations which have no associated Flood Zones due to the small size of their respective catchments (<3km2). There may be flood risk associated with these watercourses, it is just not modelled and mapped as a catchment area of 3km2 was the de minimis in the generalised 2d modelling used to determine the extent of Flood Zone 2 and 3 where no detailed hydraulic modelling is available. The assessment of flood risk, including climate change, associated with these watercourses must be adequately assessed, with the methodology used provided. It is recommended that further investigation and modelling is undertaken for these watercourses so that the risk to the solar panel areas and BESS locations can be properly quantified, considering the impacts of climate change. For further information please see the guidance on undertaking modelling for Flood Risk Assessments available online at Using modelling for flood risk assessments - GOV.UK (www.gov.uk) as well as guidance on assessing climate change for Flood Risk Assessments which can be found here: Flood risk assessments: climate change allowances - GOV.UK (www.gov.uk).	It is not considered proportionate to undertake detailed hydraulic modelling of all ordinary watercourses across the Order Limits. Many of these are minor channels with small contributing catchments and no recorded flood risk. In these locations, a risk-led approach has been adopted using the EA Flood Map for Planning, EA modelled data where available, the latest NaFRA2 mapping, LiDAR-derived topography, and Manning's-based channel flow estimates to identify low points and potential exceedance flow paths. This methodology reflects the scale and nature of the Proposed Development and the typically low vulnerability of infrastructure near these features. The approach has been developed in consultation with the EA and Wiltshire Council as LLFA. Further detail is included in **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [EN010168/APP/6.1].**
Environment Agency	Flood Risk	Please note, for the BESS site within solar panel area Lime Down D there are two ordinary watercourses which bisect this area. The fluvial flood risk for these watercourses is not represented in the Flood Map for Planning because the catchment size is less than 3km2. Similarly for the BESS site near to Whitley, there is an ordinary watercourse which crosses this site location and flows southwards to join the South Brook. It is important that Flood Risk from these watercourses is assessed through hydraulic modelling depending on which site is taken forward.	Hydraulic modelling has been undertaken for the BESS site within Lime Down D, including 1D modelling of Gauze Brook and 2D direct rainfall modelling of the adjacent field drain, which incorporates the influence of the two ordinary watercourses. For the potential BESS site near Whitley, flood risk from the ordinary watercourse connecting to the South Brook is being assessed using the EA Flood Map for Planning, EA modelled data where available, the latest NaFRA2 mapping, and site-specific topography. The approach has been agreed with the EA and LLFA and reflects the scale of the Proposed Development. Further detail is included in **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [EN010168/APP/6.1].**
Environment Agency	Surface Water Quality	Operational impacts from surface water runoff have been scoped out of the assessment. We are unable to support this decision as too little information has been provided regarding mitigation to prevent surface water from causing pollution at the BESS and substation compounds. It is unclear how the applicant will ensure that routine runoff from these areas is free of contaminants. Additionally, no information is provided on how firewater will be managed and contained at these locations. Plans to prevent firewater from causing pollution should align with relevant fire safety management plans to ensure that the application of firewater and firefighting agents will always be accompanied with appropriate containment.	**ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [EN010168/APP/6.1]** assesses the potential impacts on water quality from operational surface water runoff. Drainage from the BESS Area will be managed using lined, permeable SuDS with pollution controls including filter media and self-actuating valves to contain spills and firewater. Runoff from panelled areas and the cable corridor route will consist of direct rainfall falling onto clean surfaces. These areas do not contain any pollutant sources and do not require treatment. Runoff will either infiltrate or discharge at greenfield rates, as confirmed in **ES Volume 3, Appendix 11-1: FRA and Drainage Strategy [EN010168/APP/6.3].** Measures have been informed by consultation with the EA and LLFA. No likely significant effects on water quality are anticipated.
Environment Agency	Surface Water Quality	Furthermore, the applicant has stated that impacts from silt/ nutrient loaded surface water runoff and from the release of polluting substances has been scoped out due to the provision of "Suitable SuDS" to ensure appropriate treatment. The applicant should note that they have described a water discharge activity, which requires an environmental permit. The applicant should ensure that sufficient space is provided within the redline boundary to provide adequate treatment facilities to ensure that permittable limits can be met.	The Applicant will ensure that all relevant environmental permits are in place prior to construction of the Proposed Development in line with the **Outline CEMP [EN010168/APP/7.12]**.

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Environment Agency	Surface Water Quality	The applicant will require a water discharge activity permit for the discharge of any polluting, noxious or harmful matter. This applies even if treatment is provided. It is likely to apply for surface water runoff from any areas of exposed soil, unless the Regulatory Position Statement on Temporary Dewatering from Excavations to Surface Water applies. We note that the applicant has not included The Environmental Permitting (England and Wales) Regulations 2016 in the Scoping Report. This should be considered going forward.	The Applicant will ensure that all relevant environmental permits are in place prior to construction of the Proposed Development in line with the **Outline CEMP [EN010168/APP/7.12]**.
Environment Agency	Surface Water Quality	It should be noted that Lime Down A, B, C and D also all fall within the "Tributary - source to conf Sherston Avon" waterbody catchment.	The comment is noted. Lime Down A, B, C and D are within the "Tributary – source to confluence Sherston Avon" waterbody catchment. Potential effects on this waterbody have been assessed within the **Water Framework Directive Assessment [EN010168/APP/7.25],** which concludes that no likely significant effects would occur as a result of the Scheme.
Environment Agency	Surface Water Quality	It should be noted that Lime Down E also falls within the "Sutton Benger Bk – Source to conf R Avon" waterbody catchment.	The comment is noted. Lime Down A, B, C and D are within the "Tributary – source to confluence Sherston Avon" waterbody catchment. Potential effects on this waterbody have been assessed within the **Water Framework Directive Assessment [EN010168/APP/7.25],** which concludes that no likely significant effects would occur as a result of the Scheme.
Environment Agency	Surface Water Quality	Care should be taken by the applicant when applying the methodology for determining watercourse sensitivity proposed in Table 10.3. This methodology risks misrepresenting the sensitivity of a watercourse to pollutions and changes in water quality. The table proposes that a river with a higher Q95 flow is more sensitive than one with a lower Q95. The reverse of this is true with regards to water quality, with the less dilution meaning a higher sensitivity to change. Additionally, the table proposes that watercourses with a Water Framework Directive (WFD) designation are more sensitive than those that do not. This is again inaccurate, as WFD designation is a method of monitoring and classifying the ecological health of the water environment and not an indication of greater or lesser sensitivity to change. When determining the sensitivity of a watercourse, the applicant should ensure that professional judgement and the results of any surveys are also incorporated into the assessment.	The comment is noted. The methodology for determining watercourse sensitivity is set out in Table 11.3 of **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [EN010168/APP/6.1]**. This approach has been reviewed and supplemented by professional judgement and consideration of site-specific factors, including dilution potential and the characteristics of individual waterbodies. The assessment does not assume that WFD designation alone increases sensitivity, and higher Q95 flows were not treated as more sensitive without supporting evidence. The final sensitivity ratings are considered appropriate and proportionate to the scale and nature of the Scheme.
Environment Agency	Surface Water Quality	Table 10.4 proposes to use changes in WFD status as the key indicator for the magnitude of an impact. This approach also risks misrepresenting impacts from significant pollution and changes in water quality, which can cause detrimental effects on the local ecology without impacting the WFD status of the overall waterbody. This could be due to the duration of the change or the location of the impact in relation to monitoring locations used to classify individual element status. The applicant should also consider the duration, extent and severity of any water quality impacts when determining their magnitude.	The methodology presented in Table 11.4 of **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [EN010168/APP/6.1]** has been reviewed in light of this feedback. The assessment has considered not only potential changes in Water Framework Directive status but also the duration, extent and severity of any water quality impacts, including effects that may occur at a local scale or outside formal monitoring locations. The significance of effects has therefore been determined based on professional judgement, drawing on these additional factors as well as WFD status.
Environment Agency	Groundwater and Contamination Issues	We have reviewed the 'Environmental Impact Assessment Scoping Report' (July 2024), with particular focus on Chapter 10 Hydrology, Flood Risk and Drainage and Chapter 11 Ground Conditions and Contamination. We have also reviewed Appendix 11.1 Preliminary Geo-Environmental Risk Assessment (Land at Melksham Substation) (Delta-Simons, July 2024) and Preliminary Geo-Environmental Risk Assessment (Lime Down A to E) (Delta-Simons, July 2024). We provide the following comments on potential risks to groundwater and land contamination caused by the proposed development.	The Applicant notes this comment.
Environment Agency	Groundwater and Contamination Issues	There are some inconsistencies and factual inaccuracies in the Scoping Report. For example, the geological setting presented as Table 10.2 and Section 10.4.11 differ from those presented in Section 11.3 and the Preliminary Risk Assessments	Inconsistencies noted in the EA review have been noted and have been addressed within **ES Volume 3, Appendix 19-1 to 19-8: Lime Down Desk Studies [EN010168/APP/6.3]** and **ES Volume 1, Chapter 19: Ground Conditions [EN010168/APP/6.1].**

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		(PRA). Of concern, the Scoping Report and PRAs fail to mention highly sensitive geology present within the site boundary: • Lime Down B: an area of Ooidal limestone (Forest Marble Formation and Chalfied Oolite Formation) - Principal aquifer. Not mentioned in Sections 11.3.15, 11.3.17 or Appendix 11.3, Section 2.2 where the relevant geological setting is discussed. • Land at Melksham Substation: an area of Limestone (Forest Marble Formation) – Principal aquifer. This is not mentioned in Sections 10.4.21, 11.3.57, 11.3.60 or Appendix 11.1, Section 2.2 where the relevant geological setting is discussed. • Land at Melksham Substation is within a Drinking Water Groundwater Safeguard Zone. This is not mentioned in the Scoping Report. Furthermore: • Table 10.2 does not list all the geological formations present underlying Lime Down B, C or E areas. It also does not mention Source Protection Zones (SPZs) which would be relevant here. • Section 10.4.11 states “The bedrock geology is overlain by superficial deposits that support an ‘Unproductive’ aquifer across the Sites.” This is incorrect. Superficial deposits are in isolated bands and, where present, are Secondary A or Secondary undifferentiated aquifer. • Section 10.4.21 only mentions one bedrock formation when three are present in this area. There is reference to superficial geology which isn’t recorded on Environment Agency maps. The absence of superficial geology is noted in the PRA (Appendix 11.1). • Section 11.3.27 does not mention presence of superficial Head deposits. These are mentioned in the corresponding section of the PRA. • Superficial Head deposits are described throughout as a Secondary A aquifer. This is incorrect, it is a Secondary undifferentiated aquifer. • Appendix 11.3, Section 2.2, fails to mention superficial Alluvium in Lime Down A and bedrock Forest Marble Mudstone underlying Lime Down C. • Several historical landfill sites are adjacent to the Cable Route Search Corridor and at least one is within the Order limits. These are freely available to download from GOV.UK. These are not mentioned in any of the reports, albeit the PRAs do not cover the cable route area. Section 11.4.21 states, “based on the available information to date significant sources of contamination and therefore significant environmental effects have not been identified”. Historical landfill sites are a potential source of contamination and must be considered with respect to the proposed development. When refining the Cable Route Corridor, the potential presence of ground gas, ground water contamination and any ground stability issues relating to these landfills need to be considered. The potential presence of any associated infrastructure located outside of the boundary, such as drainage connections to foul sewer or environmental monitoring, also need to be considered. There are no active landfill sites in the vicinity of the site. • No comment is made on the potential presence or depth of groundwater in the Scoping Report. The PRA mentions a BGS borehole with an indicated groundwater level of 1.50m below ground level. This would have an impact on the potential for contamination to migrate into sensitive aquifers. Given the number of errors here, we are concerned that there might be other inaccuracies or omissions not yet noted.	

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Environment Agency	Groundwater and Contamination Issues	The Scoping Report makes no reference to guidance used regarding groundwater and contaminated land. Amongst other industry best practice guides, we strongly advise that these documents are used: • The Environment Agency's approach to groundwater protection (February 2018): The Environment Agency's approach to groundwater protection (publishing.service.gov.uk) - this is a useful document that provides an overview of the activities that are acceptable in SPZs. Protect groundwater and prevent groundwater pollution (March 2017): Protect groundwater and prevent groundwater pollution - GOV.UK (www.gov.uk).	Reference to appropriate best practice such as the Environment Agency's approach to groundwater protection (February 2018) and Protect groundwater and prevent groundwater pollution (March 2017) is outlined in Section 19.3 of **ES Volume 1, Chapter 19: Ground Conditions [EN010168/APP/6.1].**
Environment Agency	Groundwater and Contamination Issues	Two Preliminary Geo-Environmental Risk Assessments have been produced to date, one for Lime Down A to E, and one for Land and Melksham Substation. We expect to see a Preliminary Geo-Environmental Risk Assessment for the proposed cable route prior to approval of any works.	Preliminary Geo-Environmental Risk Assessments for the area covered by the cable route have now been produced and are appended to the ES within **ES Volume 3, Appendix 19-1 to 19-8: Lime Down Desk Studies [EN010168/APP/6.3].**
Environment Agency	Groundwater and Contamination Issues	"Suitable SuDS" is used as justification for scoping out construction risks to groundwater (Table 10.7). These therefore need to be in place before any construction commences. Construction of the SuDS would therefore need its own plan to mitigate against risks to groundwater at that time. Conventional SuDS are not generally suitable mitigation for contamination. Any scheme must be designed to prevent contamination entering the groundwater.	The Applicant acknowledges the comment regarding the use of SuDS in relation to construction-phase groundwater protection. For clarity, SuDS have not been relied upon as mitigation for contamination risks. Instead, measures to manage and mitigate potential contamination during construction are set out in the **Outline Construction Environmental Management Plan (CEMP) [EN010168/APP/7.12]**. These include appropriate controls on the storage and handling of fuels and chemicals, emergency spill response procedures, and measures to prevent contaminated runoff. The Outline CEMP forms the basis for a detailed CEMP to be developed and agreed with the relevant planning authority prior to the commencement of construction. The strategy ensures that construction activities, including the installation of any SuDS, will be undertaken in a manner that prevents contamination of groundwater.
Environment Agency	Groundwater and Contamination Issues	Impacts on groundwater during operation have been scoped out due to "the predominance of non-aquifer superficial deposits within the Cable Route Search Corridor". As mentioned above, this statement is incorrect as there are minimal superficial deposits across the site. We request that the applicant reassesses the risk, taking the correct ground conditions into account.	Since the scoping stage, the geological baseline has been updated and is presented in **ES Volume 3, Appendices 19-1 to 19-8: Lime Down Desk Studies [EN010168/APP/6.3]**. A full assessment of potential impacts on groundwater has been undertaken within **ES Volume 1, Chapter 19: Ground Conditions [EN010168/APP/6.1]**, taking into account the updated baseline conditions. This assessment concludes that, with the implementation of the mitigation measures set out in the **Outline OEMP [EN010168/APP/7.13]**, there are not considered to be any significant impacts on groundwater during the operational phase of the scheme
Environment Agency	Groundwater and Contamination Issues	Potential risks to groundwater from installing foundations (for solar panel frames, conversion units and inverters, fencing, substations and BESS) are not mentioned in the Scoping Report. These need to be considered and scoped in or out.	Risk to groundwater have been scoped into the ES Chapter. The foundations for all elements of the Scheme will be shallow in nature and do not represent a potential pathway for surface contaminants to deeper groundwater. Potential impacts to groundwater associated with the Scheme have been considered in **ES Volume 1, Chapter 19: Ground Conditions [EN010168/APP/6.1].** This assessment concludes that, with the implementation of the mitigation measures set out in the **Outline CEMP [EN010168/APP/7.12]**, there are not considered to be any significant impacts on groundwater during the operational phase of the scheme
Environment Agency	Groundwater and Contamination Issues	Section 13.6.3 states, "during the operation phase, the panels will be replaced at least once and the BESS at least twice". We expect to see an environmental management plan in place for these activities which employs the same or greater protection measures than that used for the construction phase.	Mitigation necessary for operational replacement activities has been outlined within the **Outline Operational Environmental Management Plan [EN010168/APP/7.13**], which includes a requirement for the preparation of a OEMP.

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Environment Agency	Groundwater and Contamination Issues	In Section 11.3.74, the applicant has acknowledged a public water supply within the proposed Cable Route Search Corridor. It is not clear if the search included private potable water abstractions, but these must also be considered. In Section 11.3.75 it is stated, "The presence of water abstractions from groundwater and surface water within/adjacent to the remaining Cable Route Search Corridor is not known at this stage and will be assessed as part of the ES chapter". We support the inclusion of this assessment in the Environmental Statement (ES). This inclusion is not reiterated in Table 10.4, which appears to apply to the whole site.	Risks to Private Water Supplies and other water abstractions, including those in the Cable Route Corridor, have been considered in **ES Volume 1, Chapter 19: Ground Conditions [EN010168/APP/6.1].**
Environment Agency	Groundwater and Contamination Issues	In Section 8.3.13 it states, "Techniques such as Horizontal Directional Drilling (HDD) may also be implemented to avoid damage to ecologically valuable habitats". This work could involve the use of drilling muds and their use may require risk assessment to ensure they do not pose a risk to controlled waters. In the Scoping Report, HDD is not discussed in the context of groundwater and land contamination. This is a disappointing omission. We expect this assessment to be included in the Construction Environmental Management Plan (CEMP) or EIA. A drilling fluid breakout will also be required for any HDD activities. Where the placement of cables takes place in land affected by contamination, the management of the waste material will need to be carefully managed.	The Applicant acknowledges the importance of assessing the potential risks associated with Horizontal Directional Drilling (HDD) and other trenchless techniques. Best practice relating to the use of trenchless techniques is discussed in Section 19.10 of **ES Volume 1, Chapter 19: Ground Conditions [EN010168/APP/6.1]**, and further detail on the management of these activities is provided in the **Outline Construction Environmental Management Plan (CEMP) [EN010168/APP/7.12]**. Where trenchless techniques, such as HDD, are proposed in locations where there is potential to affect groundwater or where works intersect land affected by contamination, appropriate mitigation measures will be secured within the Outline CEMP. These will include, where necessary, the preparation of a drilling fluid breakout plan and specific protocols for the management of any arisings from contaminated land. All trenchless excavation activities will be undertaken in accordance with relevant best practice and industry standards, including BS 5930:2015 Code of Practice for Ground Investigations and BS EN 16228-3 Drilling and Foundation Equipment – Safety – Part 3: Horizontal Directional Drilling Equipment (HDD). These measures will ensure that risks to controlled waters are appropriately managed and mitigated.
Environment Agency	Groundwater and Contamination Issues	The geology underlying the Land at Melksham Substation has been incorrectly recorded in the Scoping Report and PRA. The central part of the BESS site is underlain by a Principal aquifer and is within SPZ1, associated with a potable water abstraction 145m northeast. This area is within a Drinking Water Groundwater Safeguard Zone, which is not mentioned in the Scoping Report. Safeguard zones are established around public water supplies where additional pollution control measures are needed. These comments also apply to Lime Down D which is also partially within SPZ1.	The Applicant acknowledges the comment regarding the underlying geology and hydrogeological sensitivity at the Land at Melksham Substation and Lime Down D. Since the publication of the Scoping Report, the baseline has been updated and is presented in **ES Volume 3, Appendices 19-1 to 19-8: Lime Down Desk Studies [EN010168/APP/6.3]**. The protection of groundwater resources, including the presence of a Principal Aquifer, Source Protection Zone 1 (SPZ1), and Drinking Water Groundwater Safeguard Zone beneath the Battery Energy Storage System (BESS) site, has been fully considered in **ES Volume 1, Chapter 19: Ground Conditions [EN010168/APP/6.1]**. This assessment has informed the identification of appropriate mitigation measures to ensure the protection of sensitive receptors, including potable water abstractions, during both construction and operation.
Environment Agency	Groundwater and Contamination Issues	As such, we request that the scoping report be revised, or the potential impact on groundwater, SPZ1 and potable water abstraction from the BESS site is scoped into the EIA. When the scheme details are finalised, it will be important to ensure that the proposed activities are compliant with our groundwater protection policies, in particular, in relation to SPZs.	The Applicant acknowledges the comment regarding the underlying geology and hydrogeological sensitivity at the Land at Melksham Substation and Lime Down D. Since the publication of the Scoping Report, the baseline has been updated and is presented in **ES Volume 3, Appendices 19-1 to 19-8: Lime Down Desk Studies [EN010168/APP/6.3]**. The protection of groundwater resources, including the presence of a Principal Aquifer, Source Protection Zone 1 (SPZ1), and Drinking Water Groundwater Safeguard Zone beneath the Battery Energy Storage System (BESS) site, has been fully considered in **ES Volume 1, Chapter 19: Ground Conditions [EN010168/APP/6.1]**.

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			This assessment has informed the identification of appropriate mitigation measures to ensure the protection of sensitive receptors, including potable water abstractions, during both construction and operation.
Environment Agency	Groundwater and Contamination Issues	The BESS site will require a sealed drainage system to be in place to contain and manage any fire-fighting effluent or contaminated surface waters generated by a fire at the site. The National Fire Chief's Council has published detailed guidance on recommended fire protection measures for BESS sites. We recommend the applicant refers to this when designing the scheme: Grid Scale Battery Energy Storage System planning – Guidance for FRS (nfcc.org.uk).	The Applicant acknowledges the importance of appropriate drainage and fire water management at the BESS site. Routine surface water runoff from the BESS and associated compounds will be managed through a drainage strategy designed to provide appropriate treatment and prevent pollution. Details of the proposed drainage strategy, including measures to manage routine runoff and potential contaminants, are provided in **ES Volume 3, Appendix 11: Flood Risk Assessment and Drainage Strategy [EN010168/APP/6.3]**. The Applicant is aware of the National Fire Chiefs Council (NFCC) guidance: Grid Scale Battery Energy Storage System Planning – Guidance for Fire and Rescue Services and will continue to take this into account during the detailed design stage. The final design will ensure that appropriate measures are in place to contain and manage fire-fighting effluent or other contaminated surface water arising in the event of an incident.
Environment Agency	Groundwater and Contamination Issues	We are not satisfied with the site descriptions presented, or the conclusions made. Section 11.5 concludes that all risks to sensitive land uses and groundwater can be scoped out. We disagree with this conclusion as it is based on incorrect information.	The Applicant acknowledges the concerns raised regarding the site descriptions and conclusions in Section 11.5 of the Scoping Report. In response, the Environmental Statement provides an updated and more detailed assessment. Risks to sensitive land uses and groundwater have been fully considered in **ES Volume 1, Chapter 19: Ground Conditions [EN010168/APP/6.1]**. With the implementation of the mitigation measures set out in the **Outline Construction Environmental Management Plan (CEMP) [EN010168/APP/7.12]**, the assessment concludes that any potential impacts to sensitive land uses and groundwater are not considered to be significant
Environment Agency	Groundwater and Contamination Issues	Geological descriptions are incomplete. The presence of Source Protection Zones, including SPZ1 (unconfined), has been ignored. Historical landfill sites within and adjacent to the site boundary have not been acknowledged.	Geological conditions, including location of SPZs and historical landfill sites, have been updated and included within **ES Volume 3, Appendix 19-1 to 19-8: Lime Down Desk Studies [EN010168/APP/6.3]**.
Environment Agency	Groundwater and Contamination Issues	We agree that many of the construction risks can be managed through an effective CEMP; however we are concerned that such a plan will not be sufficient if it is based on the wrong information. In principle a detailed CEMP could be sufficient to scope out most risks to groundwater. However, if "Suitable SuDS" is used as justification for scoping out construction risks to groundwater, these therefore need to be in place before any construction commences. Conventional SuDS are not generally suitable mitigation for contamination. Any scheme must be designed to prevent contamination entering the groundwater.	Since the publication of the Scoping Report, the baseline has been updated and is presented in **ES Volume 3, Appendices 19-1 to 19-8: Lime Down Desk Studies [EN010168/APP/6.3]**. Risks to sensitive land uses and groundwater have been fully assessed in **ES Volume 1, Chapter 19: Ground Conditions [EN010168/APP/6.1]**. For clarity, Sustainable Drainage Systems (SuDS) are not relied upon as a mitigation measure for contamination. Instead, potential risks to groundwater during construction will be managed through the implementation of appropriate mitigation measures, as set out in the **Outline Construction Environmental Management Plan (CEMP) [EN010168/APP/7.12]**. With these mitigation measures in place, the assessment concludes that impacts to groundwater and sensitive receptors are not considered to be significant.
Environment Agency	Groundwater and Contamination Issues	The only mitigation listed under "Mitigation Measures" (sections 11.4.23 to 11.4.28) are the CEMP, Discovery Strategy, and bunded fuel tanks and chemicals. SuDS is discussed in Chapter 10 (Hydrology, Flood Risk and Drainage), but not Chapter 11 (Ground Conditions and Contamination). We would like to see further consideration of the risks before agreeing to the conclusions on what should be scoped in or out.	Further detail regarding proposed mitigation has been provided within **Chapter 19: Ground Conditions [EN010168/APP/6.1]** and **Chapter 11: Hydrology, Flood Risk and Drainage [EN010168/APP/6.1]**.
Environment Agency	Groundwater and Contamination Issues	In Section 11.5.1, the applicant states "it is proposed that Lime Down A to E and Land at Melksham Substation be scoped out of further consideration in the ES." We assume that this statement only refers to Ground Conditions and Contamination, however this is not explicitly clear. We disagree with the applicant's conclusion for the reasons given in this response.	The Applicant confirms that the statement in Section 11.5.1 of the Scoping Report refers specifically to ground conditions and contamination. In response to the comments received, ground conditions across the full Scheme area — including Lime Down A to E and Land at Melksham Substation — have been assessed in **ES Volume 1, Chapter 19: Ground Conditions [EN010168/APP/6.1]**. This

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			ensures a comprehensive understanding of baseline conditions and potential impacts across the entire site.
Environment Agency	Groundwater and Contamination Issues	In Section 11.5.2, the applicant states that risks from the cable route are temporary and limited to construction workers. The type of cables to be used in the Scheme have not been specified. If fluid-filled cables are proposed, pollution prevention from such cables should be included in the CEMP. If HDD is used through any of the unconfined SPZs, we expect to see controls in place to manage fluid breakout. Historical landfill sites within the site and adjacent to the site boundary must also be considered.	The Scheme will not use fluid filled cables. Measures to manage and mitigate risks from cable installation are outlined in the **Outline CEMP [EN010168/APP/7.12]**.
Environment Agency	Water Resources	There exist abstractions for potable water supply within the site boundary and almost all of the site is within SPZ1 or SPZ2. There is insufficient evidence to agree that mobilisation of ground contamination should be scoped out at this stage. This is the conclusion presented in both the Hydrology, Flood Risk and Drainage (Table 10.6) and Ground Conditions and Contamination (Table 10.4) sections.	The Applicant acknowledges the presence of potable water abstractions close to the site boundary and parts of the Scheme falling within Source Protection Zones (SPZ) 1 and 2. The potential for the mobilisation of ground contamination affecting these abstractions has been fully considered in **ES Volume 1, Chapter 19: Ground Conditions [EN010168/APP/6.1]**. Further detail is provided in **ES Volume 3, Appendices 19-1 to 19-8: Lime Down Desk Studies [EN010168/APP/6.3]**, which identify the locations of the SPZs and confirm that surface water infrastructure has been designed to prevent infiltration in these sensitive areas. With the implementation of the mitigation measures set out in the **Outline Construction Environmental Management Plan (CEMP) [EN010168/APP/7.12]**, the assessment concludes that the risk of mobilisation of contamination and resulting impacts on potable abstractions are not considered to be significant.
Environment Agency	Water Resources	Potable water supply is identified by the Scoping Report as having very high sensitivity and potentially major adverse magnitude as set out in the approach and method section of the Hydrology, Flood Risk and Drainage chapter. We recommend that this remains scoped into the assessment. The justification of good practices and pollution prevention techniques secured by the CEMP preventing pathways seems premature without further investigation of the risk and details of specific mitigation.	Potable water supply is recognised as a highly sensitive receptor and has been assessed in **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [EN010168/APP/6.1]**. The assessment concludes that there is no plausible pathway for contamination during operation and that the risk during construction is negligible provided standard pollution prevention measures are implemented. These measures will be secured through the **Outline CEMP [EN010168/APP/7.7]**.
Environment Agency	Water Resources	The Scoping Report does not include any reference to the consumptive use of water in construction or operation phases of the development (with reference to 5.16.7 of the NPS EN-01). However, other chapters (e.g. transport and access) make reference to the use of water for dust suppression and wheel washing facilities.	The use of water during construction and operation has been assessed in **ES Volume 7, Outline Water Resources Strategy [EN010168/APP/7.25]** and summarised **in ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [EN010168/APP/6.1].** The assessment confirms that water consumption for activities such as dust suppression, wheel washing and welfare facilities will be limited, with supply sourced from existing licensed water providers. No significant effects on local water resources are anticipated, and consumption is compliant with the principles set out in NPS EN-1 paragraph 5.16.7.
Environment Agency	Water Resources	The use of water from the local environment will be subject to an abstraction licence if it exceeds 20m3 per day. There is surface water availability on the Bristol and Avon catchment, however conditions to protect low flows may restrict access during prolonged dry weather. More information can be found in the abstraction licensing strategy.	The Applicant will secure all relevant permits prior to construction in line with the **Outline Construction Environmental Management Plan [EN010168/APP/7.12]**. Where any construction water use would exceed 20 m³/day, an abstraction licence will be obtained from the Environment Agency, noting that access may be subject to hands-off-flow conditions under the Agency's abstraction licensing strategy. The approach to obtaining any abstraction licence (and other consents) is set out in the **Consents and Agreements Position Statement [EN010168/APP/7.7]**.
Environment Agency	Water Resources	Consumptive uses of water for construction should not be underestimated and we recommend that all water demands, the impacts on potential sources of supply (including potable supply if applicable) are evaluated at the EIA stage.	A **Water Resources Assessment [EN010168/APP/7.26]** has been undertaken which provides an early-stage evaluation of quantities of water required for the Scheme during construction and operation, and the likely resource for these demands. Water demand during construction has been considered in **ES Volume 1, Hydrology, Flood Risk and Drainage [EN010168/APP/6.1].** This includes all

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			relevant sources and uses, including any temporary abstraction or reliance on public potable supply.
Environment Agency	Water Resources	Dewatering activities are not described in the Scoping Report, however there is below ground excavation required for foundations and below ground cables. Whilst water demands are unknown, it is difficult to confirm whether abstraction licences will be required. If dewatering is necessary, it will require an abstraction licence if it doesn't meet the criteria for exemption in The Water Abstraction and Impounding (Exemptions) Regulations 2017 Section 5: Small scale dewatering in the course of building or engineering works. It may also require a discharge permit if it falls outside of the Environment Agency regulatory position statement for de-watering discharges. If abstraction or impoundment licences are required, the determination period is up to 3 months, 4 months if advertising is necessary. A water resources assessment at the EIA stage could help to identify and problem solve any obvious obstacles and design implications and may help to expedite the permitting process later on. If dewatering will take place, and it can be demonstrated to be discharged to the same source of supply without intervening use (i.e. non-consumptive), this will increase the likelihood of a licence being granted.	The Applicant will secure all relevant permits prior to construction in line with the **Outline Construction Environmental Management Plan [EN010168/APP/7.12]**. Where any construction water use would exceed 20 m^3/day, an abstraction licence will be obtained from the Environment Agency, noting that access may be subject to hands-off-flow conditions under the Agency's abstraction licensing strategy. The approach to obtaining any abstraction licence (and other consents) is set out in the **Consents and Agreements Position Statement [EN010168/APP/7.7]**.
Environment Agency	Biodiversity	We note that a WFD Assessment will be conducted (Section 10.7.3). This should include an assessment of any potential impacts (such as sediment pollution) to watercourses on-site and the potential to impact hydrologically linked watercourses, which may therefore also impact the biodiversity that relies on these watercourses.	A WFD Assessment has been undertaken and considers potential impacts to on-site and hydrologically linked watercourses, including risks such as sediment pollution. This is provided in **DCO Volume 7, Water Framework Directive Assessment [EN010168/APP/7.11]**.
Environment Agency	Biodiversity	The Avon Bristol Rural Operational Catchment is hydrologically connected to the Severn Estuary, thus there is the possibility of pollutants from the site making their way to the Severn Estuary. Therefore, we recommend that the applicant scopes in the Severn Estuary Special Area of Conservation, Special Protection Area and Ramsar as a potential ecological receptor in Table 8.8.	The Applicant notes this comment. The Severn Estuary SPA and Severn Estuary Ramsar have been scoped into the assessment presented within **ES Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1]**.
Environment Agency	Biodiversity	It is to our knowledge that beavers are currently moving through the Bristol Avon catchment and they may be present within the site boundary in the near future. Beavers are designated a European protected species under the Conservation of Habitats and Species Regulations 2017 (as amended), therefore, we advise the applicant to consider beavers in the same way as otter and water vole, by scoping beavers in as a potential ecological receptor, and conducting a species-specific survey.	The Applicant notes that beavers are known to be present within the wider catchment of the River Avon. Beavers have been scoped into the assessment within **ES Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1]**
Environment Agency	Biodiversity	It is positive to read that habitat and protected species surveys have commenced in 2023 and 2024 (Section 8.3.46 and 8.3.52). However, it appears that the applicant has not provided a copy of the Preliminary Ecological Appraisal (PEA) report, results from the UKHAB survey or results from completed species surveys (such as great crested newt and eDNA surveys or water vole and otter surveys) as part of the appendices. Therefore, we are unable to comment on the methodology or the results of the surveys at this stage.	Detailed methodologies and findings from all ecological surveys, including UKHab surveys as well as species-specific surveys used to underpin **ES Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1]** are provided in **ES Volume 3, Appendices 9-1 to 9-7 [EN010168/APP/6.3]**.
Environment Agency	Biodiversity	We note that detailed surveys for aquatic invertebrates will not be conducted as detrimental impacts to inverts are considered to be low (Section 8.3.52). However, we hold multiple records of white-clawed crayfish just outside the site on the River Avon, Gauze Brook and By Brook; therefore, it can be reasonably assumed that the species may be present on the site. We encourage the applicant to consider the impact of pollution and siltation on white-clawed crayfish and consider conducting an aquatic invertebrate survey.	Impacts on invertebrates, including white-clawed crayfish are assessed in **ES Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1].** Detailed surveys for aquatic invertebrates are not proposed on the basis that their presence has been assumed in all suitable habitat, that impacts can be confidently assessed applying the precautionary principle, and that impacts are very likely to be low as suitable habitat will be predominantly retained and protected.
Environment Agency	Biodiversity	It is positive to read that the applicant intends to apply the mitigation hierarchy (Section 8.5.8). However, we note that this section seems to define the meaning of mitigation, compensation and enhancement (and circumstances where they	The Applicant acknowledges that some measures, such as seasonal timing and the use of an Ecological Clerk of Works (ECoW), are currently outlined at a high level. Further detail will be provided prior to construction as part of the detailed

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		may be applied) rather than outline any specific mitigation or enhancement plans for the scheme. The applicant refers to the possibility of applying seasonal timings and having an ECoW present during construction (Section 8.3.14), however these comments lack detail at this stage.	design process and through the development of the final Construction Environmental Management Plan (CEMP). An Outline CEMP [EN010168/APP/7.12] has been submitted as part of the DCO Application.
Environment Agency	Biodiversity	We note that the applicant intends to provide an 8-metre buffer from ditches and watercourses (Table 7.7). We recommend the provision of a 10-metre buffer from watercourse bank-tops as a minimum, to effectively protect the watercourse from sediments, enable bank stabilisation through vegetation establishment and allow space for commuting by mammals. However, where natural geomorphic processes take place (such as lateral channel migration), we advise the applicant to consider buffers greater than 10-metres in some locations where watercourse migration is identified, if appropriate and where feasible.	A meeting was held with the EA on 7th October 2024. At this meeting it was agreed that a minimum buffer of 8 metres from bank tops of ditches was sufficient. The minimum 10 metres buffer applies to those features classified as rivers and streams. The Scheme has adopted a minium buffer of 8 metres from ditches and 15 metres from rivers and streams as shown on **ES Volume 3, Appendix 9-8 Schedule of Protective Ecological Buffers [EN010168/APP/6.3].**
Environment Agency	Biodiversity	Section 8.4.2 highlights the risk of habitat fragmentation by culverts. Any culverting of a watercourse or waterbody can impact the dispersal of some organisms, for example, they can act as a barrier to fish species and otters. Therefore, we would oppose to the culverting of any watercourse. If vehicle crossings need to be constructed, we recommend the construction of open-span structures (such as bridges). It is positive to read that the applicant is considering crossing watercourses via HDD (Section 8.2.13). However, we recommend against conducting HDD at night (as mentioned in Section 4.3.4) due to the potential disturbance of nocturnal protected species. If culverts are currently present on the site, we recommend the opening-up of these culverts where feasible.	The Applicant notes this comment. The Scheme has been designed to minimise requirements for culverts wherever practicable. A crossing schedule (within **ES Volume 3, Appendix 11-1: Flood Risk Assessment and Drainage Strategy Covering Report [EN010168/APP/6.3**]) has been prepared detailing the location and type of crossings proposed for both cables and access, including where HDD is proposed to limit impacts on aquatic/riparian species. Impacts on aquatic/riparian species as a result of new crossings are assessed in **ES Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1],** which has concluded that no significant impacts are likely.
Environment Agency	Biodiversity	It is positive to read that the risk of spreading Invasive Non-native Species (INNS) has been considered (Section 10.6.2). We note that no INNS were detected on site (Section 8.3.59); however, we hold records of Himalayan balsam within the Cable Route Search Corridor, Japanese Knotweed within Lime Down E and the Cable Route Search Corridor, and Canadian waterweed within the Cable Route Search Corridor near Pond Close Farm. We also hold records of INNS just outside the site boundary, including Nuttall's waterweed on an unnamed main river outside the Cable Route Search Corridor, Least duckweed at Yatton Keynell, Himalayan balsam and Giant hogweed both along an unnamed main river at Lacock. Therefore, we recommend that INNS pre-construction surveys are completed, and that the applicant submits a Biosecurity Method Statement and Invasive Species Management Plan alongside the Development Consent Order (DCO) application for the proposed development.	Appropriate biosecurity measures designed to prevent the spread of INNS are prescribed within the **(Outline EPMS) [EN010168/APP/7.19]**. These measures include pre-construction inspections and method statements, as well as a framework for development of an INNS Management Plan should any INNS be encountered during construction.
Environment Agency	Fisheries	The Salmon & Freshwater Fisheries Act 1975, The Eels (England and Wales) Regulations 2009, and the Water Environment (Water Framework Directive) (England and Wales) Regulations 2017 have not been included in the list of legislation that is relevant to biodiversity. This Act and these Regulations should be considered and included as relevant in the Preliminary Environmental Information Report (PEIR) and ES.	Noted. The legislation is listed within **ES Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1].**
Environment Agency	Fisheries	The extensive watercourse network should be considered when undertaking further habitat surveys. Cable routes that cross the extensive watercourse network could have an adverse impact on sensitive fish species through increase noise from construction activities, magnetic fields from buried cables and an impact from the footprint of the crossing on sensitive spawning grounds. Cable crossings of any watercourse should be avoided in the first instance. If crossings cannot be avoided then full details which specify how the crossing will not adversely impact fish must be detailed with the CEMP, Decommissioning Environmental Management Plan (DEMP) and ES.	Potential impacts on fish arising from cable crossings are assessed in **ES Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1].** A method statement for prescribing measures to minimise adverse impacts on sensitive fish resulting from cable crossings is included with the **(Outline EPMS) [EN010168/APP/7.19].**

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Environment Agency	Fisheries	HDD is included as a method that could be implemented to minimise impacts to watercourses. However, such activities may disturb fish during key periods of migration and spawning and in extreme cases noise may kill fish. The EIA should include an assessment on the risk of fish populations within main rivers being impacted by noise and vibration from construction and decommissioning. This assessment should be included in the Noise and Vibration chapter of the PEIR and ES. Mitigation and management of any impacts should be detailed in the CEMP and DEMP.	Potential impacts on fish arising from cable crossings are assessed in **ES Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1].** A method statement for prescribing measures to minimise adverse impacts on sensitive fish resulting from HDD activities, including from noise and vibration impacts, is included with the **Outline EPMS [EN010168/APP/7.19].**
Environment Agency	Fisheries	Table 8.6 identifies ecological receptors likely to be sensitive to construction, operational and decommissioning phase impacts. We recommend that fish are included in this as a potential receptor for each source of impact.	Fish have been included as a potential receptor for each source of impact, with an assessment of impacts on fish, including identification of mitigation measures, set out in **ES Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1]**.The **Outline Ecological Protection and Mitigation Strategy (Outline EPMS) [EN010168/APP/7.19]** prescribes specific mitigation measures to avoid adverse impacts on fish.
Environment Agency	Fisheries	Beneficial effects to fish could also include the development of buffer strips which will improve the marginal and in-channel habitat and reduce fine sediment and diffuse pollution.	The Applicant notes this comment.
Environment Agency	Fisheries	We recommended that the Severn Estuary Ramsar site should be scoped in as an 'Ecological receptor' due to the presence of European eel in some of the watercourses within the proposed development site. The site is therefore functionally linked to the Severn Estuary Ramar and the Severn Estuary Site of Special Scientific Interest (SSSI).	The Applicant notes this comment. The Severn Estuary Ramsar site has been scoped into the assessment presented within **ES Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1]**.
Environment Agency	Fisheries	The use of culverts as temporary and permanent watercourse crossings can impact fish populations through migration barriers and habitat loss both in-channel and marginal. Culverting also impacts on fish habitat and spawning habitat by decreasing the quality of substrate. The Environment Agency therefore opposes the culverting of any watercourse and would prefer the installation of a clear full span crossing that maintains the natural substrate and allows free passage of fish.	The Scheme has been designed to minimise requirements for culverts wherever practicable. A crossing schedule (within **ES Volume 3, Appendix 11-1: Flood Risk Assessment and Drainage Strategy Covering Report [EN010168/APP/6.3**]) has been prepared detailing the location and type of crossings proposed for both cables and access, including where HDD is proposed to limit impacts on fish species. Impacts on fish as a result of new crossings are assessed in **ES Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1],** which has concluded that no significant impacts are likely.
Environment Agency	Fisheries	If sections of watercourses are required to be coffer dammed during the temporary works, a fish rescue will need to be undertaken, and Authorisation issued under Section 27 of the Salmon and Freshwater Fisheries Act 1975. In addition to this, any de-watering pumps will need to be adequately screened to prevent the impingement or entrainment of fish in accordance with the Eels (England and Wales) Regulations 2009. Furthermore, any over-pumping of waterbodies could cause loss of flow or desiccation of a reach which would lead to loss of fish habitat and mortality. Should any over-pumping occur measures must be in place to ensure that fish are not harmed, or habitat it not lost.	The Applicant notes this comment. The **Outline EPMS [EN010168/APP/7.19]** prescribes specific mitigation measures to avoid adverse impacts on fish, including the timing of works to avoid sensitive spawning season for trout and the capture and translocation of fish away from the working area **ES Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1]** sets out how watercourses likely to support eels will be crossed via HDD methods, avoiding loss of habitat, risk of mortality, and the requirement for fish rescue.
Environment Agency	Fisheries	An increase in fine sediment/ silt in watercourses would smother important spawning gravels, clog interstitial spaces in gravel, impact on fish egg and larval development and reduce all fish's ability to respire by the clogging of gills. The CEMP, Landscape and Ecological Management Plan (LEMP), and DEMP must detail the following mitigation: • Robust silt control measures such as, but not limited to, buffer strips, barriers, SuDS ponds. A method of works which make sure construction is stopped if unacceptable silt run off were to occur.	The **Outline CEMP [EN010168/APP/7.12], Outline DS [EN010168/APP/7.14] Outline LEMP [EN010168/APP/7.18]** and **Outline EPMS [EN010168/APP/7.19]** prescribes robust good-practices measures designed to minimise the risk of pollutants, including silt, entering watercourses and a requirement to stop works if necessary.

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Environment Agency	Fisheries	A WFD assessment will need to consider impacts to fish classifications in downstream waterbodies. Tributaries of the Bristol Avon River (such as the Gauze and Rodbourne Brooks) will provide spawning and juvenile habitat for brown trout which will migrate into the wider catchment. Therefore wider consideration of WFD impacts will be necessary. The development must ensure that there is no deterioration in WFD status due to construction, operation and decommissioning.	WFD impacts, including potential effects on downstream fish habitats such as the Gauze and Rodbourne Brooks, have been assessed within the **Water Framework Directive Assessment [EN010168/APP/7.11]** and are summarised in **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [EN010168/APP/6.1].** The assessment concludes that there would be no deterioration in WFD status of any waterbody as a result of construction, operation or decommissioning, and no significant effects on fish classifications or habitat availability are predicted.
Environment Agency	Geomorphology	Although effects on the water environment due to increased sediment loading and accidental spills have been scoped out using a CEMP, a risk remains, and the possible pathways have not been fully investigated. The items proposed to be scoped out in Table 10.7 should remain scoped in at the current time.	Potential geomorphological effects from sedimentation and accidental spills have been assessed in **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [EN010168/APP/6.1]**. The assessment concludes that, with implementation of standard pollution prevention and sediment control measures secured through the **Outline CEMP [EN010168/APP/7.7]**, the risk of geomorphological impacts is negligible and no significant effects are predicted.
Environment Agency	Geomorphology	It is positive that a cumulative assessment will be undertaken, but this also needs to consider the “source to sea” effects that the development may have. The applicant may need to consider mitigation to change “negligible negative” effects of the development into positive enhancements that would reduce the cumulative effects of existing and future developments both up and downstream.	Cumulative and source-to-sea geomorphological effects are assessed in **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [EN010168/APP/6.1]**. Opportunities for mitigation and enhancement to reduce residual effects are included in **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [EN010168/APP/6.1].**
Environment Agency	Geomorphology	Any infrastructural developments on river/ floodplain environments should be designed and delivered to have a minimal impact on natural river dynamics (e.g. erosion, deposition, meander migration etc.) and should not place any significant limitations on future river restoration projects. The applicant should avoid unnecessary interference with natural processes. We encourage use of trenchless techniques such as HDD to minimise the likelihood of cables entering the water environment. The applicant should also avoid preventing delivery of current and future mitigation measures, for example, avoid bringing cables to surface level in floodplains earmarked for future river restoration.	The Proposed Development has been designed to minimise disruption to river dynamics and avoid impacts to potential future restoration areas. The Cable Route Corridor, which includes trenchless crossings such as HDD, is described in **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [EN010168/APP/6.1].**
Environment Agency	Geomorphology	If river crossings (bridges, culverts, and buried cables) are required as part of the development, we would expect to see geomorphologically robust designs that will cause minimal impacts on natural fluvial processes operating in the river/ floodplain environment over the course of the 21st century. Therefore, it should we ensured that watercourse crossing design is informed by assessment of fluvial processes and geomorphology. For example, depth of HDD crossing should consider the likelihood of vertical channel change	Potential geomorphological impacts of watercourse crossings have been assessed at a high level within **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [EN010168/APP/6.1]**, which confirms that trenchless crossing techniques such as HDD are considered practicable in principle and will be prioritised where appropriate to minimise disturbance to watercourse beds and banks. Final design of watercourse crossings, including the selection of crossing methods and depth, will be informed by further assessment of fluvial processes and geomorphology. The design and implementation of crossings are subject to controls secured through the Development Consent Order. Discussions are ongoing with the Environment Agency and Lead Local Flood Authority regarding the wording of protective provisions to ensure that sufficient safeguards are secured in the DCO in the context of the proposed disapplication of ordinary watercourse consents and environmental permits.
Environment Agency	Geomorphology	The applicant should avoid designs which present legacy risks to natural processes and geomorphology beyond the project lifespan. For example, infrastructure such as access tunnels/shafts which are left in-situ after decommissioning could be exposed by future channel/bank erosion or river movement, becoming an impediment to natural processes.	Design of infrastructure within or near watercourses will avoid introducing legacy risks to geomorphological processes post-decommissioning. Further consideration of long-term impacts are set out within **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [EN010168/APP/6.1].**
Environment Agency	Geomorphology	Any potential construction, operational, and decommissioning phase impacts that the proposed scheme may have on the river must be subject to a WFD Assessment that is to our satisfaction. Therefore, the applicant should consider opportunities to deliver WFD mitigation measures as part of the design.	A **Water Framework Directive Assessment [EN010168/APP/7.11]** has been submitted as part of the DCO Application. This includes consideration of potential construction, operational, and decommissioning impacts that the Proposed Development may have on watercourses. Opportunities to contribute to WFD mitigation are summarised in **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [EN010168/APP/6.1]**.

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Environment Agency	Geomorphology	Geomorphologically dynamic behaviour is deemed likely to intensify in the next decades in line with Flood Estimation Handbook (Flood Estimation Handbook (FEH) | UK Centre for Ecology & Hydrology (ceh.ac.uk). Therefore, any infrastructure developments should also take some account of the likelihood for increased lateral and vertical river dynamics anticipated to result from continued hydro-climatic intensification (e.g. 'a flood-rich epoch') over the remainder of the 21st century (i.e., future proofed designs that are not just based on present-day baseline geomorphological configuration/ behaviour).	**ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [EN010168/APP/6.1]** assesses the impact of climate change in line with current guidance and best practice. This sets out how potential changes to channel form and geomorphological behaviour have been considered within the design of the Proposed Development.
Environment Agency	Geomorphology	The applicant should note that WFD applies to all surface waterbodies, not just those designated for monitoring purposes.	Advice noted. All surface waterbodies (not just those designated for monitoring) have been considered in the **Water Framework Directive Assessment [EN010168/APP/7.11].**
Environment Agency	Geomorphology	The applicant should also note that Biodiversity Net Gain (BNG) guidelines indicate that structures built within 10-metre of the bank top of a watercourse qualify as encroachment, which may affect the uplift score calculated using the BNG Watercourse metric.	Advice noted. Watercourse and Riparian encroachment has been taken into account within the BNG calculations as set out in the **Biodiversity Net Gain (BNG) Assessment Report [EN010168/APP/7.8]**
Environment Agency	Appendix 1 Environmental Permitting – Advice to Applicant	The EA provide advice on when permitting is required and directs the Applicants attention to relevant guidance.	Noted. The Applicant will ensure that all relevant environmental permits are in place prior to construction of the Proposed Development in line with the **Outline CEMP [EN010168/APP/7.12].**
Environment Agency	Appendix 2 Environmental betterment opportunities – advice to applicant	BNG will become a legal requirement for NSIPs in November 2025. It is positive to read that a BNG assessment will form part of the ES chapter and a net gain of at least 10% is intended to be demonstrated by the Scheme. You should deliver a greater percentage of BNG where it is feasible.	The Applicant notes this comment. Full details of the BNG assessment can be found in the **Biodiversity Net Gain (BNG) Assessment Report [EN010168/APP/7.8].** he assessment concludes the Scheme is expected to deliver an uplift of 34.75%, 12.31% and 20.08% in habitat units, hedgerow unit and watercourse units respectively.
Environment Agency	Appendix 2 Environmental betterment opportunities – advice to applicant	It is positive to read that you have conducted a habitat survey using the UKHABs Classification System (Table 8.1), which provides accurate habitat identification data for the BNG Metric. You should use the latest statutory (official) version of the biodiversity metric tool to calculate BNG. We also encourage the use of the Watercourse Metric (where appropriate).	The most up-to-date version of the Metric (The Statutory Biodiversity Metric), inlcuding the Watercourse element of the Metric,has been used to calculate BNG.. Full details of the BNG assessment can be found in the **Biodiversity Net Gain (BNG) Assessment Report [EN010168/APP/7.8].**
Environment Agency	Appendix 2 Environmental betterment opportunities – advice to applicant	We encourage you to deliver wetland habitat enhancements as part of BNG delivery. We also encourage habitat enhancements to be delivered ahead of project completion, if possible, to provide habitats sooner. The biodiversity metric rewards units if enhancements are delivered early, which therefore provides an incentive.	The Applicant notes this comment. Full details of the BNG assessment can be found in the **Biodiversity Net Gain (BNG) Assessment Report [EN010168/APP/7.8].**
Environment Agency	Appendix 2 Potential BNG opportunities	There could be opportunities for environmental betterment and BNG through supporting the delivery of local projects such as the Gauze Brook Restoration Project (led by Hullavington Environment Group) and the Magnificent Marden Project (led by the Bristol Avon Rivers Trust) with the aim of restoring sections of rivers for biodiversity. We also advise you to refer to the 'Bristol Avon Catchment Partnership: Catchment Plan 2022-2027' which details actions to improve the catchment.	The Applicant notes this comment.
Environment Agency	Appendix 2 Potential BNG opportunities	Somerset Council have been appointed the responsible authority to develop the Local Nature Recovery Strategy. The Council is currently in the process of drafting a strategy, which it aims to publish in early 2025 following consultation. We advise that you refer to this strategy to inform decisions on where to site off-site BNG delivery and potential enhancements.	The draft Wiltshire LNRS (made available in March 2025) has been used to determine strategic significance for baseline and post-development BNG calculations. This is detailed the **Biodiversity Net Gain (BNG) Assessment Report [EN010168/APP/7.8].**
Grittleton Parish Council	Transport and Tourism Trade	The proposed solar park lies outside of the Parish, however the Parish will be significantly affected by the proposed transport route and potentially any impact on the areas Tourism Trade.	Proposed construction vehicles routes are set out within **ES Volume 1, Chapter 13: Transport and Access [EN010168/APP/6.1]**. These will be controlled through a CTMP which will be in substantial accord with the **Outline CTMP [EN010168/APP/7.22]** and is secured under a requirement of the **Draft DCO [EN010168/APP/3.1]**. Grittleton is on the construction route but the aim of the

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			CTMP is to ensure that the effect of the construction phase on the local highway network is minimised.
Grittleton Parish Council	Transport & Access	This chapter only mentions construction traffic which we understand to mean delivery of equipment. There is no assessment of the impact which will be caused by construction workers, the EIA should include information on the numbers involved, over what time period, where accommodation will be provided and how are they transported. The following errors & omissions were also noted: 13.3.10 - B4039 description fails to mention The Gibb & the 30 mph speed limit in that settlement 13.3.12 - Fails to mention the 30 mph speed limit in The Gibb & approaching Grittleton, as well as parking around The Salutation Inn at the crossroads. 13.3.27 – Cycle Route – No methodology to access use 13.3.33 – No vehicle count has been undertaken on B4039 13.3.35 – Other Baseline Date Sources – Use of Personal Injury Collision Data, this is not considered to be an accurate measure of collisions on the local road network. 13.4.27 – Pre & post construction highway condition survey should include all unclassified roads as well as all junctions on A & B roads	The 30 mph speed limit through The Gibb is referred to in **ES Volume 1, Chapter 13: Transport and Access [EN010168/APP/6.1].** Construction worker movements have been considered and assessed in **ES Volume 1, Chapter 13: Transport and Access [EN010168/APP/6.1]**. The matters raised have been noted by the Applicant and have addressed in the preparation of the ES. Further to consultation with Wiltshire Council the extent of roads to be included in the pre and post construction highway condition surveys are set out in the **Outline CTMP [EN010168/APP/7.22]**. Other links that form part of the proposed construction vehicle route are already associated with significant numbers of HGV movements and it is not considered that the effect of HGVs associated only with the Site could reasonably be determined.
Grittleton Parish Council	Economics Tourism & Recreation	Construction workers accommodation, if tourism accommodation is taken up by construction workers there will be a knock on impact on the regions economy, as witnessed in Somerset where Hinkley C construction workers using tourist accommodation don't spend money in the wider economy.	Assessment of the likely level of impact on temporary accommodation is undertaken in Section 16.10 of **ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [EN010168/APP/6.1]**. This reports on the potential use of either vacant private rental accommodation or vacant serviced accommodation to accommodate temporary workers. The assessments have identified sufficient spare capacity to do so without substantive displacing tourists and visitors.
Grittleton Parish Council	Economics Tourism & Recreation	Socio & Economic impact, there is no consideration on the wider and longer term impact of with drawing a large area of land from mixed use agriculture to occasional sheep grazing, this will result in the lose of direct agricultural jobs and in the wider area lose of support jobs for example with agricultural equipment & support suppliers.	Assessment of the likely level of impact on the agricultural industry is undertaken in Section 16.10 of **ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [EN010168/APP/6.1]** which and reports on the overall loss of agricultural tenancies, loss of employment at owner-occupied landholdings, and the indirect impacts to suppliers and downstream industries (such as food production). The **Outline SSCEP [EN010168/APP/7.20]** includes measures to help support diversification of agricultural practices and the reskilling of agricultural workers displaced by the Scheme.
Grittleton Parish Council	Economics Tourism & Recreation	There is no recognition of significant local events which affect the local highway network for example - Badminton Horse Trials and WOMAD, which could be severely harmed during the construction period.	The Applicant has brought forward the Badminton Horse Trials and WOMAD (subject to confirmation of its future location) as specific receptors in the assessment of tourism impacts. These are presented in Section 16.10 of **ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [EN010168/APP/6.1]** and **ES Volume 3, Appendix 16-2: Tourism and Recreation Receptor Tables [EN010168/APP/6.3]**.
Hampshire County Council	N/A	I can confirm that, due to its proximity to Hampshire, it is not considered that it will have any implications and therefore the County Council has no comments.	Noted.
Health and Safety Executive	Will the proposed development fall within any of HSE's consultation distances?	According to HSE's records, the proposed DCO application boundary for this Nationally Significant Infrastructure Project is within the consultation zones of a major accident hazard pipeline ['MAHP']. This is based on the Lime Down Solar Park solar panel and cable corridor search area boundary (red and orange lines) in Figure 3.1 Site Plan in the Scoping Report EIA Scoping Report Appendices Part 1 Appendix 3.1 [downloaded from: EN010168-000005-EN010168_LDSP_Scoping Appendices (1 of 3).pdf (planninginspectorate.gov.uk)]. The major accident hazard pipeline is operated by National Grid Gas and is: • 14 Feeder Wormington/ Pucklechurch; HSE ref. number 7227, Transco ref.: 1497.	National Gas has been consulted by the Applicant and appropriate safety controls are incorporated into the Scheme design. An assessment of Major Accident and Disasters in presented in reported in **ES Volume 1, Chapter 20: Other Environmental Matters [EN010168/APP/6.1]**.

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		The Applicant should contact the above operator to verify the above and to inform an assessment of whether or not the proposed development is vulnerable to a possible major accident. There are three particular reasons for this: i. The pipeline operator may have a legal interest in developments in the vicinity of the pipeline. This may restrict developments within a certain proximity of the pipeline. ii. The standards to which the pipeline is designed and operated may restrict major traffic routes within a certain proximity of the pipeline. Consequently, there may be a need for the operator to modify the pipeline or its operation, if the development proceeds. iii. To establish the necessary measures required to alter/upgrade the pipeline to appropriate standards.	
Health and Safety Executive	Will the proposed development fall within any of HSE's consultation distances?	HSE's Land Use Planning advice is dependent on the location of areas where people may be present [HSE: Land use planning - HSE's land use planning methodology]. Based on the information in the EIA Scoping Main Report July 2024 it is unlikely that HSE would advise against the development. Please note that the advice is based on HSE's existing policy for providing land-use planning advice and the information which has been provided. HSE's advice in response to a subsequent planning application may differ should HSE's policy or the scope of the development change by the time the Development Consent Order application is submitted.	Noted.
Health and Safety Executive	Would Hazardous Substances Consent be needed?	Hazard classification is relevant to the potential for accidents. Hazardous substances planning consent is required to store or use any of the Categories of Substances or Named Hazardous Substances set out in Schedule 1 of The Planning (Hazardous Substances) Regulations 2015 as amended, if those hazardous substances will be present on, over or under the land at or above the controlled quantities. There is an "addition rule" in Part 4 of Schedule 1 for below-threshold substances. Based on the EIA Scoping Report July 2024, it is not clear whether the applicant has considered the hazard classification of any chemicals that are proposed to be present at the development. This may be because there are no in-scope hazardous substances. If hazardous substances planning consent is required, please consult the relevant Hazardous Substance Authority (usually the Local Planning Authority) on the application.	Noted.
Health and Safety Executive	Consideration of risk assessments	Regulation 5(4) of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 requires the assessment of significant effects to include, where relevant, the expected significant effects arising from the proposed development's vulnerability to major accidents. HSE's role in NSIPs is summarised in Advice Note 11 "working with public bodies in the infrastructure planning process" Annex G on the Planning Inspectorate's website: https://www.gov.uk/government/publications/nationally-significant-infrastructure-projects-advice-note-eleven-working-with-public-bodies-in-the-infrastructure-planning-process/nationally-significant-infrastructure-projects-advice-note-eleven-annex-g-the-health-and-safety-executive. This document includes consideration of risk assessments under the heading "Risk assessments". In the Scoping Report it was not clear if there was consideration of risk assessments arising from the development's vulnerability to major accidents (e.g. from the above identified sites and/or pipelines). We would advise this is considered further in line with Advice Note 11 Annex G taking account of the following: "*it may be beneficial for applicants to undertake a risk assessment as early as possible to satisfy themselves that their design and operation will meet*	Noted. An assessment of Major Accident and Disasters in presented in reported in **ES Volume 1, Chapter 20: Other Environmental Matters [EN010168/APP/6.1]**.

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		the requirements of relevant health and safety legislation as design of the Proposed Development progresses.".	
Health and Safety Executive	Explosives sites	Explosives Inspectorates response is no comment to make as there is no HSE Licensed explosive sites in the vicinity of the proposed development.	Noted.
Historic England	Receptors	Historic England has reviewed the information submitted in the scoping report from the applicant and our own records for the proposed development area. We have also made a site visit to the northern area of the proposed scheme but did not visit the proposed cable route or the Melksham Sub-Station site. In our view this development could, potentially, have an impact upon a number of designated heritage assets and their settings in the area around the proposed site. Our initial assessment shows that the following number of designated heritage assets are within 2km of the proposed development. • 761 Listed Buildings (50 Grade I, II*) • 12 Scheduled Monuments • 21 Conservation Areas 2 Registered Parks and Gardens (RPG)	Noted. See **Section 12.6 Section 12.7** of **ES Volume 1, Chapter 12: Cultural Heritage [EN010168/APP/6.1]** regarding baseline information. Annex 1 of **ES Volume 3, Appendix 12-1: Heritage Statement [EN010168/APP/6.3]** details assets scoped in for assessment and was used during consultation with Historic England and Wiltshire Council. The following number of designated heritage assets within 2km of the proposed development have been scoped in: • 89 Listed Buildings (50 Grade I, II*) • 2 Scheduled Monuments • 6 Conservation Areas • 1 Registered Parks and Gardens (RPG)
Historic England	Key receptors	We would draw your attention, in particular but not exclusively, to the following: • Bradfield Manor Farmhouse (Grade I Listed Building) • St Giles Church Alderton (Grade I Listed Building) • Alderton Conservation Area • Corsham Park (Grade II* RPG) Whilst Historic England's remit extends to the whole of the historic environment, our statutory development advice is normally restricted to the highest grades of designated heritage assets, such as grade I and II* Listed Buildings and Registered Historic Parks and Gardens, and Scheduled Monuments. In this instance, the majority of the Listed Buildings that are affected by the development are grade II. It is therefore of particular importance that advice is also sought from the conservation specialists at Wiltshire Council.	See **Section 12.6** of **ES Volume 1, Chapter 12: Cultural Heritage [EN010168/APP/6.1]** regarding assessment methodology and **Section 12.7** of **ES Volume 1, Chapter 12: Cultural Heritage [EN010168/APP/6.1]** regarding baseline information. It is noted that Historic England statutory development advice is normally restricted to the highest grades of designated heritage assets, such as grade I and II* and that advice is also sought from the conservation specialists at Wiltshire Council. Annex 1 of **ES Volume 3, Appendix 12-1: Heritage Statement [EN010168/APP/6.3]** details assets scoped in for assessment and was used during consultation with Historic England and Wiltshire Council. Scoped in assets are considered to be agreed with both stakeholders. Bradfield Manor Farmhouse (Grade I Listed Building), St Giles Church Alderton (Grade I Listed Building) and Alderton Conservation Area were scoped in, while Corsham Park (Grade II* RPG) was scoped out. The Applicant has consulted with Wiltshire County Council.
Historic England	Considerations for the ES	We would also expect the Environmental Statement to consider the potential impacts on non-designated features of historic, architectural, archaeological or artistic interest, since these can also be of national importance and make an important contribution to the character and local distinctiveness of an area and its sense of place. We would draw your attention, in particular but not exclusively, to the following: • Fosse Way Roman Road (and any associated roadside settlements) • Silchester to Bath Roman Road (and any associated roadside settlements) • Badminton Estate parkland outside of the Grade I RPG. Overall the Scoping report includes a range of assessment methodologies to allow for an understanding of the environmental impacts.	Noted. The assessment methodology is detailed in Section 12.6 of the **ES Volume 1, Chapter 12: Cultural Heritage.** . See Section 12.6 of **ES Volume 1, Chapter 12: Cultural Heritage [EN010168/APP/6.1**] regarding assessment methodology and Section 12.7 of **ES Volume 1, Chapter 12: Cultural Heritage [EN010168/APP/6.1]** regarding baseline information, which includes the Fosse Way Roman Road (ST88SE300), Silchester to Bath Roman Road (ST86NE304) and Badminton Estate parkland outside of the Grade I RPG (1000561).
Historic England	The Proposed Scheme	The proposed scheme comprises five areas of Solar Arrays within Lime Down (lettered A to E), generating up to 500kw of energy. This will require additional infrastructure and connection to the Grid comprising: a number of 33kV and 132kV	Noted

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		substations located within the Solar Arrays, a battery energy storage system (BESS), up to 400kV substations and interconnecting cables. The cable route will require a working area of between 25 and 35m but this may be wider. The Scoping report sets out the assessments to be undertaken for construction, operation and decommissioning of the development.	
Historic England	Historic England Advice: Listed Buildings and RPGs	The potential impacts of this proposal on highly significant assets need to be carefully assessed to inform the location, siting and design of the BESS and Sub-Station Area, as well as the solar panels. We would expect to see accurate visualisations to help explain the impacts of this infrastructure on heritage settings (e.g. including views of and from the asset). We have particular concerns regarding Area D and its close proximity to Bradfield Manor Farm (Grade I listed Building). As outlined in section 2.4 of the Scoping Report, the Environmental Statement will need to include information about the reasonable alternatives that have been studied. We suggest that this should include the BESS and Sub-Station Area.	Noted. **ES Volume 3, Appendix 12-1: Heritage Statement [EN010168/APP/6.3] contains** visualisations as appropriate, especially at locations where there is a potential for impact (i.e. Site D and Grade I Listed Bradfield Manor).
Historic England	Historic England Advice: Listed Buildings and RPGs	Badminton Grade I RPG lies outside of the 2km study area but is within the ZTV of the scheme. Thought therefore needs to be given to any possibly designed long views in or out of the parkland.	Noted. Long distance views were considered where heritage assets have designed views or historical association with land within the Scheme. The Applicant visited land to the east of the Badminton Estate on 28th March 2025 and it was agreed with Historic England that the overall design resulted in the Scheme being discrete within the landscape. It was also agreed with Historic England that the landscape character was distinctly different in the Scheme to the Cotswold National Landscape Area, in which the Badminton Estate lies. The removal of areas from solar and associated infrastructure, setbacks and landscape mitigation was sufficient to reduce impact to this designated heritage asset.
Historic England	Historic England Advice: Listed Buildings and RPGs	The land around Alderton is within the wider Badminton Estate and the landscape to the west of the village has remnants of parkland (ornamental) planting indicating it was part of the wider Badminton Estate Parkland.	The Applicant visited numerous areas adjacent to the Scheme, including land near Alderton, on 28th March 2025 and it was agreed with Historic England that the overall design resulted in the Scheme being discrete within the landscape. Agreed that the landscape character was distinctly different in the Scheme to the Cotswold National Landscape Area, in which the Badminton Estate lies. The removal of areas from solar and associated infrastructure, setbacks and landscape mitigation was sufficient to reduce impacts to designated heritage assets.
Historic England	Historic England Advice: Listed Buildings and RPGs	Historic England consider that this land forms part of the setting of the RPG, which only covers the core of the Parkland where it best survives, and should be considered as a non-designated heritage asset (NDHA) in its own right. The setting of this heritage asset may be extensive and although the registered park is beyond the 2km study area, the wider estate reflects scenic and heritage qualities that merit consideration.	Noted. The Applicant visited numerous areas adjacent to the Scheme on 28th March 2025 and it was agreed with Historic England that the overall design resulted in the Scheme being discrete within the landscape. Agreed that the landscape character was distinctly different in the Scheme to the Cotswold National Landscape Area, in which the Badminton Estate lies. The removal of areas from solar and associated infrastructure, setbacks and landscape mitigation was sufficient to reduce impacts to designated heritage assets.
Historic England	Historic England Advice: Listed Buildings and RPGs	Opportunities to restore or improve the former planting along roads and within this landscape would help to potentially mitigate any identified impacts.	Noted. The Scheme has identified opportunities to preserve and enhance elements that contribute to the historical landscape character such as former planting.
Historic England	Historic England Advice: Archaeology	We welcome the surveys and assessments proposed to inform the Environmental Statement (ES) set out in Chapter 12 – 12.3.31. This is essential to ensure the archaeology is characterised to allow us to provide informed advice on any mitigation strategy proposed. The survey techniques proposed will provide an idea of what may be present along the route corridor. It will also identify if there is any	Noted. The results of surveys are provided in **ES Volume 3, Appendices 12.1 to 12.5 [EN010168/APP/6.3]**.

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		archaeology potentially of national significance. It is therefore important to identify, understand and characterise these sites, through desk-top assessments, geophysics and archaeological evaluation trenching at an early stage in the process.	The assessment methodology is detailed in Section 12.6 of **ES Volume 1, Cultural Heritage [EN010168/APP/6.1].**
Historic England	Historic England Advice: Archaeology	Having this work done as early as possible will help ensure the construction is not delayed by unexpected archaeological sites.	Noted.
Historic England	Historic England Advice: Archaeology	The archaeological mitigation needs to be set out in the Construction Environment Management Plan and controlled through the DCO requirements. We note that this is not referred to in Chapter 12 and recommend that this is made clearer in the documentation. For example, it clearly states in other Chapters that the works will be controlled through the CEMP (e.g. 9.4.10, Table 10.7, 11.5.2, 14.5.23).	Noted. CEMP includes considerations relating to cultural heritage including details of archaeological mitigation. As stated in the CEMP, where required appropriate mitigation is proposed (see **ES Volume 3 Appendix 12.6 Archaeological Mitigation Strategy [EN010168/APP/6.3]**.
Historic England	Detailed Comments on the Scoping report: Methodology	In relation to the historic environment, it will be important that the tabular assessment approach described in section 2 is complemented and supported by a reasoned, narrative discussion of the significance of any heritage assets affected and the level of impact and harm. This should preferably be informed by the approaches contained in Historic England guidance, and will be necessary to meet the policies within Chapter 5.9 (Historic Environment) of the Overarching National Policy Statement for Energy (EN-1).	All assessment works has been completed in line with relevant planning policyand Historic England guidance. See **ES Volume 3, Appendix 12-8: Cultural Heritage Impact Assessment Tables [EN010168/APP/6.3]; Tables 5 to 16** and Section 12.10 of **ES Volume 1, Cultural Heritage [EN010168/APP/6.1]** for the discussion of the significance of any heritage assets affected and the level of impact and harm**.**
Historic England	Detailed Comments on the Scoping report: Reasonable alternatives	We recommend that this should include looking at the BESS and Sub-stations that may be within the setting of heritage assets and looking at alternative locations to remove or minimise any harm caused.	Setting was a consideration to the proposed location of BESS and substation. Where potential for harm to setting is identified mitigation options have been explored to remove or minimise harm. See **ES Volume 3, Appendix 12-8: Cultural Heritage Impact Assessment Tables [EN010168/APP/6.3]; Tables 5 to 16** and Section 12.10 of **ES Volume 1, Cultural Heritage [EN010168/APP/6.1]** for the discussion of the significance of any heritage assets affected and the level of impact and harm**.**
Historic England	Detailed Comments on the Scoping report: Scheme Description	4.2.35 Landscaping any new tree planting will need to be located away from known archaeology and should be assessed as part of he cultural heritage chapter.	Where landscaping and new tree planting is proposed, the potential for impacts to archaeological features was considered. No new hedgerows have been proposed where archaeological assets were identified. See **ES Volume 3, Appendix 12-8: Cultural Heritage Impact Assessment Tables [EN010168/APP/6.3]; Tables 5 to 16** and Section 12.10 of **ES Volume 1, Chapter 12: Cultural Heritage [EN010168/APP/6.1].**
Historic England	Detailed Comments on the Scoping report: Landscape and Visual	We welcome the statement at 7.3.11 that the LVIA will consider the findings of the cultural heritage chapter. However, based on the remainder of this paragraph we are a little unclear how exactly the LVIA and Cultural Heritage assessments will be integrated. Further clarity would be welcome.	The LVIA has considered impacts to receptors (such as heritage assets) particularly within the standalone assessment on the Special Qualities of the CNL- refer to **Appendix 8-6 LVIA Assessment of the Special Qualities of Cotswold National Landscape [EN010168/APP/6.3**]. Viewpoints used in the LVIA have been selected with consideration to built heritage assets. Refer to **ES Volume 2; Figure 8-14 Baseline Photography and Photomontages [EN010168/APP/6.2]**
Historic England	Detailed Comments on the Scoping report: Landscape and Visual	We would also welcome the better integration of the Landscape Character Areas with the Cultural Heritage Chapter as this will be important in understanding the setting of many of the heritage assets.	A historic landscape character assessment is provided in **ES Volume 3 Appendix 12.7 Historic Landscape Assessment [EN010168/APP/6.1].**
Historic England	Detailed Comments on the Scoping report: Cultural heritage: Legislation, Policy and Guidance	We recommend that the following guidance is also referred to: • European Landscape Convention • The Convention for the Protection of the Architectural Heritage of Europe The European Convention on the Protection of Archaeological Heritage	Noted. The Assessment has considered the listed guidance in **Section 8.3** of **ES Volume 1, Chapter 8: Landscape and Visual Impact Assessment [EN010168/APP/6.1].**
Historic England	Detailed Comments on the Scoping report: Cultural heritage: Legislation, Policy and Guidance	12.2.1 – we welcome the inclusion of Historic England Good Practice Advice (GPA) in this list, however we note that GPA2 is listed twice (ref 136 and 137) and GPA3: The Setting of Heritage Assets, is not listed. Was the second GPA 2 (ref 137) meant to be GPA3?	Ref 137 relates to GPA3.

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Historic England	Detailed Comments on the Scoping report: Cultural heritage: Legislation, Policy and Guidance	12.3.1 – we recommend that the Grade I Badminton RPG and associated estate landscape are included in the assessment. Summary of designated heritage assets – we welcome that there are none within the proposed solar farm areas or sub-station sites. However, there are many within the Cable Route Search Corridor and we would welcome further discussion on how these will be avoided or mitigated.	Noted. The Applicant visited land to the east of the Badminton Estate on 28th March 2025 and it was agreed with Historic England that the overall design resulted in the Scheme being discrete within the landscape. Agreed that the landscape character was distinctly different in the Scheme to the Cotswold National Landscape Area, in which the Badminton Estate lies. The removal of areas from solar and associated infrastructure, setbacks and landscape mitigation was sufficient to reduce impacts to designated heritage assets. See Section 12.6 of **ES Volume 1, Chapter 12: Cultural Heritage [EN010168/APP/6.1]** regarding assessment methodology for the cable route.
Historic England	Detailed Comments on the Scoping report: Cultural heritage: Legislation, Policy and Guidance	12.4.5 – We acknowledge that setting impacts during construction may largely be treated as reversible. However, it should be noted that in the case of impacts associated with the loss of vegetation and in particular mature trees, replacement planting could take many years to be fully effective. See comment on 4.2.35 above.	It is noted that Historic England agrees setting impacts during construction can largely be treated as reversible. The Scheme has identified opportunities to preserve and enhance elements that contribute to the historical landscape character such as former planting. Where appropriate loss of vegetation has been minimised and the **Outline LEMP [EN010168/APP/7.18 s**ets out a framework for the planting, management and monitoring of landscaping and ecological mitigation and enhancement habitats for the Scheme.
Historic England	Detailed Comments on the Scoping report: Cultural heritage: Legislation, Policy and Guidance	12.5 Assessment Methodology 12.5.3 – In accordance with National Policy Statement EN-1 (paragraph 4.1.5), could this consider opportunities for heritage enhancements, alongside mitigation of impacts?	The Scheme will look to identify opportunities to preserve or enhance any heritage or archaeology elements. This may include landscape planting that enhances the setting of designated heritage assets, enhancements to elements that contribute to the historic landscape character, the removal of archaeological sites from agricultural activity. See **ES Volume 3, Appendix 12-8: Cultural Heritage Impact Assessment Tables [EN010168/APP/6.3]; Tables 5 to 16** and Section 12.10 of **ES Volume 1, Cultural Heritage [EN010168/APP/6.1]** where beneficial effects have been identified.
Historic England	Detailed Comments on the Scoping report: Cultural heritage: Legislation, Policy and Guidance	Assessment of Effects 12.5.8 – 12.5.10, as stated in response to Chapter 2, any tabulated assessment should be accompanied by a reasoned, narrative discussion of the significance of heritage assets affected and the level of impact and harm to those assets, following guidance in the GPAs.	Noted. See Section 12.6 of **ES Volume 1, Chapter 12: Cultural Heritage [EN010168/APP/6.1]** regarding assessment methodology and **ES Volume 3, Appendix 12-8: Cultural Heritage Impact Assessment Tables [EN010168/APP/6.3]; Tables 5 to 16** and Section 12.10 of **ES Volume 1, Cultural Heritage [EN010168/APP/6.1] for a discussion of the** significance of heritage assets affected and the level of impact and harm to those assets
Historic England	Detailed Comments on the Scoping report: Cultural heritage: Legislation, Policy and Guidance	Appendices Report 3 of 3, Appendix 12.1 Cultural Heritage Figures – We suggest the figures include Badminton Grade I RPG as this is close to northwestern extent of the solar area (See comments above).	Noted. The Applicant visited land to the east of the Badminton Estate on 28th March 2025 and it was agreed with Historic England that the overall design resulted in the Scheme being discrete within the landscape. Agreed that the landscape character was distinctly different in the Scheme to the Cotswold National Landscape Area, in which the Badminton Estate lies. The removal of areas from solar and associated infrastructure, setbacks and landscape mitigation was sufficient to reduce impacts to designated heritage assets.
Historic England	Detailed Comments on the Scoping report: Conclusion	Historic England has some concerns regarding the level of information proposed to inform the ES. Significant work is needed to provide detailed assessments of the heritage assets that may potentially be affected. We would welcome continued engagement to help shape the ES and ensure the information provided is to a standard that allows us to make a full and informed assessment of the proposed development and its potential impacts.	Noted. Consultation with Historic England was undertaken throughout the assessment. Further details are provided in **Table 12-2 of ES Volume 1, Chapter 12: Cultural Heritage [EN010168/APP/6.1]**, which details consultation with Historic England
Historic England	Detailed Comments on the Scoping report: Conclusion	In accordance with National Policy Statement EN-1, the Applicant will also need to show how the mitigation hierarchy (avoid, reduce, mitigate, compensate) has been	Noted. See Section 12.6 of **ES Volume 1, Chapter 12: Cultural Heritage [EN010168/APP/6.1]** regarding assessment methodology

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		applied, giving priority to the avoidance of impacts in the first instance. In decision making, great weight will be given to the conservation of heritage assets.	The ES identifies mitigation options, see Section 12.9 of for embedded mitigation and Section 12.11 for additional mitigation within **ES Volume 1, Chapter 12: Cultural Heritage [EN010168/APP/6.1].**. In the first instance this includes embedded mitigation aimed at avoiding impacts through scheme design. Where residual effects have been identified additional mitigation has been proposed as appropriate.
Historic England	Detailed Comments on the Scoping report: Conclusion	To facilitate this and in advance of submission of the DCO application, we would be keen to be involved in a Technical Working Group focusing on cultural heritage and including other expert stakeholders such as Wiltshire Council's Archaeologist and Conservation Officer.	The application has undertaken consultation with all appropriate stakeholders as appropriate (See Table 122 of **ES Volume 1, Chapter 12: Cultural Heritage [EN010168/APP/6.1], including Historic England,** Wiltshire Council's Archaeologist and Conservation Officer**.**
Hullavington Parish Council	Introductory text	This is the formal response of the Hullavington Parish Council (HPC) to the proposed Lime Down Solar Park development. It has been prepared specifically to respond to the applicant's submission of a scoping EIA (Environmental Impact Assessment) document to the Planning Inspectorate dated the 16th of July 2024. HPC has resolved to object to the Lime Down Solar Park development and it is anticipated that HPC will continue to advance further objections at the appropriate points in the planning process. The comments made by HPC in this note relate solely to the Applicant's submitted scoping EIA document.	Noted.
Hullavington Parish Council	Flood Risk	The Applicant should Scope In the effects of run off rainfall and it's potential to cause flooding beyond the Application site as a result of a substantial part of the 2,000 acre site being covered by impermeable solar panels. The Applicant should Scope In run off into the main River Avon, and the lower parts of the Gauzebrook and the two un-named streams which will take run off from Areas A to C. HPC would expect to see Flood Risk Assessments for all potential water environment receptors with the potential to be affected by the Lime Down scheme to include Luckington, Sherston, Malmesbury, Corston and Malmesbury St Paul Without, as well as communities downstream on the Avon to Great Somerford, Chippenham and beyond. The Applicant should Scope In assessments of Sustainable Drainage Systems (SuDS) to see whether SuDS could assist those communities that could be affected by increased flooding outside of the boundaries of the Application site.	Surface water runoff associated with the Proposed Development has been assessed within ES Volume 3, **Appendix 9-1 to 9-9: FRA and Drainage Strategy EN010168/APP/7.12]**. These assessments confirm that the introduction of solar panels over agricultural land does not significantly increase the volume or rate of runoff, in line with peer-reviewed studies including Cook and McCuen (2013), which found that the net runoff impact of panels is negligible due to infiltration beneath and around the structures and the use of grassed vegetation cover. As the site will retain permeable surfaces beneath and between arrays, the existing infiltration and attenuation capacity of the site is largely preserved. Where impermeable infrastructure is proposed (e.g. substations, BESS compounds, access tracks), SuDS are incorporated to manage runoff in accordance with CIRIA C753 guidance. These include lined permeable SuDS with gravel subgrade and pollution containment features at high-risk locations such as BESS sites. The drainage strategy is designed to prevent any increase in offsite flows. The development will not increase discharge rates or volumes beyond the pre-development greenfield condition. Accordingly, there is no anticipated increase in flood risk to downstream communities including Sherston, Malmesbury, Luckington, Corston, Great Somerford, or Chippenham. Flood risk from the site has been assessed using EA Flood Map for Planning, EA modelled data where available, the updated NaFRA2 mapping, and site-specific hydraulic modelling at Lime Down D. Where required, this includes 1D modelling of Gauze Brook and 2D direct rainfall modelling of field drains.
Hullavington Parish Council	Source Protection Zone	A major proportion of The Lime Down site is Designated by the Environment Agency as a Source Protected Zone as it is highly vulnerable to groundwater pollution. Therefore the Applicant should specifically Scope In within Chapters 10 and 11 the impact of run off on the important water aquifers that sit beneath the site and contain large and regionally important sources of drinking water for the locality and well beyond. This Scoping In should cover both the construction and operation phases of the whole Lime Down scheme. HPC contend that it is insufficient for the Applicant to rely on good practices solely referenced within the Construction Environment Management Plan (CEMP) as the CEMP is not an environment assessment tool.	A large proportion of the Lime Down site is located within SPZ1 and SPZ2, and the sensitivity of these areas is recognised. Runoff management and groundwater protection are key considerations and have been assessed in the **ES Volume 3, Appendix 9-1 to 9-9: FRA and Drainage Strategy EN010168/APP/7.12].** Surface water drainage infrastructure in SPZ1 locations has been designed to avoid infiltration where feasible, using lined SuDS systems and pollution containment features, particularly at the BESS and substation compounds. Pollution prevention measures during construction will be secured through the **Outline CEMP [EN010168/APP/7.12],** which relates to construction activities during the construction phase. However, we acknowledge that the CEMP is not a substitute for assessment, and potential impacts to aquifers have been considered

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			in **ES Volume 3, Appendices 19-1 to 19-8: Lime Down Desk Studies [EN010168/APP/6.3]** and Table 19-1 of **ES Volume 1, Chapter 19: Ground Conditions [EN010168/APP/6.1].**
Hullavington Parish Council	Health and Safety	HPC contend the proposed Battery Energy Storage Site (BESS) within site D should be classified under the COMAH (Control of Major Accident Hazard) Regulations. Has the Applicant consulted the HSE (Health and Safety Executive) on the proposed location of the BESS and Scoped in any recommendations and/or advices.	The Scheme is not anticipated to be subject to the COMAH Regulations (2015), and there are no sites recorded on the HSE's Public Information about Establishments that are covered by the Control of Major Accident Hazards (COMAH) Regulations 2015. The government consider that lithium-ion batteries are articles rather than substances for the purposes of COMAH and are therefore outside the scope of the COMAH.
Hullavington Parish Council	Alternative Sites	The Applicant should Scope In a range of alternative sites to the proposed BESS within Site D. The BESS site should only be chosen after a range of Alternatives have been considered (in addition to the Melksham option) including sub dividing the BESS capacity and spreading it over a range of less constrained locations. The Applicant should Scope In the impacts of the potential siting of the BESS immediately adjacent to the main line railway between London and South Wales. Has Network rail been consulted on the applicants Scoping document, and if not HPC contend that any Network Rail advices should be Scoped In	**ES Volume 1, Chapter 4: Alternatives and Design Evolution [EN010168/APP/6.1]** sets out detail on the alternatives considered for the BESS. The Applicant considers the proposed BESS Area, which is centrally contained and in one area, to be the most suitable option for the Scheme because it is away from constraints such as the Cotswolds National Landscape (CNL), is well screened, is not close to many residential receptors and is in close proximity to existing built infrastructure being the existing railway line. Locating the BESS over multiple locations has not been considered further due to the likelihood of greater adverse effects given the features of the Site, such as closer proximity to residential receptors, and greater landscape and visual impacts, particularly around Lime Down A and C which are closer to the CNL. The Applicant is committed to delivering a safe and responsible Battery Energy Storage Systems (BESS) solution that will meet or exceed the latest regulatory and compliance standards, including the National Fire Chief Council Fire Safety Guidelines. The BESS design incorporates several safety features to prevent issues such as overheating or short-circuiting. These include thermal management systems, built-in sensors, and monitoring software to detect and address potential problems early. A comprehensive **Outline Battery Safety Management Plan (BSMP) [EN010168/APP/7.21**] has been prepared as part of our application for development consent. The risk of fire from BESS is assessed in **ES Volume 1, Chapter 20: Other Environmental Matters (Major Accidents and Disasters) [EN010168/APP/6.1].** This chapter concludes that there are no significant risks posed from risk of fire from BESS due to the implementation of the Outline BSMP. The Applicant can confirm that Network Rail were consulted on the Scoping Report and have provided their opinion, which has been responded to within this document.
Hullavington Parish Council	Cultural Heritage	The Applicant should Scope In the impacts of the potential siting of the BESS immediately adjacent to curtilages of historic and cultutal assets of National Significance. Has Historic England been consulted on the Applicants Scoping document, and if not HPC contend they should be consulted at this stage and their advices should be Scoped In.	Noted. **ES Volume 1, Chapter 12: Cultural Heritage [EN010168/APP/6.1],** supported by appendices in **ES Volume 3 (12.1 to 12.6) [EN010168/APP/6.3]** has assessed the potential impact of the scheme on designated heritage assets, and where required appropriate mitigation is proposed (see ES Volume 3 Appendix 12.6 Archaeological Mitigation Strategy (EN010168/APP/6.3). Consultation was taken with Historic England (See Table 122 of **ES Volume 1, Chapter 12: Cultural Heritage [EN010168/APP/6.1])**.
Hullavington Parish Council	Watercourse and Flooding	The Applicant should scope In the effects of Buffer Zones around watercourses liable to flood at a minimum of 10m from the furthest extent of potential flooding in a 1 in 100 year flood event (with climate change factored in).	As stated in **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [EN010168/APP/6.1]** buffers have been applied around all watercourses across the site in accordance with Wiltshire Council policy, which requires an 8m offset from the top of bank for ordinary watercourses. This approach aligns with national planning guidance and is considered appropriate for the scale and nature of the development. A 10m offset beyond the 1 in 100-year climate change flood extent is not considered proportionate, as solar panels are flood resilient and can be safely

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			located within areas of low or medium fluvial flood risk. Sensitive infrastructure such as substations and BESS compounds has been located outside of flood risk areas.
Hullavington Parish Council	Bats and hedgerows	The applicant should Scope In the effects of buffer zones of 10m being provided on both sides of established hedgerows and /or bat flight corridors.	The Applicant notes this comment. A minimum buffer zone of 15m has been implemented from all existing hedgerows as set out in section 9.9 of **ES Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1**].
Hullavington Parish Council	PRoWs and viewpoints	The Applicant should Scope In the effects of Buffer Zones alongside PROW (Public Rights Of Way) at a minimum depth of 10m and designed to avoid unnatural, claustrophobic senses of enclosure in what are largely open highly attractive landscapes with long range views out.	A minimum buffer zone of 15m has been implemented from all existing PRoW as set out in section 8.9 of **ES Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1].**
Hullavington Parish Council	Footpath	The Applicant should Scope In the fact that footpath and bridleway HULL7 is also a recognised long distance walking route known as The Palladian Way.	Bridleway HULL7 has been identified as part of the Palladian Way route and is assessed under both categories (PRoW and long-distance recreation route) in Section 16.10 of **ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [EN010168/APP/6.1]** and **ES Volume 3, Appendix 16-2: Tourism and Recreation Receptor Tables [EN010168/APP/6.3]**.
Hullavington Parish Council	Factors impacting the decision on the preferred cable route	The Applicant should Scope In all factors that will impact their decision on the preferred cable routes both between the areas of solar arrays, Areas A to E and the connection to the National Grid at Whitley, Melksham. The current Scoping Report misses out important constraints that need to be assessed before the preferred routing decisions are taken e/g many aspects of ecology.	The Applicant notes this comment. Impacts of the Proposed Development on protected/notable species are assessed within **ES Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1].**
Hullavington Parish Council	Buffer zones	The Applicant should Scope in the potential effects of multiple Buffer Zones leaving development land parcels that would not function well in landscape terms e/g many fields adjacent to the Gauzebrook in Area D.	The Applicant notes this comment. A minimum buffer zone of 15m has been implemented from all existing hedgerows as set out in section 9.9 of **ES Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1**
Hullavington Parish Council	Impacts of high metal security fencing within Areas A to E	The Applicant should scope In the effects of high metal security fencing within Areas A to E on roaming wild animals e/g deer. The Applicant should Scope In the effect of vast expanses of solar panels on bird behaviour, not only on bird ground nesting and feeding habitats but also on bird flight habitats and patterns.	Impacts of the Proposed Development on protected/notable species are assessed within **ES Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1].** This includes impacts of displacement caused by solar panels on birds and impacts on foraging resources and availability. Potential fragmentation effects arising from security fencing are also addressed within the chapter
Hullavington Parish Council	BNG	The Applicant should Scope In the absolute need to achieve a 20% BNG (bio diversity net gain) following the latest Policies in the Draft Wiltshire Local Plan.	The Applicant notes this comment. A BNG Assessment has been undertaken and is provided in **Biodiversity Net Gain (BNG) Assessment Report [EN010168/APP/7.8].** Whilst BNG delivery is not yet mandatory for Nationally Significant Infrastructure Projects (NSIPs), the Scheme aims to adhere to good practice and deliver a net gain for biodiversity nonetheless, in line with local planning policy. The proposed requirement for NSIPs to deliver at least 10 % net gain is currently anticipated to be made mandatory from May 2026
Hullavington Parish Council	Protected Species	The Applicant should Scope In the effects of the development on all Protected Species e/g slow worm, dormouse, grass snake, not just those species currently identified.	Impacts of the proposed development on protected/notable species are assessed within **ES Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1].** This includes an assessment of impacts on dormice and all reptiles (including slow worm and grass snake).
Hullavington Parish Council	LVIA	The Applicant should Scope In within the LVIA (Landscape and Visual Impact Assessment) the impacts on the “settings” of Historic Assets as well as the impact on the Assets themselves.	Although the LVIA assesses the effects on all landscape and visual receptors Scoped In, the impact to the setting of historic assets has been assessed in **ES Volume 1, Chapter 12: Cultural Heritage [EN010168/APP/6.1]**.
Hullavington Parish Council	Visual effects of any “cut and fill” residual material	The Applicants should Scope In the visual effects of any “cut and fill” residual material proposed to be left on site.	The impact to landscape and visual from any cut and fill required for the Scheme has been assessed in **ES Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1]**.
Hullavington Parish Council	Scope In the provisions of the Written Ministerial Statement of May 2024	The Applicant should Scope In the provisions of the Written Ministerial Statement of May 2024 particularly regarding the cumulative impact of the 5 large scale solar farms over Areas A to E. Each site, A to E is a large NSIP development in it’s own	All aspects of the Scheme are assessed within the ES, including where different areas and components which make up the Scheme interact.

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		right and needs to be considered both with other sites within the lime Down Application site and with sites in Wiltshire that are either operational or consented.	**ES Volume 1, Chapter 6: EIA Methodology** and **Chapter 21: Cumulative and In-Combination Effects [EN010168/APP/6.1]** set out the method followed for the CEA, including where it has regard to national policy, and provide an assessment of cumulative effects with other developments.
Hullavington Parish Council	Noise Assessment	The Applicant should Scope In within the baseline background noise assessment "normal" noise outside of seasonal farming operations e/g harvesting.	Details of the baseline survey, to determine background sound levels, are provided in **ES Volume 1, Chapter 14: Noise and Vibration [EN010168/APP/6.1]** and **ES Volume 3, Appendix 14-3: Baseline Noise Survey [EN010168/APP/6.3]**.
Hullavington Parish Council	Site selection process	The Applicant should Scope In it's site selection process for all of the five solar farm sites. The applicant should also explain the reasons for discarding alternative sites that were considered.	**ES Volume 1, Chapter 4: Alternatives and Design Evolution [EN010168/APP/6.1]** sets out the site selection process for the Scheme.
Hullavington Parish Council	Financial modelling	The Applicant should Scope In financial modelling of the projected de commissioning costs, and identify the proposed upfront security arrangements for those costs, including bonding of those costs.	Modelling of projected decommissioning costs has not been requested to be scoped in by the Planning Inspectorate and, in addition, these are to be borne by the operator as both financially and legally responsible for the Scheme's decommissioning, rather than a likely economic impact on the wider economy of the Study Area. Therefore, financial modelling of decommissioning costs has not been included in the assessment.
Hullavington Parish Council	Viewpoint selection	The Applicant should re examine the selection of LVIA viewpoints to ensure they are representative of the true visual impact of the scheme. From limited sampling it would appear to HPC that some viewpoints minimise the visual effects of the development.	The Applicant has reviewed and selected viewpoints which are representative of the impact of the Scheme on landscape and visual. This included the addition of viewpoints in response to comments received and consultation with Wiltshire Council and the Cotswold National Landscape. Viewpoints are presented in **ES Volume 2, Figure 8-10 [EN010168/APP/6.2]**.
Hullavington Parish Council	Soil Sampling	HPC are concerned that the Applicants soil sampling has been undertaken from the perimeter of fields with resultant samples likely to give lower quality readings than samples from within the heart of fields. Similar concerns on the widespread quality of soil sampling for solar farm development were the subject of a Parliamentary Written Answer given on the 23rd of May 2024. HPC therefore request the Applicants Scope In soil sampling from within the hearts of affected fields.	The locations of soil sampling points have been evenly distributed across field parcels – they are not taken from field perimeters as this would not be representative. The locations of observations are shown in **ES Volume 2, Figure 17.1 [EN010168/APP/6.2]**. The soil sampling methodology was agreed with Natural England.
Kington Langley Parish Counci	Food protection and energy supply	Response by Kington Langley Parish Council in response to Application by Lime Down Solar Park Limited for an Order granting Development Consent for the Lime Down Solar Park (EN010168) – as agreed at the Parish Council meeting held on Monday 12 August 2024 (Minute 056.24) Thank you for the opportunity to comment on the Scoping Opinion that will guide the Environmental Impact Assessment. We recognise the need to balance and protect the security of both food production and energy supply and, bearing in mind the statement made by the Secretary for Energy & Net Zero on 15 May 2024, we would welcome improvements to the processes that are applied to assess agricultural land quality.	Agricultural land quality is assessed against a set of long-established guidelines as set out in ES Volume 1 Chapter 17 **[EN010168/APP/6.1]** and ES Volume 3 Appendix 17.1 **[EN010168/APP/6.3]**.
Kington Langley Parish Counci	Agricultural Land Assessments	We would like to see that the agricultural land assessments are: • Carried out by appropriately qualified experts who are employed by companies that adhere to a recognised quality assurance scheme, for example are ISO 9001 accredited; and • The resulting assessments and reports are independently reviewed by appropriately qualified experts who are employed by companies that have a recognised quality assurance scheme. Such a process would help to ensure assessments are accurate and created without bias, which are key factors that would aid the independent certification of agricultural land quality.	The ALC surveys have been carried out by a long-established professional consultancy which has specialised in soil science and ALC surveys for over 50 years and is accredited to ISO 9001. A Statement of Competence is provided at **ES Volume 3, Appendix 1-1: Statement of Competence [EN010168/APP/6.3]** outlining the relevant expertise and qualifications of the experts who prepared the ES. The scope and findings of the surveys have been reviewed by and agreed with Natural England.

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Kington Langley Parish Counci	Biodiversity	Similarly, we would like to see the same quality assurance assessment and independent verification processes applied to the site's biodiversity assessments. Improving the rigour of environmental impact assessments is particularly important with so much agricultural land at stake.	The ecological assessment within **ES Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1]** of the ES has been prepared by members of the Chartered Institute of Ecology and Environmental Management (CIEEM) and follow the Institute's Code of Professional Conduct when conducting ecological assessments. A Statement of Competence is provided at **ES Volume 3, Appendix 1-1: Statement of Competence [EN010168/APP/6.3]** outlining the relevant expertise and qualifications of the experts who prepared the ES.
Kington Langley Parish Counci	Scoping considerations	Because the proposed Lime Down development is particularly large the Scoping should consider: • the habitat disruption and impact on soil quality caused by installation and maintenance (e.g., cleaning) of large areas of solar panel and related equipment • the potential for microclimate changes • loss of nature corridors - linked solar sites acting as barriers to wildlife movement, and loss of unkempt verges on roads, tracks and footpaths in the solar park region impact on footpaths for humans (degradation of amenity value)	Impacts on ecological features are assessed within **ES Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1].** The physical impact on public right of way use is assessed in **ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [EN010168/APP/6.1]**, while the potential physical and mental health effects as a result of changes to the use and amenity value of footpaths is assessed in **ES Volume 1**, **Chapter 18: Human Health [EN010168/APP/6.1]**,. **ES Volume 1, Chapter 7: Climate Change [EN010168/APP/6.1]** of the Environmental Statement assesses the impact of GHG emissions arising as a result of the Proposed Development on the climate and provides a review of the resilience of the Proposed Development to projected future climate change impacts. The potential for a microclimate to be created by solar panels is extremely unlikely, and far lower risk than from other projects such as power stations etc.
Kington Langley Parish Counci	Location of Solar Panels	We believe areas covered by the solar park have heightened risk of flooding, so an assessment of the park's impact on this must be included in the Scoping.	The potential for fluvial and surface water flooding has been assessed in **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [EN010168/APP/6.1]** across the Lime Down site using EA Flood Map for Planning, NaFRA2 mapping, and site-specific topographical data. Panelled areas have been located to avoid areas of higher flood risk where possible. Where solar panels are located in areas of low to medium flood risk, their flood-resilient design allows for occasional inundation without causing harm or displacement of floodwaters.
Kington St Michael Parish Council	Preamble	As a preamble, the Parish Council feel that not knowing the totality of subjects applicable to the proposal they cannot say they are confident that all that needs to be covered in an EIA are, or will be covered and that, perhaps, there is or should be a Government List/Schedule of prescribed subjects to be addressed by the Scoping Study and EIA? The Council consider that as this is a huge project in its embryonic stage, with a potential decision timescale some three years hence, then it is important that all possible matters are covered to avoid any potential loopholes occurring. Being mindful of this, the Council considers that the following matters need consideration and inclusion in any Scoping Opinion provided:	As stated in **ES Volume 1, Chapter 1: Introduction [EN010168/APP/6.1]** Schedule 4 of the EIA Regulations sets out the information which is required to be included in an ES. Table 1-2 summarises where the requirements of Schedule 4 of the EIA Regulations have been addressed in the ES.
Kington St Michael Parish Council	EIA requirement to consider alternatives to the proposal: Alternative sites	The alternatives to the existing proposal that need to be considered are: The Scoping Opinion should include a survey and assessment of alternative physical locations within the same radial distance from the proposed grid connection point at Melksham. Comment; The Council is unsure if examples are required, or can be given, but if it is acceptable then it is aware of a Salisbury Plain alternative. This could be used in conjunction with the disused chalk quarry at Westbury, Wiltshire and the new incinerator at Westbury that will be laying a connection to Frome for the electricity that it generates. This cable is not yet in place and may already have planning consent. This being so, a Solar Farm sited on Salisbury Plain could utilise the incinerator's National Grid connection at Frome or ensure that when the cable is laid that it is capable of taking the Solar Park's input. A Scoping Report evaluation could/should be made of the Lime Down proposals that generate 500 MW and covers 900 hectares (2240 acres) with the old cement works site at Westbury	**ES Volume 1, Chapter 4: Alternatives and Design Evolution [EN010168/APP/6.1]** sets out the site selection process for the Scheme, including where it has had regard to the Salisbury Plain, the disused chalk quarry at Westbury, and the old cement works site at Westbury.

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		covering 31 hectares (77 acres) that could be a contributory site in a Salisbury Plain proposal.	
Kington St Michael Parish Council	EIA requirement to consider alternatives to the proposal: Alternative technologies	The Scoping Opinion should include an assessment of alternative technologies to include; • The use of the Lime Down area as a site for wind turbines Comment; An onshore wind turbine has a blade height of 50 metres and generates 2.5-3 MW. If the turbines had an individual capacity of 2.5 MW then 200 would be required (166 at 3 MW). Given that NPPF is to be amended to allow onshore wind turbines, this needs to be evaluated.	As set out in **ES Chapter 4: Alternatives and Design Evolution [EN010168/APP/6.1]** the Applicant is a solar PV and energy storage developer. On that basis, alternative types of low carbon electricity generation have not been considered by the Applicant in the development of the Scheme. However, it is considered that the Site could be suitable for other forms of renewable electricity generation at the same scale as the Scheme and the relevant technologies are considered in section 4.10 of **ES Chapter 4: Alternatives and Design Evolution [EN010168/APP/6.1].** Further details on various alternative generation technologies, and the role they play in the UK's wider energy portfolio, is contained within the **Statement of Need [EN010168/APP/7.1].** Due to the Scheme's location away from the coast, tidal power and offshore wind are deemed unviable. Onshore wind is not considered to be a suitable alternative because the flat topography of the Site would likely give rise to greater adverse visual effects due to the height of the wind turbines, and the proximity to residential dwellings may give rise to adverse effects associated with shadow flicker and turbine noise. It is also considered that onshore wind would have a greater impact on the setting of the CNL than the Solar PV Panels proposed for the Scheme. Section 7.7 of the **Statement of Need [EN010168/APP/7.1]** provides evidence that energy production from land under solar is of a similar order of magnitude to energy production from the same land under onshore wind while the environmental effects of solar schemes may be significantly lower.
Kington St Michael Parish Council	EIA requirement to consider alternatives to the proposal: Alternative technologies	The Scoping Opinion should include an assessment of alternative technologies to include; • The use of the Lime Down area (part) as a site for small scale nuclear power plants. Comment; Small scale nuclear power plants as currently being proposed/developed by Rolls Royce, with a Government decision on the future scheduled for the autumn, need to be evaluated as an alternative. One small scale nuclear power plant generates 475MW. Its location is far more flexible. If located at Westbury, for example, it would have the advantage of a rail link.	As set out in **ES Chapter 4: Alternatives and Design Evolution [EN010168/APP/6.1]** nuclear power is not considered a suitable alternative for the Scheme given the length of time it would take to plan and build a nuclear plant at the site, which is not currently listed as a site on which nuclear power development is permitted. Section 6.6 of the **Statement of Need [EN010168/APP/7.1]** explains that although Small Modular Reactors (SMRs) may bring decarbonisation and energy security benefits to the UK, 2029 is being targeted for a Financial Investment Decision for the first SMR units being planned for the UK. SMRs are therefore very unlikely to be operational in the UK within a decade, while in contrast, the Scheme, if consented, is expected to be built and operational by 2029.
Kington St Michael Parish Council	EIA requirement to consider alternatives to the proposal: Alternative technologies	The Scoping Opinion should include an assessment of alternative technologies to include; • The use of the Lime Down area to use grass, via anaerobic digestion, as a means of generating renewable energy. Comment; This technology is promoted by Ecotricity, for example see: https://www.ecotricity.co.uk/#:~:text=Switch%20to%20Ecotricity-,Sustai . The advantage of this technology if employed at the Lime Down site is that it would enable the area to retain its present rural character of open field grass harvesting, and the CO2 released by anaerobic digestion (AD) would be reabsorbed by the continual regrowth of the grass. The methane generated by the AD process could either be converted on site into electricity or even supplied to the Gas Grid. The Scoping Opinion needs a full evaluation of this alternative, along with organic agricultural principles for growing the grass as organic principles will result in carbon sequestration (increased retention of carbon in the soil that has been drawn down from the atmosphere).	**ES Chapter 4: Alternatives and Design Evolution [EN010168/APP/6.1]** sets out detail on the alternative technologies considered as part of the assessment of alternatives undertaken. The use of Lime Down to use grass via anaerobic digestion was not considered. Section 7.7 of the **Statement of Need [EN010168/APP/7.1]** provides evidence that energy production from land under solar is likely to produce a greater quantity of low carbon electricity per acre than the output from a crop-based application.
Kington St Michael Parish Council	EIA requirement to consider alternatives to the proposal: Alternative technologies	The Scoping Opinion should include an assessment of alternative technologies to include; The use of the Lime Down area as a site for a mix of the above three suggestions.	As set out in **ES Volume 1, Chapter 4: Alternatives and Design Evolution [EN010168/APP/6.1]** whilst there may be opportunities to "co-locate" different renewable generation technologies, the Scheme instead includes a Battery Energy Storage System (BESS), which can store electricity including that

Consultee	Topic	Matter Raised	Applicant Response
			generated from the solar panels at times when it may not immediately be needed for later dispatch to meet consumer demand. BESS therefore supports the operation of the Solar PV Panels and also enhances grid resilience and stability, as described at Section 6.11 of the **Statement of Need [EN010168/APP/7.1]**. The Applicant's response to the above three suggestions along with an assessment of the benefits arising from the development of a co-located Solar PV and BESS facility at the site provides support to the Applicant's view that Solar PV Panels, co-located with BESS, is the preferred energy generating solution for the Site.
Kington St Michael Parish Council	EIA requirement to consider the Evaluation of Historic Assets	The EIA needs to consider all of the proposed Solar Park area for the possible existence of archaeological assets, and the impact of excavation for cables and foundations upon all such possible assets. An assumption is made that an EIA will consider the impact on the Cotswold Area of Outstanding Natural Beauty, but the Council wishes to ensure that this is the case. Comment; NPPF policy/guidance require planning applications to safeguard the whole country's Historic Assets. The land identified by this proposal is adjacent to the Roman Fosse Way, and at one point incorporates the Fosse Way within the installation. The EIA therefore needs to undertake a full evaluation of the historic assets, often archaeological remains, in the proposed Solar Park area throughout all eras of human settlement. In the case of Roman presence in the area there is a Romano-British settlement and Scheduled Monument at Easton Grey, near Malmesbury, Wiltshire, see: https://historicengland.org.uk/listing/the-list/list-entry/1013354	**ES Volume 1, Chapter 12: Cultural Heritage [EN010168/APP/6.1],** considers potential impacts to archaeological assets. **ES Volume 1, Chapter 12: Cultural Heritage [EN010168/APP/6.1],** supported by appendices in Volume 3 (12.1 to 12.6) has assessed the potential impact of the scheme on identified archaeological and built heritage assets, and where required appropriate mitigation is proposed (see ES Volume 3 Appendix 12.6 Archaeological Mitigation Strategy (EN010168/APP/6.3). No impact was identified as a result of the Scheme to the Scheduled Romano-British settlement, earthwork enclosure and a section of the Fosse Way, 415m west of Whatley Manor (NHLE reference 1013354)
Kington St Michael Parish Council	EIA requirement to consider Grade of Agricultural Land	The EIA needs to include a comprehensive, scientifically conducted survey conducted by a qualified professional consultancy. Comment; Solar Parks should be on land at Grade 3b and below, and not on Grade 3a land and above. Therefore the EIA needs to establish the agricultural soil grading of each field at the grade that it currently is. This must not be an ad hoc assessment based on hearsay or similarly weak evidence, but on clear scientific methodology conducted objectively. An example of such a professional consultant is Land Research Associates, see: http://www.lra.co.uk/services/soil-survey-soil-mapping/agricultural-land-grades#:~:text=Land%20grades%20are%20determined Comment; Solar Parks/Farms should be limited to brownfield land and poorer quality unproductive land. The statement made by the Secretary for Energy & Net Zero, on 15 May 2024 made clear the need to balance both the need for energy security and food production and said the use of Best and Most Versatile agricultural land should be avoided where possible. It also said "the Government is aware of concerns about the perceived inaccuracy and unfairness of soil surveys undertaken as part of the planning process for solar development. The Government will address this by supporting independent certification by an appropriate certifying body, subject to relevant business case approval, to ensure Agricultural Land Classification Soil Surveys are of a high standard, requiring surveyors to demonstrate meeting an agreed minimum requirement of training/experience. We will also seek to ensure consistency in how data is recorded and presented, so that reports on agricultural land classification are consistent, authoritative and objective."	**ES Volume 1, Chapter 17: Soils and Agriculture [EN010168/APP/6.1]** and **ES Volume 3, Appendix 17.1 [EN010168/APP/6.3]** set out the scope, methodology and findings of the ALC survey that has been undertaken by a professional consultancy with over 50 years' experience of undertaking these surveys. A Statement of Competence is provided at **ES Volume 3, Appendix 1-1: Statement of Competence [EN010168/APP/6.3]** outlining the relevant expertise and qualifications of the experts who prepared the ES. The survey approach and findings have been discussed and agreed with Natural England. **ES Volume 2, Figure 17.1 [EN010168/APP/6.2]** shows the location of survey observations and **Figure 17.2 [EN010168/APP/6.2]** shows the distribution of ALC grades. **ES Volume 1, Chapter 4: Alternatives and Design Evolution [EN010168/APP/6.1]** sets out that the avoidance of BMV land was a key consideration in site selection and design evolution. The solar PV panels are predominantly located on non-BMV land, with 67% on Subgrade 3b and Grade 4 land but it is not possible to avoid BMV land altogether.
Kington St Michael Parish Council	EIA requirement to consider the Evaluation of Biodiversity	A development project has to include an uplift in biodiversity. Comment; Uplift is generally defined as a 10% improvement. In order for this aspect of the Applicant's EIA to be valid, it has to: Conduct a thorough biodiversity census in all areas of the proposed development of all animals (including birds and insects) and plant species, their level of	A comprehensive suite of ecological surveys has been undertaken to underpin the assessment on Ecology and Biodiversity in **ES Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1]**. This includes a survey to classify all habitats within the Order Limits, which is detailed in Appendix 9-1. A comprehensive and proportionate survey effort for botany as well as wide range of protected/notable species of fauna has been undertaken. Full details of these can

Consultee	Topic	Matter Raised	Applicant Response
		presence (density), and the areas in which they are to be found. Significant hotspots need to be identified.	be found in **ES Volume 3, Appendix 9.1: Ecological Baseline Report [EN010168/APP/6.3] to Appendix 9-7: Wintering Bird Survey Report [EN010168/APP/6.3].**
Kington St Michael Parish Council	EIA requirement to consider the Evaluation of Biodiversity	A development project has to include an uplift in biodiversity. Comment; Uplift is generally defined as a 10% improvement. In order for this aspect of the Applicant's EIA to be valid, it has to: Conduct a thorough habitat census within the planned development area and establish the link between the habitat census and the presence and prevalence of the animal and plant species identified. In short, the EIA needs to be using the ecosystem-based means of assessment, which reveals ecological structure and integration. A habitat census will include soil - structure and life living in it - as well as all features above soil, extending from field character, hedgerows, trees, wildlife corridors, and the access for aerial species to the land territory that they require in order to breed and forage. Habitat also includes land character e.g. areas of water and their permanence, an essential dimension of overall ecological character and structure.	A full biodiversity net gain assessment has been prepared and is contained within **Biodiversity Net Gain Assessment Report [EN010168/APP/7.8]** and completed **Statutory Biodiversity Metric [EN010168/APP/7.9].** This demonstrates that the Scheme is expected to deliver an uplift of 34.75%, 12.31% and 20.08% in habitat units, hedgerow units and watercourse units respectively. A comprehensive suite of ecological surveys has been undertaken to underpin the assessment on Ecology and Biodiversity in **ES Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1]**. This includes a survey to classify all habitats within the Order Limits, which is detailed in Appendix 9-1. A comprehensive and proportionate survey effort for botany as well as wide range of protected/notable species of fauna has been undertaken. Full details of these can be found in **ES Volume 3, Appendix 9.1: Ecological Baseline Report [EN010168/APP/6.3] to Appendix 9-7: Wintering Bird Survey Report [EN010168/APP/6.3].**
Kington St Michael Parish Council	EIA requirement to consider the Evaluation of Biodiversity	A development project has to include an uplift in biodiversity. Comment; Uplift is generally defined as a 10% improvement. In order for this aspect of the Applicant's EIA to be valid, it has to: Conduct a thorough census of soil health at the mini- and micro- levels for animals, fungi and other microscopic life forms. This needs to be done on a field by field basis. Soil health is vital to the existence of habitat and thus to a full record of the ecological structure of the area and the biodiversity that it supports.	A full biodiversity net gain assessment has been prepared and is contained within **Biodiversity Net Gain Assessment Report [EN010168/APP/7.8]** and completed **Statutory Biodiversity Metric [EN010168/APP/7.9].** This demonstrates that the Scheme is expected to deliver an uplift of 34.75%, 12.31% and 20.08% in habitat units, hedgerow units and watercourse units respectively. This assessment sets out how the uplift has been calculated based on industry standard guidance and survey methodology. Survey methodology used to underpin BNG calculations is based on recording habitat type and condition, which are a reflection of the soil type/health as well as historic and current management regimes.
Kington St Michael Parish Council	EIA requirement to consider the Evaluation of Biodiversity	Having produced this thorough biodiversity survey, the EIA then needs to examine and record: The level of adverse impact that the development, and operation throughout its lifetime, will have on the existing biodiversity, its abundance and its habitat availability. As the development has to demonstrate 'biodiversity uplift', the existing character of biodiversity, abundance and habitat availability needs to be quantified - both before (actual) and after (predicted) development of the Solar Park.	The uplift in biodiversity anticipated to occur as a result of the Proposed Development has been quantified using the Statutory Biodiversity Metric published by Natural England. The **Biodiversity Net Gain (BNG) Assessment Report [EN010168/APP/7.8]** provides full details on how the baseline and post-development biodiversity units have been calculated.
Kington St Michael Parish Council	EIA requirement to consider the Evaluation of Biodiversity	Having produced this thorough biodiversity survey, the EIA then needs to examine and record: The nature of the biodiversity 'uplift' has to be quantified in precisely the same way. It needs to predict the full range of animals and plants that will be present, their abundance, and the availability of the habitats that they require. In short, the EIA needs to demonstrate how biodiversity 'uplift' (10% improvement) will be accomplished against all these parameters.	The uplift in biodiversity anticipated to occur as a result of the Proposed Development has been quantified using the Statutory Biodiversity Metric published by Natural England. The **Biodiversity Net Gain (BNG) Assessment [EN010168/APP/7.8]** provides full details on how the baseline and post-development biodiversity units have been calculated. This demonstrates that the Scheme is expected to deliver an uplift of 34.75%, 12.31% and 20.08% in habitat units, hedgerow units and watercourse units respectively.
Langley Burrell Without Parish Council	Preamble	As a preamble, the Parish Council feel that not knowing the totality of subjects applicable to the proposal they cannot say they are confident that all that needs to be covered in an EIA are, or will be covered and that, perhaps, there is or should be a Government List/Schedule of prescribed subjects to be addressed by the Scoping Study and EIA? The Council consider that as this is a huge project in its embryonic stage, with a potential decision timescale some three years hence, then it is important that all possible matters are covered to avoid any potential loopholes occurring. Being mindful of this, the Council considers that the following matters need consideration and inclusion in any Scoping Opinion provided:	As stated in **ES Volume 1, Chapter 1: Introduction [EN010168/APP/6.1]** Schedule 4 of the EIA Regulations sets out the information which is required to be included in an ES. Table 1-2 summarises where the requirements of Schedule 4 of the EIA Regulations have been addressed in the ES.

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Langley Burrell Without Parish Council	EIA requirement to consider alternatives to the proposal: Alternative sites	The Scoping Opinion should include a survey and assessment of alternative physical locations within the same radial distance from the proposed grid connection point at Melksham. Comment; The Council is unsure if examples are required, or can be given, but if it is acceptable then it is aware of a Salisbury Plain alternative. This could be used in conjunction with the disused chalk quarry at Westbury, Wiltshire and the new incinerator at Westbury that will be laying a connection to Frome for the electricity that it generates. This cable is not yet in place and may already have planning consent. This being so, a Solar Farm sited on Salisbury Plain could utilise the incinerator's National Grid connection at Frome or ensure that when the cable is laid that it is capable of taking the Solar Park's input. A Scoping Report evaluation could/should be made of the Lime Down proposals that generate 500 MW and covers 900 hectares (2240 acres) with the old cement works site at Westbury covering 31 hectares (77 acres) that could be a contributory site in a Salisbury Plain proposal.	**ES Volume 1, Chapter 4: Alternatives and Design Evolution [EN010168/APP/6.1]** sets out an assessment of the alternative sites put forward during consultation for the Scheme, which includes the Salisbury plain; the disused chalk quarry at Westbury; and the old cement works site at Westbury. These sites have been discounted for the reasons set out in section 4.3 of **ES Volume 1, Chapter 4: Alternatives and Design Evolution [EN010168/APP/6.1].**
Langley Burrell Without Parish Council	EIA requirement to consider alternatives to the proposal: Alternative technologies	The Scoping Opinion should include an assessment of alternative technologies to include; • The use of the Lime Down area as a site for wind turbines. Comment; An onshore wind turbine has a blade height of 50 metres and generates 2.5-3 MW. If the turbines had an individual capacity of 2.5 MW then 200 would be required (166 at 3 MW). Given that NPPF is to be amended to allow onshore wind turbines, this needs to be evaluated.	As set out in **ES Chapter 4: Alternatives and Design Evolution [EN010168/APP/6.1]** the Applicant is a solar PV and energy storage developer. On that basis, alternative types of low carbon electricity generation have not been considered by the Applicant in the development of the Scheme. However, it is considered that the Site could be suitable for other forms of renewable electricity generation at the same scale as the Scheme and the relevant technologies are considered in section 4.10 of **ES Chapter 4: Alternatives and Design Evolution [EN010168/APP/6.1].** Further details on various alternative generation technologies, and the role they play in the UK's wider energy portfolio, is contained within the **Statement of Need [EN010168/APP/7.1].** Due to the Scheme's location away from the coast, tidal power and offshore wind are deemed unviable. Onshore wind is not considered to be a suitable alternative because the flat topography of the Site would likely give rise to greater adverse visual effects due to the height of the wind turbines, and the proximity to residential dwellings may give rise to adverse effects associated with shadow flicker and turbine noise. It is also considered that onshore wind would have a greater impact on the setting of the CNL than the Solar PV Panels proposed for the Scheme. Section 7.7 of the **Statement of Need [EN010168/APP/7.1]** provides evidence that energy production from land under solar is of a similar order of magnitude to energy production from the same land under onshore wind while the environmental effects of solar schemes may be significantly lower.
Langley Burrell Without Parish Council	EIA requirement to consider alternatives to the proposal: Alternative technologies	The Scoping Opinion should include an assessment of alternative technologies to include; • The use of the Lime Down area (part) as a site for small scale nuclear power plants. Comment; Small scale nuclear power plants as currently being proposed/developed by Rolls Royce, with a Government decision on the future scheduled for the autumn, need to be evaluated as an alternative. One small scale nuclear power plant generates 475MW. Its location is far more flexible. If located at Westbury, for example, it would have the advantage of a rail link.	As set out in **ES Chapter 4: Alternatives and Design Evolution [EN010168/APP/6.1]** nuclear power is not considered a suitable alternative for the Scheme given the length of time it would take to plan and build a nuclear plant at the site, which is not currently listed as a site on which nuclear power development is permitted. Section 6.6 of the **Statement of Need [EN010168/APP/7.1],** explains that although Small Modular Reactors (SMRs) may bring decarbonisation and energy security benefits to the UK, 2029 is being targeted for a Financial Investment Decision for the first SMR units being planned for the UK. SMRs are therefore very unlikely to be operational in the UK within a decade, while in contrast, the Scheme, if consented, is expected to be built and operational by 2029.
Langley Burrell Without Parish Council	EIA requirement to consider alternatives to the proposal: Alternative technologies	The Scoping Opinion should include an assessment of alternative technologies to include; • The use of the Lime Down area to use grass, via anaerobic digestion, as a means of generating renewable energy. Comment; This technology is promoted by Ecotricity, for example see: https://www.ecotricity.co.uk/#:~:text=Switch%20to%20Ecotricity-,Sustai . The	**ES Chapter 4: Alternatives and Design Evolution [EN010168/APP/6.1]** sets out detail on the alternative technologies considered as part of the assessment of alternatives undertaken. The use of Lime Down to use grass via anaerobic digestion was not considered. Section 7.7 of the **Statement of Need [EN010168/APP/7.1]** provides evidence that energy production from land under

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		advantage of this technology if employed at the Lime Down site is that it would enable the area to retain its present rural character of open field grass harvesting, and the CO2 released by anaerobic digestion (AD) would be reabsorbed by the continual regrowth of the grass. The methane generated by the AD process could either be converted on site into electricity or even supplied to the Gas Grid. The Scoping Opinion needs a full evaluation of this alternative, along with organic agricultural principles for growing the grass as organic principles will result in carbon sequestration (increased retention of carbon in the soil that has been drawn down from the atmosphere).	solar is likely to produce a greater quantity of low carbon electricity per acre than the output from a crop-based application.
Langley Burrell Without Parish Council	EIA requirement to consider alternatives to the proposal: Alternative technologies	The Scoping Opinion should include an assessment of alternative technologies to include; The use of the Lime Down area as a site for a mix of the above three suggestions.	As set out in **ES Volume 1, Chapter 4: Alternatives and Design Evolution [EN010168/APP/6.1]** whilst there may be opportunities to "co-locate" different renewable generation technologies, the Scheme instead includes a Battery Energy Storage System (BESS), which can store electricity including that generated from the solar panels at times when it may not immediately be needed for later dispatch to meet consumer demand. BESS therefore supports the operation of the Solar PV Panels and also enhances grid resilience and stability, as described at Section 6.11 of the **Statement of Need [EN010168/APP/7.1]**. The Applicant's response to the above three suggestions along with an assessment of the benefits arising from the development of a co-located Solar PV and BESS facility at the site provides support to the Applicant's view that Solar PV Panels, co-located with BESS, is the preferred energy generating solution for the Site
Langley Burrell Without Parish Council	EIA requirement to consider the Evaluation of Historic Assets.	The EIA needs to consider all of the proposed Solar Park area for the possible existence of archaeological assets, and the impact of excavation for cables and foundations upon all such possible assets. An assumption is made that an EIA will consider the impact on the Cotswold Area of Outstanding Natural Beauty, but the Council wishes to ensure that this is the case. Comment; NPPF policy/guidance require planning applications to safeguard the whole country's Historic Assets. The land identified by this proposal is adjacent to the Roman Fosse Way, and at one point incorporates the Fosse Way within the installation. The EIA therefore needs to undertake a full evaluation of the historic assets, often archaeological remains, in the proposed Solar Park area throughout all eras of human settlement. In the case of Roman presence in the area there is a Romano-British settlement and Scheduled Monument at Easton Grey, near Malmesbury, Wiltshire, see: https://historicengland.org.uk/listing/the-list/list-entry/1013354	**ES Volume 1, Chapter 12: Cultural Heritage [EN010168/APP/6.1]**, supported by appendices in Volume 3 (12.1 to 12.6) has assessed the potential impact of the scheme on identified archaeological and built heritage assets, and where required appropriate mitigation is proposed (see **ES Volume 3 Appendix 12.6 Archaeological Mitigation Strategy [EN010168/APP/6.3]**. No impact was identified as a result of the Scheme to the Scheduled Romano-British settlement, earthwork enclosure and a section of the Fosse Way, 415m west of Whatley Manor (NHLE reference 1013354)
Langley Burrell Without Parish Council	EIA requirement to consider Grade of Agricultural Land	The EIA needs to include a comprehensive, scientifically conducted survey conducted by a qualified professional consultancy. Comment; Solar Parks should be on land at Grade 3b and below, and not on Grade 3a land and above. Therefore the EIA needs to establish the agricultural soil grading of each field at the grade that it currently is. This must not be an ad hoc assessment based on hearsay or similarly weak evidence, but on clear scientific methodology conducted objectively. An example of such a professional consultant is Land Research Associates, see: http://www.lra.co.uk/services/soil-survey-soil-mapping/agricultural-land-grades#:~:text=Land%20grades%20are%20determined Comment; Solar Parks/Farms should be limited to brownfield land and poorer quality unproductive land. The statement made by the Secretary for Energy & Net Zero, on 15 May 2024 made clear the need to balance both the need for energy security and food production and said the use of Best and Most Versatile agricultural land should be avoided where possible. It also said "the Government is aware of concerns about the perceived inaccuracy and unfairness of soil surveys undertaken as part of the planning process for solar development. The Government will address this by supporting independent certification by an	**ES Volume 1, Chapter 17: Soils and Agriculture [EN010168/APP/6.1]** and **ES Volume 3, Appendix 17.1 [EN010168/APP/6.3]** set out the scope, methodology and findings of the ALC survey that has been undertaken by a professional consultancy with over 50 years' experience of undertaking these surveys. The survey approach and findings have been discussed and agreed with Natural England. **ES Volume 2, Figure 17.1 [EN010168/APP/6.2]** shows the location of survey observations and **Figure 17.2 [EN010168/APP/6.2]** shows the distribution of ALC grades. **ES Volume 1, Chapter 4: Alternatives and Design Evolution [EN010168/APP/6.1]** sets out that the avoidance of BMV land was a key consideration in site selection and design evolution. The solar PV panels are predominantly located on non-BMV land, with 67% on Subgrade 3b and Grade 4 land but it is not possible to avoid BMV land altogether.

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		appropriate certifying body, subject to relevant business case approval, to ensure Agricultural Land Classification Soil Surveys are of a high standard, requiring surveyors to demonstrate meeting an agreed minimum requirement of training/experience. We will also seek to ensure consistency in how data is recorded and presented, so that reports on agricultural land classification are consistent, authoritative and objective."	
Langley Burrell Without Parish Council	EIA requirement to consider the Evaluation of Biodiversity	A development project has to include an uplift in biodiversity. Comment; Uplift is generally defined as a 10% improvement. In order for this aspect of the Applicant's EIA to be valid, it has to: Conduct a thorough biodiversity census in all areas of the proposed development of all animals (including birds and insects) and plant species, their level of presence (density), and the areas in which they are to be found. Significant hotspots need to be identified.	A comprehensive suite of ecological surveys has been undertaken to underpin the assessment on Ecology and Biodiversity in **ES Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1]**. This includes a survey to classify all habitats within the Order Limits, which is detailed in Appendix 9-1. A comprehensive and proportionate survey effort for botany as well as wide range of protected/notable species of fauna has been undertaken. Full details of these can be found in **ES Volume 3, Appendix 9.1: Ecological Baseline Report [EN010168/APP/6.3] to Appendix 9-7: Wintering Bird Survey Report [EN010168/APP/6.3].**
Langley Burrell Without Parish Council	EIA requirement to consider the Evaluation of Biodiversity	A development project has to include an uplift in biodiversity. Comment; Uplift is generally defined as a 10% improvement. In order for this aspect of the Applicant's EIA to be valid, it has to: Conduct a thorough habitat census within the planned development area and establish the link between the habitat census and the presence and prevalence of the animal and plant species identified. In short, the EIA needs to be using the ecosystem-based means of assessment, which reveals ecological structure and integration. A habitat census will include soil - structure and life living in it - as well as all features above soil, extending from field character, hedgerows, trees, wildlife corridors, and the access for aerial species to the land territory that they require in order to breed and forage. Habitat also includes land character e.g. areas of water and their permanence, an essential dimension of overall ecological character and structure.	A full biodiversity net gain assessment has been prepared and is contained within **Biodiversity Net Gain Assessment Report [EN010168/APP/7.8]** and completed **Statutory Biodiversity Metric [EN010168/APP/7.9].** This demonstrates that the Scheme is expected to deliver an uplift of 34.75%, 12.31% and 20.08% in habitat units, hedgerow units and watercourse units respectively. A comprehensive suite of ecological surveys has been undertaken to underpin the assessment on Ecology and Biodiversity in **ES Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1]**. This includes a survey to classify all habitats within the Order Limits, which is detailed in **ES Volume 3, Appendix 9.1: Ecological Baseline Report [EN010168/APP/6.3**. A comprehensive and proportionate survey effort for botany as well as wide range of protected/notable species of fauna has been undertaken. Full details of these can be found in **ES Volume 3, Appendix 9.1: Ecological Baseline Report [EN010168/APP/6.3] to Appendix 9-7: Wintering Bird Survey Report [EN010168/APP/6.3].**
Langley Burrell Without Parish Council	EIA requirement to consider the Evaluation of Biodiversity	A development project has to include an uplift in biodiversity. Comment; Uplift is generally defined as a 10% improvement. In order for this aspect of the Applicant's EIA to be valid, it has to: Conduct a thorough census of soil health at the mini- and micro- levels for animals, fungi and other microscopic life forms. This needs to be done on a field by field basis. Soil health is vital to the existence of habitat and thus to a full record of the ecological structure of the area and the biodiversity that it supports.	The Applicant notes this comment. Full details of the BNG assessment can be found in the **Biodiversity Net Gain (BNG) Assessment Report [EN010168/APP/7.8].** A full biodiversity net gain assessment has been prepared and is contained within **Biodiversity Net Gain Assessment Report [EN010168/APP/7.8]** and completed **Statutory Biodiversity Metric [EN010168/APP/7.9].** This demonstrates that the Scheme is expected to deliver an uplift of 34.75%, 12.31% and 20.08% in habitat units, hedgerow units and watercourse units respectively. This assessment sets out how the uplift has been calculated based on industry standard guidance and survey methodology. Survey methodology used to underpin BNG calculations is based on recording habitat type and condition, which are a reflection of the soil type/health as well as historic and current management regimes.
Langley Burrell Without Parish Council	EIA requirement to consider the Evaluation of Biodiversity	Having produced this thorough biodiversity survey, the EIA then needs to examine and record: The level of adverse impact that the development, and operation throughout its lifetime, will have on the existing biodiversity, its abundance and its habitat availability. As the development has to demonstrate 'biodiversity uplift', the existing character of biodiversity, abundance and habitat availability needs to be quantified - both before (actual) and after (predicted) development of the Solar Park.	The uplift in biodiversity anticipated to occur as a result of the Proposed Development has been quantified using the Statutory Biodiversity Metric published by Natural England. The **Biodiversity Net Gain (BNG) Assessment Report [EN010168/APP/7.8]** provides full details on how the baseline and post-development biodiversity units have been calculated.
Langley Burrell Without Parish Council	EIA requirement to consider the Evaluation of Biodiversity	Having produced this thorough biodiversity survey, the EIA then needs to examine and record:	The uplift in biodiversity anticipated to occur as a result of the Proposed Development has been quantified using the Statutory Biodiversity Metric published by Natural England. The **Biodiversity Net Gain (BNG) Assessment Report**

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		The nature of the biodiversity 'uplift' has to be quantified in precisely the same way. It needs to predict the full range of animals and plants that will be present, their abundance, and the availability of the habitats that they require. In short, the EIA needs to demonstrate how biodiversity 'uplift' (10% improvement) will be accomplished against all these parameters.	**[EN010168/APP/7.8]** provides full details on how the baseline and post-development biodiversity units have been calculated. This demonstrates that the Scheme is expected to deliver an uplift of 34.75%, 12.31% and 20.08% in habitat units, hedgerow units and watercourse units respectively.
Luckington and Alderton Parish Council	Consultation	Section 1.5 of the scoping EIA deals with the 'Consultation and Engagement' phase of the LDSP proposals. Whilst the developers have undertaken some consultation within the local communities during the initial 'non-statutory' phase of the Lime Down Solar Park, these have not gone well and have failed to include many residents in the process. We understand that LDSP have received over 1400 submissions from the community, despite failing to engage with significant sections of the community who will be directly affected by their proposals. Our concerns are:	The Applicant's approach to pre-application engagement has been informed by the requirements of the Planning Act 2008 and associated guidance and legislation. The Applicant's strategy of coordinating consultation activities across the Scheme has resulted in a high level of engagement and consultation responses, as described in the **Consultation Report [EN010168/APP/5.1]**. The Applicant held its stage one non-statutory consultation for just over six weeks (43 days) from 14 March to 26 April 2024. The aim of this initial consultation was to introduce the Project, present early-stage proposals for the Project and give individuals and interested parties the opportunity to share their views. Further information into the engagement completed as part of the non-statutory consultation can be found in Chapter 4: Non-statutory Consultation and Engagement of the **Consultation Report [EN010168/APP/5.1].** The feedback received to this round of consultation contributed to the development of the **Appendix E-X: Publication and compliance with the SoCC [EN010168/APP/5.2]** in preparation for Stage Two statutory consultation. This SoCC was also consulted on and approved by Wiltshire Council. Further information on the development of the SoCC, and how the Applicant complied with commitments set out in it, can be found in the **Consultation Report. [EN010168/APP/5.1].** Evidence of the SoCC, including drafts shared with local authorities can be found in **Appendix D-X: Preparation of Statement of Community Consultation (SoCC) and Appendix E-X: Publication and compliance with the SoCC [EN010168/APP/5.2].**
Luckington and Alderton Parish Council	Inadequate notice and publicity	Inadequate notice and publicity were given of the 'consultation events', only held in the large villages. The initial event in Sherston was only advised to Parish Councils 48 hours in advance, and virtually no local publicity was given to the event by the developers, nor did they make any use of social media to publicise it. Consequently, most of the community were unaware of it taking place, and had no opportunity to attend.	The Applicant published a range of consultation materials including a Community Consultation Leaflet summarising the proposals, held a series of in-person and online community information events where the proposals could be discussed with members of the Applicant's Project Team, and hosted free-to-use communications channels for enquiries. This included notifying over 10,500 properties within the vicinity of the Scheme, which were identified within a defined Core Consultation Zone. In addition to this, the Applicant made all consultation materials available online, at CAPs , at community information events and by request to the communication channels. Consultation opportunities and materials were further publicised by local media advertising, statutory notices, and maintaining a register of interested individuals. Further details on the publicising of community information events is presented in the Consultation Report [EN010168/APP/5.1].
Luckington and Alderton Parish Council	Limited public transport	There is very limited public transport in the rural area impacted by the LDSP during weekday office hours, and there is none during evenings or weekends, when most of the 'publicity events' were staged. This meant that only residents with their own transport could attend the promotional events.	The Applicant held a series of eight in - person and one online community information events across a range of dates and times, including events on weekends and events that remained open until 7:30pm on weekday evenings. Further details of these events are presented in the **Consultation Report [EN010168/APP/5.1]**, and in **Appendix C-X: Non-Statutory Consultation [EN010168/APP/5.2]**.
Luckington and Alderton Parish Council	Access to LDSP's proposals	Many of the residents in the area affected by LDSP's proposals are older, some do not have their own transport, and are less able or willing to use the internet or to engage with LDSP 'online', many simply do not have the skills to do so. When advised by the developer that they could 'go to the website', they were being offered an option that they simply cannot utilise.	The Applicant acknowledges this comment, and has committed throughout to making project information and consultation materials available both online and offline throughout its pre-application process. This has included holding multiple in-person community information events, and online webinars.

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		The developer was directly advised, at the outset of the non-statutory consultation process, of these challenges for the residents, and the inappropriateness of being overly reliant on internet solutions to conduct the consultation.	Furthermore, as well as making all consultation materials available online, the Applicant ensured all information was available at CAPs, at community information events and by request to the communication channels. This approach was committed to in the **SoCC [EN010168/APP/5.2]**, which was consulted on by host local authorities. The Applicant also maintained communications channels via email, phone, and freepost, by which requests for hard-copy consultation materials could be made. This was committed to in the **SoCC [EN010168/APP/5.2]** and described further in the **Consultation Report [EN010168/APP/5.1].**
Luckington and Alderton Parish Council	Consultation concerns raised within the local community	The developer ignored the consultation concerns raised from within the community, several parish areas did not have any locally held, accessible consultation events, and no arrangements were put in place to assist the travel challenged residents and no viable alternative was offered. This has severely undermined community confidence in the developer's ability and commitment to community consultation as part of the development process.	The Applicant sought to ensure that consultation was accessible to all who may have an interest in the Scheme. This was enabled by a hybrid approach, with content, engagement tools and opportunities to provide feedback and comments online and in-person/offline. The Applicant has carried out a multi-phased community consultation to enable the iterative development of proposals in response to the ongoing consideration of feedback received. This approach is explained and evidenced in the Applicant's **Consultation Report [EN010168/APP/5.1]**. The Applicant's initial, non-statutory consultation on the early-stage proposals for the Scheme included six in-person community information events and two online webinars. Further details on the Applicant's approach to this stage of consultation can be found in **Consultation Report, Chapter 4 [EN010168/APP/5.1].** Through the publicity, information events and a number of other means including the Project website, freephone community information line, and project email address, local communities and stakeholders were provided with initial information on the Project and given the opportunity to submit their views and comments. A summary of the feedback to the Stage One non-statutory consultation and the Applicant's response is provided in **Appendix C of the Consultation Report [EN010168/APP/5.2]**. The Applicant's Stage Two consultation (which was statutory under section 47 of the Planning Act 2008) was carried out in line with commitments and principles established in the Applicant's published Statement of Community Consultation (SoCC). As required by section 47 of the Planning Act 2008, the Applicant consulted with Wiltshire Council on a draft of the SoCC, and had due regard to their comments in updating the SoCC for publication ahead of commencing statutory consultation. **Consultation Report, Chapter 6 [EN010168/APP/5.1]** describes the process of preparing the SoCC, including the Applicant's consideration of comments received from Wiltshire Council (Table 6-1) and adherence to commitments made in the published SoCC (Table 6-4). The Applicant received 1,638 feedback responses from members of the community to the Stage Two consultation (statutory under s47 of the Planning Act 2008). During this period, the Applicant also welcomed 1,061 attendees across a series of two online and eight in-person community information events. All venues were located within the Scheme's Core Consultation Zone and were selected based on their accessibility (to affected communities) and health and safety/capacity requirements. All venues had disabled access. Reference copies of technical documents were available to view free-of-charge at the community information events and for the duration of the consultation period at four Community Access Points (CAPs), alongside community consultation literature

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			to view and take away free-of-charge. Communication channels (Email, Freephone and Freepost) have been open throughout the pre-application stage. The comments received are summarised in **Consultation Report, Chapter 10 [EN010168/APP/5.2]**. and presented in detail in **Consultation Report Appendix F-X: Statutory consultation under Section 47 of the Planning Act 2008 [EN010168/APP/5.2]**, together with how the Applicant has had regard to the feedback when finalising the DCO application.
Luckington and Alderton Parish Council	Timing of inform to local statutory consultees	When the developer submitted the EIA to the Planning Inspectorate on the 16th July 2024, they chose not inform local statutory consultees until the following day (17th July 2024), even though the developer's representatives were attending a formal LAPC council meeting later that same day (17th July). The EIA was, obviously, the main topic of discussion at this Parish Council meeting, members of the public were in attendance. The late notice made it difficult for Councillors to be properly prepared and challenge the developers.	The Applicant submitted a Scoping Report to the Planning Inspectorate on 16 July 2024, consistent with the relevant regulations. While acknowledging that PINS would then be carrying out their own consultation with relevant consultees to inform a Scoping Opinion, the Applicant continued to engage with stakeholders such as parish councils. This included attending meetings with LAPC on 17 July 2024.
Luckington and Alderton Parish Council	Omission of Wessex Water	Wessex Water has been omitted from the list of Statutory Consultees. This is misguided as they operate sewage treatment plants on the Sherston Avon and the Gauzebrook, both are historically 'High Risk' in terms of surface and groundwater flooding. Wessex Water also extract significant volumes of drinking water from the important Greater and Inferior Oolite 'vulnerable' aquifers which underly the large areas beneath the proposed development sites and the extensive hinterland areas beyond the proposed site boundaries. Not including Wessex Water as a Statutory Consultee is both disingenuous and increases the risk of unmitigated sewage contamination and the compromising of the drinking water supply of much of North Wiltshire.	Wessex Water were consulted during the EIA Scoping process. Their comments, including those relating to the Great Oolite aquifer, abstraction, and sewerage infrastructure, have informed the approach to groundwater protection and drainage. Potential impacts on water quality, groundwater vulnerability, and surface water management have been assessed in **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [EN010168/APP/6.1].**
Luckington and Alderton Parish Council	Recommendation: LAPC recommends that the EIA be amended to include specific consultation commitments during the future consultation phases of this project to include:	'In-person' consultation events to be held in every parish council area directly affected by LDSP's proposals, or situated within 5 miles of the proposed development sites or cable corridors to Melksham. These events, and any other 'consultation' processes should be actively and widely publicised (at least 2 weeks in advance) by means of local papers, radio and social media, in addition to the expected letters to the statutory consultees.	Noted. The Applicant held eight in-person events during Stage Two (statutory Section 47) consultation in January – March 2025, held in venues across the core consultation zone so that those living in the vicinity of the Scheme could attend and access information on the updated proposals. This was committed to in the Statement of Community Consultation (SoCC) provided in **Appendix D: Statement of Community Consultation [EN010168/APP/5.2]** and described further in **Chapter 7 of the Consultation Report [EN010168/APP/5.1].** The Applicant recognised the opportunity of issuing a press release to regional and local media outlet in advance of Stage Two consultation launching on Tuesday 14 January 2025 to publicise the dates and encourage anyone interested to sign up to be kept informed about the consultation. The Applicant issued further press release on the launch of Stage Two consultation on 26 January 2025. A list of media outlets to whom press releases were issued, and copies of the press releases are contained in C**hapter 7 of the Consultation Report [EN010168/APP/5.1]**. The consultation details were also publicised in Section 48 Notices published in local newspapers for two consecutive weeks, and in national newspapers. A copy of the Section 48 notice is provided in **the Consultation Report [EN010168/APP/5.1]**. In addition to this, the Applicant placed adverts across regional media outlets to publicise the Stage Two consultation and consultation programmes. Further details on these adverts are set out in **Chapter 7 of the Consultation Report [EN010168/APP/5.1].**
Luckington and Alderton Parish Council	Recommendation: LAPC recommends that the EIA be amended to include specific consultation commitments during the future consultation	LDSP should make specific arrangements to enable improved engagement and consultation accessibility for the older, mobility challenged and digitally disadvantaged within the communities affected by the LDSP proposals.	The Applicant recognises the importance of making consultation activities accessible to all, including older individuals, those with limited mobility, and people who may be digitally disadvantaged. During the Stage Two (statutory Section 47) consultation period, the Applicant held eight in-person events at publicly accessible venues designed to

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	phases of this project to include:		accommodate individuals with mobility challenges. These events provided opportunities for face-to-face engagement and were located within the core consultation zone. To ensure that those without digital access were informed, the Applicant distributed a Consultation Leaflet to 14,187 addresses within the core consultation zone. In addition, hard copy versions of technical and community consultation materials—including the Preliminary Environmental Information Report (PEIR), the Non-Technical Summary (PEIR NTS), and Feedback Forms—were made available at four Community Access Points (CAPs) for the duration of the statutory consultation. Further details on CAPs are provided in **Chapter 7 of the Consultation Report [EN010168/APP/5.1].** Hard copy materials were also available upon request. Requests for printed copies of the PEIR were considered on a case-by-case basis. To support individuals with specific accessibility needs, the Applicant considered requests for consultation materials in alternative formats, such as large print, audio versions, or translations into other languages. These were assessed on a case-by-case basis to ensure appropriate support was provided. Beyond the core consultation mailing zone, the Applicant identified and engaged with seldom heard groups—individuals and communities less likely to participate in traditional consultation methods. These groups were identified through desk-based research and discussions with Local Authorities. They include: • Geographically isolated communities • Economically inactive individuals and socially deprived communities • Young people and older people • Disabled individuals and those with learning disabilities • Ethnic minorities • Time-poor, busy working individuals A full list of these consultees is provided in the **Consultation Report [EN010168/APP/5.1].** Communications were issued to these groups to ensure they were aware of the statutory consultation and had the opportunity to participate.
Luckington and Alderton Parish Council	Recommendation: LAPC recommends that the EIA be amended to include specific consultation commitments during the future consultation phases of this project to include:	Include Wessex Water as a Statutory Consultee to allow proper independent assessment of the potential risks that the proposed LDSP development poses to sewage systems, surface flooding, groundwater and drinking water supplies in the wider area impacted by the LDSP development.	Wessex Water were consulted during the EIA Scoping process. Their comments, including those relating to the Great Oolite aquifer, abstraction, and sewerage infrastructure, have informed the approach to groundwater protection and drainage. Potential impacts on water quality, groundwater vulnerability, and surface water management have been assessed in **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [EN010168/APP/6.1].**
Luckington and Alderton Parish Council	Cumulative and In-Combination Effects	EIAA Para: 2.2.28 *If there is only one type of effect on a sensitive receptor (i.e., only one technical chapter has identified effects on that sensitive receptor), then it will be considered that there are no potential in-combination effects and the sensitive receptor will not be taken forward to Stage 2 of the assessment. This screening assessment will be reported in the ES.* The Parish Council feel that this provides inadequate protection in respect of some of the more sensitive receptors in the area affected by the development and would propose a change to this definition: *If there is only one type of effect on a sensitive receptor (i.e., only one technical chapter has identified effects on that sensitive receptor), then it will be considered that there are no potential in-combination effects and the sensitive receptor will not be taken forward to Stage 2 of the assessment. However, if the one type of effect*	This specific definition relates to in-combination effects, which is the combined effect of individual impacts from the Scheme, that are considered likely to result in new or different likely significant effect, or an effect of greater significance, than any of the impacts on their own. All in-combination effects have been considered, and those that result in a significant impact to a receptor have been reported within **Chapter 21: Cumulative and In-Combination Effects [EN010168/APP/6.1]**. The methodology for cumulative and in-combination effects is presented in presented in **Chapter 6: EIA Methodology [EN010168/APP/6.1]**.

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		on a sensitive receptor has been categorised as both 'high impact' and 'high sensitivity' (Table 2.3), then this will be treated in the same way as if it had 'two or more types of residual effect' and should be taken forward to Stage 2 of the assessment. This screening assessment will be reported in the ES.	
Luckington and Alderton Parish Council	Surface Water Drainage	EIA Para 4.2.34 The area within the proposed development sites comprises of land, under which sit two major aquifers (Greater and Inferior Oolite), these are both classed as 'vulnerable' near the proposed sites and are used for extensive drinking water extraction. The area both within and beyond the proposed development sites is very prone to significant surface water flooding. The ground is also porous and the water table in the area frequently 'overtops' the ground level, resulting in surface water flooding along the routes which the surface water takes to enter the nearby Sherston Avon and Gauzebrook watercourses to reach the Bristol Avon catchment & watercourse. Whilst it is laudable that the developer intends to try to contain flooding and surface water within their sites, the history of this area makes such a course of action highly unlikely. Therefore, the developer should be required to include, within the scope of the EIA and subsequent Environmental Assessment, a full evaluation of the wider consequences of the proposed development on nearby watercourses (Sherston Avon and Gauzebrook) by both surface water and subterranean groundwater emanating from the developers' sites. Historical flood risk in the wider area shows extensive 'high risk' receptor water courses, and is the result of both sources. The potential effects of the Scheme on groundwater and surface water flood risk, including any interactions with nearby watercourses such as the Sherston Avon and Gauze Brook, have been assessed within **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [EN010168/APP/6.1]** and the supporting Flood Risk Assessment Appendices [EN010168/APP/6.3]. The assessments considered the permeability of the underlying geology, groundwater levels, and the potential for infiltration and surface water runoff to affect adjacent areas. The design of the Scheme includes appropriate surface water management measures to ensure that post-development runoff rates will not exceed greenfield conditions, and no significant off-site flood risk or impact on groundwater quality or quantity is predicted.	The potential effects of the Scheme on groundwater and surface water flood risk, including any interactions with nearby watercourses such as the Sherston Avon and Gauze Brook, have been assessed within **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [EN010168/APP/6.1]** and the supporting **Flood Risk Assessment Appendices [EN010168/APP/6.3].** The assessments considered the permeability of the underlying geology, groundwater levels, and the potential for infiltration and surface water runoff to affect adjacent areas. The design of the Scheme includes appropriate surface water management measures to ensure that post-development runoff rates will not exceed greenfield conditions, and no significant off-site flood risk or impact on groundwater quality or quantity is predicted. No risks associated with shallow groundwater flooding were identified in the assessments developed to support **ES Volume 1, Chapter 19 Ground Conditions & Contamination [EN010168/APP/6.1].**
Luckington and Alderton Parish Council	Surface Water Drainage	The developer should also be required to conduct a wider assessment of the potential impact of their proposed industrial scale scheme on the wider catchment area of the Bristol Avon. This river system is very sensitive to changes to the volume and timing of surface and groundwater entering the system, and there are several 'high risk' flood areas downstream from the proposed development sites including, Brook End, Malmsbury, The Somerfords, Corston, Chippenham, Melksham, Trowbridge, Bradford on Avon, Bathford, Bath, Keynsham, and Bristol. Almost all these settlements have historically suffered from major flood events, causing extensive damage and disruption. The proposed Lime Down Solar Scheme is much large than any previous schemes in the catchment area, and it clearly has the potential to have a significant impact on the river system.	Surface water drainage has been assessed within **ES Volume 3, Appendices 11-1 to 11-9: Flood Risk Assessment and Drainage Strategy [EN010168/APP/6.3]**. The Proposed Development has been designed to ensure that there is no increase in runoff rates or volumes leaving the site compared to the greenfield baseline. The site is largely permeable, and runoff from impermeable infrastructure is managed through SuDS in line with national guidance. This ensures that the development will not increase flood risk to downstream receptors within the Bristol Avon catchment, including settlements such as Brook End, Malmesbury, the Somerfords, Corston, Chippenham, Melksham, Trowbridge, Bradford on Avon, Bathford, Bath, Keynsham, and Bristol.
Luckington and Alderton Parish Council	Surface Water Drainage	Recommendation: The developer should be required to investigate the potential off-site risk and include a detailed assessment of all potential off-site impacts of their development on surface water, groundwater, flood risk and drinking water. At this stage the developer rules this 'out of scope'. That should be challenged as it suggests insufficient detailed knowledge of the local geology, surface water and groundwater systems. This should all be ruled 'in-scope' and then we may be able to mitigate properly against risks which could prove to be catastrophic for local communities if they remain unaddressed.	Off-site effects on flood risk, surface water, groundwater and drinking water have been assessed within **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [EN010168/APP/6.1]** and **ES Volume 3, Appendices 11-1 to 11-9: Flood Risk Assessment and Drainage Strategy [EN010168/APP/6.3]**. This includes the potential for changes to runoff routing, infiltration, and discharge beyond the site boundary. The assessment considers local geology, topography, hydrological connectivity and the sensitivity of groundwater and potable water supplies to ensure risks are understood and mitigated appropriately. No increase

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			in off-site flood risk or impact on drinking water quality is expected as a result of the Proposed Development.
Luckington and Alderton Parish Council	Site Reinstatement	EIA Para: 4.3.17 *The land within the Scheme will be restored and returned to its original use as far as possible after decommissioning. This will include removal of the substations, converter units/inverters and BESS.* Throughout the non-statutory consultation period, the developer has repeatedly stated in public that the land used will be returned to its original agricultural use at the end of the proposed 60-year life of the development. The wording of this paragraph suggests that it will not be possible to do that, and the arbiter of what is 'as far as possible' is the developer. This does not place a sufficient onus on the developer to make good on their statement that the land being fully returned to agricultural use, and therefore, the paragraph should be rewritten to avoid the local community facing an undesirable legacy. We suggest it should be amended to read: *'The land within the Scheme will be restored and returned to its original use and agricultural classification after decommissioning. This will include removal of the substations, converter units/inverters and BESS. It will also include such remedial action as necessary to reinstate the productive qualities of the land and soil within the Scheme sites'.*	The Soil Resources Management Plan will remain in place throughout decommissioning and will minimise adverse effects on soils. This is addressed is paragraphs 3.6.3 and 3.6.4 of ES Volume 1 Chapter 3 [EN010168/APP/6.1] as follows: 3.6.3 When the operation and maintenance phase ends, the Solar PV Sites would be decommissioned and the land returned to its original use and condition as far as practicable and returned to the landowner. All Solar PV Panels, mounting piles, cabling, inverters, transformers, switchgear, BESS and substations would be removed from within the Solar PV Sites and recycled or disposed of in accordance with good practice and market conditions at that time. This will include the areas of agricultural land where the soil health, quality and structure may have improved, and the established habitats. Foundations and other below ground infrastructure will be cut to 1 m below the surface to enable future ploughing. Any piles would be removed. 3.6.4 Post-decommissioning, the landowners would choose how the land is to be used and managed, the landowner may return all of the land to arable use, although it is likely that established habitats such as hedgerows and woodland would be retained given their potential benefits to agricultural land and the wider farming estate. Permissive paths would be removed during decommissioning, with the precise timing to be determined by the contractor(s) and communicated to Wiltshire Council in accordance with the Outline Decommissioning Strategy [EN010168/APP/7.14].
Luckington and Alderton Parish Council	Conclusions on Scoping	The Parish Council is extremely concerned at some of the proposed decisions regarding moving some issues 'out of scope', despite the clear argument for placing them within scope on both local knowledge and scientific grounds.	Comment noted. The Scoping Report has been thoroughly reviewed and agreed upon with the Planning Inspectorate. The Applicant considers the issues presented within the ES to be a proportionate account of all relevant environmental impacts.
Luckington and Alderton Parish Council	Conclusions on Scoping	The geology beneath the area of the actual sites proposed for the Lime Down Solar Park development, and beneath the extensive hinterland beyond those boundaries, is much more complicated than is suggested by the simplistic and detail-poor summary contained within the developers EIA. The area within and surrounding the proposed LDAP development comprises a Great Oolitic Limestone layer (aquifer), beneath which lies a low permeability bed of Fullers Earth, and below that the Inferior Oolitic Limestone (aquifer). The Oolitic layers are important aquifers and are used as a reliable source of drinking water. Wessex Water extract water at various points, including the important extraction point at Allington, very close to both the proposed solar sites (A-E) and the proposed Cable Corridors. There are several other borehole extraction points nearby, including Rodbourne and Luckington/Alderton, the latter of which is drawn from the aquifers, pumped into the Sherston Avon, and subsequently extracted from the Sherston Avon for cross-country transportation to the River Thames, supplementing the Thames Water supply to London.	We acknowledge the concerns raised regarding the geological complexity of the Lime Down Solar Park development area and its surrounding hinterland, particularly in relation to the aquifer systems and drinking water sources. Since the submission of the Scoping Report, the geological baseline has been significantly updated and refined. This is presented in Environmental Statement (ES) Volume 3, Appendices 19-1 to 19-8: Phase 1 Desk Studies [EN010168/APP/6.3], which provide detailed characterisation of the geological sequence, including the Great Oolite Limestone, Fuller's Earth, and Inferior Oolite Limestone formations. These studies incorporate publicly available geological mapping, borehole records, and hydrogeological data to ensure a robust understanding of subsurface conditions. The importance of the Oolitic aquifers as drinking water sources, including abstraction points at Allington, Rodbourne, and Luckington/Alderton, has been fully considered in the assessment. The potential for impacts on these aquifers and associated water infrastructure has been evaluated in ES Volume 1, Chapter 19: Ground Conditions and Contamination [EN010168/APP/6.1], with specific reference to Table 19-4, which outlines the potential effects and associated mitigation measures. To ensure protection of groundwater resources, a suite of mitigation measures has been proposed and will be implemented through the Outline Construction Environmental Management Plan (CEMP) [EN010168/APP/7.12]. These include: • Controlled construction practices to prevent contamination. • Surface water management to reduce infiltration risks.

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			• Monitoring and contingency planning for unexpected ground conditions. • With the implementation of these measures, the potential impacts on geological and hydrogeological receptors, including drinking water aquifers, are assessed as not significant.
Luckington and Alderton Parish Council	Conclusions on Scoping	Groundwater is water in the soil and underlying rocks, and is the source of most of the water in rivers. In many areas it is also a source of drinking water. To protect drinking water supplies, the Government has established Groundwater Source Protection Zones (SPZs) round the most important drinking water supplies which use groundwater.	Source Protection zones and groundwater resources are considered **ES Volume 3, Appendices 19-1 to 19-8: Phase 1 Desk Studies [EN010168/APP/6.3]** and these assessments are considered in the assessments contained within Table 19-4 of **ES Volume 1, Chapter 19 Ground Conditions & Contamination [EN010168/APP/6.1].**
Luckington and Alderton Parish Council	Conclusions on Scoping	Throughout the area, within and without the development sites, there are likely to be fissures in the strata which transmit pollutants rapidly into the groundwater below. The probability of these fissures was a significant contributary argument that resulted in the rejection of an application to construct a toxic waste dump in nearby Sherston several years ago.	Geological conditions are considered **ES Volume 3, Appendices 19-1 to 19-8: Phase 1 Desk Studies [EN010168/APP/6.3]** and these assessments are considered in the assessments contained within Table 19-4 of **ES Volume 1, Chapter 19 Ground Conditions & Contamination [EN010168/APP/6.1]**
Luckington and Alderton Parish Council	Conclusions on Scoping	The entire LDSP area is in a Groundwater Source Protection Zones SPZ. The SPZ provides some protection from contamination for public water supplies (Bristol Water and Wessex Water in the North Wiltshire area) and for private borehole drinking water supplies, which we know exist in this area.	Source Protection zones and groundwater resources are considered **ES Volume 3, Appendices 19-1 to 19-8: Phase 1 Desk Studies [EN010168/APP/6.3]** and these assessments are considered in the assessments contained within Table 19-4 of **ES Volume 1, Chapter 19 Ground Conditions & Contamination [EN010168/APP/6.1]** To ensure protection of groundwater resources, a suite of mitigation measures has been proposed and will be implemented through the **Outline Construction Environmental Management Plan (CEMP) [EN010168/APP/7.12]**. These include: • Controlled construction practices to prevent contamination. • Surface water management to reduce infiltration risks. • Monitoring and contingency planning for unexpected ground conditions. With the implementation of these measures, the potential impacts on geological and hydrogeological receptors, including drinking water aquifers, are assessed as not significant.
Luckington and Alderton Parish Council	Conclusions on Scoping	The area within and without the developers' sites have a history of surface water flooding and many of them are identified as 'High Risk'. The ground underneath the developers planned sites is permeable and porous. The prediction of water flows below ground is challenging and it is difficult to predict outcomes without detailed research and proper modelling. This is self-evident by the many local springs that appear and disappear in the area as their subterranean course changes. It should not be confined to the developers to deal with such an important matter, without proper scrutiny. We would suggest that the CEMP (the developer's own 'Construction Environment Management Plan') is not the right vehicle to manage this issue. We would recommend that the area within and without the developers' sites to the extent that the surface and groundwater enter the Sherston / Bristol Avon catchment area are brought 'within scope' of the full Environmental Assessment. This will allow the scrutiny of these publicly important issues to be fully considered within the Planning Inspectorate's managed public process and not effectively dealt with by the developer behind closed doors.	Surface water and groundwater flood risk within and surrounding the Lime Down site has been assessed within **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [EN010168/APP/6.1]**. **ES Volume 3, Appendices 11-1 to 11-9: Flood Risk Assessment and Drainage Strategy [EN010168/APP/6.3]** considers surface water runoff, groundwater conditions, and infiltration risk based on available data and site-specific topography. The assessment concludes that no significant adverse effects on groundwater or surface water flood risk are predicted either within or beyond the site boundary. The **Outline CEMP [EN010168/APP/7.12]** includes mitigation measures to manage residual risks during construction in accordance with best practice.
Luckington and Alderton Parish Council	Conclusions on Scoping	The Oolitic Limestone layers beneath, and in the area surrounding the proposed LDSP development, also contain fissures and fractures which allow ground water and any pollutants to pass through the rock layers and potentially contaminate the supply of drinking water. Precisely locating these fissures is difficult and costly. If	Geological conditions are considered **ES Volume 3, Appendices 19-1 to 19-8: Phase 1 Desk Studies [EN010168/APP/6.3]** and these assessments are considered in the assessments contained within Table 19-4 of **ES Volume 1, Chapter 19 Ground Conditions & Contamination [EN010168/APP/6.1]**

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		contaminate infiltration happens because of the LDSP development, the implications for public health are, we suggest, significant.	To ensure protection of groundwater resources, a suite of mitigation measures has been proposed and will be implemented through the **Outline Construction Environmental Management Plan (CEMP) [EN010168/APP/7.12]**. These include: • Controlled construction practices to prevent contamination. • Surface water management to reduce infiltration risks. • Monitoring and contingency planning for unexpected ground conditions. With the implementation of these measures, the potential impacts on geological and hydrogeological receptors, including drinking water aquifers, are assessed as not significant.
Luckington and Alderton Parish Council	Conclusions on Scoping	The information supporting these comments is available via the British Geological Survey and Environment Agency Websites, from the Drinking Water Inspectorate and from Wessex Water and from other relevant online GIS mapping systems. These issues have been repeatedly brought to the attention of the developer, but the fact that the developer is seeking to limit the 'in scope' Study Area to the confines of the developers' sites, suggests that these concerns regarding surface water flooding, ground water flooding and contamination and drinking water sources are being given little, if any, priority by the developer, and are arguably being totally ignored.	Potential impacts on groundwater flooding, contamination, and drinking water sources have been thoroughly assessed within the Environmental Statement (ES). Specifically, **ES Volume 3, Appendices 19-1 to 19-8: Phase 1 Desk Studies [EN010168/APP/6.3]** provide a detailed review of the geological and hydrogeological baseline, incorporating data from authoritative sources including the British Geological Survey, Environment Agency, Drinking Water Inspectorate, and Wessex Water. These sources have informed the understanding of aquifer systems, groundwater vulnerability, and water abstraction points in the wider area surrounding the proposed development. The assessments presented in Table 19-4 of **ES Volume 1, Chapter 19: Ground Conditions and Contamination [EN010168/APP/6.1]** consider potential impacts on groundwater quality, flood risk, and drinking water infrastructure. These assessments extend beyond the immediate site boundaries to ensure that sensitive receptors, including nearby boreholes and surface water features, are appropriately considered. Furthermore, the **Outline Construction Environmental Management Plan (CEMP) [EN010168/APP/7.12]** sets out a comprehensive suite of mitigation measures to manage risks associated with construction and operation. These include: • Measures to prevent pollution and manage surface water runoff. • Controls to avoid mobilisation of contaminants. • Monitoring protocols to ensure protection of groundwater and drinking water sources. With the implementation of these mitigation measures, the potential impacts on groundwater flooding, contamination, and drinking water sources are assessed as not significant.
Luckington and Alderton Parish Council	Conclusions on Scoping	These water-related issues are too important, and pose too much risk to the wider public, not to be subjected to public scrutiny and addressed in the full Environmental Assessment.	A full environmental assessment of water related aspects is included in **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [EN010168/APP/6.1].**
Luckington and Alderton Parish Council	Conclusions on Scoping	The following important questions need to be answered by the developer as part of the full Environmental Assessment, and not shoved 'out of scope' and potentially ignored:	The Applicant disagrees that important questions have been shoved 'out of scope' and potentially ignored. The purpose of the Scoping Report was to identify the most likely impacts of the Proposed Development on the environment, so that the assessment can be focussed on those areas where potential significant effects are likely.
Luckington and Alderton Parish Council	Conclusions on Scoping	Will the proposed LDSP development have an impact on surface water and ground water flooding in the adjacent Sherston Avon and Gauzebrook watercourses? If so, what is that impact and what mitigation or defence measures are required to deal with it effectively?	Flood risk from surface water and groundwater has been assessed in **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [EN010168/APP/6.1]**. This includes consideration of runoff from the development into the Sherston Avon and Gauze Brook. Mitigation measures have been incorporated to ensure no increase in flood risk beyond the site boundary. For the panelled areas, embedded mitigation measures include retention of existing vegetation beneath and between

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			arrays, minimisation of ground compaction during construction, and maintenance of grassed permeable surfaces to support infiltration. For the BESS compounds, substations and access tracks, measures include permeable surfacing, SuDS features to provide attenuation storage sized for the 1 in 100-year storm event plus climate change, and lined containment where appropriate. With these measures in place, no significant adverse effects on surface water or groundwater flood risk are predicted.
Luckington and Alderton Parish Council	Conclusions on Scoping	Will the proposed LDSP development have an impact on surface water and ground water flooding in the wider Bristol Avon River systems, specifically those downstream settlements where there is a history of flooding and property damage, and that are considered 'High Flood Risk'? If so, what is that impact, where will it impact and what mitigation or defence measures are required at each affected location.	The assessment presented in **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [EN010168/APP/6.1]** and the supporting **Flood Risk Assessment Appendices [EN010168/APP/6.3]** considers surface water and groundwater pathways connected to the wider Bristol Avon system, including downstream settlements with a history of flooding. The assessment concludes that the Proposed Development will not result in any increase in surface water runoff rates or volumes compared to the existing greenfield baseline. Therefore, no increase in flood risk is predicted in any downstream locations, including settlements within the Bristol Avon catchment. Mitigation measures have been incorporated within the site to maintain greenfield discharge, including permeable surfaces, retention of vegetated ground cover beneath the arrays, and SuDS attenuation for impermeable infrastructure. No additional mitigation or defences are required beyond the site boundary as no off-site impacts have been identified.
Luckington and Alderton Parish Council	Conclusions on Scoping	Will the proposed LDSP development have an impact on drinking water quality and extraction in the areas around the proposed LDSP development sites and potential cable corridors? If so, what is that impact and what mitigation or defence measures are required to deal with it effectively?	The potential for impacts on drinking water sources, including those related to cable routes and groundwater abstraction, has been assessed in **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [EN010168/APP/6.1]** and the supporting **Flood Risk Assessment Appendices [EN010168/APP/6.3]**. The assessment concludes that no significant effects on drinking water quality or supply are predicted as a result of the Proposed Development. Mitigation measures have been incorporated to protect groundwater and drinking water resources, including the use of lined containment in areas with critical infrastructure such as BESS compounds, controls on the use and storage of fuels and chemicals, and measures to minimise soil disturbance and compaction. Additional pollution prevention measures are secured through the **Outline CEMP [EN010168/APP/7.12]**, which includes emergency response procedures in the event of an accidental spill. Further detail on water consumption and the approach to protecting local water supply sources is provided in the **Outline Water Resources Strategy [EN010168/APP/7.25]**, which confirms that no abstraction is proposed and that construction water demand will be met through existing licensed supplies.
Luckington and Alderton Parish Council	Conclusions on Scoping	Recommendation: That the 'In Scope' Study area for environmental impact should be amended to include the following, so that these important issues can be considered as part of the public statutory consultation process:	The study area assessed within **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [EN010168/APP/6.1]** includes the site and surrounding catchment where surface water and groundwater could reasonably be affected by the Proposed Development. Receptors downstream of the site, including within the Sherston Avon and Gauze Brook systems have been considered in line with best practice.
Luckington and Alderton Parish Council	Conclusions on Scoping	The area within and surrounding the proposed LDSP development sites and cable corridors from which surface water flows and subsequently enters either the Sherston Avon or Gauzebrook watercourses. It should also include any implications downstream of the development and any actions necessary to mitigate against any detrimental effects which may be disclosed.	The study area assessed within **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [EN010168/APP/6.1]** includes the site and surrounding catchment where surface water and groundwater could reasonably be affected by the Proposed Development. Receptors downstream of the site, including within the Sherston Avon and Gauze Brook systems have been considered in line with best practice.
Luckington and Alderton Parish Council	Conclusions on Scoping	The area within and surrounding the proposed LDSP development sites and cable corridors from which ground water flows and subsequently enters either the Sherston Avon or Gauzebrook watercourses. It should also include any	The study area assessed within **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [EN010168/APP/6.1]** includes the site and surrounding catchment where surface water and groundwater could reasonably be affected by the Proposed Development. Receptors downstream of the site, including within

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		implications downstream of the development and any actions necessary to mitigate against any detrimental effects which may be disclosed.	the Sherston Avon and Gauze Brook systems have been considered in line with best practice.
Luckington and Alderton Parish Council	Conclusions on Scoping	The area within and surrounding the proposed LDSP development sites and cable corridors from which surface water or groundwater flows and subsequently enters and moves through the Great and Inferior Oolitic aquifer layers. It should also include any implications for drinking water extraction, whether by water companies or private boreholes. It should identify any implications arising from the development and include any actions necessary to mitigate against any detrimental effects which may be disclosed.	These matters have been addressed in the Environmental Statement (ES). Specifically, **ES Volume 3, Appendices 19-1 to 19-8: Phase 1 Desk Studies [EN010168/APP/6.3]** provide a detailed review of the geological and hydrogeological conditions across the development sites and cable corridors. These studies incorporate data from the British Geological Survey, Environment Agency, and other relevant sources to characterise the subsurface environment and aquifer systems. The potential for surface water and groundwater to interact with the Oolitic aquifers, and the implications for drinking water sources, including licensed and private abstractions, have been assessed in Table 19-4 of **ES Volume 1, Chapter 19: Ground Conditions and Contamination [EN010168/APP/6.1]**. This includes consideration of: • Groundwater flow pathways and recharge zones. • Proximity to Source Protection Zones (SPZs). • Potential risks to water quality during construction and operation. Mitigation measures to protect groundwater and drinking water sources are set out in the **Outline Construction Environmental Management Plan (CEMP) [EN010168/APP/7.12]**. These include: • Pollution prevention controls. • Surface water management strategies. • Monitoring and contingency measures. With these measures in place, the potential impacts on aquifer systems and drinking water abstractions are assessed as not significant.
Luckington and Alderton Parish Council	Study Area	Para 10.2.1 & Para 10.2.2 The EIA states: *The Study Area, illustrated in Figure 10.1, includes all land within the Site in addition to a 250m buffer from Lime Down A to E, the Land at Melksham Substation, and Cable Route Search Corridor. This is considered sufficient to include all water environment receptors with the potential to be affected by the Scheme, considering the nature of the associated construction activities and operational infrastructure, and based on precedent set by assessment of similar projects.* *The Site incorporates Lime Down A to E, the Land at Melksham Substation, and Cable Route Search Corridor as shown in Figure 3.1. The Cable Route Search Corridor will be refined during the design process to a preferred route, which will be presented in the PEIR.* Recommendation: Whilst we are cognisant that the definition of the 'Study Area' in the EIA is required to be 'reasonable', we feel that the developer's definition is inappropriate and overly narrow. It seeks to exclude many important issues which have significant implications for the wider community and potentially the public across a very large geographic area. The scope of the 'Study Area', should be increased in respect of surface water, groundwater, flooding and drinking water extraction to include the area both within and surrounding the proposed LDSP development sites and cable corridors from which surface water and ground water flows and subsequently enters either the Sherston Avon or Gauzebrook watercourses.oIt should also include the area within and surrounding the proposed LDSP development sites and cable corridors from which surface water or groundwater flows and subsequently enters and	The Study Area defined in **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [EN010168/APP/6.1]** includes the development site and a 250m buffer around Lime Down A–E, the Melksham Substation and the cable route search corridor, as set out in Section 11.2. This extent has been discussed with the Environment Agency and the Lead Local Flood Authority and was agreed in principle as appropriate for assessing likely significant effects, taking into account the nature of the Proposed Development, professional guidance and available datasets. Off-site pathways and potential downstream effects, including those related to surface water, groundwater and drinking water abstraction, have been assessed within this defined area wherever hydrological connectivity has been identified. The assessment concludes that no significant adverse effects on flood risk, groundwater resources or drinking water supplies are predicted as a result of the Scheme.

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		moves through the Great and Inferior Oolitic aquifer layers. It should also include any implications for drinking water extraction, whether by water companies or private boreholes.	
Luckington and Alderton Parish Council	Conclusions on Scoping Table 10.4:	Construction/Decommissioning Phase *Mobilisation of existing contamination via vertical/lateral migration through permeable deposits below the site. Controlled Waters, including underlying groundwater. EIA shows as: Out* We recommend this should be 'In Scope' due to the previously described complexity and sensitivity of the water system inside and outside the confines of the LDSP proposed sites and cable corridors.	These matters are scoped in and considered in **ES Volume 3, Appendices 19-1 to 19-8: Phase 1 Desk Studies [EN010168/APP/6.3]** and these assessments are considered in the assessments contained within Table 19-4 of **ES Volume 1, Chapter 19 Ground Conditions & Contamination [EN010168/APP/6.1]**
Luckington and Alderton Parish Council	Conclusions on Scoping Table 10.4:	Construction/Decommissioning Phase *Spillages or leakages of fuels and chemicals. Leaching of chemicals from faulty battery incidents (fire damage, ash deposition and extinguishing waters). Controlled Waters, including underlying groundwater. EIA shows as Out* We recommend this should be 'In Scope' due to the previously described complexity and sensitivity of the water system inside and outside the confines of the LDSP proposed sites and cable corridors.	These matters are scoped in and considered in **ES Volume 3, Appendices 19-1 to 19-8: Phase 1 Desk Studies [EN010168/APP/6.3]** and these assessments are considered in the assessments contained within Table 19-4 of **ES Volume 1, Chapter 19 Ground Conditions & Contamination [EN010168/APP/6.1].** Mitigation measures are outlined and secured in the **Outline Construction Environmental Management Plan (CEMP) [EN010168/APP/7.12]**
Luckington and Alderton Parish Council	Conclusions on Scoping Table 10.4:	Operations Phase: *Spillages or leakages of fuels and chemicals. Leaching of chemicals from faulty battery incidents (fire damage, ash deposition and extinguishing waters) via vertical/lateral migration through permeable deposits below the site. Controlled Waters, including underlying groundwater. EIA shows as Out* We recommend this should be 'In Scope' due to the previously described complexity and sensitivity of the water system inside and outside the confines of the LDSP proposed sites and cable corridors.	These matters are scoped in and considered in **ES Volume 3, Appendices 19-1 to 19-8: Phase 1 Desk Studies [EN010168/APP/6.3]** and these assessments are considered in the assessments contained within Table 19-4 of **ES Volume 1, Chapter 19 Ground Conditions & Contamination [EN010168/APP/6.1].** Further mitigation is considered in **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [EN010168/APP/6.1] and** the **Outline Battery Safety Management Plan (BSMP) [EN010168/APP/7.21].**
Malmesbury Town Council	Amendments to the EIA	At the Malmesbury Town Council planning and environment committee meeting on 13th August 2024, it was resolved to request amendments to the Environmental Impact Assessment (EIA) by way of increasing the factors in scope – namely;	Noted.
Malmesbury Town Council	Flood Risk	At present, the consideration of risk of flooding risk is limited to the area housing the panels only. MTC believe further consideration should be given in respect of water "run-off" to immediate and indirect rivers and streams – many of which will directly affect Malmesbury which has a recent and significant history of flooding. Recent developments in and directly around Malmesbury which include Sustainable Underground Drainage Systems (SuDS) should also be reviewed as part of this assessment, reviewing their suitability for the above. Malmesbury Town Council request that a Flood Risk Assessment and consideration of water-run off is conducted and included in the EIA to incorporate a wider area to include Malmesbury.	A Flood Risk Assessment has been prepared and is contained within **ES Volume 3, Appendices 11-1 to 11-9: Flood Risk Assessment and Drainage Strategy [EN010168/APP/6.3]**. This assesses surface water runoff across the full site area and considers downstream impacts to the Sherston Avon catchment, which includes Malmesbury and other downstream settlements. The assessment confirms that runoff from the Proposed Development will be controlled to greenfield discharge rates and volumes at the site boundary using a combination of embedded mitigation measures, such as retention of vegetated cover beneath the solar arrays, and formal SuDS features for infrastructure areas including BESS compounds, substations and access tracks. No increase in runoff or flood risk is therefore predicted downstream of the site. While the assessment does not include site-specific flood modelling within Malmesbury itself, it concludes that maintaining greenfield runoff at the development boundary ensures no significant adverse effects on flood risk within the Sherston Avon catchment, including Malmesbury.
Malmesbury Town Council	Water Contamination/Ground Water	As the area occupying the potential development site for Lime Down is a drinking water source (the aquifer is under the development and is utilised by Malmesbury and beyond) and as such is designated a Source Protection Zone by the Environment Agency, Malmesbury Town Council request that a suitable analysis is conducted as part of the EIA in relation to safe drinking water and the potential impact of this development.	These matters have been fully considered as part of the Environmental Impact Assessment (EIA). Specifically, **ES Volume 3, Appendices 19-1 to 19-8: Phase 1 Desk Studies [EN010168/APP/6.3]** provide a detailed review of the geological and hydrogeological conditions, including the identification and mapping of SPZs and groundwater resources. These studies incorporate data from the Environment

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			Agency and other relevant sources to ensure a robust understanding of the aquifer systems and their sensitivity. The potential impacts of the proposed development on groundwater quality and drinking water sources have been assessed in Table 19-4 of **ES Volume 1, Chapter 19: Ground Conditions and Contamination [EN010168/APP/6.1]**. This includes consideration of: • The location of SPZs in relation to the development footprint. • The vulnerability of underlying aquifers. • The potential for contamination during construction and operation. To mitigate any potential risks, a range of measures will be implemented through the **Outline Construction Environmental Management Plan (CEMP) [EN010168/APP/7.12]**, including: • Pollution prevention controls. • Surface water and runoff management. • Monitoring and contingency procedures. With these measures in place, the potential impacts on Source Protection Zones and drinking water supplies are assessed as not significant.
Malmesbury Town Council	Soil Contamination	Given the prolonged (2+ Year) period of construction for the proposed site, Malmesbury Town Council request that further assessment is included in the EIA in relation to soil contamination relating to both the construction and any future event, including damage to cabling, panels or BESS facilities.	Construction measures and control points have been set out in the **Outline CEMP [EN010168/APP/7.12]**
Malmesbury Town Council	Traffic & Transport Management	Currently any impact arising from construction traffic or diverted traffic is not assessed in relation to neighbouring settlements, including Malmesbury. Malmesbury Town Council strongly object to this omission and request the scope is widened to include impact on Malmesbury – such disruption is very likely to have a material impact on the town, including trade, access and tourism.	Proposed construction vehicles routes are set out within **ES Volume 1, Chapter 13: Transport and Access [EN010168/APP/6.1]**. These will be controlled through a CTMP which will be in substantial accord with the **Outline CTMP [EN010168/APP/7.22]** and is secured under a requirement of the **Draft DCO [EN010168/APP/3.1]**. The aim of the CTMP is to ensure that the effect of the construction phase on the local highway network is minimised. Only the AIL delivery route passes through Malmesbury and stays on the A429. None of the main construction routes pass through Malmesbury.
Malmesbury Town Council	Consideration for Emergency Services	Hullavington is designated as a potential site to house the development's Battery Energy Storage System (BESS). Given the increased risk this poses, including that of damage and fire, Malmesbury Town Council strongly request further consideration is given to the suitability and additional training requirements required by Malmesbury's resident parttime Fire Service, given they would be likely to attend an incident. Further consideration must also be included in the EIA for any impact on air quality and ground water contamination resulting from an incident at the Hullavington BESS.	Comment noted. The risk of BESS on the surrounding environment has been considered within the ES, most notably, **Chapter 11: Hydrology, Flood Risk and Drainage, Chapter 14: Noise and Vibration, Chapter 15: Air Quality, Chapter 18: Human Health** and **Chapter 20: Other Environmental Matters (Major Accidents and Disasters) [EN010168/APP/6.1].** The Applicant has consulted with Dorset and Wiltshire Fire and Rescue Service and has incorporated all of their suggestions into the BESS design. The Applicant are committed to delivering a safe and responsible solution that will meet or exceed the latest regulatory and compliance standards, including the National Fire Chief Council Fire Safety Guidelines.
Malmesbury Town Council	Visual Assessment	At present, Malmesbury is out of the scope area (2km) for Visual Assessment and request in the strongest terms that the scope area should be increased to 5km to include Malmesbury Malmesbury has a unique visual footprint, both in and outward of the town, and it's prominent hill-top placement means the visual impact of the proposed development will apply to Malmesbury. Proposal ends.	There is no intervisibility between Malmsbury and the Lime Down Sites where significant effects would occur. The landscape and visual effects of the Scheme have been considered in **ES Volume 1, Chapter 8: Landscape and Visual [En010168/APP/6.1]**.
Melksham Without Parish Council	N/A	This is the formal response of Melksham Without Parish Council to the proposed Lime Down Solar EIA scoping document as a statutory consultee, with particular reference to the areas that are located in the parish. It has been formulated following review at both the parish council's Planning Committee and Full Council	Comment noted.

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		public meetings at the end of July, and with input from local community members, particularly from Whitley.	
Melksham Without Parish Council	Site descriptions	For context, Melksham Without Parish Council is one of the largest rural parishes in Wiltshire, with a population of approximately 7,200. Two of the villages in the parish are Whitley, which is referred to in the Lime Down documentation as “Land at the Melksham Substation” and Beanacre which is the site of the National Grid 400kV “Melksham Substation” and the southerly end of the Cable Route Search Corridor. We believe the Lime Down documentation is very misleading in its description of these two sites as they are named throughout the documentation, as they do not accurately portray the historic, rural settlements that they are but imply that they are urban, industrial areas in the town.	Comment noted. Whilst the Applicant appreciates the concern regarding the naming of Whitley and Beanacre it would like to clarify that the terminology referred to in the comment i.e., “Land at Melksham Substation” and “Melksham Substation” refer to very specific areas of land within the Order Limits. These sit outside the main residential areas in the villages. The terms referred to above relate specifically to the land and infrastructure contained within the Order Limits in these locations. The use of defined naming as set out within the PEIR and ES is important so environmental topics can be clear on what aspects are being assessed and to avoid and confusion. Whitley and Beanacre are referred to correctly where receptors in these locations have been identified by the environmental topics.
Melksham Without Parish Council	Context	Melksham Without Parish surrounds the town of Melksham on three sides – the northern, eastern and southern. In the past, the three villages in the north – Beanacre, Shaw and Whitley – were ancient centres of population. Whitley is mentioned in the Domesday book.	Comment noted.
Melksham Without Parish Council	Heritage	Through the passage of time, the villages of Whitley and Shaw have grown but continue to be distinct settlements. Whitley was probably settled around the same time as Shaw and the origin of both names means a white clearing or wood/copse. At its heart, the village is an agricultural centre with a number of working farms, and farms that have been converted to residential use but the agricultural land associated with them dispersed to other local farms. The village is rich with listed buildings. The agricultural heritage, the listed buildings, along with some other significant 20th centre residential development, give Whitley its unique character, charm and local distinctiveness. Medieval Shaw was a small community centred on its manor house and the chapel. The settlement remained small and rural but by the 17th century there were a reasonable number of houses. The population grew during the 19th century and a church and school were provided. Whitley and Shaw are considered to be a “Large Village” by Wiltshire Council in their adopted Core Strategy and emerging Local Plan (Reg 19 stage at Sept 23).	Noted. See section 12.7 of **ES Volume 1, Chapter 12: Cultural Heritage [EN010168/APP/6.1]** regarding baseline information.
Melksham Without Parish Council	Heritage and A350	Beanacre [Bennecar/Benecar] (Beanfield) is the ribbon development, interspersed with open frontages, along the busy, main A350 between the northern boundary of the town of Melksham and the village of Lacock. It is one of the oldest settlements in the area, first mentioned in estate records of 1275, the earliest surviving dwelling is the Grade I listed Old Manor which lies off the Old Road.	Noted. See section 12.7 of **ES Volume 1, Chapter 12: Cultural Heritage [EN010168/APP/6.1]** regarding baseline information and **ES Volume 3, Appendix 12-2: Archaeological Desk-Based Assessments [EN010168/APP/6.3]**) for mention of the medieval settlement of Beanacre (HER ST96NW460).
Melksham Without Parish Council	Project location	The parish council also feel that the project location is misleading on the PINS portal, “land north of Hullavington, Wiltshire” may cover the solar farm but not the supporting infrastructure, the BESS proposed in Whitley or the proposed underground cable connection to the substation through Beanacre, both of which are south of Hullavington and the M4 and in West Wiltshire. Whilst 5 parcels of land are located to the north of Hullavington, the 6th, and the cable route search corridor, are not. To a member of public looking at the website, they would believe all the proposals are for the north of the county	Comment noted. The pinpoint location illustrated on the Planning Inspectorates website is expected to provide a rough guide in terms of where the project is located. It is not possible to provide an accurate location for the whole Scheme through use of one pin. Precise location plans and drawings are available within the DCO, notably **Volume 2, Document 2.1: Location Plan [EN010168/APP/2.1]** and **Volume 6, Figure 1-1: Scheme Location [EN010168/APP/6.2].** Please note the BESS at Whitley no longer forms part of the application.
Melksham Without Parish Council	60 Year Life	A 60-year BESS life is, for all intents and purposes, permanent. Describing the BESS as “temporary” is inappropriate as it sets an incorrect context/expectation regarding the life of the scheme.	The term "temporary" reflects the fact that the site will be decommissioned and restored at the end of the operational period, ensuring that the land can be returned to its original state or repurposed for other uses.

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Melksham Without Parish Council	60 Year Life	The ability of any Decommissioning Bond to be effective so far in the future is remote. This means there is a high risk that the land will never return to agricultural use.	A Development Consent Order (DCO) includes a requirement to decommission the project and return land to its original use. Failure to comply with the requirements of a DCO is a criminal offence, while the costs of any enforcement action can also be recovered from the operator under the Planning Act 2008. Further details on how the Scheme will be decommissioned are available in **DCO Volume 7: Outline Decommissioning Strategy [EN010168/APP/7.13].** The Outline Decommissioning Strategy would be developed into a detailed Decommissioning Strategy post DCO consent and agreed with Wiltshire Council. The detailed Decommissioning Strategy would ensure that decommissioning was undertaken safely and with regard to the environmental legislation at the time of decommissioning.
Melksham Without Parish Council	60 Year Life	A 60-year BESS life implies the same timescale for access tracks and land for any related infrastructure and equipment. In fact, the scoping document refers to the BESS, access tracks, substations and units being permanent and this needs to be considered within the EIA.	As stated in **ES Volume 1, Chapter 2: The Scheme [EN010168/APP/6.1]** the 60-year design life of the Scheme ends in 2089. After 2089, the Solar PV Sites would be decommissioned and the land returned to its original use and condition as far as practicable and returned to the landowner. This includes the BESS, access tracks, substations and units which would be recycled or disposed of in accordance with good practice and market conditions at that time.
Melksham Without Parish Council	60 Year Life	Risks associated with proposed equipment upgrades, refits, replacements, and maintenance over a 60-year life also need to be included in the EIA and this should also therefore be part of the scoping.	The replacement strategy for all scheme components has been set out within **ES Volume 1, Chapter 3: The Scheme [EN010168/APP/6.1].**
Melksham Without Parish Council	Land at Melksham Substation	Throughout the scoping document the BESS site is described as “Land at Melksham Substation”. This descriptor suggests the proposed site is brownfield and that it is co-located with the substation. As the proposed site is actually a greenfield site which is in productive agriculture use, we submit that the developer’s description is misleading and should be changed throughout the document to something more illustrative such as “Agricultural Land at Whitley”.	The Applicant disagrees that this description of Melksham Substation provides any indication as to the status of the land (i.e., whether brownfield or greenfield). Please note that the BESS site at Whitley no longer forms part of the application.
Melksham Without Parish Council	Land at Melksham Substation	We also note references to the “Village of Melksham” demonstrating a lack of local research.	Comment noted. References incorrectly referring to Melksham being a village have been corrected to ‘Town’.
Melksham Without Parish Council	Land at Melksham Substation	The land at Melksham Substation is located within the parish of Melksham Without, not the parish of Melksham	Comment noted. References incorrectly referring to the land at Melksham Substation being in Melksham Parish have been corrected to Melksham Without.
Melksham Without Parish Council	Screening	We note that any screening will not be effective for circa 15 years. We do not consider a baseline 15-year period for screening maturity, 25% of the project timescale, to be remotely acceptable. The scoping study should therefore properly set out a methodology to satisfactorily mitigate such matters, including plans for how those mitigants will be implemented, such that screening becomes effective during the first 5 years of the project.	Embedded landscape and visual mitigation is included in **ES Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1]**. This includes extensive areas of new native tree and hedgerow planting which takes approximately 15 years to establish and mature to provide effective screening. This planting will become part of the legacy landscape in the long term.
Melksham Without Parish Council	Screening	The new 400kV substation will be 13m to the top of the bushbars, that is the height of a 4-storey building, will vegetation and trees be sufficient to screen?	Embedded landscape and visual mitigation is included in **ES Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1]**.
Melksham Without Parish Council	Safety	It is unacceptable to delay an assessment of safety until after the DCO application is made (we note the current proposal that the Outline Battery Storage Safety Management Plan (BSMP) will not be available until it is submitted with the DCO application). The scoping should therefore include a methodology for a preliminary safety assessment which should include fire, pollution and contamination risks. Regulators, including the HSE and the EA, and the Fire Service should be consulted on that methodology.	The purpose of scoping is purely to identify which topics will be assessed through the EIA process rather than providing any detailed assessment. As such it would be inappropriate to undertake a safety assessment at that project stage. The PEIR provided a preliminary assessment of various aspects relating to safety such as fire, pollution and contamination risks. Given the Order Limits were not fixed, and aspects of the design were still emerging at PEIR it was not possible to provide a full assessment of safety aspects at that point in time. The ES provided in the DCO contains a full assessment of safety in relation to the BESS in the following chapters: **Chapter 11: Hydrology, Flood Risk and Drainage, Chapter 14: Noise and Vibration, Chapter 15: Air Quality, Chapter**

Consultee	Topic	Matter Raised	Applicant Response
			18: Human Health and **Chapter 20: Other Environmental Matters (Major Accidents and Disasters) [EN010168/APP/6.1].** Mitigation measures put in place by these topics to ensure safety is maintained throughout all project phases can be seen in **Outline Construction Environmental Management Plan [EN010168/APP/7.12], Outline Operational Management Plan [EN010168/APP/7.13, Decommissioning Strategy [EN010168/APP/7.14]** and the **Outline Battery Safety Management Plan (BSMP) [EN010168/APP/7.21].** The Applicant confirms that the HSE and the EA, and the Fire Service were contacted as part of Statutory Consultation. Furthermore, the recommendations of Dorset and Wiltshire Fire and Rescue Service have been fully incorporated into the design of the BESS and Outline BSMP.
Melksham Without Parish Council	Safety	The development of a pollution and contamination prevention strategy should be developed as part of the EIA and the scoping should set the methodology for that process.	The Applicant notes the request for a pollution and contamination prevention strategy to be developed at scoping stage. However, the purpose of scoping is to identify the topics to be assessed in the EIA, rather than to provide detailed assessments or strategies, which would be premature at that stage. A preliminary assessment of safety-related issues, including fire, pollution and contamination risks, was presented in the PEIR, recognising that the design and Order Limits were still evolving at that time. A full assessment of pollution, contamination and safety risks is provided in the ES submitted with the DCO application, within Chapters 11 (Hydrology, Flood Risk and Drainage), 14 (Noise and Vibration), 15 (Air Quality), 18 (Human Health), 19 (Ground Conditions and Contamination) and 20 (Other Environmental Matters – Major Accidents and Disasters). These assessments are supported by mitigation measures secured through the **Outline Construction Environmental Management Plan [EN010168/APP/7.12]**, **Outline Operational Management Plan [EN010168/APP/7.13]**, **Decommissioning Strategy [EN010168/APP/7.14]** and the **Outline Battery Safety Management Plan [EN010168/APP/7.21]**.
Melksham Without Parish Council	Safety	Arrangements should be included for an independent technical expert review of all the proposed safety management and risk prevention method statements.	All documentation submitted as part of the DCO will be thoroughly scrutinized by the Planning Inspectorate during the examination process. This comprehensive review ensures that all safety management and risk prevention measures are evaluated to the highest standards.
Melksham Without Parish Council	Safety	There are several concerns about fire risk. That the batteries will ignite, and then be very difficult to extinguish. They are very close together, and the fire could easily spread, with no means of fire engines to gain access between the batteries. Anecdotal evidence to date is that the fires need water on them for days, not hours, to put them out (as evidenced by fires in electric cars which are not allowed to be unattended for 2/3 days). This will have a huge impact on the community, with the toxic fumes, but also the impact of the water used then running off to heavily increase the surface water flooding potential. The water runoff will be contaminated by the lithium and will flow into the water course and saturate the ground. There are also anecdotal concerns raised at the risk of explosion from these type of electric storage batteries; these are physically much larger in scale compared to the fires in electric cars and scooters that are reported in the press with regularity. The parish council are keen to see any comments submitted by the Fire Service to be scoped into this EIA.	The ES contains a full assessment of safety in relation to the BESS in the following chapters: **Chapter 11: Hydrology, Flood Risk and Drainage, Chapter 14: Noise and Vibration, Chapter 15: Air Quality, Chapter 18: Human Health** and **Chapter 20: Other Environmental Matters (Major Accidents and Disasters) [EN010168/APP/6.1].** Safety of the BESS is controlled through the **Outline Battery Fire Safety Management Plan [EN010168/APP/7.21]** which fully incorporates the comments received from Dorset and Wiltshire Fire and Rescue Service and the recommendations set out by the National Fire Chiefs Council. As set out in **ES Volume 3, Appendix 11-6: Flood Risk Assessment and Drainage Strategy - Lime Down D/BESS [EN010168/APP/6.3]** the BESS drainage system will be designed to isolate and contain such flows to prevent pollution of the surrounding environment. This is anticipated to be achieved using a lined, permeable gravel sub-base beneath proposed hardstanding, or a functionally equivalent alternative. Outfalls from the BESS drainage system will be fitted with automatically actuated valves, which are connected to the BESS fire alarm system. In the event of a fire, these self-actuating valves will close, isolating the BESS drainage system and containing firewater runoff locally.
Melksham Without Parish Council	Safety	Concerns are also raised about the widescale use of lithium on the site, with no research into possible long-term harm of the lithium as it's a new technology. This should be scoped in.	The Applicant confirms the use of lithium or lithium compounds on the Scheme will be limited to the BESS Area. Safety of the BESS in this area is controlled through the **Outline BSMP [EN010168/APP/7.21]**.

Consultee	Topic	Matter Raised	Applicant Response
			Potential impacts from lithium battery fires, such as contamination of water sources and smoke flumes, have been assessed in **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage** and **ES Volume 1, Chapter 15: Air Quality [EN010168/APP/6.1]**, respectively. Resultant human health impacts are assessed in **ES Volume 1, Chapter 18: Human Health [EN010168/APP/6.1]**.
Melksham Without Parish Council	Safety	Details of the risk management of the site must be scoped in, who will maintain the installation and what processes will be put in place? Will the batteries be monitored and tested for any change in temperatures, moisture content in the batteries for example? And if so, what is the plan to address any increased risks?	Details regarding responsibilities in relation to the BESS are provided in **Outline Construction Environmental Management Plan [EN010168/APP/7.12], Outline Operational Management Plan [EN010168/APP/7.13, Decommissioning Strategy [EN010168/APP/7.14]** and the **Outline Battery Safety Management Plan (BSMP) [EN010168/APP/7.21].**
Melksham Without Parish Council	Status of Consultation	It is noted that the developer claims Stage 1 NonStatutory consultation is complete and that community engagement is ongoing. This is incorrect. CAWS have set out in writing to the developer why Stage 1 was ineffective and why it cannot be claimed to be complete. Engagement with the community since then has been almost non-existent evidenced by a raft of unanswered questions and correspondence.	The Applicant's approach to pre-application engagement has been informed by the requirements of the Planning Act 2008 and associated guidance and legislation. The Applicant's strategy of coordinating consultation activities across the Scheme has resulted in a high level of engagement and consultation responses, as described in the **Consultation Report [EN010168/APP/5.1]**. This has included engagement with parish councils, Community Action: Whitley and Shaw (CAWS), and the wider community. The Applicant held its stage one non-statutory consultation for just over six weeks (43 days) from 14 March to 26 April 2024. The aim of this initial consultation was to introduce the Project, present early-stage proposals for the Project and give individuals and interested parties the opportunity to share their views. Further information into the engagement completed as part of the non-statutory consultation can be found in Chapter 4: Non-statutory Consultation and Engagement of the **Consultation Report [EN010168/APP/5.1].** The feedback received to this round of consultation contributed to the development of the Statement of Community Consultation (SoCC) provided in **Appendix D: Statement of Community Consultation [EN010168/APP/5.2]** in preparation for Stage Two statutory consultation. This SoCC was also consulted on and approved by Wiltshire Council. Further information on the development of the SoCC, and how the Applicant complied with commitments set out in it, can be found in the **Consultation Report [EN010168/APP/5.1].** Evidence of the SoCC, including drafts shared with local authorities can be found in **Appendix D-X: Statement of Community Consultation Materials [EN010168/APP/5.2].** The Applicant continued to engage with the community throughout the statutory consultation period (January-March 2025). The respondent can view the regard the Applicant has had to the comments received to this consultation, including comments received by CAWS, in **Appendix F: Statutory Consultation under section 47 of the Planning Act 2008 [EN010168/APP/5.2].** The Applicant engaged the community further with a targeted consultation (June-July 2025), the responses received to this consultation and the regard the Applicant has had to them can be found in Appendix I: Targeted Consultation [EN010168/APP/5.2] Furthermore, the Applicant made available free-to-use communication channels, including a Freephone, Freepost and email address, throughout the whole pre-application period. These remain open for any interested party to get in touch with a member of the Applicant team to discuss any concerns or questions.
Melksham Without Parish Council	Status of Consultation	Building on this feedback, the scoping document should set out an ongoing community engagement methodology consistent with the principles of paras 39-46 of the NPPF. That methodology should provide for community involvement in discharging the various studies and assessments set out elsewhere in the scoping document.	The ongoing community engagement methodology is contained within the Statement of Community Consultation (SoCC) provided in **Appendix D: Statement of Community Consultation [EN010168/APP/5.2].**

Consultee	Topic	Matter Raised	Applicant Response
Melksham Without Parish Council	"No Development"	We submit that the BESS proposal is unnecessary to realise the benefits of the proposed solar generation scheme and the government's Net Zero ambitions, and that a "no development" for the BESS component of the scheme should be fully evaluated. Our assertion is based on our community group's detailed research regarding the position of batteries in the electricity generation supply chain. We would be happy to make a copy of their paper available on request.	NPS EN-1 explains that storage is needed to reduce the costs of the electricity system and increase reliability by storing surplus electricity in times of over-supply, to provide electricity when demand is higher. Section 7.9 of the **Statement of Need [EN010168/APP/7.1]** explains that storage can achieve the benefits set out in the NPS from stand-alone facilities or facilities co-located with renewable generation facilities. The Scheme achieves added resilience through the inclusion of Battery Energy Storage Systems (BESS). The inclusion of BESS in the Scheme is important for enhancing grid resilience and stability. BESS provides 'on demand' energy storage and release, ensuring a reliable supply of electricity even during peak demand or unexpected outages. NPS EN-3 states that: "Government is supportive of solar that is co-located with other functions (for example, agriculture, onshore wind generation, or storage) to maximise the efficiency of land use" [Para 2.10.10]. and therefore provides policy support for developments, such as this Scheme, which include co-located solar and storage technologies because both technologies are needed and co-location maximises the efficiency of land use and also maximises utilisation of the grid connection.
Melksham Without Parish Council	"No Development"	The document states that "excess energy from the grid can also be imported to the batteries" but that should not be the only reason for the BESS.	While importing excess energy from the grid is one function of BESS, it is not the only reason for its inclusion in solar projects. BESS plays a crucial role in enhancing the efficiency and reliability of solar energy systems through allowing the storage of excess solar energy generated during peak production hours. This stored energy can be used during periods of low solar generation, ensuring a consistent and reliable power supply. By storing and releasing energy as needed, BESS helps maintain grid stability and balance supply with demand. This is particularly important given the intermittent nature of solar power.
Melksham Without Parish Council	"No Development"	We submit that the proposed technical design of the scheme should be frozen for the purposes of the EIA and that the scoping should therefore clearly set that out.	The Applicant confirms that the Order Limits (i.e., the maximum, worst case parameters for the Scheme) were frozen for assessment at the ES stage.
Melksham Without Parish Council	"No Development"	Without a technical baseline we do not believe any meaningful conclusions can be drawn during the EIA and that the implementation of technical alternatives in the future may undermine EIA conclusions and potentially introduce new risks	A technical baseline has been provided for each environmental topic contained within the ES.
Melksham Without Parish Council	Consistency	The document contains many inconsistencies. For example, heritage information in some parts of the document is at odds with other parts of the document suite.	Comment noted. Any inconsistencies identified at PEIR have been corrected within the ES.
Melksham Without Parish Council	Consistency	The scoping should be reviewed and updated throughout to ensure consistency.	The purpose of scoping is purely to identify which topics will be assessed through the EIA process rather than providing any detailed assessment. As such it is deemed inappropriate to continually update this document, on the basis that the matters addressed in the Scoping Report have been superseded by the ES.
Melksham Without Parish Council	Consistency	We also submit that there should be a consistent assessment methodology across all sites regardless of whether they are for BESS or solar panels.	A detailed explanation of the EIA methodology followed throughout the ES is provided within **Chapter 6: EIA Methodology [EN010168/APP/6.1]** and within each technical chapter.
Melksham Without Parish Council	Mineral Safeguarding Area	In light of the Mineral Safeguarding Area and the abundance of closed stone mines, some of which have been repurposed into alternative businesses, the scoping should set out a methodology for working in these areas and how to assess the future impact on such areas from building and operating the BESS. That methodology should include a risk assessment that should include fire, toxic fumes, and ground and water contamination.	**ES Chapter 20: Other Environmental Matters [EN010168/APP/6.1]** contains a mineral resource assessment which considers the impacts on mineral resources and permitted mineral workings. The BESS originally identified for a site north of Whitley identified in the Scoping Report has been relocated to Lime Down D which is remote from existing or historic stone mines. A full assessment of pollution, contamination and safety risks is provided in the ES submitted with the DCO application, within Chapters 11 (Hydrology, Flood Risk and Drainage), 14 (Noise and Vibration), 15 (Air Quality), 18 (Human Health), 19 (Ground Conditions and Contamination) and 20 (Other Environmental Matters –

Consultee	Topic	Matter Raised	Applicant Response
			Major Accidents and Disasters). These assessments are supported by mitigation measures secured through the **Outline Construction Environmental Management Plan [EN010168/APP/7.12], Outline Operational Management Plan [EN010168/APP/7.13], Decommissioning Strategy [EN010168/APP/7.14]** and the **Outline Battery Safety Management Plan [EN010168/APP/7.21]**.
Melksham Without Parish Council	Mineral Safeguarding Area	Given the known close proximity of some workings and the likelihood that some shafts exist either under the site or close to the boundary, we submit that the scoping should include a methodology for reviewing the existence of underground workings and the risks associated with heavy and dangerous BESS equipment above or nearby.	Risks associated with potential geohazards, including historic mine workings, have been fully considered in the Environmental Statement. These are addressed in **ES Volume 3, Appendix 19-8: *Phase 1 Desk Study, Cable Corridor Southwest*** and **Appendix 19-11: *Mining Risk Assessment* [EN010168/APP/6.3]**, with the findings incorporated into the assessments presented in Table 19-4 of **ES Volume 1, Chapter 19: Ground Conditions and Contamination [EN010168/APP/6.1]**. The assessment specifically considers the implications of locating heavy and potentially hazardous infrastructure, such as BESS units, above or in close proximity to former mine workings. Risks relating to ground stability, settlement, or subsidence have been evaluated, and appropriate mitigation measures—such as further ground investigation, foundation design adjustments, and ongoing monitoring—are secured through the **Outline Construction Environmental Management Plan [EN010168/APP/7.12]** to ensure safety and environmental protection throughout construction and operation.
Melksham Without Parish Council	Weight	There is no process or methodology to assess the weight impact of equipment on the Site especially in relation to heritage assets, underground workings (we note "…the quality of the received plans is poor and the exact location of some of the workings in relation to the Site are difficult to establish"), soil, hydrology and drainage. The scoping should include a defined process for assessing weight.	Risks associated with potential geohazards, including historic mine workings, have been fully considered in the Environmental Statement. These are addressed in **ES Volume 3, Appendix 19-8: *Phase 1 Desk Study, Cable Corridor Southwest*** and **Appendix 19-11: *Mining Risk Assessment* [EN010168/APP/6.3]**, with the findings incorporated into the assessments presented in Table 19-4 of **ES Volume 1, Chapter 19: Ground Conditions and Contamination [EN010168/APP/6.1]**. The assessment specifically considers the implications of locating heavy and potentially hazardous infrastructure, such as BESS units, above or in close proximity to former mine workings. Risks relating to ground stability, settlement, or subsidence have been evaluated, and appropriate mitigation measures—such as further ground investigation, foundation design adjustments, and ongoing monitoring—are secured through the **Outline Construction Environmental Management Plan [EN010168/APP/7.12]** to ensure safety and environmental protection throughout construction and operation.
Melksham Without Parish Council	Neighbourhood Plan	The scoping makes no reference to the emerging Joint Melksham Neighbourhood Plan 2020-2038 which is currently undergoing its second regulation 14 consultation (Version B: June 24). This is a major deficiency and should be corrected. Lime Down Solar were consulted on the second Reg 14 consultation in June, and so are well aware of it.	The Joint Melksham Neighbourhood Plan 2020-2038 has been considered and the Scheme's compliance with the policies set out within the plan can be found at Annex B of the **Planning Statement [EN010168/APP/7.2].**
Melksham Without Parish Council	Boundary and Buffer Distances	There appears to be no standard methodology for the measurement of boundary and buffer distances. As a result, for example, distances between the site and residential properties are inconsistent. Some appear to be measured from the centre of the site, some from the northern or southern boundaries and therefore vary by over 100m across the scoping document giving an inaccurate and confusing description of the proposals. The scoping should set out a standard method for the statement of such distances.	The Applicant notes the request for a standard methodology for the reporting of boundary and buffer distances. Within each ES topic chapter, the approach to distance measurement and the relevant points used for assessment are clearly set out. In most cases, distances are measured from the relevant receptor to the nearest point of the site boundary, ensuring a precautionary basis of assessment. Where an alternative approach has been required—for example, measurement from a receptor to a specific item of noise-generating equipment—this has been explicitly stated within the relevant chapter. This ensures consistency, transparency and clarity across the EIA.
Melksham Without Parish Council	Vistas and Landscape	As the site is dominant in the regional landscape the search areas need to be widened to include, as a minimum, Bowden Hill, Sandridge, Seend Cleeve, Berryfield and Westbury White Horse. We submit that the search areas should include 10km and 15km zones.	The Study Area for the landscape and visual assessment is provided in **ES Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1]**.

Consultee	Topic	Matter Raised	Applicant Response
Melksham Without Parish Council	Vistas and Landscape	Given local topography, it makes no sense to centre the search areas on the site (as the site is not highly visible from the north). These search areas should therefore be replaced by splays radiating east, west and south from the centre of the site.	The Study Area for the landscape and visual assessment is provided in **ES Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1]**.
Melksham Without Parish Council	Vistas and Landscape	All designated and non-designated assets with a direct line of sight should be assessed.	All landscape and visual receptors have been assessed in **ES Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1]**.
Melksham Without Parish Council	Bats	The scoping does not appear to acknowledge the Bat colony at Park Lane Quarry or the Drews Pond Bat Migration Route. A methodology needs to be included to consider these and any similar matters.	An assessment of impacts on bats is included within **ES Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1]**. This has been underpinned through collection of bat survey data , details of which are provided within **ES Volume 3, Appendix 9.3: Bat Survey Report [EN010168/APP/6.3]** as well as a review of existing information pertaining to bats in the local area, detailed in **ES Volume 3, Appendix 9.1: Ecological Baseline Report [EN010168/APP/6.3].** The Corsham Batscape Strategy (which includes Drews Pond Bat Migration Route) has been reviewed as part of the assessment of impacts with particular reference to the Cable Route Corridor. The assessment concludes there would be no significant impact on foraging/commuting bats as a result of the Scheme.
Melksham Without Parish Council	Trees and Woodland	The scoping does not appear to consistently recognise TPOs on or around the site, and important woodlands such as Buttonhole Wood, The Plantations and Brittle Wood are either not addressed, or are addressed inconsistently.	New desk-based searches have been completed to inform the baseline arboricultural conditions of the study area for the ES. Any new records and relevant constraints have been fully considered as part of the impact assessment. Details of all TPO (Tree Preservation Order) records and important woodlands relevant to the Scheme are included at section 10.7 of **ES Volume 1, Chapter 10: Arboriculture [EN010168/APP/6.1].**
Melksham Without Parish Council	Trees and Woodland	The methodologies need to be revised to include all TPOs and all relevant woodlands and include these in scope.	New desk-based searches have been completed to inform the baseline arboricultural conditions of the study area for the ES. Any new records and relevant constraints have been fully considered as part of the impact assessment. Details of all TPO records and important woodlands relevant to the Scheme are included at section 10.7 of **ES Volume 1, Chapter 10: Arboriculture [EN010168/APP/6.1].**
Melksham Without Parish Council	Trees and Woodland	Site access should be included in the scope of the trees and existing mature hedgerows that will have to be removed to secure the road visibility splays that are needed to accommodate 16.5m HGVs on the B3353 at Whitley.	Facilitative construction access arrangements are fully considered as part of **ES Volume 1, Chapter 10: Arboriculture [EN010168/APP/6.1].** and **Appendix 10-4 Arboricultural Impact Assessment and Outline Method Statement [EN010168/APP/6.3]**. Any unavoidable effects to trees are subject to appropriate mitigation measures detailed in the Outline Arboricultural Method Statement. Hedgerows will form part of the Ecology and Biodiversity and Landscape Chapters for the ES. They have been scoped out of the arboriculture chapter given their consideration in the aforementioned chapters.
Melksham Without Parish Council	Trees and Woodland	Arboriculture. Please refer to the adopted Melksham Neighbourhood Plan 1 (July 21) Policy 16 Trees and hedgerows and the emerging Neighbourhood Plan 2 Policy 17 Trees and hedgerows and the Wiltshire Design Guide	Local planning policy and guidance relevant to the Scheme and arboriculture are included at section 10.3 of **ES Volume 1, Chapter 10: Arboriculture [EN010168/APP/6.1**
Melksham Without Parish Council	Heritage	The scoping is inconsistent with regard to the existence and likely location of the mediaeval settlement. The likelihood of a Roman settlement is not considered at all.	**ES Volume 1, Chapter 12: Cultural Heritage [EN010168/APP/6.1]**, supported by appendices in Volume 3 (12.1 to 12.6) has assessed the potential impact of the scheme on identified archaeological and built heritage assets, such as medieval and Roman settlement remains and where required appropriate mitigation is proposed (see **ES Volume 3 Appendix 12.6 Archaeological Mitigation Strategy [EN010168/APP/6.3]**.
Melksham Without Parish Council	Heritage	A methodology needs to be included to better locate all ancient settlements along with a mitigation strategy for any such assets.	The assessment methodology is detailed in Section 12.6 of the ES Chapter. **ES Volume 1, Chapter 12: Cultural Heritage [EN010168/APP/6.1],** supported by appendices in Volume 3 (12.1 to 12.6) has assessed the potential impact of the scheme on identified archaeological and built heritage assets, and where required

Consultee	Topic	Matter Raised	Applicant Response
			appropriate mitigation is proposed (see ES Volume 3 Appendix 12.6 Archaeological Mitigation Strategy (EN010168/APP/6.3).
Melksham Without Parish Council	Heritage	Non-designated heritage assets should be listed not just referenced on a map. That approach will better allow all such assets to be captured in the analysis.	Noted. See section 12.7 of **ES Volume 1, Chapter 12: Cultural Heritage [EN010168/APP/6.1]** regarding baseline information and a list of the non-designated heritage assets.
Melksham Without Parish Council	Heritage	Vistas from all heritage assets should be assessed.	**ES Volume 3, Appendix 12-1: Heritage Statement [EN010168/APP/6.3**] considers views from heritage assets.
Melksham Without Parish Council	Heritage	We dispute the developers position regarding the lack of Scheduled Monuments within a 2km radius of the Site, as the Wiltshire HER shows many. The scoping document should therefore demonstrate how the HER will be fully analysed and how that information will be used to inform the workstreams set out elsewhere in the document.	Annex 1 of **ES Volume 3, Appendix 12-1: Heritage Statement [EN010168/APP/6.3]** details assets scoped in for assessment and was used during consultation with Historic England and Wiltshire Council. Scoped in assets are considered to be agreed with both stakeholders. The ES is supported by Appendix 12-1: Heritage Statement; and Appendix 12-2: Archaeological Desk-Based Assessments. All appendices rely on data supplied by Wiltshire HER.
Melksham Without Parish Council	Heritage	Given the unique characteristics of Whitley and nearby settlements, the review area for designated and non-designated assets should extend to 3km and 4km respectively.	Consultation was taken with Historic England and a 2km Study Area agreed (See Table 122 of **ES Volume 1, Chapter 12: Cultural Heritage [EN010168/APP/6.1]**). See Section 12.6 of ES Volume 1, Chapter 12: Cultural Heritage [EN010168/APP/6.1] regarding assessment methodology.
Melksham Without Parish Council	Heritage	The method to assess impacts on the Gastard Conservation Area should be expanded given its close proximity to the site.	Annex 1 of **ES Volume 3, Appendix 12-1: Heritage Statement [EN010168/APP/6.3]** details assets scoped in for assessment and the methodology used to determine this. The document was used during consultation with Historic England and Wiltshire Council. Scoped in assets are considered to be agreed with both stakeholders. Gastard Conservation Area was scoped out as no potential for impact to the asset was identified resulting from the scheme.
Melksham Without Parish Council	Heritage	The Roman road, the Wansdyke, the Grade II listed buildings and their setting, evidence of medieval farming and the other items of historic interest in the villages will all be impacted by the proposals. Archaeological investigations will need to be undertaken as part of evidence gathering to inform the decision-making.	ES Volume 1, Chapter 12: Cultural Heritage [EN010168/APP/6.1], supported by appendices in Volume 3 (12.1 to 12.6) has assessed the potential impact of the scheme on identified archaeological and built heritage assets, and where required appropriate mitigation is proposed (see ES Volume 3 Appendix 12.6 Archaeological Mitigation Strategy (EN010168/APP/6.3).
Melksham Without Parish Council	Cumulative Impact	The methodology for assessments of cumulative impact should be clearly set out.	The cumulative effects assessment methodology is presented in **ES Volume 1, Chapter 6: EIA Methodology [EN010168/APP/6.1**] with further detail provided in **ES Volume 1, Chapter 21: Cumulative and In-Combination Effects [EN010168/APP/6.1]**.
Melksham Without Parish Council	Cumulative Impact	Tier one should include those solar farms and BESS that have already been constructed, not just those under construction.	As described within **ES Volume 1, Chapter 6: EIA Methodology [EN010168/APP/6.1]**, the allocation of Tiers follows the criteria given in the Planning Inspectorate's Nationally Significant Infrastructure Projects: Advice on Cumulative Effects Assessment.
Melksham Without Parish Council	Cumulative Impact	Concerns are raised about the cumulative effect of the sheer amount of battery storage facility installations in the surrounding area. Residents feel that at every turn on walks on Rights of Way, they see a sea of solar panels or battery storage already. Please refer to Appendix 1 for a snapshot from the Wiltshire Council online mapping with the current battery storage installations surrounding Whitley. Likewise, Appendix 2 for the cumulative effect of the number of solar farms in the area.	**ES Volume 1, Chapter 21: Cumulative Effects and Interactions [EN010168/APP/6.1]** presents the shortlist of schemes considered within the CEA, including relevant battery storage facilities.
Melksham Without Parish Council	Cumulative Impact	"Due to the dispersed nature of the Sites within the Scheme, an assessment of the in combination landscape and visual effects of Lime Down A to E will be undertaken to determine the effects of the Scheme as a whole". The cumulative and in combination effect of the "land at Melksham sub station" site proposed for	The BESS Area at Witley has been relocated within Lime Down D for the DCO Application. Cumulative and in-combination effects have been assessed in individual topic chapters (**ES Volume 1, Chapter 7 to 20 [EN010168/APP/6.1]**)

Consultee	Topic	Matter Raised	Applicant Response
		the BESS at Whitley, and the existing Melksham Substation at Beanacre should also be in the scope, there is no reason to exclude them.	and are summarised in **ES Volume 1, Chapter 21: Cumulative and In-Combination Effects [EN010168/APP/6.1]**.
Melksham Without Parish Council	Water	Mapping not appropriate for scale of location.	It is assumed that the comment is referring to Figure 10.3 in the Scoping Report. The scale has been updated in the **ES Volume 2, Chapter 11: Hydrology, Flood Risk and Drainage Figures [EN010168/APP/6.2].**
Melksham Without Parish Council	Water	Local knowledge shows that topographical surveys have not been thorough, omitting known ditches which contribute to local flooding. The document also shows that surveys have been conducted only in summer months, as all ditches are referred to as dry, when they are incredibly wet / flooded in winter. All surveys should be conducted again in wet winter conditions to ensure baselines reflect actual wet winter conditions on the ground.	Topographical surveys and surface water mapping have informed the assessment of overland flow routes presented in **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [EN010168/APP/6.1]**. These surveys were undertaken using high-resolution GPS and LiDAR to record all permanent landform features, including ditches and depressions, regardless of whether they were dry or wet at the time of the survey. It is not standard practice to repeat topographic surveys during wet winter conditions, as the purpose is to capture the fixed ground levels and drainage features, which can be obscured by floodwater. Seasonal flood conditions have instead been assessed using the **Environment Agency's Risk of Flooding from Surface Water mapping**, which identifies topographic depressions, flow paths and watercourses that convey or store water during wet weather events. This mapping, together with EA datasets and modelled rainfall scenarios, provides a robust representation of winter exceedance conditions. The assessment concludes that all relevant drainage features and flood pathways have been considered, and no significant increase in flood risk is predicted as a result of the Proposed Development.
Melksham Without Parish Council	Water	The EIA needs to include flooding, surface water and groundwater and contamination risks both within the Site (which is shown as scoped in) AND outside the site (which is shown as scoped out). The impact of the proposed development on surrounding communities and downstream is significant and the water related risks are high. Given the expected life of the project (60 years) and the risks associated with climate change, it is imperative that scoping considers all these matters, both on-site and off-site, properly.	Flooding, surface water, groundwater and contamination risks (water quality) both within and outside the site boundary, have been assessed in **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [EN010168/APP/6.1] and** in **ES Volume 3, Appendix 9-1 to 9-9: FRA and Drainage Strategy EN010168/APP/7.12]**. This includes surface water, groundwater, and off-site pathways to downstream communities. The assessment reflects the long operational lifespan of the Proposed Development and incorporates current climate change guidance.
Melksham Without Parish Council	Water	Regarding the safety risks, the scoping needs to consider contaminated water from firefighting, both inside and outside the site.	Runoff and pollution containment associated with infrastructure such as BESS compounds and substations has been assessed in **ES Volume 3, Appendix 9-1 to 9-9: FRA and Drainage Strategy EN010168/APP/7.12]**. Measures will be incorporated to manage and contain contaminated runoff, including firewater, to prevent pollution both within and beyond the site.
Melksham Without Parish Council	Water	Given the local geology, the aquifers that run close to the site are considered highly vulnerable. Those aquifers need to be in scope and the scoping document should set a methodology for how any risks are to be assessed and mitigated during the EIA.	The vulnerability of local aquifers has been recognised in the assessment. Groundwater sensitivity and the potential for contamination have been considered within **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [EN010168/APP/6.1]** and the supporting Flood Risk Assessment Appendices **[EN010168/APP/6.3]**. The methodology includes consideration of aquifer designation, source protection zones and groundwater vulnerability mapping. Mitigation measures to protect groundwater, including pollution prevention controls, lined containment in sensitive areas such as BESS compounds, and implementation of the **Outline CEMP [EN010168/APP/7.12]**, are embedded in the Proposed Development. The assessment concludes that, with these measures in place, no significant effects on groundwater quality or aquifer integrity are predicted.
Melksham Without Parish Council	Water	We note no new connections to the water supply main are proposed. Given the significant safety risks the scoping should set out a methodology for calculating emergency water supply needs and how they might be satisfied.	The Applicant notes this comment. A **Water Resources Assessment [EN010168/APP/7.26]** has been prepared which sets out the methodology used to calculate both typical and peak water demands, including emergency requirements. While a permanent mains connection is not proposed for all areas, the assessment confirms that viable supply options are available, including a confirmed connection from Bristol Water and water tankering provision.

Consultee	Topic	Matter Raised	Applicant Response
			Emergency water needs, including for fire safety, will be addressed through on-site storage and site-specific emergency planning measures, which will be secured through the **OEMP [EN010168/APP/7.13].**
Melksham Without Parish Council	Water	The scoping also needs to consider the extent to which water (contaminated or not) will be caught in SuDS. This is especially important given the topography of the site and pre-existing significant flood risks	The Applicant notes this comment. **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [EN010168/APP/6.1]** describes the surface water management approach for the Scheme, including the use of SuDS features where required to manage runoff from infrastructure such as substations, BESS areas and access tracks. **ES Volume 3, Appendix 9-1 to 9-9: FRA and Drainage Strategy EN010168/APP/7.12]** takes account of site topography and downstream receptors to ensure surface water is appropriately managed. The approach reflects the nature of the Scheme and the anticipated reduction in runoff from large areas of the site compared to the existing baseline.
Melksham Without Parish Council	Water	Construction of the BESS will inevitably lead to increased levels of silt, sediment and nutrients entering the local surface water and river systems. Given the significant water risks associated with the Whitley site those matters should be brought in scope of the EIA.	The Applicant notes this comment. **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [EN010168/APP/6.1]** assesses the potential for construction-phase surface water runoff from the BESS area to affect local water quality, including the mobilisation of silt, sediment and other pollutants (including nutrients). These risks will be managed through measures set out in the **Outline CEMP [EN010168/APP/7.12]**, including standard construction-phase pollution prevention controls. **ES Volume 3, Appendix 9-1 to 9-9: FRA and Drainage Strategy EN010168/APP/7.12]** confirms how these measures align with relevant guidance and reflect the sensitivity of local watercourses, including those draining towards the Whitley area.
Melksham Without Parish Council	Water	Modelling needs to take into consideration Wiltshire Council data and local data as well as EA data.	The Applicant notes this comment. Where hydraulic modelling has been undertaken, it has followed Environment Agency guidance to ensure consistency with regulatory expectations. All available and relevant data, including from Wiltshire Council and local sources, has been reviewed and utilised where appropriate to inform the assessment presented in **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [EN010168/APP/6.1]**.
Melksham Without Parish Council	Water	The methodology and risk assessment also needs to consider the 100+ wells in Whitley most of which are still in some form of use.	The Applicant notes this comment. The potential for impacts on groundwater, including private water supplies (including wells), has been considered in **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [EN010168/APP/6.1]**. The presence of private wells in the local area have been reviewed using available datasets and any relevant risks have been addressed through the groundwater assessment.
Melksham Without Parish Council	Water	We note runoff from the solar panels is considered but runoff from the BESS is not. BESS runoff needs to be scoped in.	The Applicant notes this comment. Runoff from the BESS area has been considered in **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [EN010168/APP/6.1]** and **ES Volume 3, Appendix 9-1 to 9-9: FRA and Drainage Strategy EN010168/APP/7.12]**. The BESS area includes a dedicated surface water drainage system with pollution control measures.
Melksham Without Parish Council	Water	10. Hydrology, the adopted Neighbourhood Plan 1 and the emerging NHP2 should be considered here, Policy 3: Flood Risk and natural flood management especially as it specifically references the South Brook catchment area, see page 31 & 33 of the adopted NHP1.	The Applicant notes this comment. Relevant policies from the adopted and emerging Neighbourhood Plans, including those relating to flood risk and natural flood management, have been considered in **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [EN010168/APP/6.1]**.
Melksham Without Parish Council	Water	There have been several instances of extensive internal property flooding in both Whitley and Beanacre, the Wiltshire Council drainage team must be consulted on these aspects for their local knowledge.	The Applicant notes this comment. Engagement with Wiltshire Council as Lead Local Flood Authority has been undertaken to inform the assessment presented in **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [EN010168/APP/6.1].** Local flood history and drainage information has been reviewed where available and has been taken into account in **ES Volume 3, Appendix 9-1 to 9-9: FRA and Drainage Strategy EN010168/APP/7.12]**. The assessments confirm that the Proposed Development does not exacerbate existing flood risk issues in Whitley, Beanacre or downstream areas.

Consultee	Topic	Matter Raised	Applicant Response
Melksham Without Parish Council	Water	Surface water runoff from the BESS should not be scoped out	The Applicant notes this comment. Surface water runoff from the BESS area has been assessed within **ES Volume 3, Appendix 9-1 to 9-9: FRA and Drainage Strategy EN010168/APP/7.12]. ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [EN010168/APP/6.1]** describes the measures proposed to manage both runoff volume and water quality. This includes dedicated drainage infrastructure designed in accordance with relevant guidance.
Melksham Without Parish Council	Water	The villages of Shaw and Whitley suffer from surface water flooding regularly; with regular instances of internal flooding of properties that are well documented. The volunteer flood wardens are regularly deployed to protect properties with sandbags and pump out water to prevent property flooding. There is telemetry installed in the watercourse opposite Shaw School to inform the Environment Agency and the flood wardens. The catchment area is “flashy”, it comes very quickly, and leaves quickly but with devastation often left in its place. There are concerted efforts to install flood mitigation measures as part of community benefits in planning obligations as well as new Environment Agency funding to help with flooding of properties further downstream at Dunch Lane. BART (Bristol & River Avon Trust) have installed natural flood management measures north of Whitley. Wiltshire Council’s drainage team have installed a drainage scheme on Corsham Road and First Lane in the last ten years.	The Applicant notes this comment. **ES Volume 3, Appendix 9-1 to 9-9: FRA and Drainage Strategy EN010168/APP/7.12]** takes account of local flood risk, including the susceptibility of Shaw and Whitley to surface water flooding. The assessment considers the potential for the Scheme to influence runoff patterns and flood risk downstream, with appropriate surface water management measures proposed where necessary. The assessments confirm that the Proposed Development does not exacerbate existing flood risk issues in Whitley or Shaw.
Melksham Without Parish Council	Water	The community and stakeholders are working hard, and together, to minimize the risk of further flooding in the two villages and it is felt that the hard surfaces of the battery storage units, and the hardstanding concrete slabs that they will sit on could dramatically raise the risk of flooding to properties in Shaw and Whitley and further downstream. The effects of this must be scoped in. The size of any flood attenuation would also have to be very large scale and give an industrial feel; with some 50 acres of hard landscaping.	The potential effects of hard surfacing associated with the BESS and supporting infrastructure have been assessed in **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [EN010168/APP/6.1] and ES Volume 3, Appendix 9-1 to 9-9: FRA and Drainage Strategy EN010168/APP/7.12]**. These assessments consider both the volume and rate of runoff, with appropriate drainage and pollution controls proposed to manage risk. The scale of impermeable surfacing associated with the BESS is limited relative to the overall Scheme, and the Proposed Development will not increase flood risk to Shaw, Whitley or downstream areas.
Melksham Without Parish Council	Soil	We note that this is scoped out in the operational phase. For BESS this should be scoped in due to permanent disturbance, especially when elsewhere in report the BESS is referred to as permanent.	The permanent disturbance at the BESS occurs within the construction phase. There is no additional disturbance initiated during operation. The Scoping Opinion [ID 3.15.1] agrees that effects on soil and agricultural land during the operational phase of the Proposed Development can be scoped out on the basis that significant effects on soil and agricultural land are likely to be restricted to the construction and decommissioning phases.
Melksham Without Parish Council	Traffic	The scoping should consider traffic flows for the B3353.	Sections of the B3353 have been considered as part of the assessment in relation to the installation of the Grid Connection Cables during the construction phase. This assessment is set out in **ES Volume 1, Chapter 13: Transport and Access [EN010168/APP/6.1].**
Melksham Without Parish Council	Technical Studies	This states that the BESS will be either at “D. Hullavington” or “Land at Melksham Substation” and that “ongoing technical studies will determine which location is most appropriate” – is this part of the scope of the EIA? What technical studies are being used to inform this decision, they fall within the scope of the EIA.	The Applicant confirms that BESS will be positioned in Lime Down D only. The land at the Existing National Grid Melksham Substation was discounted following feedback at non-statutory consultation and further analysis of potential environmental effects, **ES Volume 1, Chapter 4: Alternatives and Design Evolution [EN010168/APP/6.1]** sets out the Alternative Sites for the BESS Area.
Melksham Without Parish Council	Wider Context	Wider context, the report makes no mention of the villages that are close to “Land at Melksham Substation”, Whitley for the BESS and Beanacre for the substation	Whitley and Beanacre are referred to correctly where receptors in these locations have been identified by the environmental topics.
Melksham Without Parish Council	Ecology Mitigation	The ecological mitigation and enhancement measures should not just include “bird and bat boxes” as detailed and they should not just be for the “range of species recorded within the local areas” but they should be aiming to increase the biodiversity too. In 8.3.49 & 8.3.47 it states that there is evidence of amphibians and reptiles at Land at Melksham Substation, including Great Crested Newts.	The Applicant notes this comment. A BNG Assessment for the Scheme is provided in **Biodiversity Net Gain (BNG) Assessment Report [EN010168/APP/7.8]**. This documents the net gain for biodiversity expected to be delivered by the Proposed Development.

Consultee	Topic	Matter Raised	Applicant Response
Melksham Without Parish Council	Ecology Mitigation	The advice of the Melksham and Wiltshire separate Design Guides should be adhered to and included in the scope; as too the National Design Guide references N1, N2 and N3 provide information on what is expected at a national level. As per DC.03.10 of the Melksham Design Guidelines and Code July 2023 https://www.melkshamneighbourhoodplan.org/_files/ugd/c4c117_deba1f1a4db7400590f1268b0e78c591.pdf "New development should propose small interventions into the built environment to provide species with cover from predators and shelter during bad weather. Some examples are bird, bat and bee bricks, reptile refugia and hibernacula within the development, in order to increase biodiversity."	The Applicant notes this advice. The provision of a suite of wildlife sheltering features, including bat boxes, bird boxes, log piles and hibernacula are prescribed with the **Outline Landscape and Ecological Management Plan [EN010168/APP/7.18]**
Melksham Without Parish Council	Ecology Mitigation	As per the Wiltshire Design Guide (March 2024) https://www.wiltshire.gov.uk/media/13005/Wiltshire-Design-Guide-Printable/pdf/Final_Sign_off_8320_WiltshireDesignGuide_Consultation-1.0-.pdf?m=1711381358013 6.6.4 in new woodlands and meadows and on the advice of qualified ecologists incorporate plant species that will attract pollinating inspects, dead wood, log piles, reptile refugia and hibernacula. New development should protect the identified priority habitats in the area like ponds, hedges, water courses, chalk grasslands, TPOs and woodland blocks. Additional actions to protect the specific habitats are set out in the Wiltshire Biodiversity Action Plan. New development should help increase movement of species between isolated wildlife populations. Biodiversity, woodlands, hedgerows, ditches should be protected and enhanced where possible and be an integrated part of the design process rather than an afterthought. Land sown as grassland and meadow management – as per the Wiltshire Design Guide 6.2.3 this should be looking for opportunities to extend designated wildlife sites and increase provision of pollen/nectar rich wildflower habitats.	The Applicant notes this advice. Considerable planting of new woodland, hedgerows and species-rich grassland habitats are proposed as shown **ES Volume 2, Figure 3-4: Landscape and Ecology Mitigation Plan [EN010168/APP/6.2]**. All such planting will prioritise species appropriate to the locality and will complement designated site for nature conservation within the surrounding landscape as set out within the **Outline Landscape and Ecological Management Plan (Outline LEMP) [EN010168/APP/7.18].** The provision of a suite of wildlife sheltering features, including piles and hibernacula are prescribed with the **Outline LEMP.**
Melksham Without Parish Council	Ecology Mitigation	There will be an inevitable impact on the wildlife and biodiversity of the Whitley BESS site. This is not fields of solar panels with compatible uses of agriculture, wildlife and biodiversity; this is fields of metal boxes full of live electrical equipment, sitting on concrete pads and gravel. The requirement for biodiversity net gain, which came into force in February 2024, cannot surely find a realistic way to be put in place for an increase of 10% on what is already a site rich in biodiversity. How this can be achieved must be scoped in.	A BNG Assessment for the Scheme is provided in **Biodiversity Net Gain (BNG) Assessment Report [EN010168/APP/7.8].** This documents the net gain for biodiversity expected to be delivered by the Proposed Development
Melksham Without Parish Council	Green Infrastructure	"Green infrastructure scale interventions will be in line with the Biodiversity Opportunity Mapping Study undertaken by the Greater Lincolnshire Nature Partnership" why is this not in line with the Wiltshire Council Green and Blue Infrastructure plans, the Neighbourhood Plans in the scheme areas, and the Local Natural Recovery Strategy that Wiltshire Council are currently working on. One assumes that it's a "cut and paste" and it should refer to Wiltshire and not Lincolnshire?	Reference to the Greater Lincolnshire Nature Partnership was included by mistake. This has been correct in the ES.
Melksham Without Parish Council	Soil Compaction	This section states that the "reduced movement of agricultural machinery will result in reduced soil compaction and/or damage to root systems" due the solar panels. The scope also needs to be looking at the effect of the soil compaction of the BESS, and of the run off from the solar panels as well as the disruption to the root systems from construction and the underground cabling. See Appendix 3 for photos of potential issues.	Soil disturbance/compaction caused by the BESS has been assessed as an effect incurred in the construction phase in **ES Volume 1, Chapter 17: Soils and Agriculture [EN010168/APP/6.1]** and addressed by measures set out in the outline Soil Resource Management Plan **[EN010168/APP/7.15]**

Consultee	Topic	Matter Raised	Applicant Response
Melksham Without Parish Council	Noise	“Noise effects due to construction activities would be temporary in nature will generally only occur during daytime hours (07:00 to 23:00 hours) As such, it is considered that noise effects due to construction are unlikely to result in significant effects. However, it is not possible to conclude that construction effects would be 'not significant' when localised temporary“ Construction activity should not be between 7am and 11pm, this is unacceptable.	**ES Volume 1, Chapter 3: The Scheme [EN010168/APP/6.1]** confirms that core construction working hours would be Monday to Friday 07:00 to 18:00 and Saturday 08:00 to 13:30 which have been assessed for noise and vibration, as detailed in **ES Volume 1, Chapter 14: Noise and Vibration [EN010168/APP/6.1]**. While some construction activities may be required outside of these times, they would be limited to instances such as where cable construction works cross a public highway.
Melksham Without Parish Council	Noise	“During the operation phase, noise would be generated by the substations, inverters, battery storage systems and transformers associated with the Scheme at the Solar PV sites and the Land at Melksham Substation. The level of noise at nearby receptors would be dependent on the plant noise emission levels and distance to the receptors. Operational noise levels will be predicted at the nearest residential receptors and assessed to determine the magnitude of any effect. Any effects of operational noise shall be temporary for the duration of the site’s operational lifespan.” 60 years is not temporary	Operational noise impacts have been assessed within **ES Volume 1, Chapter 14: Noise and Vibration [EN010168/APP/6.1]** in a manner consistent with a permanent noise source.
Melksham Without Parish Council	Noise	There will be 200no. unit operating at 65Db each, which we understand will give a combined noise level of 88Db in a flat area. For comparison, the noise level coming from the M4 is 85Db, and this will be the noise inflicted on residents of Top Lane. Due to all the hard surfaces and sharp edges the noise will bend and defract and will be quieter for some residents but noisier for others, and will feel like a Chinook helicopter overhead with the “pulsing/beating” sound/feeling that brings. The noise will be very different in character to the noise of the natural environment currently experienced. The effects of the noise impact must be scoped in.	The effect of the noise impact is scoped in and, while solar farm infrastructure would not sound like traffic on the M4 or a Chinook helicopter, a penalty is applied to the operational noise levels calculated in the assessment to account for the character of the noise and acknowledge that it will be different to the natural environment currently experienced. Further details are presented in **ES Volume 1, Chapter 14: Noise and Vibration [EN010168/APP/6.1]**.
Melksham Without Parish Council	Matters to be scoped out	Vibration from operation, there is no mention of the operation of the new 400kV substation or the BESS, just the solar arrays, this should be addressed. They should not be scoped out.	Due to the nature of the 400 kV Substation, vibration has been scoped out for further assessment which has been accepted by the planning inspectorate in their scoping opinion response. Noise from the BESS Area and substations is assessed as presented in **ES Volume 1, Chapter 14: Noise and Vibration [EN010168/APP/6.1]**.
Melksham Without Parish Council	Matters to be scoped out	Concerns have been raised about the weight of the battery storage units on site and any potential vibration, especially as the area is littered with historic underground quarries and a network of tunnels.	ES Chapter 20: Other Environmental Matters contains a mineral resource assessment which considers the impacts on mineral resources and permitted mineral workings The BESS originally proposed for the site north of Whitley in the Scoping Report has been relocated to Lime Down D, which is situated away from both existing and historic mining operations. Impacts on ground conditions are dealt addressed in **ES Volume 1, Chapter 19: Ground Conditions and Contamination [EN010168/APP/6.1].**
Melksham Without Parish Council	Matters to be scoped out	Operational traffic – it says there will be little operational traffic but omits to mention the traffic for the replacement of the BESS and the solar panels several times over the lifetime, only the day-to-day operations, these should be scoped in.	Traffic associated with the replacement of Solar PV Panels and BESS Batteries have been scoped in and assessed in **ES Volume 1, Chapter 13: Transport and Access [EN010168/APP/6.1]**. This includes details regarding the methodology and vehicle movements during the replacement period.
Melksham Without Parish Council	Glint and glare	Whilst the solar arrays are not at “Land at Melksham substation” and at the Melksham Substation should you also be identifying the Wiltshire Air Ambulance base that is within 10km of those sites? The Wiltshire Air Ambulance is in the parish of Melksham Without, and south of Melksham, but with its flight path to and from the base for servicing all over Wiltshire https://www.wiltshireairambulance.co.uk/our-lifesaving-work/our-airbase	Comment noted. The Wiltshire Air Ambulance base is outside of the 10km Study Area used in the glint and glare assessment presented in Section 20.1 of **ES Volume 1, Chapter 20 Other Environmental Matters** and therefore has been scoped out of the assessment.
Melksham Without Parish Council	Air Quality	There is no mention of Air Quality in Melksham, but it’s one of the main drivers in the business case for a Melksham Eastern A350 Bypass	Any areas potentially affected by the Scheme have been considered; the Study Areas are detailed in **ES Volume 1, Chapter 15: Air Quality**

Consultee	Topic	Matter Raised	Applicant Response
		https://www.wiltshire.gov.uk/media/4983/A350-Melksham-Bypass-Strategic-Outline-Business-Case-2017/pdf/A350_Melksham_Bypass_SOBC_2017.pdf?m=1604514276497 Just because it does not currently have an air quality monitoring station in Melksham, it does not mean that there are not air quality issues, this should be scoped in.	**[EN010168/APP/6.1]** (Section 15.5) and have been defined following the relevant best practice guidance. The Study Areas are presented in: • **ES Volume 2, Figure 15-1: Construction Dust Emissions Study Area [EN010168/APP/6.2];** • **Figure 15-3: Non-Road Mobile Machinery (NRMM) Emissions Study Area [EN010168/APP/6.2];** • **Figure 15-4: Back-Up Generator Emissions Study Area [EN010168/APP/6.2];** • **Figure 15-5: BESS Fire Emissions Study Area, Receptors and Modelled BESS Locations [EN010168/APP/6.2].** The guidance and methodology used to define the assessment Study Areas for the ES has been agreed with Wilshire County Council Environmental Health Officers (EHOs) as detailed in Table 15-2.
Melksham Without Parish Council	Socio-Economics, Tourism & Recreation	There is comprehensive documentation on the JSNA (Joint Strategic Needs Assessment) for Wiltshire, by area, so you can look for Melksham for example, but this has not been referenced or used as a source of reference. This brings together over 140 indicators spanning 10 different topics. This should be scoped in. As should the Wiltshire Intelligence website, which provides a location for a wide range of data sets, indicators and assessments that have relevance to Wiltshire's residents. https://www.wiltshireintelligence.org.uk/jsna/ https://www.wiltshireintelligence.org.uk/cajsna/ https://www.wiltshireintelligence.org.uk/	The use of the JSNA and Wiltshire Intelligence data has been used to inform the assessment of baseline human health and wellbeing conditions in Section 18.7 of **ES Volume 1, Chapter 18: Human Health [EN010168/APP/6.1]**.
Melksham Without Parish Council	Socio-Economics, Tourism & Recreation	"The Scheme is predominantly set within agricultural land which is not in itself a key tourist attraction or destination. The land does however play a role in providing a landscape context to recreational use of pedestrian and cycling routes and trails, and to the enjoyment and appreciation of the neighbouring Cotswolds National Landscape, which the Scheme borders" The setting of the tourism in Wiltshire should be scoped in, for example, the effect on the Pear Tree Inn and other B&Bs in Top Lane Whitley who will adjacent to and with a view of the BESS; it's not enough to just consider the field its proposed to be built in.	**ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [EN010168/APP/6.1]** considers environmental effects arising as a result of the Scheme, in relation to topics including tourism and accessibility and desirability of recreational facilities. This includes a detailed assessment of the likely impacts from the Scheme on the tourism economy and on individual tourism and recreation facilities and assets in the Scheme's Study Area in **ES Volume 3, Appendix 16-2: Tourism and Recreation Receptor Tables [EN010168/APP/6.3]**. This accounts for likely impacts to PRoW, tourism and visitor destinations, and tourism-dependent businesses in the areas immediately impacted by the Scheme.
Melksham Without Parish Council	Socio-Economics, Tourism & Recreation	"Impacts on tourism and recreation during construction and operation. Effects on tourism and recreation are likely to be limited to those facilities immediately impacted by the Scheme, such as PRoW and heritage assets within close proximity to the Scheme boundaries" There is no mention of the impact on any local businesses, and tourism providers, no one will be going to the pub for a meal after their walk to the heritage asset on the PRoW if they are impacted. This must be scoped in.	
Melksham Without Parish Council	Socio-Economics, Tourism & Recreation	Concerns have been raised about the impact on the local facilities and businesses. The Pear Tree Inn and Spindles bike shop/Sprockets Café both on Top Lane attract visitors from all over the locality and further afield for the accommodation at the Pear Tree and holiday rentals in the village. Visitors come for the views from these venues, and the surrounding countryside, and these will be impacted by the countryside and landscape being altered beyond recognition as so widescale. The local estate agent has already reported two house sales in the village that have fallen through since the start of the Lime Down public consultation, as a direct result of the proposals and others on hold. Residents have chosen to live in the village for the views and neighbouring countryside amenities and are upset at the prospect of that changing, and the lowering of their house prices as a result, if they then decide to relocate.	**ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [EN010168/APP/6.1]** considers environmental effects arising as a result of the Scheme, in relation to topics including tourism and accessibility and desirability of recreational facilities. This includes a detailed assessment of the likely impacts from the Scheme on the tourism economy and on individual tourism and recreation facilities and assets in the Scheme's Study Area in **ES Volume 3, Appendix 16-2: Tourism and Recreation Receptor Tables [EN010168/APP/6.3]**. This accounts for likely impacts to PRoW, tourism and visitor destinations, and tourism-dependent businesses in the areas immediately impacted by the Scheme. The Applicant has sought to assess potential effects to neighbouring properties and consult with local residents and provide sufficient information to ensure

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			stakeholders to understand the likely impacts of the Scheme. The results of these assessments, along with proposed mitigations, are presented in the Environmental Statement **[EN010168/APP/6.1] to [EN010168/APP/6.3]**. Published research and evidence to date does not suggest that solar farms have a significant adverse long-term effect to nearby property values.
Melksham Without Parish Council	Socio-Economics, Tourism & Recreation	Some of the existing residential development is only 100m from the proposed site.	The Scheme design commits to embedded mitigation measures, such as offsets from residential properties and suitable landscape screening, to ensure impacts from the Scheme are minimised. Relevant embedded mitigation is set out in Section 16.9 of **ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [EN010168/APP/6.1]**.
Melksham Without Parish Council	Scoped out of the EIA	"The following matters are proposed to be scoped out of the EIA: Specific matters. Impacts upon property value, and crime are proposed to be scoped out of any stage of the assessment due to these matters being very unlikely to be significantly affected by the Scheme. This is as there is little conclusive evidence that property value is significantly affected by the development of utility scale solar farms or that any negative effect is felt over a large area." What about any evidence that the siting of a BESS or 400kV sub station has on the impact on property value, this should be scoped in.	Published research and evidence to date does not suggest that solar farms or their associated infrastructure have a significant adverse long-term effect to nearby property values. That notwithstanding, the location of the BESS Area and 132 kV and 400 kV Substations have been carefully selected to minimise adverse impacts on landscape, residential amenity, and on enjoyment of recreational features in the countryside.
Melksham Without Parish Council	Other Environmental Matters	"Major Accident or Disaster Potential Flooding Properties and people in areas of increased flood risk. Both the vulnerability of the Scheme to flooding, and its potential to exacerbate flooding, will be addressed in the Hydrology, Flood Risk and Drainage chapter of the ES. The Scheme does not propose large expanses of hardstanding that would be likely to cause significant increase to surface water flooding" The scheme does propose a large expanse of hardstanding for the BESS at the "Land at Melksham substation" in an area known to flood with internal property flooding (14 properties in Whitley in 2014) and therefore should be considered and scoped in. This should also include the impact of the underground cabling at Beanacre which also should be scoped in, due to the changes to water flow and ditch management during construction.	The BESS compound is no longer proposed at the Land at Melksham Substation. **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [EN010168/APP/6.1]** assesses the potential for construction activities, including trenching and underground cabling at Beanacre, to influence local drainage patterns. **ES Volume 3, Appendix 9-1 to 9-9: FRA and Drainage Strategy EN010168/APP/7.12]** considers how surface water will be managed during construction to avoid increasing flood risk in sensitive areas such as Whitley.
Melksham Without Parish Council	Other relevant planning documents	Recent decisions on planning applications should be considered as planning precedent and scoped in. Recently refused application (21/3/24) for a battery storage facility at Land at Somerford Farm, Brinkworth (Planning application PL/2022/02824) by Wiltshire Council.	The Applicant disagrees with this position and believes that Applications should be considered based on their own merits. The Applicant has worked hard to reduce the impacts of the Scheme through the provision of design avoidance measures and embedded mitigation incorporated into the Scheme design, which will avoid/reduce potential significant effects.
Melksham Without Parish Council	Other relevant planning documents	The proposed battery storage facility and ancillary development will result in uncharacteristic and harmful landscape and visual effects. The loss of existing agricultural land and replacement with a new urban industrial use is considered to have an unacceptable adverse landscape effect on the quiet rural tranquillity and character of the surrounding fields and more importantly, on the very close existing residential development.	The proposed BESS Area has been relocated from near Witley to within Lime Down D. Landscape and visual effects from the BESS Area, as well as the wider Scheme, have been assessed in **ES Volume 1, Chapter 8: Landscape and Visual [En010168/APP/6.1]**.
Melksham Without Parish Council	Other relevant planning documents	The proposal is thereby objected to by reason of its size, scale, design, appearance as it would have a harmful impact on the landscape character and appearance of the area in conflict with Core Policy 51 ii, iv, vi v11 and Core Policy 57 I, iii of the Wiltshire Core Strategy and Paragraphs 135 and 180 of the NPPF.	The Substation at Melksham has been removed from the Scheme

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Melksham Without Parish Council	Other relevant planning documents	Policy 2: Renewable Energy in both the adopted Melksham Neighbourhood Plan and the emerging draft Melksham Neighbourhood Plan 2 (Regulation 14 version October 2023) as proposals are only supported if it can be demonstrated that: 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 local amenity and safety; d. the proposal does not have an unacceptable degree of impact on a feature of heritage, natural or biodiversity importance. e. there are direct benefits to the local community. Proposals for **energy storage** will be supported, where it meets one or more of the following: a. it is located on or near, existing or proposed renewable energy generation sites; b. it alleviates grid constraints; and it enables the delivery of further renewable developments.	Appendix B of the **Planning Statement [EN010168/APP/.7.2**] sets out the Scheme's compliance with policy 2: Renewable Energy in the adopted Melksham Neighbourhood Plan and emerging draft Melksham Neighbourhood Plan 2.
Melksham Without Parish Council	Human Health and Wellbeing	The proposed BESS at Whitley is huge, and we understand it will be the largest in Europe and will completely alter the feel of the village and surrounding countryside. From the indicative plan it looks as though it is the same size as the village itself. The impact on the wellbeing of the residents must be scoped in.	The BESS Area proposed as part of the Scheme is of a similar size and energy storage capacity as many other proposed and permitted developments in the UK. It should be noted that the proposed BESS Area at Whitley has been relocated to Lime Down D. This is now the only location within the Order Limits where a BESS Area is proposed, as shown on the **Works Plan [EN010168/APP/2.3]**. The Applicant acknowledges the important of community identity and sense of place, and resultant physical and mental health and wellbeing conditions that this affects. As such, assessment of impacts to community identity and culture, and access to the countryside including future impacts upon PRoW are assessed in **ES Volume 1, Chapter 18: Human Health [EN010168/APP/6.1]**.
Melksham Without Parish Council	Human Health and Wellbeing	The well-being of residents in the village of Whitley and the surrounding villages has already been impacted. The prospect of this proposed battery storage site is already making residents feel anxious and spoiling their quiet enjoyment of where they live. The thoughts of the impact of the delivery and construction period; the impact of any final installation on the daily life of residents – on their daily dog walk on the adjacent Right of Way, the view out the window, the feel of the village - are already being keenly felt.	
Melksham Without Parish Council	Light Pollution	There are concerns relating to the light pollution at the site. For both the neighbouring residents and the established wildlife. Presumably, the security lighting will be triggered by motion sensors, and by the local wildlife, including the badgers, rabbits, and deer that are regularly seen on the fields? This is very impactful on nocturnal wildlife, and is known to affect migrating wildlife, affect pollinators (butterflies and bees) as well as impact on the amenity of the neighbouring residents. The impacts of this must be scoped in.	Impacts on ecological features are assessed within ES Volume 1, Chapter 9: Ecology and Biodiversity **[EN010168/APP/6.1]** including impacts on wildlife from artificial lighting at night. The assessment concludes there would be no significant impact on nocturnal wildlife as resulting from new lighting associated with the Scheme.
Melksham Without Parish Council	Delivery and Construction	A very detailed delivery and construction method programme and plan will presumably be required as part of any application but the parish council and residents are clear that any agreed plan must be adhered to, with a suitable penalty clause arrangement in place if the construction is not to plan to act as a strong deterrent.	An **Outline Construction Environmental Management Plan (CEMP) [EN010168/APP/7.12]** has been submitted as part of the DCO application. The Outline CEMP will be used as a basis for a detailed CEMP to be produced prior to the commencement of construction by the contractor and approved by Wiltshire Council before any works start.
Melksham Without Parish Council	Delivery and Construction	Unfortunately, the delivery of the solar farm at neighbouring Norrington (W/12/02072/FUL) brought the area to a standstill for days, with it regularly reported on the national traffic bulletins on the radio. Due to a short timescale for a deadline to be connected to the grid with financial implications for the developers, the construction and delivery plan was ignored. Deliveries were continuous through the night, with foreign drivers knocking on residents' doors in the small hours of the night seeking directions. This is unacceptable and there seemed to be no recourse to halt this impact on the residents and the major highway delays in the area.	Construction vehicle movements will be controlled through a CTMP which will be in substantial accord with the **Outline CTMP [EN010168/APP/7.22]** and is secured under a requirement of the **Draft DCO [EN010168/APP/3.1]**. The aim of the CTMP is to ensure that the effect of the construction phase on the local highway network is minimised. Construction deliveries by HGV will be coordinated to arrive/depart between 09:30-16:30 where possible, to avoid the network peak hours of 08:00-09:00 and 17:00-18:00.

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Melksham Without Parish Council	Delivery and Construction	There is currently a battery site being installed southwest of the Beanacre substation, which has raised numerous issues and visits to the site and residents' gardens due to the impact the installation is making on the residents; particularly noise from machinery which is currently being investigated by Wiltshire Council's public protection environmental health team to establish if it's still construction noise or the finished installed equipment noise (17/04116 & PL/22/02615 refers).	Construction and operational noise from the Scheme will be controlled in line with the **Outline CEMP [EN010168/APP/7.12]**, which includes noise monitoring to be agreed with Wiltshire Council, and the **Outline OEMP [EN010168/APP/7.13]** which includes a commitment to noise from the Scheme not exceeding the levels reported in **ES Volume 1, Chapter 14: Noise and Vibration [EN010168/APP/6.1]**.
Melksham Without Parish Council	Delivery and Construction	It is understood that the access to the proposed BESS site will only be via Goodes Hill, with only emergency access via Littleworth Lane which is used constantly for access to the Right of Ways MELW65 & MELW72, with many visitors to the area parking in Littleworth Lane to access the RoW as it's a popular dog walking area.	The BESS Area at Whitley is no longer proposed as part of the Scheme. Therefore, the only transport and access impacts associated with Scheme this area will relate to the installation of the Grid Connection Cables during the construction phase.
National Gas Transmissions	Nearby gas infrastructure	NGT has 1 feeder main located within or in proximity to the Order limits. Details of this infrastructure is as follows: • Feeder Main – FM14 – Wormington to Pucklechurch • Cathodic Protection Groundbeds/TR • Ancillary apparatus Please note that NGT has existing easements for these pipelines which provides rights for ongoing access and prevents the erection of permanent / temporary buildings/structures, change to existing ground levels or storage of materials etc within the easement strip.	Comment noted.
National Gas Transmissions	Cathodic Protection System	To ensure a high level of safety and reliability in operation, National Gas Transmission's assets are protected by a cathodic protection system. It is essential that buried steel pipework associated with the transmission and distribution of natural gas is designed, installed, commissioned and maintained to withstand the potentially harmful effects of corrosion and that the corrosion control systems employed are monitored to ensure continued effectiveness. Installations in the vicinity of National Gas Transmission's assets which may potentially interfere with the cathodic protection system must be assessed and approved by National Gas Transmission, and appropriate control measures must be put in place where required.	Comment noted.
National Gas Transmissions	Cathodic Protection System	Installations which have the potential to interfere with National Gas Transmission's Cathodic protection system include (but are not limited to): 1. High voltage cable crossings and parallelism 2. High voltage ac pylon parallelism 3. Battery Energy Storage Systems 4. Third party pipelines with cathodic protection systems 5. PV Solar arrays Further information on D.C interference can be found in UKOPA/GPG/031 Edition C Microsoft Word - UKOPA GPG 031 DC Interference Ed 1.docx Microsoft Word - UKOPA GPG 031 DC Interference Ed 1.docx (hold ctrl and click to access)Further information on A.C. interference can be found in UKOPA/GPG/027 UKOPA Good Practice Guide UKOPA Good Practice Guide (hold ctrl and click to access) The safe limits for transfer voltage and impressed current that a high-pressure gas pipeline can be exposed to are outlined in T/PL/ECP/1, T/PL/ECP/2 and BS EN 50122-1. These are the safe limits for non-electrically trained personnel.	Comment noted.
National Gas Transmissions	Solar Farms	Please be aware of the specific guidance for developing solar farms near to gas transmission pipelines: https://www.nationalgas.com/document/82936/download	Comment noted.

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		UKOPA Good Practice Guide - Requirements for the Siting and Installation of Solar Photovoltaic (PV) Installations in the Vicinity of Buried Pipelines - UKOPA/GP/014 Edition 1	
National Gas Transmissions	Solar Farms	Where the Promoter intends to acquire land, extinguish rights, or interfere with any of NGT's apparatus, NGT will require appropriate protection and further discussion on the impact to its apparatus and rights including adequate Protective Provisions. A Deed of Consent will also be required for any works proposed within the easement strip.	The Applicant will engage further with NGT to ensure that its assets are appropriately protected, including on whether protective provisions are required to be agreed and incorporated into the DCO.
National Gas Transmissions	Solar Farms	Key Considerations: • NGT has a Deed of Grant of Easement for each pipeline, which prevents the erection of permanent / temporary buildings, or structures, change to existing ground levels, storage of materials etc. • Please be aware that written permission is required before any works commence within the NGT easement strip. Furthermore a Deed of Consent will be required prior to commencement of works within NGT's easement strip subject to approval by NGT's plant protection team. • Any large installations which may result in a large population increase in the vicinity of a high pressure gas pipeline must comply with the HSE's Land Use Planning methodology, and the HSE response should be submitted to National Gas Transmission for review The below guidance is not exhaustive and all works in the vicinity of NGT's asset shall be subject to review and approval from NGT's plant protection team in advance of commencement of works on site.	Comment noted.
National Gas Transmissions	Pipeline Safety	General Notes on Pipeline Safety: • You should be aware of the Health and Safety Executives guidance document HS(G) 47 "Avoiding Danger from Underground Services", and NGT's Dial Before You Dig Specification for Safe Working in the Vicinity of NGT Assets. There will be additional requirements dictated by NGT's plant protection team. • NGT will also need to ensure that its pipelines remain accessible during and after completion of the works. • Our pipelines are normally buried to a depth cover of 1.1 metres, however actual depth and position must be confirmed on site by trial hole investigation under the supervision of a NGT representative. Ground cover above our pipelines should not be reduced or increased. • If any excavations are planned within 3 metres of NGT High Pressure Pipeline or, within 10 metres of an AGI (Above Ground Installation), or if any embankment or dredging works are proposed then the actual position and depth of the pipeline must be established on site in the presence of a NGT representative. A safe working method agreed prior to any work taking place in order to minimise the risk of damage and ensure the final depth of cover does not affect the integrity of the pipeline. • Below are some examples of work types that have specific restrictions when being undertaken in the vicinity of gas assets therefore consultation with NGT's Plant Protection team is essential: - Demolition - Blasting - Piling and boring - Deep mining - Surface mineral extraction	Comment noted.

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		- Landfilling - Trenchless Techniques (e.g. HDD, pipe splitting, tunnelling etc.) - Wind turbine installation - minimum separation distance of 1.5x the mast/hub height is required, and any auxiliary installations such as cable or track crossings will require a deed of consent. - Solar farm installation Tree planting schemes	
National Gas Transmissions	Traffic Crossings	• Where existing roads cannot be used, construction traffic should ONLY cross the pipeline at agreed locations. • Permanent road crossings will require a surface load calculation and will require a deed of consent. • The pipeline shall be protected, at the crossing points, by temporary rafts constructed at ground level. The third party shall review ground conditions, vehicle types and crossing frequencies to determine the type and construction of the raft required. • The type of raft shall be agreed with NGT prior to installation. • No protective measures including the installation of concrete slab protection shall be installed over or near to the NGT pipeline without the prior permission of NGT • NGT will need to agree the material, the dimensions and method of installation of the proposed protective measure. • The method of installation shall be confirmed through the submission of a formal written method statement from the contractor to NGT. An NGT representative shall monitor any works within close proximity to the pipeline to comply with NGT specification T/SP/SSW22	Comment noted.
National Gas Transmissions	New Asset Crossings	• New assets (cables/pipelines etc) may cross the pipeline at perpendicular angle to the pipeline i.e. 90 degrees. • The separation distance for a cable >33kV is 1000mm and pre and post energisation surveys may be required at National Gas Transmission's discretion. A risk assessment/method statement will need to be provided to, and accepted by National Gas Transmission prior to the deed of consent being agreed. Where a new asset is to cross over the pipeline a clearance distance of 0.6 metres between the crown of the pipeline and underside of the service should be maintained. If this cannot be achieved the service shall cross below the pipeline with a clearance distance of 0.6 metres. • A new service should not be laid parallel within an easement strip • Clearance must be at least 600mm above or below the pipeline • An NGT representative shall approve and supervise any cable crossing of a pipeline. A Deed of Consent is required for any cable crossing the easement	Comment noted.
National Gas Transmissions	General Guidance	Where the promoter intends to acquire land, extinguish rights, or interfere with any of NGT apparatus, protective provisions will be required in a form acceptable to it to be included within the DCO. NGT requests to be consulted at the earliest stages to ensure that the most appropriate protective provisions are included within the DCO application to safeguard the integrity of our apparatus and to remove the requirement for objection. Adequate access to NGT pipelines must be maintained at all times during construction and post construction to ensure the safe operation of our network.	Noted. Following discussions with NGET appropriate protective provisions have been included within the **Draft Development Consent Order [EN010168/APP/3.1]**.

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National Gas Transmissions	Further Safety Guidance	To download a copy of the HSE Guidance HS(G)47, please use the following link: https://www.hse.gov.uk/pubns/books/hsg47.htm Working Near National Gas Assets https://www.nationalgas.com/land-and-assets/working-near-our-assets Specification for Safe Working in the Vicinity of National Gas High Pressure Pipelines and Associated Installations https://www.nationalgas.com/document/82951/download Tree Planting Guidance https://www.nationalgas.com/document/82976/download Excavating Safely https://www.nationalgas.com/document/82971/download Dial Before You Dig Guidance https://www.nationalgas.com/document/128751/download Essential Guidance: https://www.nationalgas.com/gas-transmission/document/82931/download Solar Farm Guidance https://www.nationalgas.com/document/82936/download	Comment noted.
National Grid Electricity Transmission	Nearby infrastructure	NGET has high voltage electricity overhead transmission lines, underground cables and a high voltage substation within the scoping area. The overhead lines and substation forms an essential part of the electricity transmission network in England and Wales.	Comment noted.
National Grid Electricity Transmission	Existing infrastructure	Substation • MELKSHAM 400 kV Sub Station • MELKSHAM 275 kV Sub Station • MELKSHAM 132 kV Sub Station Associated overhead and underground apparatus including cables	Comment noted.
National Grid Electricity Transmission	Existing infrastructure	Overhead Lines • ZG 400 kV OHL HINKLEY POINT - MELKSHAM 1 HINKLEY POINT - MELKSHAM 2 • 4YX 400 kV OHL MELKSHAM - SEABANK IMPERIAL PARK – MELKSHAM • ZF 400 kV OHL MELKSHAM - MINETY 1 MELKSHAM - MINETY 2 • YYM 400 kV OHL BRAMLEY - MELKSHAM 1 BRAMLEY - MELKSHAM 2 XL 275 kV OHL IRON ACTON - MELKSHAM 1 IRON ACTON - MELKSHAM 2	Comment noted.
National Grid Electricity Transmission	Existing infrastructure	Cable Apparatus MELKSHAM - THINGLEY: 33 kV Commissioned Cable. MELK4 THIJ3R2 K1 01	Comment noted.
National Grid Electricity Transmission	New infrastructure	Please refer to the Holistic Network Design (HND) and the National Grid ESO website to view the strategic vision for the UK's ever growing electricity transmission network. https://www.nationalgrideso.com/future-energy/the-pathway-2030-holistic-network-design/hnd	Comment noted.
National Grid Electricity Transmission	New infrastructure	NGET requests that all existing and future assets are given due consideration given their criticality to distribution of energy across the UK. We remain committed to working with the promoter in a proactive manner, enabling both parties to deliver successful projects wherever reasonably possible. As such we encourage that ongoing discussion and consultation between both parties is maintained on interactions with existing or future assets, land interests, connections or consents and any other NGET interests which have the potential to be impacted prior to submission of the Proposed DCO.	Comment noted. The Applicant has liaised with NGET and is confident it has identified all existing and future assets within proximity to the Scheme.

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National Grid Electricity Transmission	New infrastructure	The Great Grid Upgrade is the largest overhaul of the electricity grid in generations, we are in the middle of a transformation, with the energy we use increasingly coming from cleaner greener sources. Our infrastructure projects across England and Wales are helping to connect more renewable energy to homes and businesses. To find out more about our current projects please refer to our network and infrastructure webpage. https://www.nationalgrid.com/electricity-transmission/network-and-infrastructure/infrastructure-projects Where it has been identified that your project interacts with or is in close proximity to one of NGET's infrastructure projects, we would welcome further discussion at the earliest opportunity.	Comment noted.
National Grid Electricity Transmission	New infrastructure	These projects are all essential to increase the overall network capability to connect the numerous new offshore wind farms that are being developed, and transport new clean green energy to the homes and businesses where it is needed.	Comment noted.
National Grid Electricity Transmission	Specific Comments – Electricity Infrastructure	NGET's Overhead Line/s is protected by a Deed of Easement/Wayleave Agreement which provides full right of access to retain, maintain, repair and inspect our asset	Noted. Following discussions with NGET appropriate protective provisions have been included within the **Draft Development Consent Order [EN010168/APP/3.1]**.
National Grid Electricity Transmission	Specific Comments – Electricity Infrastructure	Statutory electrical safety clearances must be maintained at all times. Any proposed buildings must not be closer than 5.3m to the lowest conductor. NGET recommends that no permanent structures are built directly beneath overhead lines. These distances are set out in EN 43 – 8 Technical Specification for "overhead line clearances Issue 3 (2004)".	Noted. Following discussions with NGET appropriate protective provisions have been included within the **Draft Development Consent Order [EN010168/APP/3.1]**.
National Grid Electricity Transmission	Specific Comments – Electricity Infrastructure	If any changes in ground levels are proposed either beneath or in close proximity to our existing overhead lines then this would serve to reduce the safety clearances for such overhead lines. Safe clearances for existing overhead lines must be maintained in all circumstances.	Noted. Following discussions with NGET appropriate protective provisions have been included within the **Draft Development Consent Order [EN010168/APP/3.1]**.
National Grid Electricity Transmission	Specific Comments – Electricity Infrastructure	The relevant guidance in relation to working safely near to existing overhead lines is contained within the Health and Safety Executive's (The relevant guidance in relation to working safely near to existing overhead lines is) Guidance Note GS 6 "Avoidance of Danger from Overhead Electric Lines" and all relevant site staff should make sure that they are both aware of and understand this guidance.	Noted. Following discussions with NGET appropriate protective provisions have been included within the **Draft Development Consent Order [EN010168/APP/3.1]**.
National Grid Electricity Transmission	Specific Comments – Electricity Infrastructure	Plant, machinery, equipment, buildings or scaffolding should not encroach within 5.3 metres of any of our high voltage conductors when those conductors are under their worse conditions of maximum "sag" and "swing" and overhead line profile (maximum "sag" and "swing") drawings should be obtained using the contact details above.	Noted. Following discussions with NGET appropriate protective provisions have been included within the **Draft Development Consent Order [EN010168/APP/3.1]**.
National Grid Electricity Transmission	Specific Comments – Electricity Infrastructure	If a landscaping scheme is proposed as part of the proposal, we request that only slow and low growing species of trees and shrubs are planted beneath and adjacent to the existing overhead line to reduce the risk of growth to a height which compromises statutory safety clearances.	Noted.
National Grid Electricity Transmission	Specific Comments – Electricity Infrastructure	Drilling or excavation works should not be undertaken if they have the potential to disturb or adversely affect the foundations or "pillars of support" of any existing tower. These foundations always extend beyond the base area of the existing tower and foundation ("pillar of support") drawings can be obtained using the contact details above.	Noted. Following discussions with NGET appropriate protective provisions have been included within the **Draft Development Consent Order [EN010168/APP/3.1]**.
National Grid Electricity Transmission	Specific Comments – Electricity Infrastructure	NGET high voltage underground cables are protected by a Deed of Grant; Easement; Wayleave Agreement or the provisions of the New Roads and Street Works Act. These provisions provide NGET full right of access to retain, maintain, repair and inspect our assets. Hence we require that no permanent / temporary structures are to be built over our cables or within the easement strip. Any such	Noted. Following discussions with NGET appropriate protective provisions have been included within the **Draft Development Consent Order [EN010168/APP/3.1]**.

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		proposals should be discussed and agreed with NGET prior to any works taking place.	
National Grid Electricity Transmission	Specific Comments – Electricity Infrastructure	Ground levels above our cables must not be altered in any way. Any alterations to the depth of our cables will subsequently alter the rating of the circuit and can compromise the reliability, efficiency and safety of our electricity network and requires consultation with National Grid prior to any such changes in both level and construction being implemented.	Noted. Following discussions with NGET appropriate protective provisions have been included within the **Draft Development Consent Order [EN010168/APP/3.1]**.
National Grid Electricity Transmission	HSE Guidance	To download a copy of the HSE Guidance HS(G)47, please use the following link: http://www.hse.gov.uk/pubns/books/hsg47.htm	Comment noted.
National Grid Electricity Transmission	Further Advice	We would request that the potential impact of the proposed scheme on NGET's existing and future assets as set out above and including any proposed diversions is considered in any subsequent reports, including in the Environmental Statement, and as part of any subsequent application.	Comment noted.
National Grid Electricity Transmission	Further Advice	Where any diversion of apparatus may be required to facilitate a scheme, NGET is unable to give any certainty with the regard to diversions until such time as adequate conceptual design studies have been undertaken by NGET. Further information relating to this can be obtained by contacting the email address below.	Comment noted.
National Grid Electricity Transmission	Further Advice	Where the promoter intends to acquire land, extinguish rights, or interfere with any of NGET apparatus, protective provisions will be required in a form acceptable to it to be included within the DCO.	Comment noted.
National Grid Electricity Transmission	Further Advice	NGET requests to be consulted at the earliest stages to ensure that the most appropriate protective provisions are included within the DCO application to safeguard the integrity of our apparatus and to remove the requirement for objection. All consultations should be sent to the following email address: box.landandacquisitions@nationalgrid.com	Comment noted. NGET has been consulted throughout the DCO process. Appropriate protective provisions are included within the **Draft Development Consent Order [EN010168/APP/3.1]**.
National Highways	General	Thank you for inviting National Highways (previously operating as the Highways Agency and Highways England) to provide comments on the above request for a scoping opinion. As a Statutory Consultee we seek to act as a proactive partner and therefore welcome pre-application discussion. This includes the opportunity to provide advice on the scope of any Environmental Statement pursuant to the procedures set out in the Environmental Impact Assessment Regulations 2017, which also identifies us as a statutory party.	This comment is noted by the Applicant.
National Highways	General	Whilst we have no view on whether the above development meets the requirements for an Environmental Statement, we offer comments on the assessment of traffic impacts that we would expect to accompany any submission, as well as potential operational asset impacts that will require consideration by the applicant. Our comments relate to matters arising from our responsibilities to manage and maintain the strategic road network (SRN) which in this case comprises the M4 motorway and junctions 17 and 18 in particular. Comments relating to the local road network should be sought from the appropriate Local Highway Authority.	The SRN, including Junctions 17 and 18 of the M4, has been considered as part of the transport and access assessment presented in **ES Volume 1, Chapter 13: Transport and Access [EN010168/APP/6.1]**. Engagement with National Highways and Local Highway Authorities regarding the consideration of the SRN and LRN, respectively, has been undertaken throughout the pre-application stage and will continue through the post-application stages see Table 13-2 **ES Volume 1, Chapter 13: Transport and Access [EN010168/APP/6.1]**.
National Highways	Scheme information	We understand that the scheme comprises of a series of Solar Arrays across approximately 900 ha within sites identified as Lime Down A to E, a number of 33kV and 132kV substations located within the Solar Array sites, a BESS, up to two 400kV substations, and interconnecting cables. The point of connection for the scheme to the National Grid is at the existing 400kV Melksham Substation. The scheme will be linked to Melksham Substation via underground cables within a Cable Route Corridor. The Cable Route Search Corridor is indicated but the route remains under consideration and subject to environmental assessments, landowner negotiations and consultation input. The scheme is expected to operate for 60 years, with batteries and solar panels likely to require replacement at least	Comment noted.

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		once during this period. Subject to the DCO process, it is anticipated that construction could commence in 2027 with the site operational by 2029.	
National Highways	Traffic	It is acknowledged that the primary traffic impact will be during the construction phase, and all construction vehicles are likely to route to the sites via the M4 at either junction 17 or 18. It will therefore be necessary for the scheme to be supported by a transport assessment which specifically considers the construction phase of the development and a construction traffic management plan which should consider the impact on the M4 and associated junctions. National Highways will also need to be a party in any further discussions regarding the Cable Route Corridor as the cables will need to pass under the M4 and any associated works will need to be agreed with us. Given that the Solar Arrays will be located at least 1.7km to the north of the M4, we consider that the development is unlikely to otherwise have any significant adverse impacts on the SRN. We have therefore set out below both the general and specific areas of concern that National Highways would expect to see considered as part of any Environmental Statement submission.	The Applicant has prepared **ES Volume 3, Appendix 13-1: Transport Assessment [EN010168/APP/6.3]** and the **Outline CTMP [EN010168/APP/7.22]** as part of the DCO Application which consider the impact and management of construction traffic on the SRN as a result of the Scheme. Engagement with National Highways regarding the Cable Route Corridor has been undertaken throughout the pre-application stage and will continue through the post-application stages see Table 13-2 **ES Volume 1, Chapter 13: Transport and Access [EN010168/APP/6.1]**..
National Highways	General aspects to be addressed	An assessment of transport related impacts of the proposal should be carried out and reported as described in current national planning practice guidance.	Transport impacts have been assessed in line with current national planning practice guidance within **ES Volume 1, Chapter 13: Transport and Access [EN010168/APP/6.1]** and **ES Volume 3, Appendix 13-1: Transport Assessment [EN010168/APP/6.3]**.
National Highways	General aspects to be addressed	Environmental impacts arising from any disruption during construction, traffic volume, composition or routing change and transport infrastructure modification should be fully assessed and reported, along with the environmental impact of the road network upon the development itself.	Environmental impacts, such as air quality and noise and vibration, associated with traffic and access requirements of the Scheme have been assessed within the relevant chapters of the ES ,Volume 1 Chapter 14 noise vibration **[EN010168/APP/6.1]**, Chapter 15 Air Quality **[EN010168/APP/6.1]**
National Highways	General aspects to be addressed	Adverse changes to noise and air quality should be considered, including in relation to compliance with the European air quality Limit Values and/or Local Authority designated Air Quality Management Areas (AQMAs) and World Health Organisation (WHO) criteria.	Air quality impacts are assessed in **ES Volume 1, Chapter 15: Air Quality [EN010168/APP/6.1]** and have been considered in the context of relevant standards including Limit Values, Air Quality Objectives and Acute Exposure Guideline Levels. The assessment also considers the location of AQMAs, the location of which are described in Section 15.7 of the ES.
National Highways	Location specific considerations	The assessment of traffic impacts accompanying any DCO submission should consider the operation of the strategic road network in line with national planning practice guidance and DfT Circular 01/2022 The Strategic Road Network and the Delivery of Sustainable Development. Where proposals result in a severe congestion or unacceptable safety impact, mitigation will be required in line with current policy. Specific consideration will need to be given to the M4 and junctions 17 and 18 in particular. With regards the SRN the transport assessment should specifically consider traffic impacts during the construction phase.	Transport impacts to the SRN, including Junctions 17 and 18 of the M4, have been considered and assessed as part of **ES Volume 1, Chapter 13: Transport and Access [EN010168/APP/6.1]** and **ES Volume 3, Appendix 13-1: Transport Assessment [EN010168/APP/6.3]**. Engagement with National Highways and Local Highway Authorities regarding the consideration of the SRN and LRN has been undertaken throughout the pre-application stage and will continue through the post-application stages.
National Highways	Location specific considerations	A construction traffic management plan will need to accompany any submission. The scoping report indicates that all construction vehicles are likely to route to the development site via the M4 and junctions 17 or 18. Vehicle types, volumes and routing will need to be clearly understood and appropriate mitigation measures understood and agreed.	Construction vehicle movements will be controlled through a CTMP which will be in substantial accord with the **Outline CTMP [EN010168/APP/7.22]** and is secured under a requirement of the **Draft DCO [EN010168/APP/3.1]**. The aim of the CTMP is to ensure that the effect of the construction phase on the local highway network is minimised.
National Highways	Location specific considerations	The effects of the proposed development should be assessed cumulatively with other schemes and we would expect the applicants to agree an appropriate list of schemes, including committed development in the area.	**ES Volume 1, Chapter 21: Cumulative Effects and Interactions [EN010168/APP/6.1]** presents the shortlist of schemes considered within the CEA. The long list of cumulative developments was shared with Wiltshire County Council for agreement on 11th November 2024. A final list of cumulative developments was shared with Wiltshire Council on 23 May 2025. A further two cumulative developments were requested to be included in the long and short list and these developments have now been considered.
National Highways	Location specific considerations	The scheme Cable Route Corridor will pass under the M4 in a location yet to be defined. Any drilling works to accommodate the cable route must be subject to the	Noted.

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		Design Manual for Roads and Bridges CD622 Managing Geotechnical Risk reporting, and subject to review and acceptance by National Highways. We would welcome further engagement directly with the applicant to progress this requirement.	
National Highways	Location specific considerations	Works to implement the Cable Route Corridor under the M4 will be subject to either a s61 consent or s50 licence. Again, National Highways would encourage early engagement with the applicant to progress the required agreements and funding arrangements.	Engagement with National Highways regarding the Cable Route Corridor has been undertaken throughout the pre-application stage and will continue through the post-application stages.
National Highways	General considerations	These comments are only advisory as the responsibility for determining the scope and form of any EIA Report rests with the Planning Authority. Our comments are made on the basis of the information available to us at this time, and are made without prejudice to future advice and/or recommendations, which would be made on receipt of a formal submission. We would welcome the opportunity to engage directly with the applicant with regards to the emerging Cable Route Corridor and associated M4 impacts.	The Applicant notes this comment. Engagement with National Highways regarding the Cable Route Corridor has been undertaken throughout the pre-application stage and will continue through the post-application stages.
NATS Safeguarding	No conflict from a technical aspect or with safeguarding criteria	The proposed development has been examined from a technical safeguarding aspect and does not conflict with our safeguarding criteria. Accordingly, NATS (En Route) Public Limited Company ("NERL") has no safeguarding objection to the proposal.	Comment noted.
NATS Safeguarding	Guidance on consultation	However, please be aware that this response applies specifically to the above consultation and only reflects the position of NATS (that is responsible for the management of en route air traffic) based on the information supplied at the time of this application. This letter does not provide any indication of the position of any other party, whether they be an airport, airspace user or otherwise. It remains your responsibility to ensure that all the appropriate consultees are properly consulted.	Comment noted.
NATS Safeguarding	Guidance for statutory consultees	If any changes are proposed to the information supplied to NATS in regard to this application which become the basis of a revised, amended or further application for approval, then as a statutory consultee NERL requires that it be further consulted on any such changes prior to any planning permission or any consent being granted.	Comment noted.
Natural England	General	Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.	Comment noted.
Natural England	General	A robust assessment of environmental impacts and opportunities, based on relevant and up to date environmental information, should be undertaken prior to an application for a Development Consent Order. Annex A (transcribed in the below tables) to this letter provides Natural England's advice on the scope of the Environmental Impact Assessment (EIA) for the proposed development. Natural England have had pre-application engagement with the project	The Environmental Statement provides a detailed assessment of the Scheme's impact on the environment. The assessment has been supported by extensive desk-based research and survey work to identify the baseline conditions within and surrounding the Order Limits and considers the potential effects of the Scheme.
Natural England	Natural England Advice on EIA Scoping: General Principles	Regulation 11 of the Infrastructure Planning Regulations 2017 - (The EIA Regulations) sets out the information that should be included in an Environmental Statement (ES) to assess impacts on the natural environment. This includes: • A description of the development – including physical characteristics and the full land use requirements of the site during construction and operational phases • Appropriately scaled and referenced plans which clearly show the information and features associated with the development • An assessment of alternatives and clear reasoning as to why the preferred option has been chosen	In line with Regulation 11 of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017, the Environmental Statement includes the following within ES Volume 1 and Volume 2: • **Chapter 2: The Order limits [EN010168/APP/6.1]** and **Chapter 3: The Scheme [EN010168/APP/6.1]** describe the key characteristics of the Order limits and the principal components of the Scheme and the design parameters used in the assessment, respectively; • All elements of the Scheme are presented in **Figure 3-1: Indicative Site Layout Plan [EN010168/APP/6.2]** and **Figure 3-2: Key Construction Phase Features [EN010168/APP/6.2]**;

Consultee	Topic	Matter Raised	Applicant Response
		• A description of the aspects and matters requested to be scoped out of further assessment with adequate justification provided. • Expected residues and emissions (water, air and soil pollution, noise, vibration, light, heat, radiation etc.) resulting from the operation of the proposed development • A description of the aspects of the environment likely to be significantly affected by the development including biodiversity (for example fauna and flora), land, including land take, soil, water, air, climate (for example greenhouse gas emissions, impacts relevant to adaptation, cultural heritage and landscape and the interrelationship between the above factors • A description of the likely significant effects of the development on the environment – this should cover direct effects but also any indirect, secondary, cumulative, short, medium, and long term, permanent and temporary, positive, and negative effects. Effects should relate to the existence of the development, the use of natural resources (in particular land, soil, water and biodiversity) and the emissions from pollutants. This should also include a description of the forecasting methods to predict the likely effects on the environment • A description of the measures envisaged to prevent, reduce and where possible offset any significant adverse effects on the environment • An outline of the structure of the proposed ES From the information provided to date we are confident that the general principles are likely to be addressed within the Environmental Statement.	• Detail regarding the alternatives considered and evolution of design for the Scheme are presented in **Chapter 4: Alternatives and Design Evolution [EN010168/APP/6.1]**; • Each technical chapter of the Environmental Statement (**Chapter 7** to **Chapter 20 [EN010168/APP/6.1]**) confirms the matters scoped out of the Assessment and provides justification for this. • An assessment of the potential residues and emissions from operation and maintenance of the Scheme is provided in **Chapter 11: Hydrology, Flood Risk and Drainage [EN010168/APP/6.1], Chapter 14: Noise and Vibration [EN010168/APP/6.1], Chapter 15: Air Quality [EN010168/APP/6.1], Chapter 19: Ground Conditions and Contamination [EN010168/APP/6.1], and Chapter 20: Other Environmental Matters [EN010168/APP/6.1]**; • A description of the aspects of the environment likely to be significantly affected by the Scheme is provided in each technical chapter of the Environmental Statement (**Chapter 7** to **Chapter 20 [EN010168/APP/6.1]**); • A description of the likely significant effects of the Scheme on the environment is presented in each technical chapter of the Environmental Statement (**Chapter 7** to **Chapter 20 [EN010168/APP/6.1]**) and summarised in **Chapter 22: Summary of Residual Effects [EN010168/APP/6.1]**; • A description of measures proposed to prevent, reduce and offset significant adverse effects on the environment are presented in each technical chapter of the Environmental Statement (**Chapter 7** to **Chapter 20 [EN010168/APP/6.1]**). • An outline of the structure of the Environmental Statement is presented in **Chapter 1: Introduction [EN010168/APP/6.1]**.
Natural England	Cumulative and In-Combination Effects	The ES should fully consider the implications of the whole development proposal. This should include an assessment of all supporting infrastructure. An impact assessment should identify, describe, and evaluate the effects that are likely to result from the project in combination with other projects and activities that are being, have been or will be carried out. The following types of projects should be included in such an assessment (subject to available information): a. existing completed projects; b. approved but uncompleted projects; c. ongoing activities; d. plans or projects for which an application has been made and which are under consideration by the consenting authorities; and plans and projects which are reasonably foreseeable, i.e. projects for which an application has not yet been submitted, but which are likely to progress before completion of the development and for which sufficient information is available to assess the likelihood of cumulative and in-combination effects.	**Chapter 21: Cumulative and In-Combination Effects [EN010168/APP/6.1]** presents the shortlist of schemes considered within the Cumulative Effects Assessment. The long list of cumulative developments was shared with Wiltshire County Council for agreement on 5th November 2024. A final list of cumulative developments was shared with Wiltshire Council on 23 May 2025. A further two cumulative developments were requested to be included in the long and short list and these developments have now been considered. **Chapter 6: EIA Methodology [EN010168/APP/6.1]** outlines the criteria used to identify cumulative schemes which is similar to the approach outlined in the comment.

<table>
<tr><th>Consultee</th><th>Topic</th><th>Matter Raised</th><th>Applicant Response</th></tr>
<tr><td>Natural England</td><td>Cumulative and In-Combination Effects</td><td><table><tr><th colspan="2">Plans or projects that Natural England are aware of that might need to be considered in the ES</th></tr><tr><td>Project /Plan</td><td>Status</td></tr><tr><td>Hullavington Solar Park</td><td>Existing completed projects</td></tr><tr><td>Rodbourne Rail Solar Farm</td><td>Existing completed projects</td></tr><tr><td>Red Barn Solar Farm</td><td>Plans or projects for which an application has been made and which are under consideration by the consenting authorities</td></tr></table></td><td>The Applicant understands Hullavington Solar Park and Rodbourne Rail Solar Park have been constructed and, therefore, are not considered in the Cumulative Effects Assessment. These instead form part of the baseline conditions for the assessment.
Red Barn Solar Farm has been included as part of the cumulative short list presented in Chapter 21: Cumulative and In-Combination Effects [EN010168/APP/6.1].</td></tr>
<tr><td>Natural England</td><td>Environmental Data</td><td>Natural England is required to make available information it holds where requested to do so. National datasets held by Natural England are available at
Detailed information on the natural environment is available at http://www.magic.gov.uk/
Natural England’s SSSI Impact Risk Zones are a GIS dataset which can be used to help identify the potential for the development to impact on a SSSI. The dataset and user guidance can be accessed from the https://naturalengland-defra.opendata.arcgis.com/datasets/sssi-impact-risk-zones-england
Natural England does not hold local information on local sites, local landscape character, priority habitats and species or protected species. Local environmental data should be obtained from the appropriate local bodies. This may include the local environmental records centre, the local wildlife trust, local geo-conservation group or other recording society.</td><td>The Applicant notes this advice.</td></tr>
<tr><td>Natural England</td><td>Biodiversity and Geodiversity</td><td>The assessment will need to include potential impacts of the proposal upon sites and features of nature conservation interest as well as opportunities for nature recovery through biodiversity net gain (BNG). There might also be strategic approaches to take into account.</td><td>The Applicant notes this advice. Impacts on sites and features of nature conservation interest, inlcuding consideration of opportunites for nature recovery are assessed in ES Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1].</td></tr>
<tr><td>Natural England</td><td>Biodiversity and Geodiversity</td><td>We advise this includes the emerging Local Nature Recovery Strategy (LNRS) for Wiltshire which will be the key mechanism for planning and mapping local delivery of the Nature Recovery Network (NRN). The NRN refers to a single, growing national network of improved joined-up, wildlife rich places which will benefit people and wildlife https://www.gov.uk/government/publications/local-nature-recovery-strategies/local-nature-recovery-strategies</td><td>The Applicant notes this advice. The draft Wiltshire LNRS has been taken into account when considering habitat creation and enhancement measures, as well as determining Strategic Significance in Biodiversity Net Gain (BNG) calculations. This is detailed within the Biodiversity Net Gain Assessment Report [EN010168/APP/7.8].</td></tr>
<tr><td>Natural England</td><td>Biodiversity and Geodiversity</td><td>Ecological Impact Assessment (EcIA) is the process of identifying, quantifying, and evaluating the potential impacts of defined actions on ecosystems or their components. EcIA may be carried out as part of the EIA process or to support other forms of environmental assessment or appraisal. Guidelines have been developed by the Chartered Institute of Ecology and Environmental Management (CIEEM).</td><td>The Applicant notes this advice. ES Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1] details the Ecological Impact Assessment that has been undertaken in the context of Environmental Impact Assessment (EIA) methodology.</td></tr>
<tr><td>Natural England</td><td>International and European Sites</td><td>The development site is within or may impact on the following European/ Internationally Designated Nature Conservation Site: Bath & Bradford on Avon Bats SAC (Special Area of Conservation)
The Bath & Bradford on Avon Bats SAC Designated Sites View (naturalengland.org.uk) is located within 10km of the development site (4km of the cable route search area) and therefore potential impacts upon the designated site should be taken into consideration.</td><td>The Applicant notes this advice. The Bath & Bradford on Avon Bats SAC is scoped into the assessment within ES Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1].</td></tr>
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Consultee	Topic	Matter Raised	Applicant Response
Natural England	Biodiversity and Geodiversity	The ES should thoroughly assess the potential for the proposal to affect internationally designated sites of nature conservation importance / European sites, including marine sites where relevant. This includes Special Protection Areas (SPA), Special Areas of Conservation (SAC), listed Ramsar sites, candidate SAC and proposed SPA.	The Applicant notes this advice. Impacts on internationally designated sites are assessed in **ES Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1]**.
Natural England	Biodiversity and Geodiversity	Article 6 (3) of the Habitats Directive requires an appropriate assessment where a plan or project is likely to have a significant effect upon a European Site, either individually or in combination with other plans or projects.	The Applicant notes this advice. The Habitat Regulations Assessment (HRA) [EN010168/APP/7.10] report provides information to support an appropriate assessment for European Sites scopes into the assessment.
Natural England	Nationally Designated Sites	The development site may impact on the following Sites of Special Scientific Interest (SSSI's): - Harries Ground, Rodbourne SSSI - Sutton Lane Meadows SSSI Box Mine SSSI	The Applicant notes this advice. Impacts on these three SSSIs are assessed in **ES Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1]**.
Natural England	Nationally Designated Sites	The Environmental Statement should include a full assessment of the direct and indirect effects of the development on the features of special interest within the SSSI and identify appropriate mitigation measures to avoid, minimise or reduce any adverse significant effects. We acknowledge the applicant's search and agree with the identified list of statutory designated SSSI sites in Table 8.4 of the Scoping Report and the justification for scoping out SSSI sites designated for geological features. Specific consideration should be given to those designated sites which are directly adjacent to the development boundary, including Harries Ground, Rodbourne SSSI.	The Applicant notes this advice. Impacts on these designated sites are assessed in **ES Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1]**.
Natural England	Nationally Designated Sites	Sites of Special Scientific Interest are protected under the Wildlife and Countryside Act 1981 (as amended). Further information on SSSIs and their special interest features can be found at http://www.magic.gov.uk/	The Applicant notes this advice. Impacts on SSSIs are assessed in **ES Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1]**.
Natural England	Nationally Designated Sites	Natural England's SSSI Impact Risk Zones can be used to help identify the potential for the development to impact on a SSSI. The dataset and user guidance can be accessed from the Natural England Open Data Geoportal.	The Applicant notes this advice. This dataset has been used to identify SSSIs which could be impacted by the Scheme as set out in **ES Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1].**
Natural England	Regionally and Locally Important Sites	The ES should consider any impacts upon local wildlife and geological sites, including local nature reserves. Local Sites are identified by the local wildlife trust, geo-conservation group or other local group. The ES should set out proposals for mitigation of any impacts and if appropriate, compensation measures and opportunities for enhancement and improving connectivity with wider ecological networks. They may also provide opportunities for delivering beneficial environmental outcomes. Contact the relevant local body for further information.	The Applicant notes this advice. Impacts on local sites are assessed in **ES Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1].**
Natural England	Protected Species	The ES should assess the impact of all phases of the proposal on protected species (including, for example, great crested newts, reptiles, birds, water voles, badgers and bats). Natural England does not hold comprehensive information regarding the locations of species protected by law. Records of protected species should be obtained from appropriate local biological record centres, nature conservation organisations and local groups. Consideration should be given to the wider context of the site, for example in terms of habitat linkages and protected species populations in the wider area.	The Applicant notes this advice. Impacts on protected species are assessed in **ES Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1].**
Natural England	Protected Species	The area likely to be affected by the development should be thoroughly surveyed by competent ecologists at appropriate times of year for relevant species and the survey results, impact assessments and appropriate accompanying mitigation strategies included as part of the ES. Surveys should always be carried out in optimal survey time periods and to current guidance by suitably qualified and, where necessary, licensed, consultants.	The Applicant notes this advice. Detailed methodology, including timings and personnel, are provided for all surveys within **ES Volume 3, Appendices 9-1 to 9-7 [EN010168/APP/6.3].**

Consultee	Topic	Matter Raised	Applicant Response
Natural England	Protected Species	Natural England has adopted standing advice for protected species, which includes guidance on survey and mitigation measures. A separate protected species licence from Natural England or Defra may also be required.	The Applicant notes this advice. Surveys and mitigation measures have followed standing advice where relevant as set out in **ES Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1].**
Natural England	Protected Species	Applicants should check to see if a mitigation licence is required using NE guidance on licencing NE wildlife licences. Natural England are unable to advise upon the decision for a licence. This responsibility falls to the developer. Applicants can also make use of Natural England's charged service Pre Submission Screening Service for a review of a draft wildlife licence application. Advice Note Eleven, Annex C – Natural England and the Planning Inspectorate | National Infrastructure Planning contains details of Natural England's role in wildlife licencing for NSIPs.	The Applicant notes this advice. Consideration of requirements for wildlife licences are set out in **ES Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1].**
Natural England	District Level Licensing for Great Crested Newts	Where strategic approaches such as district level licensing (DLL) for great crested newts (GCN) are used, a letter of no impediment (LONI) will not be required. Instead, the developer will need to provide evidence to the Examining Authority (ExA) on how and where this approach has been used in relation to the proposal, which must include a counter-signed Impact Assessment and Conservation Payment Certificate (IACPC) from Natural England, or a similar approval from an alternative DLL provider.	The Applicant notes this advice. A countersigned IAPAC will be provided to the to accompany any granting of DCO consent.
Natural England	District Level Licensing for Great Crested Newts	The DLL approach is underpinned by a strategic area assessment which includes the identification of risk zones, strategic opportunity area maps and a mechanism to ensure adequate compensation is provided regardless of the level of impact. In addition, Natural England (or an alternative DLL provider) will undertake an impact assessment, the outcome of which will be documented in the IACPC (or equivalent).	The Applicant notes this advice. Further information on the Scheme's location in relation to NE GCN risk zones has been provided as part of the ES, most explicitly in **ES Volume 2, Figures 9.5.4 to 9.5.6: Natural England GCN Risk Zones [EN010168/APP/6.2].**
Natural England	District Level Licensing for Great Crested Newts	If no GCN surveys have been undertaken, Natural England's risk zone modelling may be relied upon. During the impact assessment, Natural England will inform the Applicant whether their scheme is within one of the amber risk zones and therefore whether the Proposed Development is likely to have a significant effect on GCN. The IACPC will also provide additional detail including information on the Proposed Development's impact on	The Applicant notes this advice. Further information on the Scheme's location in relation to NE GCN risk zones has been provided as part of the ES, most explicitly in **ES Volume 2, Figures 9.5.4 to 9.5.6: Natural England GCN Risk Zones [EN010168/APP/6.2].**
Natural England	District Level Licensing for Great Crested Newts	GCN and the appropriate compensation required.	N.b. this is a continuation of comment from above
Natural England	District Level Licensing for Great Crested Newts	Should the DLL scheme for GCN be used, consideration of GCN in the ES can be restricted to cross-referring to the Natural England (or alternative provider) IACPC as a justification as to why significant effects on GCN populations as a result of the Proposed Development would be avoided.	The Applicant notes this advice. While DLL is intended to be used for the Scheme, impacts on GCN are nevertheless assessed in **ES Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1].**
Natural England	District Level Licensing for Great Crested Newts	It should be noted that at present, a scheme is active within the project boundary in Wiltshire. Natural England would encourage engagement from the applicant regarding DLL as soon as possible to ensure entry into the scheme is feasible. Contact can be made with GCNDLL using the following email address, gcndll@naturalengland.org.uk.	The Applicant notes this advice. Consultation has been made with the Natural England DLL team. The NE DLL team advised there is a very good supply of compensation ponds for entry into the DLL scheme.
Natural England	Priority Habitats and Species	Priority Habitats and Species are of particular importance for nature conservation and included in the England Biodiversity List published under section 41 of the Natural Environment and Rural Communities Act 2006. Most priority habitats will be mapped either as Sites of Special Scientific Interest, on the Magic website or as Local Wildlife Sites. Lists of priority habitats and species can be found here. Natural England does not routinely hold species data. Such data should be collected when impacts on priority habitats or species are considered likely.	The Applicant notes this advice. Information pertaining to Priority Habitats and Species as well as an assessment of impacts on these are provided in **ES Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1].**

Consultee	Topic	Matter Raised	Applicant Response
Natural England	Priority Habitats and Species	Consideration should also be given to the potential environmental value of brownfield sites, often found in urban areas and former industrial land. Sites can be checked against the (draft) national Open Mosaic Habitat (OMH) inventory published by Natural England and freely available to download. Further information is also available here.	The Applicant notes this advice. The dataset has been reviewed as part of **ES Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1].** and the Scheme does not intersect with any mapped OMH.
Natural England	Priority Habitats and Species	An appropriate level habitat survey should be carried out on the site, to identify any important habitats present. In addition, ornithological, botanical, and invertebrate surveys should be carried out at appropriate times in the year, to establish whether any scarce or priority species are present.	The Applicant notes this advice. Detailed methodology, including timings and personnel, are provided for all surveys within **ES Volume 3, Appendices 9-1 to 9-7 [EN010168/APP/6.3].**
Natural England	Priority Habitats and Species	The Environmental Statement should include details of: • Any historical data for the site affected by the proposal (e.g. from previous surveys) • Additional surveys carried out as part of this proposal • The habitats and species present • The status of these habitats and species (e.g. whether priority species or habitat) • The direct and indirect effects of the development upon those habitats and species • Full details of any mitigation or compensation measures Opportunities for biodiversity net gain or other environmental enhancement	The Applicant notes this advice. These details are included within **ES Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1].**
Natural England	Ancient Woodland, Ancient and Veteran Trees	Ancient woodland has been identified within the scoping areas for the proposed development. The ES should assess the impacts of the proposal on the ancient woodland and any ancient and veteran trees, and the scope to avoid and mitigate for adverse impacts. It should also consider opportunities for enhancement.	The Applicant notes this advice. An assessment of impacts on ancient woodland is provided within **ES Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1].** Additional assessments of impacts on ancient and veteran trees are provided in **ES Volume 1, Chapter 10: Arboriculture [EN010168/APP/6.1].**
Natural England	Ancient Woodland, Ancient and Veteran Trees	Ancient woodland is an irreplaceable habitat of great importance for its wildlife, its history, and the contribution it makes to our diverse landscapes. Paragraph 186 of the NPPF sets out the highest level of protection for irreplaceable habitats and development should be refused unless there are wholly exceptional reasons, and a suitable compensation strategy exists.	The Applicant notes this advice. Information pertaining to Ancient Woodland as well as an assessment of impacts on this habitat are provided in **ES Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1] and Chapter 10: Arboriculture [EN010168/APP/6.1].**
Natural England	Ancient Woodland, Ancient and Veteran Trees	Ancient woodland needs to be considered in line with the Overarching National Policy Statement (NPS) for Energy EN-1. The NPS EN-1 makes reference to ancient woodland, veteran trees and other irreplaceable habitats in the following paragraphs: 5.4.14, 5.4.15, 5.4.32 & 5.4.54.	The Applicant notes this advice. Information pertaining to Ancient Woodland as well as an assessment of impacts on this habitat are provided in **ES Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1] and Chapter 10: Arboriculture [EN010168/APP/6.1].**
Natural England	Ancient Woodland, Ancient and Veteran Trees	Natural England maintains the Ancient Woodland Inventory which can help identify ancient woodland. The wood pasture and parkland inventory sets out information on wood pasture and parkland. The ancient tree inventory provides information on the location of ancient and veteran trees.	The Applicant notes this advice. These sources of information have been used to record baseline information as set out in **ES Volume 3, Appendix 9.1: Ecological Baseline Report [EN010168/APP/6.3]**
Natural England	Ancient Woodland, Ancient and Veteran Trees	Natural England and the Forestry Commission have prepared standing advice on ancient woodland, ancient and veteran trees.	The Applicant notes this advice. Information pertaining to Ancient Woodland as well as an assessment of impacts on this habitat, including consideration of the Natural England and Foresty Commission standing advice are provided in E**S Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1] and Chapter 10: Arboriculture [EN010168/APP/6.1].**
Natural England	Biodiversity Net Gain	The Environment Act 2021 includes NSIPs in the requirement for Biodiversity Net Gain (BNG), with the biodiversity gain objective for NSIPs defined as at least a 10% increase in the pre-development biodiversity value of the on-site habitat. It is the intention that BNG should apply to all terrestrial NSIPs accepted for examination from November 2025.	Noted. A BNG Assessment for the Scheme is provided in **Biodiversity Net Gain (BNG) Assessment Report [EN010168/APP/7.8]** in line with best practice guidance, and a completed version of the **Statutory Biodiversity Metric** provided **[EN010168/APP/7.9].**

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Natural England	Biodiversity Net Gain	Natural England welcome the Project's commitment to include a BNG assessment and demonstrate a net gain of at least 10%. We also acknowledge the reference made in the Scoping Report to assessments that will be carried out using the Statutory Biodiversity Metric. We also welcome the reference to habitat creation and enhancement from the scheme.	Noted. A BNG Assessment for the Scheme is provided in **Biodiversity Net Gain (BNG) Assessment Report [EN010168/APP/7.8]** in line with best practice guidance, and a completed version of the **Statutory Biodiversity Metric** provided **[EN010168/APP/7.9].**
Natural England	Biodiversity Net Gain	Biodiversity Net Gain outcomes can be achieved on-site, off-site or through a combination of both, however, on-site provision should be considered first in line with the mitigation hierarchy. Natural England advise that the Statutory Biodiversity Metric should be used to calculate the biodiversity impact of the development. The same version of the BNG metric should be used pre- and post-development to ensure consistency.	Noted. A BNG Assessment for the Scheme is provided in **Biodiversity Net Gain (BNG) Assessment Report [EN010168/APP/7.8]** in line with best practice guidance, and a completed version of the **Statutory Biodiversity Metric** provided **[EN010168/APP/7.9].**
Natural England	Biodiversity Net Gain	Natural England recognises the opportunity for the development to deliver BNG and it is recommended that the following guidance is applied in order to achieve this: • Biodiversity Net Gain: Good Practice Principals for Development BS 8683: 2021 Process for designing and implementing Biodiversity Net Gain	The Applicant notes this advice. A BNG Assessment for the Scheme is provided in **Biodiversity Net Gain (BNG) Assessment Report [EN010168/APP/7.8],** which includes details on how this guidance has been followed.
Natural England	Biodiversity Net Gain	In order to maximise nature recovery and target habitat enhancement where it will have the greatest local benefit it is recommended that locally identified opportunities should be acknowledged and incorporated into the design of BNG (both on and off-site). This should include any locally mapped ecological networks and priority habitats identified by Wiltshire County Council. In addition, Local Nature Recovery Strategies (LNRS) are a new mandatory system of spatial strategies for nature established by the Environment Act 2021 which will contribute to the national Nature Recovery Network (NRN). Work is currently underway to develop these strategies, which will identify strategic priorities for nature protection, recovery, and enhancement. Given the size, scale and opportunities afforded by the application it is therefore recommended that engagement with relevant local planning authorities, responsible authorities and statutory consultees (including Natural England) is undertaken to align habitat enhancement through the development with any emerging plans and policies in relation to LNRS.	The Applicant notes this advice. A BNG Assessment for the Scheme is provided in **Biodiversity Net Gain (BNG) Assessment Report [EN010168/APP/7.8].** This sets out how the draft Wiltshire LNRS has been taken into account when developing habtiat creation an enhancement measures. which includes details on how this guidance has been followed.
Natural England	Landscape: Nationally Designated Landscapes	The development site may impact on the Cotswolds National Landscape. The Energy National Policy Statement EN-1 gives significant protection including within the setting of the protected landscape. Public bodies have a duty to seek to further the statutory purposes of designation in carrying out their functions (under section 245 of the Levelling Up and Regeneration Act 2023). This duty also applies to proposals outside the designated area but impacting on its natural beauty. Consideration should be given to the direct and indirect effects on this designated landscape and in particular the effect upon its purpose for designation. The management plan for the designated landscape may also have relevant information that should be considered in the EIA.	A full assessment of landscape and visual effects on the CNL and its setting in relation to Sites A, B and C (and parts of the Cable Route Search Corridor) has been included in the ES. The CNL Management will be used to inform the approach to mitigation and positive enhancement within the setting of the CNL.
Natural England	Landscape and Visual Impacts	Section 245 (Protected Landscapes) of the Levelling Up and Regeneration Act 2023 (LURA) places a duty on relevant authorities (including local planning authorities) in exercising or performing any functions in relation to, or so as to affect, land in a National Park, the Broads or a National Landscape in England, to seek to further the statutory purposes of the area. Planning Practice Guidance (http://www.gov.uk/) confirms that this duty also applies to proposals outside the designated area but impacting on its natural beauty.	It is recognised that Sites A, B and C are within the setting of the CNL and have the potential to impact on the CNL.

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Natural England	Landscape and Visual Impacts	Consideration should be given to the direct and indirect effects on this designated landscape and in particular the effect upon its purpose for designation. The management plan for the designated landscape may also have relevant information that should be considered in the EIA.	See above response.
Natural England	Landscape and Visual Impacts	The environmental assessment should refer to the relevant National Character Areas as referenced in paragraph 155 of the Scoping Report (48 Trent and Belvoir Vales). Character area profiles set out descriptions of each landscape area and statements of environmental opportunity.	The LVIA will consider the NCA profiles. However, the Scheme is located within NCA 107-The Cotswolds and NCA 117-The Avon Vales. Statements of environmental opportunity for these NCAs will inform the Landscape and Ecological Masterplan for the Scheme.
Natural England	Landscape and Visual Impacts	The EIA should include a full assessment of the potential impacts of the development on local landscape character using landscape assessment methodologies. We encourage the use of Landscape Character Assessment (LCA), based on the good practice guidelines produced jointly by the Landscape Institute and Institute of Environmental Assessment in 2013. LCA provides a sound basis for guiding, informing, and understanding the ability of any location to accommodate change and to make positive proposals for conserving, enhancing or regenerating character.	The LVIA will assess the local landscape character with reference to the Wiltshire Landscape Character Assessment, the North Wiltshire Landscape Character Assessment and the West Wiltshire Landscape Character Assessment.
Natural England	Landscape and Visual Impacts	A landscape and visual impact assessment should also be carried out for the proposed development and surrounding area. Natural England recommends use of the methodology set out in *Guidelines for Landscape and Visual Impact Assessment 2013* ((3rd edition) produced by the Landscape Institute and the Institute of Environmental Assessment and Management. For National Parks and National Landscapes, we advise that the assessment also includes effects on the 'special qualities' of the designated landscape, as set out in the statutory management plan for the area. These identify the particular landscape and related characteristics which underpin the natural beauty of the area and its designation status.	A full assessment of landscape and visual effects on the CNL's Special Qualities has been included in the ES.
Natural England	Landscape and Visual Impacts	The assessment should also include the cumulative effect of the development with other relevant existing or proposed developments in the area. This should include an assessment of the impacts of other proposals currently at scoping stage.	The LVIA has included an assessment of the Sites individually, in combination and cumulatively with other similar schemes including sites at scoping stage.
Natural England	Landscape and Visual Impacts	To ensure high quality development that responds to and enhances local landscape character and distinctiveness, the siting and design of the proposed development should reflect local characteristics and, wherever possible, use local materials. Account should be taken of local design policies, design codes and guides as well as guidance in the National Design Guide and National Model Design Code. The ES should set out the measures to be taken to ensure the development will deliver high standards of design and green infrastructure. It should also set out detail of layout alternatives, where appropriate, with a justification of the selected option in terms of landscape impact and benefit.	The LVIA has taken account of local design policies, design codes and guides. The LVIA and the ES will set out the design development and alternative layouts.
Natural England	Landscape and Visual Impacts	The National Infrastructure Commission has also produced Design Principles Design Principles for National Infrastructure - NIC endorsed by Government in the National Infrastructure Strategy.	The landscape and visual assessment has been completed in accordance with relevant guidance.
Natural England	Heritage Landscapes	The ES should include an assessment of the impacts on any land in the area affected by the development which qualifies for conditional exemption from capital taxes on the grounds of outstanding scenic, scientific, or historic interest.	Noted.
Natural England	Connecting People with Nature	The ES should consider potential impacts on access land, common land, public rights of way and, where appropriate, the England Coast Path and coastal access routes and coastal margin in the vicinity of the development, in line with NPPF paragraph 100 and there will be reference in the relevant National Policy Statement. It should assess the scope to mitigate for any adverse impacts. Rights	The Applicant confirms impacts on the accessibility, desirability and use of PRoW, open spaces, formal and informal recreation facilities in the countryside have been assessed in Section 16.10 of **ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation {EN010168/APP/6.1]** with assessment of individual receptors set out in **ES Volume 3, Appendix 16-2: Tourism and Recreation Receptor Tables [EN010168/APP/6.3]**.

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		of Way Improvement Plans (ROWIP) can be used to identify public rights of way within or adjacent to the proposed site that should be maintained or enhanced.	The Applicant confirms that existing PRoW are to be protected within the Scheme design with PRoW management strategies and mitigation measures to minimise adverse effects set out in the **Outline PRoWMP [EN010168/APP/7.17]**. These are confirmed as embedded mitigation measures in Section 16.9 of **ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [EN010168/APP/6.1]**. The Order Limits does not contain any open access land, common land, nor is it located near the England Coast Path or coastal margin.
Natural England	Connecting People with Nature	Measures to help people to better access the countryside for quiet enjoyment and opportunities to connect with nature should be considered. Such measures could include reinstating existing footpaths or the creation of new footpaths, cycleways, and bridleways. Links to other green networks and, where appropriate, urban fringe areas should also be explored to help promote the creation of wider green infrastructure. Access to nature within the development site should also be considered, including the role that natural links have in connecting habitats and providing potential pathways for movements of species.	Opportunities to improve connectivity and develop local authority green infrastructure strategies within the Order Limits have been explored and implemented, where practicable. New permissive access routes have been included in the Scheme design in tandem with landscape and ecological requirements, as shown as Work No.10 on the **Works Plan [EN010168/APP/2.3]** and shown on **ES Volume 2, Figure 3-4: Landscape and Ecology Mitigation Plan [EN010168/APP/6.2]**. These are considered as additional mitigation and enhancement measures in Section 16.11 of **ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [EN010168/APP/6.1]**. In addition, PRoW and permissive paths within the Solar PV Sites have been given at least 15 m buffers between their centreline and any on-site enclosures or electrical infrastructure. These buffers are to be planted with wildflower or meadow mixes to encourage enhanced biodiversity in areas accessible to the public.
Natural England	Connecting People with Nature	Relevant aspects of local authority green infrastructure strategies should be incorporated where appropriate.	
Natural England	Soils and Agricultural Land Quality	Soils are a valuable, finite natural resource and should also be considered for the ecosystem services they provide, including for food production, water storage and flood mitigation, as a carbon store, reservoir of biodiversity and buffer against pollution. It is therefore important that the soil resources are protected and sustainably managed. Impacts from the development on soils and best and most versatile (BMV) agricultural land should be considered in line paragraphs 5.168, 5.167 and 5.179 of the NPS for National Networks. Further guidance is set out in the Natural England Guide to assessing development proposals on agricultural land.	Impacts on soils and BMV agricultural land are assessed in ES Volume 1 Chapter 17 **[EN010168/APP/6.1]**. The protection and sustainable management of soil resources are set out in the outline Soil Resources Management Plan **[EN 010168/APP/7.15]**
Natural England	Soils and Agricultural Land Quality	The following issues should be considered and, where appropriate, included as part of the Environmental Statement (ES): • The degree to which soils would be disturbed or damaged as part of the development. This includes during construction (i.e. siting of construction compounds and temporary access tracks) and operation (i.e. location of pylons, permanent access tracks and supporting infrastructure). The extent to which agricultural land would be disturbed or lost as part of this development, including whether any best and most versatile (BMV) agricultural land would be impacted	Noted. **ES Volume 1 Chapter 17: Soils and Agriculture [EN010168/APP/6.1]** considers the varying impacts on soil resources from different elements of the Scheme, such as installing solar panels, constructing associated infrastructure and access tracks, and installing the cables. It also quantifies the area of BMV land that would be impacted.
Natural England	Soils and Agricultural Land Quality	This will require a detailed Agricultural Land Classification (ALC) survey on the entire Order Limits and the cable route. For information on the availability of existing ALC information see http://www.magic.gov.uk/.	The survey approach has been discussed and agreed with Natural England, The scope, method and findings are set out in **ES Volume 3, Appendix 17.1 [EN010168/APP/6.3].**
Natural England	Soils and Agricultural Land Quality	• Where an ALC and soil survey of the land is required, this should normally be at a detailed level, e.g. one auger boring per hectare, (or more detailed for a small site) supported by pits dug in each main soil type to confirm the physical characteristics of the full depth of the soil resource, i.e. 1.2 metres. This may be amended for linear areas to provide an accurate depiction of the land quality along the linear area. The survey data can inform suitable soil handling methods and appropriate reuse of the soil resource where required (e.g. agricultural reinstatement, habitat creation, landscaping, allotments and public open space).	In respect of the first bullet, the survey approach has been discussed and agreed with Natural England, and is set out in **ES Volume 3, Appendix 17.1 [EN010168/APP/6.3].** In respect of the second bullet, **ES Volume 1, Chapter 4: Alternative and Design Evolution [EN010168/APP/6.1]** explains that the avoidance of BMV land is a key consideration in site selection and the evolution of the detailed design of the Scheme. In respect of the third bullet, an **Outline Soil Resources Management Plan** is submitted with the ES **[EN10168/APP/7.15].**

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		• The ES should set out details of how any adverse impacts on BMV agricultural land can be minimised through site design/masterplan. The ES should set out details of how any adverse impacts on soils can be avoided or minimised and demonstrate how soils will be sustainably used and managed through the Soil Management Plan. This should include consideration in site design and master planning, and areas for green infrastructure or biodiversity net gain, as well as sustainable soil management throughout all phases of the development. The aim will be to minimise soil handling and maximise the sustainable use and management of the available soil to achieve successful after-uses and minimise off-site impacts.	
Natural England	Soils and Agricultural Land Quality	Further information is available in the Defra Construction Code of Practice for the Sustainable Use of Soil on Development Sites and The British Society of Soil Science Guidance Note Benefitting from Soil Management in Development and Construction.	Noted. The **Outline Soil Resources Management Plan [EN10168/APP/7.15]** submitted with the ES has been based on these (and other relevant) documents
Natural England	Decommissioning and After use	The ES should include details of the decommissioning and after use of the site. If the site is reverted to agriculture, the loss of created habitats could have a negative impact on biodiversity, habitats and species which have established in the operational period.	The approach to decommissioning is set out in **ES Volume 1, Chapter 3 [EN010168/APP/6.1].** Chapter 3 explains that on decommissioning, the Solar PV Sites would be returned to their original use and condition as far as practicable and returned to the landowner. The landowners would choose how the land is to be used and managed, and may return the land to arable use, although it is likely that established habitats such as hedgerows and woodland would be retained given their potential benefits to agricultural land and the wider farming estate.
Natural England	Air Quality	Air quality in the UK has improved over recent decades but air pollution remains a significant issue. For example, approximately 85% of protected nature conservation sites are currently in exceedance of nitrogen levels where harm is expected (critical load) and approximately 87% of sites exceed the level of ammonia where harm is expected for lower plants (critical level of 1µg) [1] . A priority action in the England Biodiversity Strategy is to reduce air pollution impacts on biodiversity. The Government's Clean Air Strategy also has a number of targets to reduce emissions including to reduce damaging deposition of reactive forms of nitrogen by 17% over England's protected priority sensitive habitats by 2030, to reduce emissions of ammonia against the 2005 baseline by 16% by 2030 and to reduce emissions of NOx and SO2 against a 2005 baseline of 73% and 88% respectively by 2030. Shared Nitrogen Action Plans (SNAPs) have also been identified as a tool to reduce environmental damage from air pollution.	Noted. Nature conservation sites located in the vicinity of the Scheme are described in Section 15.7 of **ES Volume 1, Chapter 15: Air Quality [EN010168/APP/6.1]** and air quality impacts on nature conservation sites have been considered in the ES.
Natural England	Air Quality	The planning system plays a key role in determining the location of developments which may give rise to pollution, either directly, or from traffic generation, and hence planning decisions can have a significant impact on the quality of air, water and land. The ES should take account of the risks of air pollution and how these can be managed or reduced. This should include taking account of any strategic solutions or SNAPs, which may be being developed or implemented to mitigate the impacts of air quality. Further information on air pollution impacts and the sensitivity of different habitats/designated sites can be found on the Air Pollution Information System (http://www.apis.ac.uk/).	Air quality impacts on nature conservation sites during construction, operation and maintenance and decommissioning are considered in **ES Volume 1, Chapter 15: Air Quality [EN010168/APP/6.1]** and mitigation has been recommended where required.
Natural England	Air Quality	Natural England has produced guidance for public bodies to help assess the impacts of road traffic emissions to air quality capable of affecting European Sites. Natural England's approach to advising competent authorities on the assessment of road traffic emissions under the Habitats Regulations - NEA001	As described in Section 15.5 of **ES Volume 1, Chapter 15: Air Quality [EN010168/APP/6.1],** road traffic flows associated with all phases of the Scheme are below thresholds set out in the Environmental Protection UK and Institute of Air Quality Management guidance and as such there are not expected to be any Scheme air quality effects associated with road traffic emissions.

[1] https://uk-air.defra.gov.uk/library/reports?report_id=1001

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Natural England	Air Quality	Information on air pollution modelling, screening and assessment can be found on the following websites: • SCAIL Combustion and SCAIL Agriculture - http://www.scail.ceh.ac.uk/ • Ammonia assessment for agricultural development https://www.gov.uk/guidance/intensive-farming-risk-assessment-for-your-environmental-permit • Environment Agency Screening Tool for industrial emissions https://www.gov.uk/guidance/air-emissions-risk-assessment-for-your-environmental-permit Defra Local Air Quality Management Area Tool (Industrial Emission Screening Tool) – England http://www.airqualityengland.co.uk/laqm	Noted, this information has been reviewed in the context of the assessment presented in **ES Volume 1, Chapter 15: Air Quality [EN010168/APP/6.1]**.
Natural England	Air Quality	There is potential for this development to cause adverse impacts to designated sites via dust and vehicle emissions during the construction phase of the development. Please note that adverse impacts specifically to designated sites during all phases of development should be assessed within the ES.	Air quality impacts on designated sites during construction, operation and maintenance and decommissioning are considered in **ES Volume 1, Chapter 15: Air Quality [EN010168/APP/6.1]** and mitigation has been recommended where required. Mitigation measures for construction dust are incorporated into the **Outline Construction Environmental Management Plan (CEMP) [EN010168/APP/7.12].**
Natural England	Climate Change	The England Biodiversity Strategy published by Defra establishes principles for the consideration of biodiversity and the effects of climate change. The ES should reflect these principles and identify how the development will embed Nature Based Solutions, maintain ecological networks and build resilience to climate change. The ES should also incorporate the policies as set out in NPS EN-1 relating to climate change.	The Scheme will embed Nature Based Solutions for improving biodiversity and strengthening ecological networks, including the creation and enhancement of a variety of habitats such as woodlands, hedgerows, trees, species-rich grassland and ponds. Additional benefits are likely to result from the cessation of intensive arable farming practices at the Scheme, for instance through a reduction in sediment, nutrient and chemical spray runoff entering the local watercourse network. Such measures are described in **ES Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1]**. In accordance with the principles of the strategy, a quantifiable net gain for biodiversity is reported in the **Biodiversity Net Gain Assessment Report [EN010168/APP/7.8]** which sets out how the Scheme is expected to result in a total increase of 34.56 % in habitat units, 12.31% for hedgerow units and 20.08% for watercourse units. Climate change resilience measures are set out in Volume 1, Chapter 7 **[EN010168/APP/6.1]**
Natural England	Contribution to Local Environmental Initiatives and Priorities	The ES should consider the contribution the development could make to relevant local environmental initiatives and priorities to enhance the environmental quality of the development and deliver wider environmental gains. This should include considering proposals set out in relevant local strategies including landscape strategies, green infrastructure strategies, Sustainable Drainage System (SuDS) strategies, tree and woodland strategies, biodiversity strategies or biodiversity opportunity areas. Opportunities for wider environmental gains often include multifunctional benefits and can improve environment for people, nature and climate	A description of measures proposed to prevent, reduce and offset significant adverse effects, as well as enhance environment conditions, are presented in each technical chapter of the Environmental Statement (**ES Volume 1, Chapter 7 to Chapter 20 [EN010168/APP/6.1]**).
Network Rail	General	Network Rail is a statutory undertaker and owns, operates and maintains the majority of the rail infrastructure of Great Britain pursuant to its network licence. Under the terms of that licence Network Rail is under a duty to secure the operation, maintenance, renewal and enhancement of the network in order to satisfy the reasonable requirements of customers and funders. Therefore any proposed development which is in close proximity to the railway or could potentially affect Network Rail's land interests, need to be carefully considered.	The Applicant notes this comment.
Network Rail	General	The EIA should consider Transport and Access and the use of any Network Rail assets (e.g. level crossings, bridges etc..) both during construction phases and post construction. Where level crossing may be used, these should be assessed	No level crossings will be used to access the Scheme, however, there are locations where construction vehicles will need to cross railway bridges. Transport related impacts at railway bridge crossings during construction, operation and maintenance, and decommissioning phases have been assessed in **ES Volume**

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		within the submitted transport assessment and recommendations made for appropriate mitigation to reduce the additional risk generated at the crossings.	**1, Chapter 13: Transport and Access [EN010168/APP/6.1]** and **ES Volume 3: Appendix 13-1 Transport Assessment [EN010168/APP/6.3]**. All construction routes have been finalised by taking account of any height, width and weight restrictions that may apply to near-by Network Rail assets.
Network Rail	General	Lime Down Development areas C, D and E should also consider the impact of drainage and flood risk on the adjacent railway. The parcels of land should also consider any glint and glare to be generated by the solar panels and any impacts this may have on nearby railway signals and train drivers vision	**ES Volume 3, Appendix 9-1 to 9-9: FRA and Drainage Strategy EN010168/APP/7.12]** assesses the potential for surface water runoff from Development Areas C, D and E to affect neighbouring land, including the adjacent railway. Surface water will be managed to ensure there is no increase in runoff to offsite receptors, with localised SuDS features proposed where required. The Glint and Glare Assessment contained within Section 20.1 of **ES Volume 1, Chapter 20: Other Environmental Matters [EN010168/APP/6.1]** includes a full assessment of impacts on the railway.
New Forest National Park Authority	General	The land parcels associated with this proposed development are located within the administrative boundary of Wiltshire Council. The New Forest National Park Authority is an adjoining planning authority to Wiltshire Council. Therefore, by virtue of Section 43 of the Planning Act 2008 (local authorities for the purposes of the consultation requirements in section 42) and Section 133 of the Localism Act 2011 (Pre-application consultation with local authorities) it is agreed that the New Forest National Park Authority is legally a 'consultation body' for this NSIP proposal.	Noted.
New Forest National Park Authority	Potential impacts	The proposed Lime Down Solar Park is located over 40 miles from the northern boundary of the New Forest National Park. Given this distance - allied to the fact that we do not consider there to be any landscape impacts on the National Park (including in combination/cumulative impacts) - I can confirm that the New Forest National Park Authority does not have any comments to make regarding the Scoping Opinion for the proposed Lime Down Solar Park development.	Noted.
Northern Gas Networks	Impact on Northern Gas Networks	Northern Gas Networks do not cover this area. You can use the link below to check which gas network operator covers each area before submission to ensure you have the correct network; https://www.energynetworks.org/operating-the-networks/whos-my-network-operator	This comment is noted by the Applicant.
Seagry Parish Council	Preamble	My Council is grateful that they have been identified as a consultation body and have pleasure in providing you with their views on what information they consider should be included in the Scoping Opinion that should be beneficial and improve the Environmental Statement required from the Applicant. As a preamble, the Parish Council feel that not knowing the totality of subjects applicable to the proposal they cannot say they are confident that all that needs to be covered in an EIA are, or will be covered and that, perhaps, there is or should be a Government List/Schedule of prescribed subjects to be addressed by the Scoping Study and EIA?	This comment is noted by the Applicant. The Environmental Statement covers a range of relevant topics with any specific matters scoped in and out of the assessment detailed within each technical chapter (**ES Volume 1, Chapter 7 to Chapter 20 [EN010168/APP/6.1]**). These were confirmed following the Scoping Opinion adopted by the Secretary of State on 22 August 2024.
Seagry Parish Council	Introductory text	The Council consider that as this is a huge project in its embryonic stage, with a potential decision timescale some three years hence, then it is important that all possible matters are covered to avoid any potential loopholes occurring. Being mindful of this, the Council considers that the following matters need consideration and inclusion in any Scoping Opinion provided:	This comment is noted by the Applicant. The Environmental Statement covers a range of relevant topics with any specific matters scoped in and out of the assessment detailed within each technical chapter (**ES Volume 1, Chapter 7** to **Chapter 20 [EN010168/APP/6.1]**). These were confirmed following the Scoping Opinion adopted by the Secretary of State on 22 August 2024.
Seagry Parish Council	EIA requirement to consider alternatives to the proposal: Alternative sites	The alternatives to the existing proposal that need to be considered are: • Alternative sites.	**ES Volume 1, Chapter 4: Alternatives and Design Evolution [EN010168/APP/6.1]** sets out the site selection process for the Scheme, including where it has had regard to the Salisbury Plain, the disused chalk quarry at Westbury, and the old cement works site at Westbury

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		The Scoping Opinion should include a survey and assessment of alternative physical locations within the same radial distance from the proposed grid connection point at Melksham. Comment; The Council is unsure if examples are required, or can be given, but if it is acceptable then it is aware of a Salisbury Plain alternative. This could be used in conjunction with the disused chalk quarry at Westbury, Wiltshire and the new incinerator at Westbury that will be laying a connection to Frome for the electricity that it generates. This cable is not yet in place and may already have planning consent. This being so, a Solar Farm sited on Salisbury Plain could utilise the incinerator's National Grid connection at Frome or ensure that when the cable is laid that it is capable of taking the Solar Park's input. A Scoping Report evaluation could/should be made of the Lime Down proposals that generate 500 MW and covers 900 hectares (2240 acres) with the old cement works site at Westbury covering 31 hectares (77 acres) that could be a contributory site in a Salisbury Plain proposal.	
Seagry Parish Council	EIA requirement to consider alternatives to the proposal: Alternative technologies	The alternatives to the existing proposal that need to be considered are: • Alternative technologies The Scoping Opinion should include an assessment of alternative technologies to include; • The use of the Lime Down area as a site for wind turbines. Comment; An onshore wind turbine has a blade height of 50 metres and generates 2.5-3 MW. If the turbines had an individual capacity of 2.5 MW then 200 would be required (166 at 3 MW). Given that NPPF is to be amended to allow onshore wind turbines, this needs to be evaluated.	As set out in **ES Chapter 4: Alternatives and Design Evolution [EN010168/APP/6.1]** the Applicant is a solar PV and energy storage developer. On that basis, alternative types of low carbon electricity generation have not been considered by the Applicant in the development of the Scheme. However, it is considered that the Site could be suitable for other forms of renewable electricity generation at the same scale as the Scheme and the relevant technologies are considered in section 4.10 of **ES Chapter 4: Alternatives and Design Evolution [EN010168/APP/6.1].** Further details on various alternative generation technologies, and the role they play in the UK's wider energy portfolio, is contained within the **Statement of Need [EN010168/APP/7.1].** Due to the Scheme's location away from the coast, tidal power and offshore wind are deemed unviable. Onshore wind is not considered to be a suitable alternative because the flat topography of the Site would likely give rise to greater adverse visual effects due to the height of the wind turbines, and the proximity to residential dwellings may give rise to adverse effects associated with shadow flicker and turbine noise. It is also considered that onshore wind would have a greater impact on the setting of the CNL than the Solar PV Panels proposed for the Scheme. Section 7.7 of the **Statement of Need [EN010168/APP/7.1]** provides evidence that energy production from land under solar is of a similar order of magnitude to energy production from the same land under onshore wind while the environmental effects of solar schemes may be significantly lower.
Seagry Parish Council	EIA requirement to consider alternatives to the proposal: Alternative technologies	The alternatives to the existing proposal that need to be considered are: • Alternative technologies The Scoping Opinion should include an assessment of alternative technologies to include; • The use of the Lime Down area (part) as a site for small scale nuclear power plants. Comment; Small scale nuclear power plants as currently being proposed/developed by Rolls Royce, with a Government decision on the future scheduled for the autumn, need to be evaluated as an alternative. One small scale nuclear power plant generates 475MW. Its location is far more flexible. If located at Westbury, for example, it would have the advantage of a rail link.	As set out in **ES Chapter 4: Alternatives and Design Evolution [EN010168/APP/6.1]** nuclear power is not considered a suitable alternative for the Scheme given the length of time it would take to plan and build a nuclear plant at the site, which is not currently listed as a site on which nuclear power development is permitted. Section 6.6 of the **Statement of Need [EN010168/APP/7.1],** explains that although Small Modular Reactors (SMRs) may bring decarbonisation and energy security benefits to the UK, 2029 is being targeted for a Financial Investment Decision for the first SMR units being planned for the UK. SMRs are therefore very unlikely to be operational in the UK within a decade, while in contrast, the Scheme, if consented, is expected to be built and operational by 2029.
Seagry Parish Council	EIA requirement to consider alternatives to the proposal: Alternative technologies	The alternatives to the existing proposal that need to be considered are: • Alternative technologies The Scoping Opinion should include an assessment of alternative technologies to include;	**ES Chapter 4: Alternatives and Design Evolution [EN010168/APP/6.1]** sets out detail on the alternative technologies considered as part of the assessment of alternatives undertaken. The use of Lime Down to use grass via anaerobic digestion was not considered. Section 7.7 of the **Statement of Need [EN010168/APP/7.1]** provides evidence that energy production from land under

Consultee	Topic	Matter Raised	Applicant Response
		• The use of the Lime Down area to use grass, via anaerobic digestion, as a means of generating renewable energy. Comment; This technology is promoted by Ecotricity, for example see: https://www.ecotricity.co.uk/#:~:text=Switch%20to%20Ecotricity-,Sustai . The advantage of this technology if employed at the Lime Down site is that it would enable the area to retain its present rural character of open field grass harvesting, and the CO2 released by anaerobic digestion (AD) would be reabsorbed by the continual regrowth of the grass. The methane generated by the AD process could either be converted on site into electricity or even supplied to the Gas Grid. The Scoping Opinion needs a full evaluation of this alternative, along with organic agricultural principles for growing the grass as organic principles will result in carbon sequestration (increased retention of carbon in the soil that has been drawn down from the atmosphere).	solar is likely to produce a greater quantity of low carbon electricity per acre than the output from a crop-based application.
Seagry Parish Council	EIA requirement to consider alternatives to the proposal: Alternative technologies	The alternatives to the existing proposal that need to be considered are: • Alternative technologies The Scoping Opinion should include an assessment of alternative technologies to include; The use of the Lime Down area as a site for a mix of the above three suggestions.	As set out in **ES Volume 1, Chapter 4: Alternatives and Design Evolution [EN010168/APP/6.1]** whilst there may be opportunities to "co-locate" different renewable generation technologies, the Scheme instead includes a Battery Energy Storage System (BESS), which can store electricity including that generated from the solar panels at times when it may not immediately be needed for later dispatch to meet consumer demand. BESS therefore supports the operation of the Solar PV Panels and also enhances grid resilience and stability, as described at Section 6.11 of the **Statement of Need [EN010168/APP/7.1]**. The Applicant's response to the above three suggestions along with an assessment of the benefits arising from the development of a co-located Solar PV and BESS facility at the site provides support to the Applicant's view that Solar PV Panels, co-located with BESS, is the preferred energy generating solution for the Site
Seagry Parish Council	EIA requirement to consider the Evaluation of Historic Assets	The EIA needs to consider all of the proposed Solar Park area for the possible existence of archaeological assets, and the impact of excavation for cables and foundations upon all such possible assets. An assumption is made that an EIA will consider the impact on the Cotswold Area of Outstanding Natural Beauty, but the Council wishes to ensure that this is the case. Comment; NPPF policy/guidance require planning applications to safeguard the whole country's Historic Assets. The land identified by this proposal is adjacent to the Roman Fosse Way, and at one point incorporates the Fosse Way within the installation. The EIA therefore needs to undertake a full evaluation of the historic assets, often archaeological remains, in the proposed Solar Park area throughout all eras of human settlement. In the case of Roman presence in the area there is a Romano-British settlement and Scheduled Monument at Easton Grey, near Malmesbury, Wiltshire, see: https://historicengland.org.uk/listing/the-list/list-entry/1013354	**ES Volume 1, Chapter 12: Cultural Heritage [EN010168/APP/6.1],** supported by appendices in Volume 3 (12.1 to 12.6) has assessed the potential impact of the scheme on identified archaeological and built heritage assets, and where required appropriate mitigation is proposed (see ES Volume 3 Appendix 12.6 Archaeological Mitigation Strategy (EN010168/APP/6.3). No impact was identified as a result of the Scheme to the Scheduled Romano-British settlement, earthwork enclosure and a section of the Fosse Way, 415m west of Whatley Manor (NHLE reference 1013354).
Seagry Parish Council	EIA requirement to consider Grade of Agricultural Land	The EIA needs to include a comprehensive, scientifically conducted survey conducted by a qualified professional consultancy. Comment; Solar Parks should be on land at Grade 3b and below, and not on Grade 3a land and above. Therefore the EIA needs to establish the agricultural soil grading of each field at the grade that it currently is. This must not be an ad hoc assessment based on hearsay or similarly weak evidence, but on clear scientific methodology conducted objectively. An example of such a professional consultant is Land Research Associates, see: http://www.lra.co.uk/services/soil-survey-soil-mapping/agricultural-land-grades#:~:text=Land%20grades%20are%20determined Comment; Solar Parks/Farms should be limited to brownfield land and poorer quality unproductive land. The statement made by the Secretary for Energy & Net Zero, on 15 May 2024 made clear the need to balance both the need for energy	**ES Volume 1, Chapter 17: Soils and Agriculture [EN010168/APP/6.1]** and **ES Volume 3, Appendix 17.1 [EN010168/APP/6.3]** set out the scope, methodology and findings of the ALC survey that has been undertaken by a professional consultancy with over 50 years' experience of undertaking these surveys. A Statement of Competence is provided at **ES Volume 3, Appendix 1-1: Statement of Competence [EN010168/APP/6.3]** outlining the relevant expertise and qualifications of the experts who prepared the ES.The survey approach and findings have been discussed and agreed with Natural England. **ES Volume 2, Figure 17.1 [EN010168/APP/6.2]** shows the location of survey observations and **Figure 17.2 [EN010168/APP/6.2]** shows the distribution of ALC grades. **ES Volume 1, Chapter 4: Alternatives and Design Evolution [EN010168/APP/6.1]** sets out that the avoidance of BMV land was a key

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		security and food production and said the use of Best and Most Versatile agricultural land should be avoided where possible. It also said "the Government is aware of concerns about the perceived inaccuracy and unfairness of soil surveys undertaken as part of the planning process for solar development. The Government will address this by supporting independent certification by an appropriate certifying body, subject to relevant business case approval, to ensure Agricultural Land Classification Soil Surveys are of a high standard, requiring surveyors to demonstrate meeting an agreed minimum requirement of training/experience. We will also seek to ensure consistency in how data is recorded and presented, so that reports on agricultural land classification are consistent, authoritative and objective."	consideration in site selection and design evolution. The solar PV panels are predominantly located on non-BMV land, with 67% on Subgrade 3b and Grade 4 land but it is not possible to avoid BMV land altogether.
Seagry Parish Council	EIA requirement to consider the Evaluation of Biodiversity	A development project has to include an uplift in biodiversity. Comment; Uplift is generally defined as a 10% improvement. In order for this aspect of the Applicant's EIA to be valid, it has to:	The uplift in biodiversity anticipated to occur as a result of the Proposed Development has been quantified using the Statutory Biodiversity Metric published by Natural England. The **Biodiversity Net Gain (BNG) Assessment Report [EN010168/APP/7.8]** provides full details on how the baseline and post-development biodiversity units have been calculated.
Seagry Parish Council	EIA requirement to consider the Evaluation of Biodiversity	Conduct a thorough biodiversity census in all areas of the proposed development of all animals (including birds and insects) and plant species, their level of presence (density), and the areas in which they are to be found. Significant hotspots need to be identified.	A comprehensive suite of ecological surveys has been undertaken to underpin the assessment on Ecology and Biodiversity in **ES Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1]**. A comprehensive and proportionate survey effort for botany as well as wide range of protected/notable species of fauna has been undertaken. Full details of these can be found in **ES Volume 3, Appendices 9.1 to 9-7: Wintering Bird [EN010168/APP/6.3].**
Seagry Parish Council	EIA requirement to consider the Evaluation of Biodiversity	Conduct a thorough habitat census within the planned development area and establish the link between the habitat census and the presence and prevalence of the animal and plant species identified. In short, the EIA needs to be using the ecosystem-based means of assessment, which reveals ecological structure and integration. A habitat census will include soil - structure and life living in it - as well as all features above soil, extending from field character, hedgerows, trees, wildlife corridors, and the access for aerial species to the land territory that they require in order to breed and forage. Habitat also includes land character e.g. areas of water and their permanence, an essential dimension of overall ecological character and structure.	A comprehensive suite of ecological surveys has been undertaken to underpin the assessment on Ecology and Biodiversity in **ES Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1]**. A comprehensive and proportionate survey effort for botany as well as wide range of protected/notable species of fauna has been undertaken. Full details of these can be found in **ES Volume 3, Appendices 9.1 to 9-7: Wintering Bird [EN010168/APP/6.3].**
Seagry Parish Council	EIA requirement to consider the Evaluation of Biodiversity	Conduct a thorough census of soil health at the mini- and micro- levels for animals, fungi and other microscopic life forms. This needs to be done on a field by field basis. Soil health is vital to the existence of habitat and thus to a full record of the ecological structure of the area and the biodiversity that it supports.	A comprehensive suite of ecological surveys has been undertaken to underpin the assessment on Ecology and Biodiversity in **ES Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1]**. This is based industry standard guidance and survey methodology. Survey methodology used to underpin the assessment is based on recording habitat type and condition, which are a reflection of the soil type/health as well as historic and current management regimes.
Seagry Parish Council	EIA requirement to consider the Evaluation of Biodiversity	Having produced this thorough biodiversity survey, the EIA then needs to examine and record: The level of adverse impact that the development, and operation throughout its lifetime, will have on the existing biodiversity, its abundance and its habitat availability. As the development has to demonstrate 'biodiversity uplift', the existing character of biodiversity, abundance and habitat availability needs to be quantified - both before (actual) and after (predicted) development of the Solar Park.	The uplift in biodiversity anticipated to occur as a result of the Proposed Development has been quantified using the Statutory Biodiversity Metric published by Natural England. The **Biodiversity Net Gain (BNG) Assessment Report [EN010168/APP/7.8]** provides full details on how the baseline and post-development biodiversity units have been calculated.
Seagry Parish Council	EIA requirement to consider the Evaluation of Biodiversity	The nature of the biodiversity 'uplift' has to be quantified in precisely the same way. It needs to predict the full range of animals and plants that will be present, their abundance, and the availability of the habitats that they require. In short, the EIA needs to demonstrate how biodiversity 'uplift' (10% improvement) will be accomplished against all these parameters.	The uplift in biodiversity anticipated to occur as a result of the Proposed Development has been quantified using the Statutory Biodiversity Metric published by Natural England. The **Biodiversity Net Gain (BNG) Assessment Report [EN010168/APP/7.8]** provides full details on how the baseline and post-development biodiversity units have been calculated. This demonstrates that the

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			Scheme is expected to deliver an uplift of 34.75%, 12.31% and 20.08% in habitat units, hedgerow units and watercourse units respectively.
Seagry Parish Council	Closing	In closing, as mentioned above, my Council is grateful for the opportunity of responding to the consultation and they trust that their views are taken into consideration when the matter is determined.	This comment is noted by the Applicant.
Severn Trent Water	Comment on ES	I refer to the attached consultation and would confirm that we have no comment in respect of the Environmental Statement.	This comment is noted by the Applicant.
Sherston Parish Council	Covering statement	This is a formal response from Sherston Parish Council and Easton Grey Parish to the proposed Lime Down Solar Park development. It has been prepared specifically to respond to the developer's submission of a scoping EIA (Environmental Impact Assessment) document to the Planning Inspectorate (Ref: EN010168) on the 16th July 2024. The Parish Council has resolved to object to this development on a specific range of issues, and it is expected that the Parish Council will continue to advance its objections, at the appropriate junctures, as the application process progresses.	This comment is noted by the Applicant.
Sherston Parish Council	Introductory text	At this time, Sherston Parish Council and Easton Grey Parish recognise that the developer's application in respect of the proposed Lime Down Solar Park is at the Pre-Application stage, so the comments made by the Parish Council relate solely to the submission of the developer's scoping EIA. "*Please note that we have been in contact with the Chair of the Easton Grey Parish meeting and there is some uncertainty as to whether they are or are not a consultee. In those circumstances, and to ensure that their views are known, the comments below included input from Easton Grey and the approval of chair of the Easton Grey Parish meeting*". Having undertaken a review of the documentation provided we believe there are a number of material considerations which have been omitted or scoped out which we would like to see included.	This comment is noted by the Applicant.
Sherston Parish Council	Consultation	Whilst responding we would like to raise our concerns about the timing of the issuing of the documentation, notwithstanding the fact that the document itself constitutes some 1000 pages. Councils are typically on holiday during the month of August, as a result we have only been effectively afforded 2 weeks to respond.	The Applicant appreciates the time and resource local councils put aside to consider and provide feedback on the Scheme. Unfortunately given the significant lead times in preparing a DCO application and the long statutory time periods for Examination, there is no perfect time that avoids holiday periods entirely. However, where the Council does need more time to consider material and the statutory time periods and programme allow it, the Applicant has sought to accommodate extensions (and has done so on numerous occasions).
Sherston Parish Council	Consultation	Section 1.5 of the scoping EIA deals with the 'Consultation and Engagement' phase of the LDSP proposals. Whilst the developers have undertaken some consultation within the local communities during the initial 'non-statutory' phase of the Lime Down Solar Park, these have not gone well and have failed to include many residents in the process. We understand that LDSP have received over 1400 submissions from the community, despite failing to engage with significant sections of the community who will be directly affected by their proposals. Our concerns are: Inadequate notice and publicity were given of the 'consultation events', only held in the large villages. The initial event in Sherston was only advised to Parish Councils 48 hours in advance, and virtually no local publicity was given to the event by the developers, nor did they make any use of social media to publicise it. Consequently, most of the community were unaware of it taking place, and had no opportunity to attend.	The Applicant's approach to pre-application engagement has been informed by the requirements of the Planning Act 2008 and associated guidance and legislation. The Applicant's strategy of coordinating consultation activities across the Scheme has resulted in a high level of engagement and consultation responses, as described in the **Consultation Report [EN010168/APP/5.1]**. The Applicant held its stage one non-statutory consultation for just over six weeks (43 days) from 14 March to 26 April 2024. The aim of this initial consultation was to introduce the Project, present early-stage proposals for the Project and give individuals and interested parties the opportunity to share their views. Further information into the engagement completed as part of the non-statutory consultation can be found in Chapter 4: Non-statutory Consultation and Engagement of the **Consultation Report [EN010168/APP/5.1].** The Applicant did provide notice and publicity of the Stage One community information events. This included notifying over 10,500 properties within the vicinity of the Scheme, which were identified within a defined Core Consultation Zone. In addition to this, the Applicant made all consultation materials available online, at CAPs , at community information events and by request to the communication channels. Consultation opportunities and materials were further publicised by local media advertising, statutory notices, and maintaining a register

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			of interested individuals. Further details on the publicising of community information events is presented in the Consultation Report [EN010168/APP/5.1]. The feedback received to this round of consultation contributed to the development of the Statement of Community Consultation (SoCC**) provided in Appendix D:Statement of Community Consultation [EN010168/APP/5.2]** in preparation for phase two statutory consultation. This SoCC was also consulted on and approved by Wiltshire Council. Further information on the development of the SoCC, and how the Applicant complied with commitments set out in it, can be found in the **Consultation Report [EN010168/APP/5.1].** Evidence of the SoCC, including drafts shared with local authorities can be found in **Appendix D-X: Statement of Community Consultation Materials [EN010168/APP/5.2]** The Applicant published a range of consultation materials including a Community Consultation Leaflet summarising the proposals, held a series of in-person and online community information events where the proposals could be discussed with members of the Applicant's Project Team, and hosted free-to-use Project communications channels for enquiries. This included notifying over 10,500 properties within the vicinity of the Project, which were identified within a defined Core Consultation Zone. In addition to this, the Applicant made all consultation materials available online, at CAP sites, at public information events and by request to the Project communication channels. Consultation opportunities and materials were further publicised by local media advertising, statutory notices, and maintaining a register of interested individuals.
Sherston Parish Council	Consultation	There is very limited public transport in the rural area impacted by the LDSP during weekday office hours, and there is none during evenings or weekends, when most of the 'publicity events' were staged. This meant that only residents with their own transport could attend the promotional events.	The Applicant held a series of eight in - person and one online community information events across a range of dates and times, including events on weekends and events that remained open until 7:30pm on weekday evenings. Further details of these events are presented in the **Consultation Report [EN010168/APP/5.1]**, and in **Appendix C-X: Phase One Consultation Materials [EN010168/APP/5.2]**.
Sherston Parish Council	Consultation	Many of the residents in the area affected by LDSP's proposals are older, some do not have their own transport, and are less able or willing to use the internet or to engage with LDSP 'online', many simply do not have the skills to do so. When advised by the developer that they could 'go to the website', they were being offered an option that they simply cannot utilise.	The Applicant acknowledges this comment, and has committed throughout to making project information and consultation materials available both online and offline throughout its pre-application process. This has included holding multiple in-person information events, and online webinars.
Sherston Parish Council	Consultation	The developer was directly advised, at the outset of the non-statutory consultation process, of these challenges for the residents, and the inappropriateness of being overly reliant on internet solutions to conduct the consultation.	Furthermore, as well as making all consultation materials available online, the Applicant ensured all information was available at CAP sites, at public information events and by request to the Project communication channels. This approach was committed to in the Statement of Community Consultation (SoCC**) provided in Appendix D: Statement of Community Consultation [EN010168/APP/5.2]**, which was consulted on by host local authorities. The Applicant also maintained communications channels via email, phone, and freepost, by which requests for hard-copy consultation materials could be made. This was committed to in the SoCC
Sherston Parish Council	Consultation	The developer ignored the consultation concerns raised from within the community, several parish areas did not have any locally held, accessible consultation events, and no arrangements were put in place to assist the travel challenged residents and no viable alternative was offered. This has severely undermined community confidence in the developer's ability and commitment to community consultation as part of the development process.	The Applicant refutes the claim that it has ignored consultation concerns raised from within the community. Following the review and consideration of feedback received to the Stage One (non - statutory) consultation, the Applicant prepared a Stage One consultation summary report to share details of the level engagement, themes of responses received, and updates regarding the Applicant's consideration of feedback and next steps for the Scheme.

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			The Applicant published a Stage One Consultation Summary Report on 24 October 2024 to summarise the feedback received during the Stage One consultation and how this feedback was being considered to inform the Project. The Stage One Consultation Summary Report was: • Shared by email and post with key stakeholders (including MPs, councillors and parish councils) and individuals who had registered to be kept informed; • Uploaded to the Project website; and • Wider publicity via a press release, which was sent to over nineteen local publications. This is further detailed in Section 4 of the **Consultation Report [EN010168/APP/5.1]** and a copy of the Stage One consultation summary report is provided as **Appendix C-X: Phase One Consultation Summary Report [EN010168/APP/5.2].** The Applicant's response to feedback received during Stage Two (statutory) consultation, including those of s42 consultees, can be found in **Appendix G: Statutory consultation under section 42 of the Planning Act 2008.** The Applicant held eight in-person events during Stage Two (statutory Section 47) consultation in January – March 2025, held in venues across the core consultation zone so that those living in the vicinity of the Scheme could attend and access information on the updated proposals. This was committed to in the **Statement of Community Consultation (SoCC) [EN010168/APP/5.1.4]** and described further in **Chapter 7 of the Consultation Report [EN010168/APP/5.1].** The Applicant recognises the importance of making consultation activities accessible to all, including older individuals and those with limited mobility. During the Stage Two (statutory Section 47) consultation period, the Applicant held eight in-person events at publicly accessible venues designed to accommodate individuals with mobility challenges. These events provided opportunities for face-to-face engagement and were located within the core consultation zone.
Sherston Parish Council	Consultation	When the developer submitted the EIA to the Planning Inspectorate on the 16th July 2024, they chose not to inform local statutory consultees until the following day (17th July 2024), even though the developer's representatives were attending a formal LAPC council meeting later that same day (17th July). The EIA was, obviously, the main topic of discussion at this Parish Council meeting, members of the public were in attendance. The late notice made it difficult for Councillors to be properly prepared and challenge the developers	The Applicant submitted a Scoping Report to the Planning Inspectorate on 16 July 2024, consistent with the relevant regulations. While acknowledging that PINS would then be carrying out their own consultation with relevant consultees to inform a Scoping Opinion, the Applicant continued to engage with stakeholders such as parish councils. This included attending meetings such with LAPC on 17 July 2024.
Sherston Parish Council	Consultation	Wessex Water has been omitted from the list of Statutory Consultees. This is misguided as they operate sewage treatment plants on the Sherston Avon and the Gauzebrook, both are historically 'High Risk' in terms of surface and groundwater flooding. Wessex Water also extract significant volumes of drinking water from the important Greater and Inferior Oolite 'vulnerable' aquifers which underly the large areas beneath the proposed development sites and the extensive hinterland areas beyond the proposed site boundaries. Not including Wessex Water as a Statutory Consultee is both disingenuous and increases the risk of unmitigated sewage contamination and the compromising of the drinking water supply of much of North Wiltshire.	The Applicant has consulted with Wessex Water given their operational interest in the region. Feedback received has informed the **Water Resources Assessment [EN010168/APP/7.26]** and **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [EN010168/APP/6.1]**. The assessment considers the sensitivity of local aquifers, nearby abstraction points and sewage treatment infrastructure, and will evaluate potential risks to both surface water and groundwater quality.

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Sherston Parish Council	Recommendations	• That the EIA be amended to include specific consultation commitments during the future consultation phases of this project to include: ○ 'In-person' consultation events to be held in every parish council area directly affected by the proposals, or situated within 5 miles of the proposed development sites or cable corridors to Melksham. ○ These events, and any other 'consultation' processes should be actively and widely publicised (at least 2 weeks in advance) by means of local papers, radio and social media, in addition to the expected letters to the statutory consultees. LDSP should make specific arrangements to enable improved engagement and consultation accessibility for the older, mobility challenged and digitally disadvantaged within the communities affected by the LDSP proposals.	The Applicant held Statutory Consultation between 29 January 2025 and 19 March 2025 which included eight in person events and two online events to provide feedback on the Scheme. These events were publicised through various mediums, including local papers, radio, social media, and letters in advance. The Applicant held a total of eight in person and two online events across the consultation period. Events were held on a range of dates and times throughout the week, including in the afternoon, evening and at weekends to encourage attendance from all consultees. All venues were located within the Scheme's Core Consultation Zone and were selected based on their accessibility (to affected communities) and health and safety/capacity requirements. All venues had disabled access.
Sherston Parish Council	Chapter 7. Landscape and Visual Assessment	*Please see appended report in the Scoping Opinion drafted by Prof. Richard Skeffington providing further detail* Request – everything within a 5km to be scoped in. Why – we believe given the size and scale of the overall planned construction that this would be more appropriate.	The assessment of Landscape effects includes all landscape receptors within the 5Km Study Area. Through detailed desk top and site appraisal, visual receptors within the 2-5km study were scoped out of the assessment
Sherston Parish Council	Chapter 8. Ecology and Biodiversity	*Please see appended report in the Scoping Opinion drafted by Prof. Richard Skeffington providing further detail* Request – we would ask that survey of dormice is undertaken to understand what species are in the suggested construction locations, specifically to ensure that protected species are considered. Why – there are dormice in the suggested locations which are a protected and/or threatened species as such, we need to be sure we understand the impact and any mitigating actions you would suggest undertaking	Dormouse are known to be present in the local area and suitable habitat is present within the Order Limits. The species has been assumed to be present in all suitable habitat. Specific surveys are not proposed on the basis that an adequate assessment can be made taking into consideration the extent and location of suitable habitat and the likely impacts of the proposals. A full assessment of the potential impacts on dormice is provided in **ES Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1]**
Sherston Parish Council	Chapter 9. Arboriculture	*Please see appended report in the Scoping Opinion drafted by Prof. Richard Skeffington providing further detail* Request – scope in the loss of trees within the construction area. Why – The 'embedded mitigation' is not clear. We believe the impact to, and removal of trees (particularly mature trees) undermines historic efforts and planning legislation to protect and conserve, equally in recent years farmers have been paid to plant trees which may now be removed?	A full assessment of potential impacts to arboricultural features within the DCO Order Limits is included at **Appendix 10-4 Arboricultural Impact Assessment and Outline Method Statement [EN010168/APP/6.3].** The Scheme has been designed, as far as practicable, to avoid and reduce impacts and effects on Arboriculture by embedding mitigation measures into the design process. 6.5.13 Embedded mitigation measures such as the below have been incorporated into the Scheme: • Significant tree and woodland planting is proposed within the Solar PV Sites to compensate for any tree losses associated with the Scheme; • Machinery movements and spoil/material storage will avoid the RPAs of retained trees within the Solar PV Sites and the Cable Route Corridor; • Micro-siting will be employed to avoid the removal or occurrence of root or canopy impacts to veteran trees and high-quality category A trees within the Cable Route Corridor; • An Arboricultural Clerk of Works (ACoW) will be required to guide consented tree removal and pruning and ensure tree protection measures are put in place and maintained to safeguard trees during construction.
Sherston Parish Council	Chapter 10. Hydrology, Flood Risk and Drainage	*Please see appended report in the Scoping Opinion drafted by Prof. Richard Skeffington providing further detail* Request – please extend the study area in Fig. 10.1 to include the River Avon, the Gauzebrook, and the small streams which drain the scheme near Alderton, Luckington and Foxley. The applicant to provide a flood risk assessment for the communities of Luckington, Sherston, Pinkney, Easton Grey, Malmesbury,	The report prepared by Prof. Skeffington has been reviewed and has helped to reinforce and calibrate the findings of the hydrological assessments. While individual events such as Storm Bert provide useful local insight, assessments of flood risk must be based on long-term datasets including the Flood Estimation Handbook (FEH), Environment Agency flood mapping, and catchment-scale modelling outputs. The influence of local geology and aquifer response, including

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		Malmesbury St Paul Without (including Corston), Great Somerford and possibly other communities on the river down to Bradford on Avon'. Why – the area is currently highly susceptible to flooding. Several times a year, roads from Norton/Foxley to Malmesbury, Easton Grey and Chippenham become impassible for cars, with the interior of properties in our local area having flooded from time to time	the Great Oolite, has been considered in **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [EN010168/APP/6.1]**. **ES Volume 3, Appendix 9-1 to 9-9: FRA and Drainage Strategy EN010168/APP/7.12]** assesses the potential for changes in surface water runoff and infiltration within the site and its immediate surroundings. The wider catchment, including communities such as Sherston and Malmesbury, lie outside the likely zone of influence of the Scheme. However, the assessment confirms that the Proposed Development will not increase flood risk beyond the site, including to downstream communities.
Sherston Parish Council	Chapter 11. Ground Conditions and Contamination	*Please see appended report in the Scoping Opinion drafted by Prof. Richard Skeffington providing further detail* Request 1 – include all aspects of groundwater within the EIA. Why – some of the local drinking water comes from the ground water. Request 2 – include all matters related to ground conditions and contamination within the EIA. Request 3 - include all the effects of silt, sediment, nutrients and chemical spills during construction to be in the EIA. Request 4 – include the impacts on water quality in the EIA.	The Applicant confirms that Request 1, 2 and 4 raised in this scoping opinion response have been assessed within the Environmental Statement. Specifically, detailed consideration is provided in **ES Volume 3, Appendices 19-1 to 19-8: Phase 1 Desk Studies [EN010168/APP/6.3]** and in **ES Volume 1, Chapter 19: Ground Conditions & Contamination [EN010168/APP/6.1]**. These assessments cover groundwater (including its use as a source of local drinking water), ground conditions and contamination, as well as the associated impacts on groundwater quality. Request 3 is addressed through the **Outline Construction Environmental Management Plan (CEMP) [EN010168/APP/7.12].**
Sherston Parish Council	Chapter 12 – Cultural Heritage	*Please see appended report in the Scoping Opinion drafted by Prof. Richard Skeffington providing further detail* Request – scope in impact during operation and decommissioning on cultural heritage sites specifically the Fosseway Why – previous planning applications in the area have required archaeologist reports to support them.	See Section 12.6 of **ES Volume 1, Chapter 12: Cultural Heritage [EN010168/APP/6.1]** regarding assessment methodology and Sections 12.10 regarding the assessment of likely impacts, including to the Fosse Way.
Sherston Parish Council	Chapter 13 Transport and Access	*Please see appended report in the Scoping Opinion drafted by Prof. Richard Skeffington providing further detail* Study area only includes immediate area of sites. Though there is mention of individual roads it is not clear exactly which sections will be considered. Request 1 – all roads in and around the village of Sherston and Easton Grey to be included Why – there is no clear understanding of which roads will be used for what and when, or conversely which roads will not be used. There are a number of weight restricted roads and bridges around Sherston which require consideration. Request 2 – scope in all aspects of operational and decommissioning phases Why – both the infrastructure and people in the area would be exposed to transport impact for a period of up to 60 years. The evaluation of this aspect should form a necessary part of the EIA.	Proposed construction vehicle routes are identified in **ES Volume 1, Chapter 13: Transport and Access [EN010168/APP/6.1]**and illustrated in **ES Volume 2, Figure 13-1: Study Area – Solar PV Sites [EN010168/APP/6.2]** and **ES Volume 2, Figure 13-2: Study Area – Cable Route Corridor [EN010168/APP/6.2]**. The Study Area for the transport and access assessment is based on the construction vehicle routes to the Order Limits. These will be secured through a CTMP which will be in substantial accord with the **Outline CTMP [EN010168/APP/7.22]** and secured under a requirement of the **Draft DCO [EN010168/APP/3.1]**. The aim of the CTMP is to ensure that the effect of the construction phase on the local highway network is minimised. Outside of the identified construction vehicles routes, there will not be transport and access effects. All construction routes within and immediately surrounding Sherston and Easton Grey are included in the Study Area.. **ES Volume 1, Chapter 13: Transport and Access [EN010168/APP/6.1]** explains the operational and decommissioning effects of the Scheme in regard to transport and access. In addition, **ES Volume 3: Appendix 13-1 Transport Assessment [EN010168/APP/6.3]** has been prepared to support the DCO Application.
Sherston Parish Council	Chapter 14 Noise and Vibration	*Please see appended report in the Scoping Opinion drafted by Prof. Richard Skeffington providing further detail* Request 1 – include an assessment of noise and vibration during the construction, operation and decommissioning phases Why – to have full confidence in the EIA, the report should cover noise and vibration under all circumstances.	An assessment of the noise and vibration impacts on nearby sensitive receptors across the local area throughout the construction, operation and maintenance, and decommissioning phases have been included within **ES Volume 1, Chapter 14: Noise and Vibration [EN010168/APP/6.1]**.

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Sherston Parish Council	Chapter 15. Glint and Glare	*Please see appended report in the Scoping Opinion drafted by Prof. Richard Skeffington providing further detail* Glint is a flash of light from the panels. Glare is a continuous reflection of light. Is only being considered for aviation, the railway and houses within 1 km of the scheme. Request – that road users (cars, cyclists, horses etc) and wildlife (birds, deer etc) are scoped in. Why – we are specifically concerned about safety of road users given the positioning of the panels in relation to some of the road infrastructure. The proposed panels are 4.5m high and track the sun, the effects are not fully understood as there are no comparables yet?	The potential impact on road users are assessed within the Section 20.1 of **ES Volume 1, Chapter 20: Other Environmental Matters [EN010168/APP/6.1]** and **ES Volume 3, Appendix 20-4: Solar Photovoltaic Glint and Glare Study [EN010168/APP/6.3].** Wildlife is not assessed within the Glint and Glare Assessment as it is not considered that this has the potential to present a significant safety or amenity impact. Wildlife are regularly exposed to natural and manmade sources of glint and glare, such as bodies of water and agricultural buildings.
Sherston Parish Council	Chapter 17. Air Quality	*Please see appended report in the Scoping Opinion drafted by Prof. Richard Skeffington providing further detail* Request 1 – scope in dust emissions during construction, operation and decommissioning Request 2 – that the risk and impact of BESS fires is referred to the Health and Safety Executive to be assessed under the Control of Major Accident Regulations 2015 COMAH regulations Request 3 – include assessment of the likely toxic gas emissions from a BESS fire	Air quality impacts during construction, operation and maintenance and decommissioning are assessed in **ES Volume 1, Chapter 15: Air Quality [EN010168/APP/6.1]** and mitigation has been recommended where required. An assessment of air quality effects associated with construction dust is presented in **ES Volume 3, Appendix 15-1 [EN010168/APP/6.3].** An assessment of air quality effects associated with a potential fire to the BESS is presented in **ES Volume 3, Appendix 15-2 [EN010168/APP/6.3].** Mitigation measures for construction dust are incorporated into the **Outline Construction Environmental Management Plan (CEMP) [EN010168/APP/7.12].** The Scheme is not subject to the COMAH Regulations (2015), and there are no sites recorded on the HSE's Public Information about Establishments that are covered by the Control of Major Accident Hazards (COMAH) Regulations 2015.
Sherston Parish Council	Chapter 18. Socio-Economic Effects	*Please see appended report in the Scoping Opinion drafted by Prof. Richard Skeffington providing further detail* Socio-economic effects include positive and negative effects on employment, tourism and recreation during construction and operation. Scoped out are effects on property prices which they say will be insignificant. Request – scope in the impact on property prices Why – evidence that the awareness of the construction intent has already had impact on local property prices – please see detail attached (letters from Stacks Property Search and James Pyle & Co)	The Applicant has assessed potential effects to neighbouring properties and consult with local residents and provide sufficient information to ensure stakeholders to understand the likely impacts of the Scheme. The results of these assessments, along with proposed mitigations, are presented in the ES **[EN010168/APP/6.1] to [EN010168/APP/6.3]**. Published research and evidence to date does not suggest that solar farms have a significant adverse long-term effect to nearby property values.
Sherston Parish Council	Chapter 19. Human health and Well-being	*Please see appended report in the Scoping Opinion drafted by Prof. Richard Skeffington providing further detail* Request – include all scoped-out items in a properly-designed study. Why – any decisions taken should be taken in relation to this specific construction and not we believe based on other 'findings'. It would be better to have an open-minded assessment of impacts, for instance by asking the existing population what the effects might be. The village has already experienced impact to mental health and wellbeing with disputes occurring as a result of this proposal.	The scope of assessment as set out in Section 18.6 of **ES Volume 1, Chapter 18: Human Health [EN010168/APP/6.1]** was agreed by the Planning Inspectorate in their Scoping Opinion as these are matters not anticipated to generate significant human health effects during the construction, operation and maintenance, and decommissioning of the Scheme. The assessment therefore concentrated on likely significant effects to ensure that these are properly understood, and appropriate mitigation measures to minimise human health effects are put in place and secured through the DCO process. The Applicant acknowledges that anticipation, questions, and anxieties about the Scheme are present at present ahead of the Scheme being constructed. Whilst this does not fall within the temporal assessment scope of the EIA, it is nonetheless a serious consideration. As such, throughout the pre-application stage the Applicant has sought to consult and engage with local residents, both to provide sufficient information to ensure stakeholders understand the likely impacts of the Scheme and also to understand community concerns, needs, and how the Scheme may be best adapted to minimise adverse effects on communities. These matters have guided the implementation of the Scheme's design and both embedded and additional mitigation and enhancement measures, secured

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			through the respective management plans by way of requirement in the **Draft Development Consent Order [EN010168/APP/3.1]**. In addition, the Applicant has engaged with Wiltshire Council's Public Health team throughout the pre-application stage to determine the best methods of responding to community needs and where mental health and wellbeing is raised as a present concern. This is set out in **ES Volume 3, Appendix 18-1: Matters Relevant to Human Health Raised Through Consultation [EN010168/APP/6.3]**
Sherston Parish Council	Hours of Work	There seems to be some discrepancy between the hours noted in the report, which one could interpret as almost 24x7 working:- • P54 - 4.3.4. Construction and Phasing – construction hours Mon-Fri 07:00 – 18:00 and Sat 08:00 – 13:30 • P234 14.4.9 Likely Environmental Effects shows construction during daytime 07:00 – 23:00 (no mention of weekday / weekend) • P235 14.5.3 Construction and Decommissioning shows the highest noise levels at Mon-Fri 07:00 – 19:00 and Sat 07:00 – 12:00 but evenings till 23:00 and all weekends seem to have higher noise levels than 23:00-07:00 which must indicate some activity till 23:00 Request - Ideally we would like to see definitive hours of work so that these are understood by all parties and can therefore be monitored during all phases.	Paragraph 3.4.20 of **ES Volume 1, Chapter 3: The Scheme [EN010168/APP/6.1]** confirms that core construction working hours would be: • Monday to Friday from 07:00 to 18:00 (daylight hours permitting); • Saturday from 08:00 to 13:30 (daylight hours permitting); and • No Sunday or Bank Holiday working unless crucial to construction (for example for HDD which must be a continuous activity) or in an emergency.
Sherston Parish Council	Overall: Cumulative impact	Lastly, one of the key considerations is the importance of cumulative impact which is recognised in the governments National Planning Policy framework (NPPF) and in planning case law (Lancashire CC v Secretary of State 2007).	**Chapter 21: Cumulative and In-Combination Effects [EN010168/APP/6.1]** presents the cumulative effects assessment which considers the approach outlined in the NPPF.
Sherston Parish Council	Overall: Cumulative impact	It is a material consideration spanning all aspects of an EIA and Environmental Statement. The vast scale of Lime Down means cumulative impact is a major consideration. The project's footprint of solar panels and other infrastructure is 10 kms from east to west and 5 kms from north to south. Whilst submitted as a single Nationally Significant Infrastructure Project (NSIP) application, in fact Lime Down amounts to six NSIPs comprising Areas A, B, C, D, E and the underground cable connection to Melksham.	**Chapter 21: Cumulative and In-Combination Effects [EN010168/APP/6.1]** presents the shortlist of schemes considered within the CEA. The long list of cumulative developments was shared with Wiltshire County Council for agreement on 5th November 2024. A final list of cumulative developments was shared with Wiltshire Council on 23 May 2025. A further two cumulative developments were requested to be included in the long and short list and these developments have now been considered. This is presented in **Appendix 21-1: Long List of Cumulative Developments [EN010168/APP/6.3].**
Sherston Parish Council	Overall: Cumulative impact	Each of these parts of Lime Down would qualify as an NSIP in its own right. Taken as a combination the various impacts are multiplied. Arguably, Lime Down is one of the most environmentally damaging of all solar NSIPs being handled by the Planning Inspectorate. The Scoping Report makes limited reference to Cumulative Impact, yet there is a world of difference between one NSIP and six. If Lime Down were approved residents would feel lost in a massive industrial development. Walkers, cyclists and visitors would experience complex after complex as they travel through the area. The recognised cycle routes and footpath networks would be diminished in value.	**ES Volume 1, Chapter 21: Cumulative and In-Combination Effects [EN010168/APP/6.1]** presents the shortlist of schemes considered within the Cumulative Effects Assessment. The long list of cumulative developments was shared with Wiltshire County Council for agreement on 5th November 2024. A final list of cumulative developments was shared with Wiltshire Council on 23 May 2025. A further two cumulative developments were requested to be included in the long and short list and these developments have now been considered. This is presented in **Appendix 21-1: Long List of Cumulative Developments [EN010168/APP/6.3].**
Sherston Parish Council	Overall: Cumulative impact	Cumulative Impact must therefore be a major aspect of the evaluation of Lime Down and the environmental damage it would cause.	**ES Volume 1, Chapter 21: Cumulative Effects and Interactions [EN010168/APP/6.1]** presents the cumulative effects assessment, which follows the methodology outlined in **ES Volume 1, Chapter 6: EIA Methodology [EN010168/APP/6.1]**.
James Pyle & Co	Introduction	I write following the publication on July 16th of the Environmental Impact Assessment provided by Lime Down Solar and in particular, referencing their statement that there is no evidence to suggest there is an impact on house values or demand in the area. The report specifically states: 18.5.2 Impacts on property value are proposed to be scoped out of any stage of the assessment due to these matters being very unlikely to be significantly affected by the Scheme. This is as there is little	The Applicant notes these comments and acknowledges that impacts to property prices is a concern for neighbouring residents and businesses. Throughout the pre-application stage the Applicant has sought to assess potential effects to neighbouring properties and consult with local residents and provide sufficient information to ensure stakeholders to understand the likely impacts of the Scheme. The results of these assessments, along with proposed mitigations, are presented in the ES **[EN010168/APP/6.1] to [EN010168/APP/6.3]**. Published

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		conclusive evidence that property value is significantly affected by the development of utility scale solar farms or that any negative effect is felt over a large area.	research and evidence to date does not suggest that solar farms have a significant adverse long-term effect to nearby property values. That notwithstanding, the Scheme has been designed to minimise visual effects on its surrounding, with particular efforts given to minimise impacts on visual and residential amenity, including through the provision of setbacks away from individual residential properties and settlements.
James Pyle & Co	House prices	As a leading Estate Agent, owning and running James Pyle & Co, we are located in the midst of the proposed development area, we mainly let and sell village and country homes within the Sherston adjoining parishes. I can categorically confirm and provide significant written evidence to counter this statement, confirming that this proposal is significantly affecting our market, both in terms of the prices being achieved and deterring buyers from considering this area as a suitable place to live.	
James Pyle & Co	Impact on House sales	Since the announcement was made earlier this year, we immediately had buyers withdraw from the purchases of the last two remaining new build barn conversions, named Grain Store Barns located at Pig Lane, Farleaze. We initially salvaged these sales as it was rumoured the adjoining land was being withdrawn from the scheme. Eventually both sales concluded but we our developer client had to renegotiate the prices down to compensate by 10%. (Prices were originally £750,000 plus and the net prices were below £700,000)	
James Pyle & Co	Impact on House sales	We had introduced a buyer to purchase a significant country house in the same vicinity for over £4m. Upon the announcement of Lime Down, they immediately withdrew their interest.	
James Pyle & Co	Impact on House sales	We are aware that Fosse Lodge, Grittleton should have been marketed for around £2m. It was subsequently discounted due to Lime Down and sold around £1.5m	
James Pyle & Co	Impact on House sales	Manor Barn Foxley. Marketed at £1.5m – now sold and completing at a discount due to Lime Down at £1.35m	
James Pyle & Co	Impact on House sales	Viewings and sales in Sherston village parish down 80% by comparison with last 5 years despite market improvements in 2024.	
James Pyle & Co	Impact on House sales	On a daily basis, we have buyers telling us they no longer wish to search in the Lime Down affected area, choosing to search in the Tetbury, Malmesbury and Gloucestershire area. We have countless evidence of these conversations on record.	
James Pyle & Co	Impact on House sales	Similarly, we have substantial evidence of viewing cancellations and viewing feedback citing Lime Down as the reason they are no longer interested in pursuing properties in our area.	
James Pyle & Co	Impact on House sales	We would conclude that all values in Sherston and its surrounding parishes have been affected by the impact of the Lime Down Solar proposal in all price ranges. We would consider that the ‘premium’ (at least 10% over Malmesbury and Tetbury prices that has always been obtained previously), has now been lost and in order to overcome the issues the LD Proposal (where possible), house prices will need to be below their true market value in order to be attractive to the buying public.	
James Pyle & Co	Impact on House sales	The impact on the Lime Down Area proposal has had significant effect on the market place, witnessed by a downturn in sales, lower prices being realised and an impact on not only our business, but upon the lives of those trying to sell their homes who have needs to move, whether that be downsizing, ill health or upsizing.	
James Pyle & Co.	Impact on House sales	We therefore would like to make a strong objection to the Lime Down Proposal in its current form and scale, in order to safeguard the desirability of our area and countryside and reduce the impact on owners needing to sell their homes and move, downsize or upsize in the community.	

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Stacks Property Search	Introduction	I am writing to directly challenge the statement outlined in the Environmental Impact Assessment scoping document provided by IGP in July which states that there is no evidence to suggest there is an impact on demand for property or on residential house values in the surrounding area.	
Stacks Property Search	Housing Prices	The statement contained in section 18.5.2 indicates that housing prices and demand will not be “scoped in” as there is likely to be very little or no impact by the proposed industrial development.	
Stacks Property Search	Housing Prices	In my capacity as a property buying agent located within the heart of the proposed development, I have been acting for buyers for the past eight years	
Stacks Property Search	Housing Prices	Established 40 years ago, since when it has focused on the Cirencester area, Stacks is the oldest buying agency in the UK, I am retained by several local, national and international clients to find and secure property; many of these clients have focused on areas in and around Sherston, which is one of the most sought-after villages in Wiltshire. It is recognized for offering all the critical elements that buyers are looking for, including a good school, an excellent shop, and a highly regarded doctors’ surgery all operating within a thriving community.	
Stacks Property Search	Housing Prices	The villages in and around Sherston also offer excellent access via the M4 to both Bath and Bristol as well as frequent train links via Kemble and Chippenham to London. It has been well documented via articles in national Newspapers that this area is considered a “prime” spot.	
Stacks Property Search	Housing Prices	Since the initial suggestion of a solar development, I have had buyers withdraw from transactions directly as a result of the proposed plan. This includes the purchase of a house near Arlington, from which my buyers withdrew on the basis that one of the proposed cable connections to Melksham was very close to the house. They withdrew at exchange having completed legal work and having completed a survey.	
Stacks Property Search	Housing Prices	Other buyers have withdrawn from a purchase in Willesley on the basis that the impact on access from junction 17 of the M4 could be affected for many years, and they felt that resale value would be compromised.	
Stacks Property Search	Housing Prices	I also have a buyer that was considering the purchase of a house in Alderton, which again they have decided against due to the proximity of the solar development, likewise a house near the centre of Sherston, was also rejected on the basis of the threat of the solar industrial scale development.	
Stacks Property Search	Housing Prices	I have a client in Foxley that has lost buyers as a direct result of the development and has had to reduce the value significantly in order to secure a sale.	
Stacks Property Search	Housing Prices	The effect overall is that numerous clients have redefined their search areas to take out purchasing anywhere between Malmesbury and Melksham. This has also impacted purchases as far afield as Lacock and is a consideration for buyers towards Tetbury.	
Stacks Property Search	Housing Prices	In the case of a listed house near Alderton, I initially viewed the property with clients when the off market price, this has since had to be discounted by some 40% from the off market guide.	
Stacks Property Search	Housing Prices	Other international buyers have been considering the purchase of a highly valuable home within the proposed development and have immediately stated that they would not consider this at all due to the proposed plans. This is also the case with another very valuable house that is located within the midst of the proposed Lime Down development	
Stacks Property Search	Housing Prices	The scale of the development means that when buyers arrive at Junction 17 they will have to drive through endless fields of solar panels. It is this industrialisation of	

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		the landscape that will have a long-term impact and a negative effect on housing demand and prices for many years to come. It will also mean that the community that people strive for will be destroyed forever.	
Stacks Property Search	Housing Prices	The direct result to me is a significant loss of income which has a significant impact on my turnover and my ability to maintain the two people who work with me.	
Stacks Property Search	Housing Prices	I am strongly opposed to the Lime Down development for both the personal impact it has on my house price which I believe will be reduced by some 35%, together with the effect it is having on prices locally, and hence on my business.	
Stacks Property Search	Housing Prices	I urge you to insist that the effect on house values and moreover on demand both locally and further afield along the cable route and surrounding area is bought into the scope of investigation for submission.	
Great Somerford (incorporating Startley) Parish Council	Issues	Communications, when part of the site is within the boundary of Great Somerford.	The Applicant notes this comment.
Great Somerford (incorporating Startley) Parish Council	Issues	Extension of study areas for Flood Risk and Groundwater.	**ES Volume 3, Appendix 9-1 to 9-9: FRA and Drainage Strategy EN010168/APP/7.12]** assesses potential impacts on both the site and surrounding areas, including downstream receptors such as Great Somerford. The assessment demonstrates that the Proposed Development will not increase flood risk within the village or to local roads.
Great Somerford (incorporating Startley) Parish Council	Communications	The Parish Council were concerned there appeared to be poor communication with the Parish Council and the community. Inadequate publicity for the pre-application consultation for a major development, with part within their parish boundary, and the likely increase for flood risk in the village and more frequent flooding of access roads.	**ES Volume 3, Appendix 9-1 to 9-9: FRA and Drainage Strategy EN010168/APP/7.12]** assesses potential impacts on both the site and surrounding areas, including downstream receptors such as Great Somerford. The assessment demonstrates that the Proposed Development will not increase flood risk within the village or to local roads.
Great Somerford (incorporating Startley) Parish Council	Communications	The Parish Council requests; • Great Somerford (Incorpoating Startley) Parish Council is registered as a consultee with information sent to. Helen Wallace. clerk.gspc@gmail.com. Wessex Water, who have treatment plant on the disused railway line serving Great and Little Somerford should be included as Statutory Consultee. Infiltration to the main pipes serving Little Somerford have infiltration from flood water.	The Parish Council's request to be included as a consultee has been noted. Wessex Water has been consulted as part of the ongoing assessment process. Relevant information regarding localised infiltration and the nearby treatment works has been considered, where appropriate, in the **Water Resources Assessment [EN010168/APP/7.26]**.
Great Somerford (incorporating Startley) Parish Council	Hydrology, Flood Risk and Drainage	The author, landowner and farmer within the parish, raised his concerns on the potential increase of flooding on farmland and on roads within the Parish and the immediate surrounds as many access roads are regularly flooded being in Flood Zone 3, at the meeting at Seagry on 10th. April 2024.	Flood risk to land and roads within and surrounding the Parish has been assessed using Environment Agency mapping, topographic data, and relevant hydrological datasets. **ES Volume 3, Appendix 9-1 to 9-9: FRA and Drainage Strategy EN010168/APP/7.12]** confirms that the Proposed Development will not increase flood risk to agricultural land, access routes, or surrounding receptors.
Great Somerford (incorporating Startley) Parish Council	Hydrology, Flood Risk and Drainage	The response received on 17th April, stated, " *there will be a concept strategy for managing site run off during the operational lifetime of the development, inclusive of resilience to climate change. The strategy will describe the measures that will be put in place to manage run off to ensure no contribution is made to flood risk on neighbouring lands. However we appreciate that every site is different and will be looking at additional drainage and flood risk mitigation, we could include as part of the proposals. An example of this would be the inclusion of boundary drainage features, such as swales, to capture site run off in response to heavy rainfall events, providing for storage and encouraging infiltration of this water. Promotion of wetland habitats is also being considered as part of our approach to delivering biodiversity net gain, which would be another means of reducing flood risk, while supporting local aquatic and avian life*." Mitigation measures above give little comfort to residents of Great Somerford. There is no certainty in the statements "inclusion of swales to provide storage and	The response dated 17 April 2024 reflected the early stage of the planning process. Since then the assessment presented in **ES Volume 3, Appendix 9-1 to 9-9: FRA and Drainage Strategy EN010168/APP/7.12]** has been undertaken which sets out the principles for managing surface water to ensure no increase in flood risk on site or downstream. The vast majority of the site will remain as permeable land with minimal alteration to the runoff regime. Where impermeable areas are introduced, such as at the substations and BESS compounds, runoff will be managed using lined, permeable SuDS features underlain by gravel subbase, with flow control to restrict discharge. All design measures account for local hydrology, catchment sensitivity and soil type, and are being progressed in line with best practice and regulatory expectations.

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		encourage infiltration. …….inclusion of wetland habitats another means of reducing flood risk." Without scrutiny of full details these may only provide flood risk reduction within the site, not downstream of the site. Unlike other large scale sites, the drainage/ runoff from these individual sites in different catchment areas, with large variation in soil complexes from free draining Sacrewell/Badsey to poorly drained clays Fladbury/Thames, which can be seasonally affected by groundwater and flooding, is extremely complex.	
Great Somerford (incorporating Startley) Parish Council	Hydrology, Flood Risk and Drainage	In addition to the data on the complex soils on each individual site and around the catchment areas of the three main tributaries it will be necessary to have data on (below rows);	**ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [EN010168/APP/6.1]** draws upon Environment Agency datasets and model outputs which incorporate the underlying soil characteristics, catchment delineation, and topography. These datasets have informed the understanding of baseline hydrology and flood risk across the site. Where appropriate, these have been supplemented by site-specific data and topographical survey. **ES Volume 3, Appendix 9-1 to 9-9: FRA and Drainage Strategy EN010168/APP/7.12]** reflects these conditions and ensures that the Proposed Development is appropriate to the sensitivity of each catchment.
Great Somerford (incorporating Startley) Parish Council	Hydrology, Flood Risk and Drainage	Victorian underdrainage, modern tile and perforated plastic pipe systems with or without permeable fill, as these increase the infiltration rates and can lower groundwater levels. Any damage to these systems particularly on main pipes, leading to outlets, by panel fixings, cable laying and other works disturbing ground could increase waterlogging and subsequent surface run off.	The potential presence of field drainage systems such as underdrainage or perforated pipework is acknowledged. Construction methods will be selected to minimise ground disturbance, particularly in panelled areas where piling or ground screw systems are typically used. A detailed Construction Environmental Management Plan (CEMP) will be prepared prior to works commencing, which will include measures to avoid or mitigate potential disruption to drainage infrastructure during construction. An **Outline CEMP [EN010168/APP/7.12]** has been submitted as part of the DCO submission. **ES Volume 3, Appendix 9-1 to 9-9: FRA and Drainage Strategy EN010168/APP/7.12]** has also accounted for the local soil permeability and runoff characteristics to ensure the development does not increase surface water flood risk.
Great Somerford (incorporating Startley) Parish Council	Hydrology, Flood Risk and Drainage	The current capacity of the tributaries in the catchment areas and their reduction due to cut backs in maintenance by landowners and the similar cut backs on the River Avon by the Environment Agency.	The baseline hydrological assessment considers the current capacity of watercourses based on Environment Agency datasets, including updated NaFRA2 and surface water mapping. While changes in maintenance regimes may influence localised conveyance, these are beyond the control of the Proposed Development. The assessment within **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [EN010168/APP/6.1]** concludes that runoff rates and volumes from the site remain at or below greenfield levels, such that there is no increase in flood risk to these tributaries or downstream catchments.
Great Somerford (incorporating Startley) Parish Council	Hydrology, Flood Risk and Drainage	Recent drainage improvements carried out on other infrastructures, railways. motorways and local highways, discharging into the River Avon in this area.	The Applicant notes this comment. The cumulative effects of surface water runoff from all parts of the Proposed Development, including tributaries that drain towards the River Avon and the C82 access road to Great Somerford, have been assessed in **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [EN010168/APP/6.1]** and the supporting **Flood Risk Assessment Appendices [EN010168/APP/6.3]**. The assessment confirms that runoff will be managed to greenfield discharge rates and volumes at the site boundary, and no significant increase in flood risk is predicted on the C82 or other downstream receptors as a result of the Proposed Development.
Great Somerford (incorporating Startley) Parish Council	Hydrology, Flood Risk and Drainage	The Parish Council has concerns any increase in flow from the Rodbourne Brook will result in the C82 south of the railway line and of increased flow from the Gausebrook Brook will make this road impassable, north of the railway line. For a number of years this road has been the only exit from the village as other roads have been flooded with no routes clear to Dauntsey, Little Somerford or Seagry. (Appendix A.)	The potential for increased flows from the site to affect surrounding receptors, including Rodbourne Brook and Gauze Brook, has been considered as part of **ES Volume 3, Appendix 9-1 to 9-9: FRA and Drainage Strategy EN010168/APP/7.12]**. The Drainage Strategy has been designed to ensure that greenfield runoff rates are maintained or bettered during all storm events, including climate change allowances, and therefore the Proposed Development will not increase flood risk to local roads or neighbouring communities.

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Great Somerford (incorporating Startley) Parish Council	Hydrology, Flood Risk and Drainage	The Parish Council recommends the scope for the Flood Risk assessment includes the cumulative effect, of two tributaries from the site to the River Avon, which defines the depth of water on the C82 access road to Great Somerford.	The Applicant notes this comment. The cumulative effects of surface water runoff from all parts of the Proposed Development, including the tributaries that drain towards the River Avon and the C82 access road to Great Somerford, have been assessed within **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [EN010168/APP/6.1]** and the supporting **Flood Risk Assessment Appendices [EN010168/APP/6.3]**. The assessment confirms that runoff will be restricted to greenfield discharge rates and volumes at the site boundary and that no significant increase in flood risk is predicted downstream, including on the C82 or other local roads.
Great Somerford (incorporating Startley) Parish Council	Hydrology, Flood Risk and Drainage	In considering downstream effects the recent increases in speed of run-off following mitigation measures to protect M4, Network rail embankment and main roads should be included.	The Applicant notes this comment. Recent works to protect infrastructure such as the M4, Network Rail embankment and local roads have been considered in **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [EN010168/APP/6.1]**. The proposed development will not result in any offsite increase in flood risk, as surface water will be appropriately managed within the site in line with national policy and guidance.
Great Somerford (incorporating Startley) Parish Council	Hydrology, Flood Risk and Drainage	The Parish Council requests the Planning Inspectorate to extend the study area for Flood Risk to include the river Avon Catchment area down to the Bridge over the River Avon close to the Dauntsey Great Somerford boundary. There could be significant risks to increased flooding on the access roads serving the village of Great Somerford from the Rodbourne Brook, Gauzebrook and the River Avon.	The Proposed Development does not result in increased flood risk offsite, including to the River Avon or local access roads such as the C82. **ES Volume 3, Appendix 9-1 to 9-9: FRA and Drainage Strategy EN010168/APP/7.12]** assesses all relevant downstream pathways where a connection exists. No wider impact on the River Avon catchment is anticipated and further extension of the study area is not considered necessary.
Great Somerford (incorporating Startley) Parish Council	Groundwater	Great Somerford Parish Council also have concerns leaving Groundwater in the Construction Management Plan scoped out of the EIA considering the large amount of below ground engineering works, which could change stream flow in dry weather and the damping down of flood peaks. The risks need to be assessed, presented, and discussed with any mitigation measures should also be subject to discussion and challenge. Groundwater should be scoped in to protect our water supplies and the rivers.	Groundwater has been considered within **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [EN010168/APP/6.1]**, including potential impacts associated with below-ground works and trenching. The **Outline CEMP [EN010168/APP/7.12]**, to be secured through the DCO, includes mitigation to reduce construction risks to surface and groundwater. Given the nature of the development and the limited duration and extent of below-ground activity, no significant effects on groundwater flow or quality are expected.
Great Somerford (incorporating Startley) Parish Council	Conclusion	The EIA should include; Great Somerford Parish Council and Wessex Water as consultees. The catchment areas of the Rodbourne Brook and the Gauzebrook from the site to the River Avon in the FRA. Extending the study area in Fig.10.1 to include the River Avon, Gauzebrook and Rodbourne Brook. Groundwater in Table10.7	The Applicant notes this comment. Wessex Water has been consulted. Their input has informed **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [EN010168/APP/6.1]**. Chapter 11 assesses groundwater and considers all relevant catchments associated with site parcels. The study area in **ES Volume 2, Figure 10.1 [EN010168/APP/6.2]** will reflect the appropriate extent based on likely significant effects, but it is not necessary to extend it downstream where the Proposed Development will not cause offsite flood risk impacts.
Great Somerford (incorporating Startley) Parish Council	Access Roads around Great Somerford and Startley	C66. Running due north from the village to Little Somerford and then connection to B4042. Has regularly flooded with flood water from River Avon flowing from underpass in disused railway line to the west across the road under the raised footway. The depth of water from this source has been mitigated now the underpass has been restricted with an earth bund. The fooding now comes from the River Avon downstream of the crump measuring weir backing up the watercourse, which crosses the road in culvert with white rails. This water course carries a large amount of runoff from C66 and developments along the west side of the road. Flood water under the railway bridge can be impassable for cars after heavy rain and recently there has also been flooding close to the church.	The Applicant notes this comment. Flooding on the C66 appears to result from downstream interactions with the River Avon, which are outside the zone of influence of the Proposed Development. **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [EN010168/APP/6.1]** considers flood risk to and from the Proposed Development, including any receptors where the development could influence runoff or infiltration patterns. As noted, the access roads around Great Somerford and Startley lie well outside the site boundary and relevant sub-catchments. No increase in flood risk to these access roads will occur.
Great Somerford (incorporating Startley) Parish Council	Access Roads around Great Somerford and Startley	C66 South from the centre of the village	The Applicant notes this comment. The information regarding road flooding and recent mitigation measures has helped inform the baseline understanding of flood risk in the area. However, the Proposed Development will not result in any

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		Has regularly been flooded in different locations mainly between Seagry and Sutton Benger. The flooding by the tributary close to Sutton Benger appears to have been mitigated by a relief pipe to the south of the bridge.	increase in runoff or flood risk to surrounding areas, including the local road network. **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [EN010168/APP/6.1]** considers all relevant receptors, and cumulative flood risk effects are addressed where significant effects are likely. Further detail on emergency access and egress is provided in **ES Volume 1, Chapter 13: Transport and Access [EN010168/APP/6.1].**
Great Somerford (incorporating Startley) Parish Council	Access Roads around Great Somerford and Startley	C45 This has regularly flooded from the Mile Stone back to the boundary of Home Idover Demesne Farm with the Business Park formerly part of Little Smithcot Farm and has been flooded for a number of days each time. February 2024 the Brinkworth Brook flooded over the road both sides of Somerford Bridge with fast flowing water. On these occasions the flood waters receeded in a number of hours and the road was passable at this point for all vehicles. There has been further flooding immediately south of the railway bridge, which clears slowly due to reduction in pipe size between network rail pipe work and highway pipes. (The author lives close to this area and it is noticeable the Brinkworth Brook rises and falls much quicker even after small amounts of rain once the surrounding land is at capacity. The flood meadows upstream of Somerford Bridge do not take the volume of water they did 50 years ago.)	The Applicant notes this comment. While the information on historic flooding along the C45 and from the Brinkworth Brook is useful to inform the baseline flood risk context, the Proposed Development will not increase runoff or flood risk to surrounding land or infrastructure. Drainage from the site will be managed in accordance with **ES Volume 3, Appendix 9-1 to 9-9: FRA and Drainage Strategy EN010168/APP/7.12]** to ensure no offsite increase in surface water discharge.
Great Somerford (incorporating Startley) Parish Council	Access Roads around Great Somerford and Startley	C77 To Dauntsey This regularly floods from the Great Somerford Parish Boundary to the River Avon. There has been one noticeable change this year that water to the north of the road from parish boundary to the level crossing on the disused railway line now backs up in both roadside ditches, This may be as a result of restricted flow in culvert on parish boundary. There is deeper flood water beyond the Old Rectory, this clears as the river level drops. Both of these sections on C77 are impassable to most cars.	The Applicant notes this comment. The historic flood risk to the C77 road from the River Avon and nearby drainage features has been considered as part of the baseline presented in **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [EN010168/APP/6.1]**. The Proposed Development will not lead to an increase in offsite flood risk, including to local roads or watercourses. The measures included in **ES Volume 3, Appendix 9-1 to 9-9: FRA and Drainage Strategy EN010168/APP/7.12]** ensures runoff is controlled and does not exceed pre-development rates.
Great Somerford (incorporating Startley) Parish Council	Access Roads around Great Somerford and Startley	C77 To Startley This has flooded for many years within the village from Manor Stables to Shiptons Lane. Works done in the last two years have reduced the length of time this section is impassable and it is hoped planned further works will mitigate the depth of flood water. Localised flooding has also occurred in the last two years in Shiptons Lane and Hollow Street. This occurs when flood water from the Rodbourne Brook backs up the ditch in the lane to the river meadows.	The Applicant notes this comment. The observations regarding localised flooding and improvements made through recent works are helpful and have informed the baseline presented in **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [EN010168/APP/6.1]**. The Proposed Development will not increase flood risk offsite, including to roads such as C77, Shiptons Lane, or Hollow Street. The measures included in **ES Volume 3, Appendix 9-1 to 9-9: FRA and Drainage Strategy EN010168/APP/7.12]** ensure no additional burden is placed on the Rodbourne Brook or its tributaries.
Great Somerford (incorporating Startley) Parish Council	Access Roads around Great Somerford and Startley	C 82 Startley to Malmesbury. This has flooded south of the railway bridge when the Rodbourne Brook flows over land and north of the railway by Rodbourne Rail Farm when Gauzebrook floods over land. In February this year the roadside ditch on the west side of the road running north was spilling out into the road with field run off containing some silt/sediment, which appeared to originate close to the boundary of the solar area, whether from surface field runoff or through permeable soils. The author has been collecting information for the Great Somerford Flood Plan and it is clear all the tributaries in the Parish flowing into the River Avon do cause more flooding on these roads now they appear to peak more often and faster than in the past when the land is at field capacity or at times following drought conditions leaving baked surface soils.	The Applicant notes this comment. Observations regarding the behaviour of the Rodbourne Brook and Gauzebrook, and the noted changes in runoff patterns due to antecedent conditions, are understood and have helped to inform the baseline conditions presented in **ES Volume 3, Appendix 9-1 to 9-9: FRA and Drainage Strategy EN010168/APP/7.12]**. As outlined in the strategy, runoff from the Proposed Development will be managed to greenfield rates or better, with no increase in flow to offsite areas including roads such as the C82. This ensures there will be no exacerbation of flood risk downstream or to local receptors.

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South Wraxall Parish Council	Introductory text	The South Wraxall Parish Council would like to raise the following points:	The Applicant notes this comment.
South Wraxall Parish Council	Cumulative impacts	Whilst not opposed to the principle of the development of solar farms in line with the National Planning Policy Framework, this Council is increasingly concerned at the concentration of solar farms, battery storage and associated infrastructure in Wiltshire. Some villages are now completely surrounded by solar farms and their continued concentration represents a significant cumulate 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 evening spread across the UK and not concentrated in specific areas effectively industrialising the countryside.	The Applicant notes this comment. **ES Chapter 21: Cumulative Effects and Interactions [EN010168/APP/6.1]** presents the cumulative effects assessment, prepared in line with the methodology set out in **ES Chapter 6: EIA Methodology [EN010168/APP/6.1]**. The site selection process, including consideration of grid connection availability, land characteristics and the ability to co-locate with supporting infrastructure, has been undertaken in accordance with the relevant National Policy Statements (NPS), which form the decision-making framework for nationally significant energy projects. While the Council references the NPPF, it is the NPS that provides the primary policy basis for assessing the need for, and cumulative implications of, renewable energy infrastructure at this scale. The Applicant has therefore ensured that both site selection and cumulative assessment have been undertaken in a manner consistent with national policy requirements, taking account of the distribution of existing infrastructure while recognising the importance of accessible grid connections and suitable sites to deliver renewable energy nationally.
South Wraxall Parish Council	Cumulative impacts	Since the motion was passed there has been a ministerial statement which goes some way to ensuring that the "cumulative impact" of greenfield solar facilities is a valid factor to take into account when considering such applications whether that is by Wiltshire Council in the case of Red Barn and Great Chalfield or the Secretary of State in the case of Lime Down.	The Applicant notes this comment. **Chapter 21: Cumulative Effects and Interactions [EN010168/APP/6.1]** presents the cumulative effects assessment, which follows the methodology outlined in **Chapter 6: EIA Methodology [EN010168/APP/6.1]**.
St Paul Malmesbury Without Parish Council	Introductory text	This is the formal response of the St Paul Malmesbury Without Parish Council (SPMWPC) to the proposed Lime Down Solar Park development. It has been prepared specifically to respond to the applicant's submission of a scoping EIA (Environmental Impact Assessment) document to the Planning Inspectorate dated the 16th of July 2024.	The Applicant notes this comment.
St Paul Malmesbury Without Parish Council	Effects of rainfall	The Applicant should Scope In the effects of run off rainfall and its potential to cause flooding beyond the Application site as a result of a substantial part of the 2,000+ acre site being covered by impermeable solar panels. The Applicant should Scope In run off into the main River Avon, and the parts of the Gauzebrook that affect Corston because of local concerns that flooding already occurs which with additional run off could overwhelm the Gauzebrook in this area. Given the proximity of the Hullavington Sewage Works any substantial increase in the water level could carry sewage into Corston. The Applicant should scope In assessments of Sustainable Drainage Systems (SuDS) to identify whether SuDS could assist those communities that could be affected by increased flooding outside of the boundaries of the Application site.	Surface water runoff during both construction and operation have been scoped into the assessment presented in **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [EN010168/APP/6.1] and ES Volume 3, Appendix 9-1 to 9-9: FRA and Drainage Strategy EN010168/APP/7.12]**. The Drainage Strategy confirms that the Proposed Development will not result in any increase in runoff rates or volumes beyond greenfield conditions, including to the River Avon, Gauzebrook or any associated infrastructure such as Hullavington Sewage Works. Surface water will be managed using a range of techniques consistent with Sustainable Drainage Systems (SuDS) principles, including infiltration-based measures and flow controls where required. These are designed to prevent any off-site impact and maintain pre-development flow characteristics. Given this, there has been no need to scope in additional downstream flood assessments, as there will be no effect beyond the site boundary.
St Paul Malmesbury Without Parish Council	Impact of runoff on aquifers	The Applicant should specifically Scope In within Chapters 10 and 11 the impact of run off on the important water aquifers that sit beneath the site and contain large and regionally important sources of drinking water for the locality and well beyond. This should include the major aquifer by Rodbourne Rail farm. This Scoping In should cover both the construction and operational phases of the whole Lime Down scheme. SPMWPC contend that it is insufficient for the Applicant to rely on good practices solely referenced within the Construction Environment Management Plan (CEMP) as the CEMP is not an environment assessment tool.	The Applicant notes this comment. The potential impact of surface water runoff on underlying aquifers has been scoped into **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [EN010168/APP/6.1]** and **ES Volume 1, Chapter 11: Ground Conditions [EN010168/APP/6.1]**.These chapters consider both the construction and operational phases of the Proposed Development, with specific regard to the site's location over a Principal Aquifer and within a Drinking Water Safeguard Zone. The design approach includes the use of permeable and lined SuDS measures, which will reduce the potential for infiltration of any contaminants in sensitive areas, particularly around the BESS compounds, substations, and any areas of increased construction activity. These measures are secured through the **Outline CEMP [EN010168/APP/7.12]** to ensure they are implemented appropriately during the construction phase.

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			The assessment has been informed by Environment Agency guidance and available hydrogeological datasets, and concludes that, with the implementation of these mitigation measures, the Proposed Development will not pose a risk to the underlying aquifers.
St Paul Malmesbury Without Parish Council	Local roads	The Applicant has not made it clear which local roads are Scoped In therefore SPMWPC request that all local roads around the villages of Rodbourne and Corston are included, not only in the construction phase but also during on-going maintenance and decommissioning. The proposed route through Rodbourne is a single track road not designed for large vehicles and is frequently used by pedestrians, cyclists and horse riders.	Proposed construction vehicle routes are identified in **ES Volume 1, Chapter 13: Transport and Access [EN010168/APP/6.1** and illustrated in **ES Volume 2, Figure 13-1: Study Area – Solar PV Sites [EN010168/APP/6.2]** and **ES Volume 2, Figure 13-2: Study Area – Cable Route Corridor [EN010168/APP/6.2**. The Study Area for the transport and access assessment is based on the construction vehicle routes to the Order Limits. These will be secured through a CTMP which will be in substantial accord with the **Outline CTMP [EN010168/APP/7.22]** and secured as part of the DCO. Outside of the identified construction vehicles routes, there will not be transport and access effects. **ES Volume 1, Chapter 13: Transport and Access [EN010168/APP/6.1]** explains the operational and decommissioning effects of the Scheme in regard to transport and access. In addition, **ES Volume 3: Appendix 13-1 Transport Assessment [EN010168/APP/6.3]** has been prepared to support the DCO Application. The road through Rodbourne will not be used for construction, replacement or decommissioning. Access will instead be taken directly from the A429.
St Paul Malmesbury Without Parish Council	Impact on livestock	The Applicant has only considered glare in relation to humans, however this problem will also affect livestock, particularly the very adjacent facilities focussed on high value horse rearing in site E and parts of site D. Furthermore the fact that the panels rotate to follow the sun exacerbates the problem to livestock because the noise from the motors is likely to produce additional agitation to these high value animals and hence negatively impact the businesses involved. This factor needs to be Scoped In.	Livestock such as horses are not assessed within the Glint and Glare Assessment contained within Section 20.1 of **ES Volume 1, Other Environmental Matters [EN010168/APP/6.1]** as it is not considered that this has the potential to present a significant safety or amenity impact. Guidance produced by the British Horse Society in April 2024 states that “the incidence of glare or dazzle [from solar panels] is very low compared with glass" and “any reflection is unlikely to be a direct problem to horses, riders or carriage-drivers because of the angles and distances involved”.
St Paul Malmesbury Without Parish Council	LVIA	The Applicant should Scope In within the LVIA (Landscape and Visual Impact Assessment) the impacts on the “settings” of Historic Assets as well as the impact on the Assets themselves.	The setting of historic assets is primarily considered within the **ES Volume 1, Chapter 12: Cultural Heritage [EN010168/APP/6.1].**. Where heritage assets form part of the landscape, e.g. views to churches, these are considered within the LVIA.
St Paul Malmesbury Without Parish Council	LVIA	The Applicant should re-examine the selection of LVIA viewpoints to ensure they are representative of the true visual impact of the scheme. From limited sampling it would appear to SPMWPC that some viewpoints minimise the visual effects of the development.	Viewpoint locations will be agreed with the National Landscape Board and Wiltshire Council.
St Paul Malmesbury Without Parish Council	Protected Species	The Applicant should Scope In the effects of the development on all Protected Species, such as slow worm, dormouse, grass snake, and not just those species currently identified.	Impacts of the Proposed Development on protected/notable species are assessed within **ES Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1].**
St Paul Malmesbury Without Parish Council	Ability of local emergency services to respond to damage or fire to the BESS	SPMWPC request that the Applicant Scopes In the suitability and ability of the local emergency services to respond to damage or fire to the Battery Energy Storage System (BESS). Given the vast size of the BESS any fire related incident is likely to spread very rapidly and could quickly develop into a major incident. The station at Malmesbury is parttime and is likely to require additional manpower and training in these types of emergencies, as would the full-time station at Chippenham. Furthermore, the impact upon air and soil quality and ground water contamination in the event of an incident at the Hullavington BESS should be Scoped In.	The Applicant notes this comment. The **Outline Battery Safety Management Plan [EN010168/APP/7.21]** submitted with the DCO application has been developed in consultation with the Dorset and Wiltshire Fire and Rescue Service including the BESS design.
Sutton Benger Parish Council	Introductory text	Sutton Benger Parish Council is not antisolar but we do support solar in proportion around the country and in the right places – we do not feel that this development	**ES Volume 1, Chapter 4: Alternatives and Design Evolution [EN010168/APP/6.1]** describes the consideration of alternatives and the design evolution of the Proposed Development. The report concludes there were no

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		meets these criteria, for example: Wiltshire has already met it's 2030 carbon neutral of 500mWh by currently producing 827mWh.	alternative technologies or sites studied by the Applicant that could deliver the Design Vision, noting the availability of grid connections for the National Grid. A full explanation of site selection is set out in **Appendix A: Site Selection Report of the Planning Statement [EN010168/APP/7.2].** The report concludes that the location of the Proposed Development comprises a suitable site taking into account planning and environmental constraints and operational considerations
Sutton Benger Parish Council	Introductory text	We recognise that this is a very complex overly long, technical, scientific and policy led document. However, as a team of Councillors with engineering, scientific, farming, commerce and civil service experience we have commented to the best of our combined experience on the scoping consultation, especially with regard to significant omissions, as follows:	The Applicant notes this comment.
Sutton Benger Parish Council	Cumulative Effect of the scale of the development	This is of considerable significance in the case of Lime Down. Whilst presented as a single NSIP by IGP it is, in effect, six projects (the underground powerline joining Lime Down to Melksham, plus areas A, B, C. D and E). Each of these six projects would qualify as NSIPs in their own right. It is the massive cumulative impact of IGP's proposals that singles it out from other Solar Park applications and justifies scoping into the EIA.	**Chapter 21: Cumulative Effects and Interactions [EN010168/APP/6.1]** presents the cumulative effects assessment, which follows the methodology outlined in **Chapter 6: EIA Methodology [EN010168/APP/6.1]**. The Scheme is defined as a Nationally Significant Infrastructure Project (NSIP) under Sections 14(1)(a) and 15(2) of the Planning Act 2008 as an onshore generating station in England exceeding 50MW generating capacity. More detail on the consenting process can be found in **Section 1.6** of **ES Volume 1, Chapter 1: Introduction [EN010168/APP/6.1]**.
Sutton Benger Parish Council	Cumulative Effect of the scale of the development	Government policy and legal precedent support our position on this. The Government's NPPF states that planning authorities should take into account the cumulative impacts from individual sites and/or from a number of sites in a locality.	**Chapter 21: Cumulative Effects and Interactions [EN010168/APP/6.1]** presents the cumulative effects assessment, which follows the methodology outlined in **Chapter 6: EIA Methodology [EN010168/APP/6.1]**.
Sutton Benger Parish Council	Habitat Loss and Fragmentation	Large-scale solar farms require extensive land areas, which can lead to the clearing of trees and vegetation and the displacement of wildlife. This habitat disruption can have significant consequences for local biodiversity, potentially threatening species that rely on the affected areas. The document identifies impact on 138 conservation areas.	Impacts on local habitats and wildlife are assessed in **ES Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1]**. The Proposed Development provides an opportunity to benefit local biodiversity, particularly when located on current arable land, through establishment and maintenance of higher value habitats and features for wildlife.
Sutton Benger Parish Council	Soil and Water Resources	Construction and maintenance activities can lead to soil erosion and compaction, affecting soil health and lead to an increased risk of flooding and water contamination.	The potential effects on soils during construction and maintenance activities will be minimised with adherence to the **Outline Soil Resources Management Plan [EN010168/APP/7.15].** **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [EN010168/APP/6.1]** assesses flood risk from all sources. Measures included within **ES Volume 3, Appendix 9-1 to 9-9: FRA and Drainage Strategy EN010168/APP/7.12]** and the **Outline CEMP [EN010168/APP/7.12]** ensure that the development does not increase flood risk beyond the application site. The potential impacts of the proposed development on groundwater quality have been assessed in **ES Volume 1, Chapter 19: Ground Conditions and Contamination [EN010168/APP/6.1]**. To manage and mitigate these risks, a range of measures will be implemented through the **Outline Construction Environmental Management Plan (CEMP) [EN010168/APP/7.12]**, including: • Pollution prevention and spill response protocols. • Surface water and drainage management. • Monitoring and contingency planning. With these mitigation measures in place, the potential impacts on groundwater resources and drinking water abstractions are assessed as not significant.
Sutton Benger Parish Council	Microclimate Changes	The installation of extensive solar panels can alter local microclimates by changing surface albedo (reflectivity) and temperature.	**ES Volume 1, Chapter 7: Climate Change [EN010168/APP/6.1]** of the Environmental Statement assesses the impact of GHG emissions arising as a result of the Proposed Development on the climate and provides a review of the resilience of the Proposed Development to projected future climate change impacts. The

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			potential for a microclimate to be created by solar panels is extremely unlikely, and far lower risk than from other projects such as power stations etc.
Sutton Benger Parish Council	Chemical Use and Pollution	Solar panel manufacturing and maintenance may involve the use of chemicals that could contaminate soil and water if not managed properly. This includes potential leaks or spills of coolant fluids, cleaning agents, or other chemicals used in panel upkeep.	The specification of the solar panels will include Per- and Polyfluoroalkyl Substances free coatings to solar panels. The use of chemicals during construction and operational phases will be managed via the **Outline CEMP [EN010168/APP/7.12]** and **Outline OEMP EN010168/APP/7.13]**
Sutton Benger Parish Council	Chemical Use and Pollution	The projected lifespan of the site indicates that both solar panels and batteries will have to be replaced at least once during the life. There are still many unknown factors regarding the disposal and recycling of these components.	The Materials and Waste section within **ES Volume 1, Chapter 20: Other Environmental Matters [EN010168/APP/6.1]** provides an assessment of effects relating to waste. The **Outline SWMP [EN010168/APP/7.16], Outline CEMP [EN010168/APP/7.12], Outline OEMP EN010168/APP/7.13], Outline DS [EN010168/APP/7.14]** within ES Volume 7 which accompany the application covers waste management.
Sutton Benger Parish Council	Impact on Wildlife	The development will have an impact on dormice, which are a protected species. Birds and insects may be affected by the presence of solar panels. Birds can sometimes mistake reflective panels for water and collide with them. Insects attracted to the heat or light emitted by the panels can also be impacted, potentially disrupting local ecosystems.	Impacts on dormice, birds and invertebrates are assessed in **ES Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1]** No significant adverse effects are anticipated for dormice. Significant effects on birds or invertebrates as a result of colliding with, or becoming attracted to, panels are not anticipated to occur.
Sutton Benger Parish Council	Land Use Change	Converting agricultural or natural land to solar farms can alter the landscape significantly, potentially reducing land available for farming or conservation. This change can affect food production and natural land reserves.	The area and grade of agricultural land that will be used for the Proposed Development is set out in **ES Volume 1 Chapter 17 [EN010168/APP/6.1]**, although there may be opportunity to continue some agricultural use (sheep grazing) around the panel areas
Sutton Benger Parish Council	Noise and Light Pollution	During construction and maintenance, solar farms will generate noise and light pollution, which will disturb local wildlife and human populations. Nighttime lighting for security will disrupt nocturnal animals and contribute to light pollution.	Construction noise and vibration impacts have been assessed within **ES Volume 1, Chapter 14: Noise and Vibration [EN010168/APP/6.1]**. Through the implementation of mitigation measures and best practicable means, as outlined in Section 14.9 of **ES Volume 1, Chapter 14: Noise and Vibration [EN010168/APP/6.1]**, significant effects on the human population are not expected. Impacts on ecological features are assessed within **ES Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1]** of the ES including impacts from noise and artificial lighting at night. Significant effects from these potential sources of impact on wildlife are not anticipated.
Sutton Benger Parish Council	Public Rights of Way	The proposal impacts multiple footpaths, byways and long distance paths (Cotswold Way, McMillan Way), which will deter walkers from using this area and impacting the local economy.	Measures within the **Outline PRoWMP [EN010168/APP/7.17]** will be implemented to minimise the effect of the Scheme on PRoW users. This includes setting back Solar PV Panels at least 15 m from PRoW and new permissive paths created to allow for better connectivity.
Sutton Benger Parish Council	Landscape	The Cotswolds and Avon Vale are described in the document as areas of “open and expansive landscape”. Clearly 2000 acres of 4.5m high solar panels is a complete anathema to this description. There is no assessment of the impact to archaeological remains during the operation and decommissioning phases.	See above response.
Sutton Benger Parish Council	Property Prices	There will be a detrimental impact on property prices, despite the report’s claims that they are “*very unlikely to be significantly affected by the Scheme*”.	The Applicant has assessed potential effects to neighbouring properties and consult with local residents and provide sufficient information to ensure stakeholders to understand the likely impacts of the Scheme. The results of these assessments, along with proposed mitigations, are presented in the ES **[EN010168/APP/6.1] to [EN010168/APP/6.3]**. Published research and evidence to date does not suggest that solar farms have a significant adverse long-term effect to nearby property values.
Sutton Benger Parish Council	Mitigation	Mitigating these effects requires careful planning and implementation of best practices, such as choosing less ecologically sensitive sites, employing wildlife corridors, using less water-intensive cleaning methods, mitigating the impact on the local economy through reduced tourism and implementing effective waste	The Scheme has been designed to avoid, minimise or reduce any adverse significant effects and include enhancement measures, as far as practicable. **Chapter 4: Alternative and Design Evolution [EN010168/APP/6.1]** describes the evolution of the design of the Scheme and alternatives considered.

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		management and recycling programs for old panels. Additionally, integrating solar development with agricultural activities (agrivoltaics) can help balance energy production with environmental conservation and local land use needs.	Agricultural activities are not proposed to be integrated alongside the Scheme, however should consent be granted, grazing by sheep will be explored within the Solar PV Sites.
Sutton Benger Parish Council	Mitigation	Sutton Benger Parish Council would further we want to ensure that we can achieve the absolute best environmental solution and outcome for our community, especially with regard to: • No Traffic Impact within our parish - all construction and commuter traffic is to avoid our roads, • Financial Compensation should be available to the local community, through grants or infrastructure improvement which recognise the loss of environment that we will suffer, A Publicly accessible nature reserve, benefitting both locals and nature	The Study Area for the transport and access assessment is based on the construction vehicle routes to the Order Limits. Construction vehicle movements will be controlled through a CTMP which will be in substantial accord with the **Outline CTMP [EN010168/APP/7.22]** and is secured under a requirement of the **Draft DCO [EN010168/APP/3.1]**. The aim of the CTMP is to ensure that the effect of the construction phase on the local highway network is minimised. Outside of these routes, there will not be transport and access effects. No construction routes are proposed through the parish of Sutton Benger. Financial improvements to community infrastructure are to be made available through a Community Benefit Fund, set up separately from the DCO process. New permissive paths will be provided within the Solar PV Sites to allow for better connectivity to the surrounding area, as secured through the **Outline PRoWMP [EN010168/APP/7.17]**.
UK Health Secretary Agency	Environmental Public Health	We understand that the promoter will wish to avoid unnecessary duplication and that many issues including air quality, emissions to water, waste, contaminated land etc. will be covered elsewhere in the Environmental Statement (ES). We believe the summation of 2 relevant issues into a specific section of the report provides a focus which ensures that public health is given adequate consideration. The section should summarise key information, risk assessments, proposed mitigation measures, conclusions and residual impacts, relating to human health. Compliance with the requirements of National Policy Statements and relevant guidance and standards should also be highlighted.	The Applicant confirms this approach, wherein topic-specific matters will be covered in each technical chapter in the ES, with summarised human health impacts, mitigation measures, and residual effects assessed in **ES Volume 1, Chapter 18: Human Health [EN010168/APP/6.1]**. Compliance with NPS and guidance is set out in **ES Volume 3, Appendix 18-2: Human Health Legislation, Policy and Guidance [EN010168/APP/6.3]** and supported in **ES Volume 1, Chapter 5: Energy Need Legislative Context and Energy Policy [EN010168/APP/6.1]**. The Materials and Waste section within **ES Volume 1, Chapter 20: Other Environmental Matters [EN010168/APP/6.1]** provides an assessment of effects relating to waste. The **Outline SWMP [EN010168/APP/7.16]**, **Outline CEMP [EN010168/APP/7.12]**, **Outline OEMP EN010168/APP/7.13]**, and **Outline Decommissioning Strategy [EN010168/APP/7.14]** which accompany the DCO Application cover waste management.
UK Health Secretary Agency	Environmental Public Health	In terms of the level of detail to be included in an ES, we recognise that the differing nature of projects is such that their impacts will vary. UKHSA and OHID's predecessor organisation Public Health England produced an advice document Advice on the content of Environmental Statements accompanying an application under the NSIP Regime', setting out aspects to be addressed within the Environmental Statement. This advice document and its recommendations are still valid and should be considered when preparing an ES. Please note that where impacts relating to health and/or further assessments are scoped out, promoters should fully explain and justify this within the submitted documentation.	The Applicant has referred to UKHSA and PHE advice in **ES Volume 1, Chapter 18: Human Health [EN010168/APP/6.1]** and **ES Volume 3, Appendix 18-2: Human Health Legislation, Policy and Guidance [EN010168/APP/6.3]**, and provides brief justification for each heath topic scoped out of full assessment.
UK Health Secretary Agency	Recommendation	Our position is that pollutants associated with road traffic or combustion, particularly particulate matter and oxides of nitrogen are non-threshold; i.e, an exposed population is likely to be subject to potential harm at any level and that reducing public exposure to non-threshold pollutants (such as particulate matter and nitrogen dioxide) below air quality standards will have potential public health benefits. We support approaches which minimise or mitigate public exposure to non-threshold air pollutants, address inequalities (in exposure) and maximise co-benefits (such as physical exercise). We encourage their consideration during development design, environmental and health impact assessment, and development consent.	The Applicant confirms that potential human health impacts due to pollutants from vehicular traffic/combustion have been assessed under the 'Air quality' in relevant sections of **ES Volume 1, Chapter 18: Human Health [EN010168/APP/6.1]** and are assessed on the basis of the information provided in **ES Volume 1, Chapter 15: Air Quality [EN010168/APP/6.1]**. Measures to address inequalities and maximise co-benefits are explored, where practicable. Resultant residual human health effects from air quality impacts are assessed at Section 18.10 of **ES Volume 1, Chapter 18: Human Health [EN010168/APP/6.1]**.
UK Health Secretary Agency	Human Health and Wellbeing - OHID	This section of OHIDs response, identifies the wider determinants of health and wellbeing we expect the ES to address, to demonstrate whether they are likely to give rise to significant effects. OHID has focused its approach on scoping	The Applicant can confirm that these themes are considered in the wider determinants of health in **ES Volume 1, Chapter 18: Human Health [EN010168/APP/6.1]**.

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		determinants of health and wellbeing under four themes, which have been derived from an analysis of the wider determinants of health mentioned in the National Policy Statements. The four themes are: • Access • Traffic and Transport • Socioeconomic • Land Use Having considered the submitted Scoping Report, OHID wish to make the following specific comments and recommendations.	
UK Health Secretary Agency	Baseline health data	The scoping of mental health into the assessment is welcome given the potential for community anxiety from such a scheme and initial data regarding suicides within Table 19.1 Health Profile of Local Authority Areas and England. Mental well-being is fundamental to achieving a healthy, resilient and thriving population. It underpins healthy lifestyles, physical health, educational attainment, employment and productivity, relationships, community safety and cohesion and quality of life. A scheme of this scale and nature has impacts on the over-arching protective factors, which are: • Enhancing control • Increasing resilience and community assets • Facilitating participation and promoting inclusion The ES should provide additional local data on wider public mental health, to that which is currently contained within Table 19.1. It is noted that the local public health team will be contacted (para 19.4.17) to supplement desk-based findings.	The Applicant acknowledges the importance of mental health and confirms baseline mental health data and assessment of potential impacts, including on community control, influence, and resilience, are assessed in **ES Volume 1, Chapter 18: Human Health [EN010168/APP/6.1]**.
UK Health Secretary Agency	Baseline health data	Health baseline data should be sufficiently granular to represent local communities' health baseline and sensitivities, currently only local authority level data is provided. Data at least at ward level should be provided where available.	The Applicant confirms that the baseline data in Section 18.7 of **ES Volume 1, Chapter 18: Human Health [EN010168/APP/6.1]** has been undertaken to ward level to determine baseline conditions in the 2 km Study Area for human health.
UK Health Secretary Agency	Baseline health data	Effective and meaningful community engagement will be important in understanding community anxiety and also as a potential mitigation action. Community responses can be a useful source of information.	The Applicant confirms that additional consideration of mental health and community anxiety has been explored through community engagement and meta-review of consultation feedback during statutory consultation to understand existing community anxieties, sense of place, and areas of greatest concern. Furthermore, the Applicant has engaged with Wiltshire Council's Public Health team throughout the pre-application stage to determine the best methods of responding to community needs and where mental health and wellbeing is raised as a present concern. This is set out in **ES Volume 3, Appendix 18-1: Matters Relevant to Human Health Raised Through Consultation [EN010168/APP/6.3]**.
UK Health Secretary Agency	Baseline health data	Recommendation Advice should also be sought from the local public health team on additional local data.	The Applicant confirms that the assessment of baseline conditions in Section 18.7 of **ES Volume 1, Chapter 18: Human Health [EN010168/APP/6.1]** has been supported by local authority data profiles for wards and community areas within the 2 km Study Area, as provided by Wiltshire Council's Public Health team, in addition to publicly available data from Wiltshire Intelligence.
UK Health Secretary Agency	Baseline health data	The baseline data should include mental health and wellbeing data. When estimating community anxiety and stress in particular, a qualitative assessment may be most appropriate. This may involve conducting resident surveys but also information received through public consultations, including community engagement exercises. Robust and meaningful consultation with the local community will be an important mitigation measure, in addition to informing the assessment and subsequent mitigation measures.	The Applicant confirms that additional consideration of mental health baseline data and community anxiety has been explored through OHID fingertips data, Wiltshire Intelligence local health profiles, and through community engagement and meta-review of consultation feedback during statutory consultation in the assessment of baseline conditions in Section 18.7 of **ES Volume 1, Chapter 18: Human Health [EN010168/APP/6.1]**.

Consultee	Topic	Matter Raised	Applicant Response
UK Health Secretary Agency	Baseline health data	Health baseline data should be reported at appropriate geographic scale to represent local communities, e.g., at least ward level data where available.	The Applicant confirms the baseline data in Section 18.7 of **ES Volume 1, Chapter 18: Human Health [EN010168/APP/6.1]** has been gathered to ward level, where available, to determine baseline conditions in the 2 km Study Area for human health.
Wessex Water	Proposal	The developer Island Green Power, is proposing a new utility-scale solar (large, feeds directly into the grid) and battery energy storage project at Lime Down, North Wiltshire. It will provide 500 megawatts (MW) of renewable solar power and will be built across 5 sites – 857 ha agricultural land (sixth site at Melksham – Battery Energy Storage System). As the proposals exceed 50 MW they are classified as a Nationally Significant Infrastructure Project (NSIP).	**Chapter 3: The Scheme [EN010168/APP/6.1]** describes the principal components of the Scheme and the design parameters used. The option for a BESS Area near Whitley has been removed from the Scheme and the BESS Area is located within Lime Down D.
Wessex Water	Proposal	The development consenting regime for a NSIP comes under the Planning Act 2008. To gain permission to build and operate the solar park they need to apply to the Planning Inspectorate (rather than the local planning authority) for a Development Consent Order (DCO).	Paragraph 1.1.7 of **Chapter 1: Introduction [EN010168/APP/6.1]** confirms that the Scheme is classified as a NSIP for the purposes of the Planning Act 2008 and requires an application for a DCO. The application for the Scheme will be submitted to the Planning Inspectorate and the decision whether to grant a DCO will be made by the Secretary of State for Energy Security and Net Zero.
Wessex Water	Proposal	In the case of energy related NSIPs, the Planning Inspectorate acts on behalf of the Secretary of State for Energy and Net Zero. The Planning Inspectorate examine the application and make a final recommendation to the Secretary of State on granting consent. The Secretary of State makes the final decision.	Paragraph 1.1.7 of **Chapter 1: Introduction [EN010168/APP/6.1]** confirms that the Scheme is classified as a NSIP for the purposes of the Planning Act 2008 and requires an application for a DCO. The application for the Scheme will be submitted to the Planning Inspectorate and the decision whether to grant a DCO will be made by the Secretary of State for Energy Security and Net Zero.
Wessex Water	Wessex Water interest	The Proposed Lime Down Solar Park (Figure 1) lies within the Environment Agency (EA) designated Source Protection Zones (SPZs) 2 and 3 of several strategic Great Oolite groundwater sources owned and operated by Wessex Water (Figure 2). The most pertinent source in terms of this proposal is Rodbourne. This source (licence no 17/53/01/G/410) is licensed for abstraction at up to 13 Ml/d (million litres per day) and 5200 Ml/year. There are also a number of private groundwater supplies in this area.	These considerations have been fully addressed in the Environmental Statement (ES). Specifically, **ES Volume 3, Appendices 19-1 to 19-8: Phase 1 Desk Studies [EN010168/APP/6.3]** provide a detailed review of the geological and hydrogeological setting, including the delineation of SPZs and the identification of licensed and private groundwater abstractions. These studies draw on data from the Environment Agency, Wessex Water, and other authoritative sources. The potential impacts of the proposed development on groundwater quality, including risks to the Great Oolite aquifer and associated drinking water sources, have been assessed in Table 19-4 of **ES Volume 1, Chapter 19: Ground Conditions and Contamination [EN010168/APP/6.1]**. This includes: • Consideration of the location and sensitivity of SPZs. • Assessment of potential contamination pathways during construction and operation. • Evaluation of risks to both public and private water supplies. To manage and mitigate these risks, a range of measures will be implemented through the **Outline Construction Environmental Management Plan (CEMP) [EN010168/APP/7.12]**, including: • Pollution prevention and spill response protocols. • Surface water and drainage management. • Monitoring and contingency planning. With these mitigation measures in place, the potential impacts on groundwater resources and drinking water abstractions, including the Rodbourne source, are assessed as not significant.
Wessex Water	Wessex Water interest	The boreholes abstract water from the Great Oolite aquifer which lies beneath the Forest Marble in this area. Marble would not impact the underlying Great Oolite aquifer.	Drinking water source protection is considered in **ES Volume 3, Appendices 19-1 to 19-8: Phase 1 Desk Studies [EN010168/APP/6.3]** and these assessments are considered in the assessments contained within Table 19-4 of **ES Volume 1, Chapter 19 Ground Conditions & Contamination [EN010168/APP/6.1]**

Consultee	Topic	Matter Raised	Applicant Response
Wessex Water	Wessex Water interest	We have had pesticide (in particular metaldehyde) detections in Wessex Water's Rodbourne abstraction which we presume come from contaminated water in the Gauze Brook. It is poissble that under certain hydrogeological circumstances, pathways from the surface into the Great Oolite aquifer can be created. This appears to be when groundwater levels in the Great Oolite aqufer are low (such as at the end of dry summer/autumn) and surface water flows are high (eg from autumnal storms). Our own investigations into Great Oolite source at Chippenham have highlighted the presence, and the importance of geological faulting in this area in providing preferential flow pathways from the surface to the groundwater.	The Applicant acknowledges Wessex Water's observations regarding the presence of pesticides in the Rodbourne abstraction and the potential for preferential flow pathways into the Great Oolite aquifer. The proposed development will not involve the use of metaldehyde or other agrichemicals associated with intensive farming. The transition from arable agriculture to solar use is expected to reduce the risk of surface water contamination entering local watercourses, including the Gauze Brook. Additionally, all drainage features associated with sensitive infrastructure such as substations and BESS will be lined and sealed, with no infiltration permitted to protect underlying aquifers. As stated in **ES Volume 3, Appendix 9-1 to 9-9: FRA and Drainage Strategy [EN010168/APP/7.12]** SuDS features will be adopted with either impermeable linings or robust pollution prevention measures, as appropriate depending on site conditions and groundwater sensitivity. Groundwater risks, including potential connectivity with the Great Oolite aquifer, have been considered in **ES Volume 1, Chapter 19: Ground Conditions [EN010168/APP/6.1]**. Standard mitigation through design and also through the Outline CEMP **[EN010168/APP/7.12]** and Outline OEMP EN010168/APP/7.13] are sufficient to protect water resources in the vicinity of the scheme. Wessex Water will continue to be consulted as the design progresses to ensure their abstractions are protected. **No specific risks to groundwater associated with historic contamination have been identified.**
Wessex Water	Wessex Water interest	With that in mind we have some concerns that any polluting substances derived from the development and operation of the Lime Down Solar Park may, under the right hydrogeological circumstances, and the passage of time, reach the Great Oolite aquifer.	Drinking water source protection is considered in **ES Volume 3, Appendices 19-1 to 19-8: Phase 1 Desk Studies [EN010168/APP/6.3]** and these assessments are considered in the assessments contained within Table 19-4 of **ES Volume 1, Chapter 19 Ground Conditions & Contamination [EN010168/APP/6.1]**
Wessex Water	Wessex Water interest	We note that the cable corridor search passes through other Wessex Water SPZs and areaas of existing Wessex Water Assets. In these areas we would expect the developer to provide the risk assessments outlined below.	Drinking water source protection is considered in **ES Volume 3, Appendices 19-1 to 19-8: Phase 1 Desk Studies [EN010168/APP/6.3]** and these assessments are considered in the assessments contained within Table 19-4 of **ES Volume 1, Chapter 19 Ground Conditions & Contamination [EN010168/APP/6.1]**
Wessex Water	Hydrogeological Risk Assessment requirement	In order to come to a view on this development we would require the development of a thorough hydrogeological risk assessment (HRA) of the potential pollution sources arising from this development, and the potential pathways through to the aquifer. The HRA should take into account the latest conceptual understanding of the hydrogeology and the source operation.	Since the submission of the Scoping Report, the baseline understanding of geological and hydrogeological conditions has been significantly enhanced. This is presented in **ES Volume 3, Appendices 19-1 to 19-8: Phase 1 Desk Studies [EN010168/APP/6.3]**, which includes a detailed Preliminary Risk Assessment (PRA) for the entire Scheme. The PRA considers potential contaminant sources, pathways, and receptors, including the hydrogeological setting and the presence of Source Protection Zones (SPZs). The potential impacts on aquifers, including the Great Oolite and associated SPZs, have been assessed in **ES Volume 1, Chapter 19: Ground Conditions and Contamination [EN010168/APP/6.1]**, with specific reference to Table 19-4, which outlines the identified risks and proposed mitigation measures. To ensure the protection of groundwater resources, including public and private water supplies, a range of mitigation measures will be implemented through the **Outline Construction Environmental Management Plan (CEMP) [EN010168/APP/7.12]**. These include: • Pollution prevention controls and spill response procedures. • Surface water and drainage management to prevent infiltration of contaminants. • Monitoring and contingency planning for unexpected ground conditions. With these measures in place, the potential impacts on groundwater quality and abstraction sources are assessed as not significant.

Consultee	Topic	Matter Raised	Applicant Response
Wessex Water	Hydrogeological Risk Assessment requirement	The 'source' element should include the risks from all of the infrastructure associated with the Solar Park including panels, cables and supporting structures. The risks should include the use of buried fluid filled cables if that is part of the proposal.	Sources associated with the Scheme are considered in the assessments contained within Table 19-4 of **ES Volume 1, Chapter 19 Ground Conditions & Contamination [EN010168/APP/6.1].** The Scheme will not use fluid filled cables. Measures to manage and mitigate risks from cable installation are outlined in the **Outline CEMP [EN010168/APP/7.12]**.
Wessex Water	Hydrogeological Risk Assessment requirement	The HRA should consider the potential use of perfluoroalkyl substances (PFAS) in the cabling, and in the manufacture of solar panels, or at least certain elements within them, and the potential for PFAS to wash off the panels and contribute to surface water flow (Gauze Brook) and groundwater inflitration (to recharge the Great Oolite aquifer). These PFAS substances (of which 48 are currently being monitored for by the Water Industry under guidance from the Drinking Water Inspectorate (DWI)) are very persistent (hence being refered to as 'forever chemicals'). As such, it is important that an HRA should consider the long-term implications of this development on groundwater quality. The presence of low levels of PFAS in the Rodbourne source (at the lower end of DWI's Tier 1 – 'Low' category) indicates that there is connection with the surface.	All photovoltaic arrays/ panels will be certified as PFAS free, meaning there is no risk of mobilisation of PFAS coatings on the panels being leached or otherwise mobilised and entering ground or surface water. Risks associated with other potential sources of PFAS are considered in the assessments contained within Table 19-4 of **ES Volume 1, Chapter 19 Ground Conditions & Contamination [EN010168/APP/6.1].**
Wessex Water	Wessex Water response	At present the potential impacts of this proposal are not clear. This is because neither the 'source' issues (what exactly are the potential contaminants), nor the pathways are well understood. In conclusion, Wessex Water feels obliged to register a holding 'objection' to this proposed development pending appropriate risk assessments, including a detailed Hydrogeological Risk Assessment (HRA) that considers the above concerns as a minimum.	Since the submission of the Scoping Report, the baseline understanding of geological and hydrogeological conditions has been significantly enhanced. This is presented in **ES Volume 3, Appendices 19-1 to 19-8: Phase 1 Desk Studies [EN010168/APP/6.3]**, which includes a detailed Preliminary Risk Assessment (PRA) for the entire Scheme. The PRA considers potential contaminant sources, pathways, and receptors, including the hydrogeological setting and the presence of Source Protection Zones (SPZs). The potential impacts on aquifers, including the Great Oolite and associated SPZs, have been assessed in **ES Volume 1, Chapter 19: Ground Conditions and Contamination [EN010168/APP/6.1]**, with specific reference to Table 19-4, which outlines the identified risks and proposed mitigation measures. To ensure the protection of groundwater resources, including public and private water supplies, a range of mitigation measures will be implemented through the **Outline Construction Environmental Management Plan (CEMP) [EN010168/APP/7.12]**. These include: • Pollution prevention controls and spill response procedures. • Surface water and drainage management to prevent infiltration of contaminants. • Monitoring and contingency planning for unexpected ground conditions. With these measures in place, the potential impacts on groundwater quality and abstraction sources are assessed as not significant.
Wessex Water	Wessex Water Position Statement – Solar Farm Development	PFAS (per and polyfluoroalkyl substances) are a large group of highly fluorinated substances with a carbon backbone, produced since the 1940s and known for their beneficial water/oil-repellent and stain/heat-resistant properties. PFAS are used in a wide-ranging set of applications, including solar panel and battery manufacturing and installation. PFAS are found in the coatings on electrical wires, backing panels, tapes and adhesives, and the main concern is the use in antireflective coatings (ARC) and anti-soil coatings (ASC) to increase solar panel productivity.	PFAS-containing products will not be used on the solar panels. Risks associated with other potential sources of PFAS are considered in the assessments contained within Table 19-4 of **ES Volume 1, Chapter 19 Ground Conditions & Contamination [EN010168/APP/6.1].**
Wessex Water	Wessex Water Position Statement – Solar Farm Development	Due to their extreme persistence in the environment, PFAS have been found in water environments around the world including in the United Kingdom. In line with regulations and guidance, the water industry continues to ensure that PFAS and other similar chemicals are minimised in drinking water. As part of this, we want to work with all stakeholders to tackle PFAS at source and minimise the impact of PFAS on our customers.	As part of the embedded mitigation strategy for the Lime Down Solar Park (LDSP), PFAS-containing products will not be used on the solar panels. This commitment is clearly set out in **ES Volume 1, Chapter 19: Ground Conditions [EN010168/APP/6.1]**. In addition, the potential risks associated with other sources of PFAS contamination have been considered in the risk assessments presented in Table

Consultee	Topic	Matter Raised	Applicant Response
			19-4 of ES Volume 1, Chapter 19. This includes an evaluation of potential contaminant pathways and receptors, including groundwater and drinking water abstractions.
Wessex Water	Wessex Water Position Statement – Solar Farm Development	Wessex Water would like any solar developers to provide documentation verifying that the solar panels and associated electrical equipment used to construct solar parks and battery energy storage facilities do not contain PFAS, including PFOA, PFOS, GenX and PTFE. This will ensure that any risk to the environment, groundwater and drinking water quality is reduced and ultimately protects public health.	All photovoltaic arrays/ panels will be certified as PFAS free, meaning there is no risk of mobilisation of PFAS coatings on the panels being leached or otherwise mobilised and entering ground or surface water. Risks associated with other potential sources of PFAS are considered in the assessments contained within Table 19-4 of **ES Volume 1, Chapter 19 Ground Conditions & Contamination [EN010168/APP/6.1].**
West Berkshire District Council	Comment on the Proposed Development	West Berkshire District Council has no comment on this matter.	The Applicant notes this comment.
Wiltshire Council	Scope of comments	The following comments relate to the built historic environment. It is assumed that related issues such as archaeology and landscape will be dealt with separately by their respective specialists.	Noted.
Wiltshire Council	Policy	From the point of view of the historic environment the main statutory tests are set out within the Planning (Listed Building and Conservation Areas) Act 1990. Section 66 (PP) requires that special regard be given to the desirability of preserving or enhancing listed buildings, their settings or any features of special architectural or historic interest which they possess.	Noted.
Wiltshire Council	Policy	Paragraph 58B of the Planning Act 1990 require that in considering whether to grant planning permission or permission in principle for the development of land in England which affects a registered park and garden, the LPA must have special regard to the desirability of preserving or enhancing the asset or its setting.	The Applicant requires further clarification to respond to this. Is the Council referring to the Town and Country Planning Act 1990? If so, section 58B is not in force yet.
Wiltshire Council	Policy	Section 72(1) of the Planning (Listed Building and Conservation Areas) Act 1990 also requires the Council to pay special attention to the desirability of preserving or enhancing the character or appearance of designated Conservation Areas.	Noted.
Wiltshire Council	Policy	The NPPF outlines government policy, including its policy in respect of the historic environment. Section 16 of the NPPF 'Conserving and enhancing the historic environment' sets out the Government's high-level policies concerning heritage and sustainable development. National Planning Practice Guidance provides guidance on interpreting the NPPF.	Noted.
Wiltshire Council	Policy	The Council's Core Strategy Policy CP58 'Ensuring the conservation of the historic environment' requires that "designated heritage assets and their settings will be conserved, and where appropriate enhanced, in a manner appropriate to their significance." It is also required that distinctive elements of 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.	Noted.
Wiltshire Council	Site and assets considered	As set out within the EIA Scoping Report, Lime Down Solar Park Project which consists of a major electricity generating station comprising of ground mounted solar array sites and 'Associated Development' comprising of Battery Energy Storage System (BESS), grid connection infrastructure and other infrastructure integral to the construction, operation and maintenance, and decommissioning of the Scheme. Sites affected comprise six land parcels referred to as Lime Down A, B, C, D and E, and Land at Melksham Substation. Five of the parcels are located to the north of the village of Hullavington, approximately 800m to the north of the village at the closest location. The sixth parcel, Land at Melksham Substation is located approximately 160m north of the village of Whitley, near the town of Melksham.	**Chapter 2: The Order Limits [EN010168/APP/6.1]** provides an overview of the Order limits and surrounding area. The Order limits presents the maximum extent of land anticipated to be acquired and/or used for the construction, operation and maintenance, and decommissioning phases of the Scheme. This includes the Solar PV Sites, Highway Improvement Areas, Cable Route Corridor, and the Existing National Grid Melksham Substation.

Consultee	Topic	Matter Raised	Applicant Response
Wiltshire Council	Opinion	I am generally content that the suggested scoping is appropriate in respect of the built historic environment. The Main Report and Appendices provide an appropriate summary of the points that will need to be considered in the Environmental Impact Assessment and should lead to a thorough coverage of the important issues.	Noted.
Wiltshire Council	Suggestion	My only suggestion would be that Para 12.2 Legislation, Policy and Guidance should also include consideration of the Historic England Advice Note 15: Commercial Renewable Energy Development and the Historic Environment (2021).	Advice was used to produce the **ES Volume 3, Appendix 12-1: Heritage Statement [EN010168/APP/6.3]** and suggested guidance was added.
Wiltshire Council	Background	Under the Flood and Water Management Act 2010 the LLFA is the responsible 'risk management authority' for managing 'local' flood risk which refers to flood risk from surface water, groundwater and from ordinary watercourses. The LLFA is a statutory consultee for major developments with surface water drainage, under the Town and Country Planning (Development Management Procedure) (England) Order 2015. It is in this capacity this response scoping opinion response is compiled.	The Applicant notes this comment.
Wiltshire Council	Background	It is noted that the EA should also be consulted as part of the scoping of the EIA, such that any requirements they have on modelling the fluvial flood risk, managing water quality, and determining any permit requirements are incorporated.	The Environment Agency has been engaged from the outset of the project, including through the EIA Scoping stage and subsequent technical meetings. Their input has informed the approach to assessing fluvial flood risk, the scope of hydraulic modelling, and the strategy for managing water quality.
Wiltshire Council	Background	Matters concerning surface water flood risk and surface water management, including water quality, are expected to be adequately addressed at the detailed planning application stage. The applicant is expected to consider how surface water will be managed during all construction stages and may wish to consider through EIA opportunities where this can be achieved and managed consistently at each site.	**ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [EN010168/APP/6.1]** includes a detailed assessment of surface water flood risk and surface water management during both construction and operation. **ES Volume 3, Appendix 9-1 to 9-9: FRA and Drainage Strategy EN010168/APP/7.12]** and the **Outline CEMP [EN010168/APP/7.12]** define how surface water will be managed during construction to avoid increased flood risk or pollution, and to ensure consistency across the various site areas. Site-specific Drainage Strategies and Surface Water Management Plans will be developed at the detailed design stage, with further engagement with the LLFA to agree discharge locations, allowable rates, and runoff controls.
Wiltshire Council	Points for inclusion	It is noted that concerns have been raised by Parish Councils on the susceptibility of local villages to combined surface water / groundwater and fluvial flooding, and the EIA should seek to appropriately assess the combined risk of this occurring and demonstrate that the proposals will be appropriate to not increase the risk of flooding elsewhere. In addition to the standard points, we would raise at pre-application stage (included at the bottom of our response below), we would have the following specific points for inclusion in the EIA / disagreements with the Scoping Opinion currently:	The Applicant acknowledges the concerns raised regarding combined flood risk. **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [EN010168/APP/6.1]** assesses flood risk from all sources, including fluvial, surface water, and groundwater, drawing on available Environment Agency data, site-specific topographic and geological information, and NaFRA2 mapping. This assessment takes into account of the potential for combined events where relevant, with specific regard to areas of overlapping susceptibility. Measures included within **ES Volume 3, Appendix 9-1 to 9-9: FRA and Drainage Strategy EN010168/APP/7.12]** and the **Outline CEMP [EN010168/APP/7.12]** ensure that the development does not increase flood risk beyond the application site.
Wiltshire Council	Points for inclusion	It is stated that the site is within FZ2 and FZ3, but the applicant has stated that they will be reliant on the existing EA Flood Maps (including for Surface Water, the RoFSW maps). Given these maps are not suitable for considering site-specific flood risk (by the EA's own disclaimers), and given the sensitivity of the areas in question for flooding, we would expect detailed modelling to be completed using EA Product 6 Data to more accurately define the risk of fluvial flooding in order to feed into the sequential approach.	The Applicant notes the request for detailed fluvial modelling. EA Flood Map for Planning, EA Product 6 data, and the updated NaFRA2 mapping are all being used in combination to inform the Sequential Test. Where EA modelled data is available, it has been applied to define site-specific flood risk and inform layout refinement. Hydraulic modelling has been undertaken where necessary, specifically for the Gauze Brook, in agreement with the EA and LLFA. Given the scale of the site and the location of sensitive infrastructure, the assessment is proportionate and aligned with national guidance. A Sequential Test has been prepared separately using this refined flood risk baseline and is reported in **ES Volume 3, Appendix 9-1 to 9-9: FRA and Drainage Strategy EN010168/APP/7.12]**.

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Wiltshire Council	Points for inclusion	Detailed pluvial (surface water) modelling should be completed using site-specific topographical survey to more accurately define the pluvial flood risk and contribute to the sequential test for the sites. This is important to ensure that all ordinary watercourses, as defined within the Land Drainage Act, are covered by the assessment.	The Applicant acknowledges the importance of understanding surface water flood risk and confirms that site-specific topographical survey data has been used throughout the assessment. The updated National Flood Risk Assessment (NaFRA2) dataset has also been incorporated, which includes improved hydrological inputs, topography, and climate change assumptions. This provides a high-resolution and nationally consistent baseline to assess surface water risk, which is more suitable for strategic scale sites of this nature than undertaking separate isolated hydraulic models for each catchment. This position was supported through engagement with both the Environment Agency (EA) and Wiltshire Council during dedicated consultation meetings in March and May 2025. The EA confirmed that they would not expect blanket hydraulic modelling across the full site, and that appropriate use of available datasets, including EA fluvial modelling and NaFRA2, would be acceptable provided that localised risks to critical infrastructure (e.g. substations or BESS) are addressed through more detailed modelling where necessary. Wiltshire Council also confirmed in the 7 May 2025 meeting that they welcomed the site-specific approach and accepted that detailed surface water modelling may not be required at this stage, provided that the Sequential Test reflects the latest datasets and the site layout avoids high-risk areas. Accordingly, surface water flood risk has been used as a constraint in the development layout. Areas of higher risk have been avoided or safeguarded through elevation and drainage design. Ordinary watercourses have been mapped using a combination of EA open data, local LiDAR, and site walkover information. A Sequential Test has been prepared separately using this refined flood risk baseline and is reported in **ES Volume 3, Appendix 9-1 to 9-9: FRA and Drainage Strategy EN010168/APP/6.3].**
Wiltshire Council	Points for inclusion	Flood risk modelling should assess the combination of flooding (i.e. pluvial + fluvial flooding), in order that the sequential test can be demonstrated appropriately. Wiltshire Council datasets / records should be used as part of this assessment.	The Applicant has assessed the combined risk of surface water and fluvial flooding as part of the site-wide assessment. The Sequential Test presented in **ES Volume 3, Appendix 9-1 to 9-9: FRA and Drainage Strategy EN010168/APP/6.3]** has been informed by both fluvial and surface water flood risk using the latest datasets, including EA modelling, Flood Map for Planning, NaFRA2, and RoFSW, supported by site-specific topographic survey. Relevant Wiltshire Council datasets and locally available flood history records have been reviewed and incorporated where appropriate. It was agreed in discussions with the Council on 7 May 2025 that the Sequential Test should use the most up-to-date and accurate flood risk datasets available, rather than rely solely on isolated modelling exercises. Combined flood mechanisms will be considered in identifying areas to be avoided and in confirming that proposed infrastructure is located in the lowest-risk zones available.
Wiltshire Council	Points for inclusion	It is noted that there are historic issues with groundwater flooding and groundwater levels which will need to be assessed. Groundwater monitoring, to establish the peak seasonal groundwater levels, should be carried out at each of the identified sites for the period of 1 calendar year.	The Applicant confirms that the assessment presented in **ES Volume 3, Appendix 9-1 to 9-9: FRA and Drainage Strategy EN010168/APP/6.3]** incorporates available groundwater flood risk mapping, published geological and hydrogeological data, and any relevant records of past flooding. A full year of monitoring is not considered proportionate given the nature of the Proposed Development. The vast majority of the Development Area comprises solar panels, which are raised above ground level and do not obstruct groundwater flow. No buildings or impermeable structures are proposed in known areas of groundwater emergence. Where infrastructure such as substations or Battery Energy Storage Systems (BESS) is proposed, this will be located and designed to ensure resilience to groundwater variation, drawing on BGS mapping, EA datasets, and local knowledge.

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			This approach has been agreed as appropriate with the Environment Agency and Wiltshire Council during meetings held in March and May 2025, recognising the limited sensitivity of most of the site to groundwater risk and the scale of the development.
Wiltshire Council	Points for inclusion	As part of modelling flood risk, the applicant should provide assessment of any impact to the surrounding catchment area as per the recommendations from Luckington and Alderton Parish Council.	The Applicant confirms that **ES Volume 3, Appendix 9-1 to 9-9: FRA and Drainage Strategy EN010168/APP/6.3]** includes consideration of downstream catchments, including any potentially affected areas identified by Parish Councils. The assessment ensures that the Proposed Development does not increase flood risk elsewhere, in line with the requirements of the National Planning Policy Framework. Given the nature of the Proposed Development and the limited impermeable surfacing, no material increase in surface water runoff is anticipated. As confirmed during discussions with the Environment Agency and Wiltshire Council, modelling will be targeted and proportionate to the sensitivity of each location. Where risk is identified, mitigation will be incorporated to ensure no offsite impacts arise.
Wiltshire Council	Points for inclusion	For the sensitive sites as outlined in 10.4.13, water quality monitoring should be undertaken for (we would suggest) a period of 1 year in order to confirm baseline water quality. The EIA should include a strategy for monitoring water quality at these sites to ensure that there is no detriment, during both construction and the first years of operation.	The Applicant notes this recommendation and has incorporated a proportionate approach to water quality assessment as part of the Environmental Impact Assessment. Sensitive locations have been identified through baseline review and consultation, and these will inform a targeted monitoring strategy. Given the proposed change of use from agriculture to solar generation, the risk of agrichemical runoff will be significantly reduced. The assessment will therefore focus on identifying any residual risks from construction activities or infrastructure such as Battery Energy Storage Systems (BESS). Embedded mitigation measures – including sealed and lined SuDS beneath BESS, spill containment systems, and vegetated buffer zones – will be implemented to minimise the potential for any water quality impacts. Rather than adopting a blanket 12-month monitoring programme, the EIA defines monitoring requirements based on the sensitivity of each location, the nature of identified risks, and the availability of existing baseline data. Where appropriate, additional monitoring commitments will be specified in the **Outline CEMP [EN010168/APP/7.12]** and refined post-consent in consultation with the Environment Agency and the Lead Local Flood Authority.
Wiltshire Council	Points for inclusion	The EIA should include clear plans for how pollution risk, both to receiving watercourses and to groundwater (noting the sensitive nature of aquifers which still contribute to wells in the area) will be managed throughout both the construction and operation phases, so that expert opinion can be consulted. These controls should be detailed and agreed up-front rather than through a CEMP to be provided at a later date. This must include consideration of increased silt / sediment, suspended solids, metals, hydrocarbons and chemicals ingress into both watercourses and groundwater. This should also include prevention of accidental ingress (e.g. chemical spills).	Pollution risk management is addressed in **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [EN010168/APP/6.1]** through embedded design and procedural controls, rather than deferred to the CEMP. This includes consideration of sediment, suspended solids, hydrocarbons, and chemical ingress risks during construction and operation. Control measures will be based on best practice, with BESS infrastructure designed with lined, sealed drainage systems including self-actuating valves, and runoff from panelled areas managed through permeable, vegetated cover. These measures are designed to mitigate the risk of accidental or routine pollution reaching sensitive receptors, including groundwater.
Wiltshire Council	Points for inclusion	Where the applicant intends to cross watercourses, we would expect the methodology to be included in the EIA. Wherever possible we would expect to see trenchless methods used to minimise impact on watercourses.	The Applicant acknowledges this expectation and confirms that trenchless techniques such as HDD will be used where appropriate to reduce potential impacts. **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [EN010168/APP/6.1]** and **ES Volume 3, Appendix 9-1 to 9-9: FRA and Drainage Strategy [EN010168/APP/6.3]** include details regarding watercourse crossings. Where trenchless methods are not suitable, suitable controls are contained within the **Outline CEMP [EN010168/APP/7.12]** to manage environmental risk.
Wiltshire Council	Points for inclusion	The EIA must consider any proposed changes in ground level, as this could result in catchment transfer, increasing the risk of flooding to some watercourses.	No significant changes in ground level are proposed as part of the development. Where minor earthworks are required for access or infrastructure, any potential for catchment transfer will be reviewed as part of the site-specific drainage strategy

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			and informed by detailed topographical data. Measures are included within **ES Volume 3, Appendix 9-1 to 9-9: FRA and Drainage Strategy [EN010168/APP/6.3]** to ensure flood risk is not increased elsewhere.
Wiltshire Council	Points for inclusion	With regard to the proposed surface water drainage strategy specifically:	No response required.
Wiltshire Council	Points for inclusion	A comprehensive scheme to manage surface water runoff from the development must be adopted (WC as the LLFA regards solar panels as impermeable, and managing runoff from the development by gravel tracks and grassland is not considered acceptable).	The Applicant acknowledges the Lead Local Flood Authority's position at the time of this comment. Since then, further engagement has taken place with Wiltshire Council, including meetings held in March and May 2025. Through this dialogue, it was agreed that the approach to surface water drainage would differentiate between panelled areas and built infrastructure. **ES Volume 3, Appendix 9-1 to 9-9: FRA and Drainage Strategy EN010168/APP/6.3]** confirms that attenuation and SuDS are incorporated where appropriate, with drainage design accounting for impermeable infrastructure such as substations, access tracks and BESS locations. For panelled areas, reference has been made to the work of Cook and McCuen (2013), which demonstrates that solar developments over vegetated ground do not lead to increased runoff. This approach has been accepted in principle by Wiltshire Council through ongoing discussions and the agreed methodology. As such, the surface water strategy reflects both best practice and site-specific hydrology, ensuring that runoff is managed without increasing flood risk elsewhere.
Wiltshire Council	Points for inclusion	Management of runoff from the BESS must be included in the scope of the EIA.	The Applicant confirms that runoff from the BESS has been included in **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [EN010168/APP/6.1]** and sets the principles of managing runoff at the BESS, which will include the use of SuDS features designed to attenuate flows and control water quality in line with best practice.
Wiltshire Council	Points for inclusion	In line with Wiltshire Council's betterment strategy, we would expect there to be a minimum 30% betterment provided when compared to existing discharge rates. Long-term storage shall be provided to ensure that there is no increase in surface water discharge volumes compared to the existing greenfield scenario.	The Applicant confirms that the Drainage Strategy presented in **ES Volume 3, Appendix 9-1 to 9-9: FRA and Drainage Strategy EN010168/APP/6.3]** has been developed in accordance with Wiltshire Council's betterment strategy. A minimum 30% reduction in peak runoff rates has been applied to all events from the 1 in 1 year to the 1 in 100 year return period. The volume of runoff from each drainage area has also been assessed to allow no increase above the 1 in 100 year 6-hour greenfield volume, with long-term storage included where necessary to comply with local policy.
Wiltshire Council	Points for inclusion	Overland flows, including exceedance flows, must be safely managed to prevent an increase in flood risk to people and property.	The Applicant confirms that overland flow paths and exceedance routes have been assessed across the site within **ES Volume 3, Appendix 9-1 to 9-9: FRA and Drainage Strategy [EN010168/APP/6.3]** using topographical data and the latest surface water flood mapping. Sensitive infrastructure will be located outside of overland flow routes, and development levels will be set to provide sufficient freeboard where necessary. Where appropriate, exceedance routes will be retained or redirected within the site to ensure no increase in flood risk to people or property on or off site.
Wiltshire Council	Points for inclusion	The strategy must address the risk of channelised flows from the proposed solar panels creating new overland flow routes and locally increasing flood risk. This must include plans for how vegetation will be managed between the solar arrays.	The Applicant has reviewed the potential for concentrated surface water runoff from solar panels to create new overland flow routes. Research, including Cook and McCuen (2013), demonstrates that runoff from panelled areas is comparable to that from grassland, particularly where panels are raised and vegetation is retained. The development involves a change of use from intensively farmed arable land. Such land is typically characterised by compacted soils, limited vegetation cover, shallow-rooted monoculture crops, and regular tracking by heavy machinery. In contrast, the proposed development will introduce permanent managed grassland,

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			which improves infiltration, reduces soil compaction, and enhances surface water attenuation. Vegetation will be retained and actively managed across the site to support diffuse runoff and minimise erosion. These principles will be secured through the CEMP and a long-term land management plan. An **Outline CEMP [EN010168/APP/7.12]** has been submitted as part of the DCO application.
Wiltshire Council	Points for inclusion	Where proposing discharges to ordinary watercourses, the ordinary watercourses must be traced to ensure that there is downstream connectivity and that this is not a ditch with a dead-end for flow.	Downstream connectivity of ordinary watercourses has been confirmed through site-specific topographic assessment and site walkovers, ensuring that any proposed discharge locations connect to active, functional drainage paths.
Wiltshire Council	Points for inclusion	Infiltration testing in accordance with BRE365, and Wiltshire Council's Soakaway Guidance must be undertaken to confirm viability of any proposed soakaway features.	Infiltration testing has been undertaken in line with BRE365 and the Council's Soakaway Guidance at relevant locations to confirm the viability of infiltration-based drainage proposals.
Wiltshire Council	Points for inclusion	It is noted that the applicant intends to utilise unbound / "permeable" materials to form access roads etc. Due to the compaction experienced during construction and operation, these will still represent an increase in impermeability compared to the existing scenario, and as such should be accounted for within calculations of runoff and required attenuation.	Access tracks and similar surfaces have been accounted for as semi-impermeable in runoff calculations to reflect likely compaction. Attenuation has been sized accordingly to ensure a precautionary approach.
Wiltshire Council	Points for inclusion	Our standard requirements for surface water drainage strategies are included below. These should be factored into the EIA in addition to the above specific points.	Wiltshire Council's standard drainage strategy requirements have been reviewed and incorporated into the approach adopted within the EIA and Drainage Strategy presented in **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [EN010168/APP/6.1]** and **ES Volume 3, Appendix 9-1 to 9-9: FRA and Drainage Strategy EN010168/APP/6.3].**
Wiltshire Council	Points for inclusion	Evidence that SuDS have been selected, wherever possible, to provide a wide range of benefits including amenity, biodiversity and maintaining water quality.	SuDS have been selected as part of the Scheme design in accordance with the **Flood Risk Assessment and Drainage Strategy [EN010168/APP/6.3]**. Their primary purpose is to manage surface water and maintain greenfield runoff rates. Where practicable, these measures may also deliver wider benefits such as improving water quality, supporting biodiversity and providing incidental amenity, for example through swales or attenuation basins. The potential for such multifunctional benefits will be considered further at detailed design, subject to site-specific constraints..
Wiltshire Council	Points for inclusion	Evidence that SuDS source control measures to manage water quantity and maintain water quality have been implemented wherever possible and throughout the management train so the development is not reliant upon large attenuation features close to the points of discharge.	The Drainage Strategy presented in **ES Volume 3, Appendix 9-1 to 9-9: FRA and Drainage Strategy EN010168/APP/7.12]** applies source control and treatment train principles wherever viable to manage runoff locally and avoid reliance on single large attenuation features.
Wiltshire Council	Points for inclusion	Existing greenfield runoff rates for the site.	Greenfield runoff rates have been calculated using industry-standard hydrological methods and used to inform allowable discharge rates in line with Wiltshire Council policy.
Wiltshire Council	Points for inclusion	• Post development runoff rates in accordance with Wiltshire Council's betterment policy: - *With regards the control of surface water discharges from new development, Wiltshire Council requires post development discharges from greenfield sites to provide 30% betterment over pre-development discharges for all storm events between the 1 in 1year and 1 in 100year return period events.* *For greenfield development, the runoff volume from the development to any highway drain, sewer or surface water body in the 1 in 100 year, 6 hour rainfall event should never exceed the greenfield runoff volume for the same event.*	The Applicant has applied Wiltshire Council's betterment requirements to areas where formal drainage is proposed, including BESS compounds, substation areas, and internal access tracks. These areas will be designed to discharge at 30% below greenfield rates, and runoff volume will be controlled for the 1 in 100-year, 6-hour event. The panelled areas, which remain vegetated and drain naturally to ground, will not generate increased runoff requiring attenuation.
Wiltshire Council	Points for inclusion	• Evidence demonstrating how the surface water disposal hierarchy has been applied and how all other options have been exhausted. The	The Drainage Strategy presented in **ES Volume 3, Appendix 9-1 to 9-9: FRA and Drainage Strategy EN010168/APP/6.3]** follows the surface water disposal hierarchy. For the vast majority of the site, including all panelled areas, surface

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		hierarchy is set out below (as per the Sewerage Sector Guidance, paragraph C.3.12): - Surface water runoff is collected for use. - Discharge into the ground via infiltration. - Discharge to a watercourse or other surface water body. - Discharge to surface water sewer or other drainage system, discharging to a watercourse or other surface water body. Discharge to a combined sewer.	water will infiltrate naturally into the ground via grassed vegetation. Where infiltration is unviable due to local ground conditions or infrastructure sensitivity (e.g. BESS compounds), discharge to watercourses at controlled rates is proposed. No connections to sewers are proposed.
Wiltshire Council	Points for inclusion	The drainage strategy does not increase flood risk, as a result of catchment transfer.	The Drainage Strategy presented in **ES Volume 3, Appendix 9-1 to 9-9: FRA and Drainage Strategy EN010168/APP/6.3]** has been developed to ensure no catchment transfer occurs. Drainage catchments have been reviewed to ensure discharges occur to the same downstream flow paths as existing. Panelled areas retain existing flow directions and drainage characteristics.
Wiltshire Council	Points for inclusion	A detailed plan showing the existing drainage features on the site and how the proposed drainage strategy will be implemented.	**ES Volume 3, Appendix 9-1 to 9-9: FRA and Drainage Strategy EN010168/APP/6.3]** includes plans showing the location of existing watercourses, ditches, and site-specific drainage features. Overlays of proposed attenuation features and outfalls from the formal drainage areas are also provided, with explanatory text on drainage implementation principles.
Wiltshire Council	Points for inclusion	If infiltration is proposed, it is implemented in manner that does not create an offsite impact, particularly if there are reports of groundwater flooding in the area.	Infiltration will only be used in locations where ground conditions are suitable and where no risk of offsite impact is identified. Panelled areas drain naturally via infiltration, and infiltration testing will be undertaken for any formal drainage proposals to ensure that infiltration features are appropriately sited and designed.
Wiltshire Council	Points for inclusion	Surface water can be safely managed within the proposed development, up to and including a 1 in 100 year plus climate change event.	For areas with formal drainage, attenuation will be provided to manage the 1 in 100-year plus 45% climate change rainfall event. Exceedance routing will be incorporated to ensure no increase in risk to downstream receptors. Panelled areas do not require attenuation given their natural vegetated drainage characteristics.
Wiltshire Council	Points for inclusion	Existing flood flow routes through the site have been maintained or where they will be affected, adequate measures to intercept and safely control flows through the site have been provided to ensure flood risk is not increased elsewhere.	Flood flow routes have been identified using site topography and EA mapping. The layout has been designed to avoid interfering with these flow paths, particularly in panelled areas which are permeable and raised. Where infrastructure intersects identified flow routes, appropriate culverts or open channels will be incorporated.
Wiltshire Council	Points for inclusion	All proposed drainage features are outside flood zones 2 and 3 and where they are adjacent to an ordinary watercourse, they are not located within the EA surface water flood maps. Where drainage features are located adjacent to flood zones 2 and 3, they must be above the 1 in 100 year plus climate change flood level. This information can be provided by the EA.	All formal drainage features have been located outside Flood Zones 2 and 3 wherever practicable. Where located adjacent to flood risk areas, invert and outfall levels will be set above the 1 in 100-year plus climate change flood level, using EA and site survey data.
Wiltshire Council	Points for inclusion	The strategy mimics the existing drainage characteristics of the site by retaining and utilising any existing drainage features.	**ES Volume 3, Appendix 9-1 to 9-9: FRA and Drainage Strategy EN010168/APP/7.12]** has been developed to mimic existing conditions. Surface water from panelled areas will continue to drain to ground across grassed strips and ditches. Where drainage is formalised, outfalls are directed to existing watercourses with appropriate controls in place.
Wiltshire Council	Points for inclusion	Measures to prevent pollution of the receiving groundwater and/or surface waters.	Pollution prevention measures are embedded within **ES Volume 3, Appendix 9-1 to 9-9: FRA and Drainage Strategy EN010168/APP/6.3]** for all areas with formal drainage. This includes lined subbases beneath BESS areas, sediment control, and isolation valves where required. The change in land use from agriculture to solar panels will reduce the risk of pesticide and fertiliser runoff from the wider site.

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Wiltshire Council	Points for inclusion	A clearly labelled drainage layout plan showing the pipe networks and any attenuation ponds. The plan should show any pipe node numbers referred to within the drainage calculations.	Drainage layout plans with clear labelling of all formal drainage elements are included within **ES Volume 3, Appendix 9-1 to 9-9: FRA and Drainage Strategy EN010168/APP/6.3].** These plans include node references matching hydraulic calculations and clearly illustrate pipe routes, attenuation features, and discharge locations.
Wiltshire Council	Points for inclusion	Geotechnical factual and interpretive reports, including infiltration tests in accordance with British Research Establishment (BRE) Digest 365 – Soakaway Design.	Infiltration testing has been undertaken at Lime Down D in accordance with BRE 365 (reported in the **Flood Risk Assessment and Drainage Strategy – Lime Down D [EN010168/APP/6.3]**). Results showed negligible infiltration and confirmed that infiltration systems are not suitable for managing surface water in these areas. This conclusion is consistent with the wider hydrogeological baseline reported in **ES Chapter 19: Ground Conditions [EN010168/APP/6.1]**, which identifies shallow groundwater across all sites, typically perched on low permeability clays, with measured depths often within 0.5–5 m below ground level. Several sites also lie within Source Protection Zones. Given these conditions, infiltration drainage is not appropriate for substation and BESS areas where there is a higher pollution risk and a need to protect sensitive aquifers. The adopted strategy is therefore based on attenuation and controlled discharge to existing watercourses at greenfield rates, which is robust and precautionary. For the wider solar PV areas, land use will change from intensive arable farming to managed grassland beneath panels, which is expected to improve soil structure and permeability relative to baseline, supporting diffuse infiltration and reducing runoff generation without the need for formal soakaway systems.
Wiltshire Council	Points for inclusion	Groundwater level monitoring (taking into account seasonal variations).	Baseline groundwater conditions have been characterised in **ES Chapter 19: Ground Conditions [EN010168/APP/6.1]**, drawing on BGS and Environment Agency datasets. These confirm that shallow groundwater is typical across the Scheme, with perched water above low permeability horizons and recorded groundwater depths of 0.025–5 m below ground level in some areas. The presence of Secondary A aquifers and Source Protection Zones reinforces the need for a sealed drainage approach for substation and BESS infrastructure. Seasonal groundwater monitoring will be undertaken as part of the post-consent ground investigation programme, secured via the **Outline CEMP [EN010168/APP/7.12]**, to inform detailed foundation and drainage design. This ensures that seasonal variation is captured before construction commences, while avoiding disproportionate duplication at this stage.
Wiltshire Council	Points for inclusion	The applicant is referred to Wiltshire Council's Surface Water Soakaway Guidance for the standards that must be met for planning approval and adoption of infiltration drainage features.	The overall drainage strategy, as reported in the **Flood Risk Assessment and Drainage Strategy [EN010168/APP/6.3]**, does not rely on infiltration systems, reflecting the shallow groundwater conditions and pollution risks to sensitive aquifers identified in **ES Chapter 19: Ground Conditions [EN010168/APP/6.1]**. Instead, attenuation SuDS with restricted discharge to existing watercourses at greenfield rates are proposed, which is both precautionary and deliverable. Where detailed site investigation identifies isolated areas with viable infiltration potential, any localised infiltration features will be designed in accordance with Wiltshire Council's Soakaway Guidance. However, given the confirmed shallow groundwater conditions across the sites and the presence of SPZs, reliance on soakaway-based drainage is not considered appropriate for the scheme.
Wiltshire Council	Points for inclusion	Calculations and drawings for the drainage system design showing designated holding areas and conveyance routes based on no flooding on site for a 1 in 30 year plus climate change rainfall event.	**The Flood Risk Assessment and Drainage Strategy [EN010168/APP/6.3]** includes calculations and design drawings demonstrating that all areas with formal drainage proposals (such as access tracks, the BESS and substations) will be managed to ensure no onsite flooding during the 1 in 30 year plus climate change

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			event. Panelled areas are not proposed to include formal drainage, with grassland beneath and between arrays maintained to support infiltration and diffuse runoff management.
Wiltshire Council	Points for inclusion	Calculations and drawings for the drainage system design showing designated holding areas and conveyance routes based on no flooding on site for a 1 in 100 year plus climate change rainfall event in respect to a building (including basement) or utility plant susceptible to water within the development.	The **Flood Risk Assessment and Drainage Strategy [EN010168/APP/6.3]** confirms that all sensitive infrastructure, including the BESS and substations, will be located outside identified flood risk areas. Drainage features are designed to ensure no flooding occurs during the 1 in 100 year plus 45% climate change event. Finished levels will be raised above local ground levels to provide further resilience.
Wiltshire Council	Points for inclusion	Calculations should include an allowance for increased surface water runoff, as a result of urban creep, in accordance with LASOO guidance.	The Flood Risk Assessment and Drainage Strategy [EN010168/APP/6.3] explains that, given the nature of the Proposed Development, which comprises low-intensity solar infrastructure and extensive permeable grassland, urban creep is not applicable. Areas with formal drainage comprise fixed footprints that will not intensify post-consent.
Wiltshire Council	Points for inclusion	Hydraulic Models should set the MADD factor / additional storage volume factor to 0m3 / ha in order to prevent an overestimation of storage capacity in the proposed drainage network.	Where formal drainage is proposed, the Flood Risk Assessment and Drainage Strategy [EN010168/APP/6.3] confirms that hydraulic modelling and attenuation sizing assume no additional storage through depression storage (MADD = 0 m³/ha), in line with best practice
Wiltshire Council	Points for inclusion	If the drainage model includes runoff from the full site (both permeable and impermeable areas), the default Cv values of 0.75 (summer) and 0.84 (winter) may be used. If runoff is only included from impermeable catchment areas within the drainage model, a Cv value of 1 must be used.	The Flood Risk Assessment and Drainage Strategy [EN010168/APP/6.3] applies Cv values in accordance with Wiltshire Council guidance. A Cv of 1 is applied to impermeable catchments such as roofs and compounds, while greenfield Cv values are applied where natural infiltration is expected, such as panelled grassland.
Wiltshire Council	Points for inclusion	If attenuation tanks are proposed that an allowance for reduced attenuation volume due to silt ingress (as per Section 21.9.9 of the SuDS Manual CIRIA C753)	Where attenuation tanks are proposed, the Flood Risk Assessment and Drainage Strategy [EN010168/APP/6.3] notes that final detailed design will include an allowance for reduced storage volume due to siltation, consistent with CIRIA C753. This will be confirmed at detailed design stage.
Wiltshire Council	Points for inclusion	A plan showing the cross sections and design of any attenuation pond and its components.	Plans showing cross sections and component design of attenuation features will be prepared at detailed design stage and submitted for approval in line with the Flood Risk Assessment and Drainage Strategy [EN010168/APP/6.3].
Wiltshire Council	Points for inclusion	Drawings showing conveyance routes for flows exceeding the 1 in 100 year plus climate change rainfall event that minimise the risk to people and property.	**ES Volume 3, Appendix 9-1 to 9-9: FRA and Drainage Strategy EN010168/APP/7.12]** includes flow routing plans for exceedance events, based on the 1 in 100 year plus climate change scenario, ensuring safe management of surface water without increasing flood risk to people or property.
Wiltshire Council	Points for inclusion	Consent for any outfalls from the proposed drainage systems into a public sewer or other drainage system not owned by the applicant.	Any required outfalls into third-party drainage systems or public sewers will be confirmed with the relevant authority, and the necessary consents will be secured prior to construction, as noted in the **Flood Risk Assessment and Drainage Strategy [EN010168/APP/6.3].**
Wiltshire Council	Points for inclusion	Details of how the proposed and existing drainage features on the site will be maintained and managed after completion with confirmation from the relevant authority that they will adopt any systems that are being offered for adoption.	A maintenance strategy will be prepared for all drainage features in accordance with the **Flood Risk Assessment and Drainage Strategy [EN010168/APP/6.3]** and the **Outline Operational Environmental Management Plan [EN010168/APP/7.13].** No third-party adoption is currently proposed, with systems managed by the operator in line with an agreed long-term maintenance schedule.
Wiltshire Council	Points for inclusion	Adequate measures during construction to control pollution to existing watercourses and groundwater.	Pollution control measures will be secured through the **Outline Construction Environmental Management Plan [EN010168/APP/7.12],** including controls to prevent sediment-laden runoff, accidental spillages and mobilisation of contaminants, particularly near watercourses or areas of groundwater vulnerability, as identified in the **Flood Risk Assessment and Drainage Strategy [EN010168/APP/6.3].**

Consultee	Topic	Matter Raised	Applicant Response
Wiltshire Council	Introductory text	The proposals comprise the development of a series of Solar Arrays within Lime Down A to E, a number of 33kV and 132kV substations located within the Solar Array sites, a BESS (Battery Energy Storage Solution), up to two 400kV substations, and interconnecting cables. The point of connection for the Scheme to the National Grid is at the existing 400kV Melksham Substation located approximately 600m the north of the village of Melksham. The Scheme will be linked to Melksham Substation via underground cables within a Cable Route Corridor. The proposed location of the Cable Route Corridor within the Cable Route Search Corridor is under consideration and will be refined through environmental assessments, landowner negotiations and consultation input.	**Chapter 3: The Scheme [EN010168/APP/6.1]** describes the principal components of the Scheme and the design parameters used. This includes the Cable Route Corridor between Lime Down D and the Existing Melksham Substation.
Wiltshire Council	Introductory text	The solar arrays at sites Lime Down A-E are located to the north and east of the village of Hullavington, north of the M4 corridor. The sites predominantly consist of arable land bound by hedgerows and trees. Public rights of way cross each site and Lime Down C and E are intersected by the Great Western Railway line. The Gauze Brook runs through Lime Down D and Gabriel's Well watercourse runs through Lime Down E. Although the sites consist mainly of arable fields, they support some habitats of ecological value to local wildlife, contributing to habitat connectivity with the wider landscape area, providing function for commuting and foraging by a range of species, via hedgerows, trees and grass margins.	The Applicant notes this comment. **ES Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1]. Section 9.7** outlines the baseline conditions, including habitats within the study area.
Wiltshire Council	Designated sites	The site is not within any areas designated for nature conservation, however Lime Down E is located immediately adjacent to Harries Ground, Rodbourne SSSI which comprises a species-rich neutral grassland which supports a population of marsh fritillary butterflies.	The Applicant notes this comment. **ES Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1]. Section 9.7** outlines the baseline conditions, including designations within the study area.
Wiltshire Council	Designated sites	There are no internationally designated sites within 10km of Lime Down A-E. The Bath and Bradford on Avon Bats SAC is located within 10km of the Melksham sub-station site and the proposed cable route corridor.	The Applicant notes this comment. **ES Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1]. Section 9.7** outlines the baseline conditions, including designations within the study area.
Wiltshire Council	Designated sites	There are several internationally designated sites within 30km of Lime Down A-E, the Melksham Sub Station and the proposed cable route corridor. Those with qualifying mobile species, i.e. bats and/or birds, within 30km of the sites are: • Severn Estuary SPA and Ramsar site, • Salisbury Plain SPA, • Mells Valley SAC, and Bath and Bradford on Avon Bats SAC.	The Applicant notes this comment. **ES Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1]. Section 9.7** outlines the baseline conditions, including designations within the study area.
Wiltshire Council	Designated sites	The EIA Scoping Report does not refer to the cable route potentially running through several greater horseshoe bat and Bechstein's bat consultation zones associated with the Bath and Bradford on Avon Bats SAC in the Corsham and Chippenham area, or specifically that these areas would be avoided. The Bechstein's consultation zones are associated with three core roosts that have been identified since the publication of the Bat SAC Planning Guidance for Wiltshire, 2015. Development within these areas has the potential to disturb bats and damage and disturb habitats functionally linked to the core roosts and therefore has the potential to adversely affect the integrity of the SAC. Any proposed development within these core areas must therefore be subject to an appropriate assessment which concludes no adverse effect on the SAC alone or in-combination with other plans or projects, in order to be authorised.	The Applicant notes this comment. Parts of the Cable Route Corridor and Highway Improvement Areas do lie within the bat consultation zones. A **Habitats Regulations Assessment (HRA) Report [EN010168/APP/7.10]** has been completed for the Scheme, considering potential impacts on the Bath and Bradford on Avon Bats SAC, which concludes no adverse effect on implementation of adequate embedded and additional mitigation measures. A full assessment of potential impacts of the Scheme on bats is provided within **ES Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1].**
Wiltshire Council	Designated sites	There are an additional four SSSI's within 5km of Lime Down A-E and the Melksham Sub Station: • Stanton St Quinton Quarry and motorway Cutting SSSI; • Sutton Lane Meadows SSSI; • Corsham Railway Cutting SSSI; and	The Applicant notes this comment. **ES Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1]. Section 9.7** outlines the baseline conditions, including designations within the study area.

Consultee	Topic	Matter Raised	Applicant Response
		Box Mine SSSI.	
Wiltshire Council	Designated sites	A further 11 SSSI's were identified within 5km of the cable route corridor.	The Applicant notes this comment. **ES Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1]. Section 9.7** outlines the baseline conditions, including designations within the study area.
Wiltshire Council	Designated sites	Corston Quarry and Pond Local Nature Reserve (LNR) and Conygre Mead LNR are located approximately 1km and 4km respectively from Lime Down D. There are a number of local non-statutory designated sites within 2km of Lime Down A-E, the Melksham Sub-station and the proposed cable route corridor. There are several areas of priority habitat (listed under Section 41 of the NERC Act 2006) within and adjacent to Lime Down A-E and the cable route including hedgerows and areas of lowland calcareous grassland, deciduous woodland, running water and lowland meadows.	The Applicant notes this comment. **ES Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1]. Section 9.7** outlines the baseline conditions, including designations and priority habitat within the study area.
Wiltshire Council	PEA	The EIA Scoping Report states that a Preliminary Ecological Appraisal has been undertaken, although this has not been appended to the EIA Scoping Report, and that species surveys have commenced. The EIA Scoping Report is proposing to scope in the following impacts and ecological receptors: • Impacts of Electric and Magnetic Fields (EMFs) on aquatic species from the primary cable route; • Bath and Bradford on Avon Bats SAC; • National Statutorily Designated Sites within 5km of the Site; • Local Statutory and Non-Statutory Designated Sites within 2km of the Site; • Habitats of Principal Importance and Local Priority Habitats; • Badgers; • Bats; • Otters and water voles; • Dormice; • Other mammals – brown hare, harvest mice, hedgehog and polecat; • Amphibians including great crested newts; • Reptiles; • Breeding and wintering birds (further wintering bird surveys have been scoped out for the Melksham Sub Station site); • Invertebrates; • Plants; • Fish; and Invasive and non-native species.	The Applicant notes this comment. **ES Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1]. Section 9.7** outlines the baseline conditions, including designations, priority habitat and species within the study area.
Wiltshire Council	Habitats	Due to suitable habitat on the sites for dormice, reptiles and invertebrates being limited to field margins, hedgerow bases and hedgerows which will be predominantly retained, targeted surveys for these species are not proposed. It is noted that sufficient information to assess whether the proposal will have an adverse effect on these protected species will be required.	The Applicant notes this comment. **ES Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1]. Section 9.10** provides an assessment of likely impacts and effects on dormice, reptiles and invertebrates.
Wiltshire Council	Ecological Receptors	The following impacts and ecological receptors have been scoped out of the assessment: • Impacts of EMFs on terrestrial species, and impacts of EMFs resulting from cables within the Sites and interconnecting cables; • Severn Estuary SAC, SPA and Ramsar;	The Applicant notes this comment.. **ES Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1] Table 9-1** outlines the impacts and ecological receptors which have been scoped into the assessment.

Consultee	Topic	Matter Raised	Applicant Response
		• Salisbury Plain SAC and SPA; • Mells Valley SAC. and National Statutorily Designated Sites within 5km of the Site, designated solely for geological interest.	
Wiltshire Council	Response	Overall, we agree with the scope of the biodiversity assessment proposed in Chapter 8 Ecology and Biodiversity however, the EIA Scoping Report does not consider the potential for impacts on beavers. There is a beaver record approximately 3.9km to the north east of Lime Down D on the River Avon. The Gauze Brook runs through Lime Down D and Gabriel's Well runs through Lime Down E, both are tributaries of the River Avon. There are also beaver records on the River Avon within close proximity of the proposed cable route corridor with several tributaries of the river crossing the corridor. There is the potential for impacts on beavers from disturbance or damage or destruction of habitat, including resting sites, during construction operation and decommissioning and therefore it is considered that beavers should be included within the scope of the EIA.	The Applicant notes this comment. Beavers have been scoped into the assessment within **ES Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1]**
Wiltshire Council	Wiltshire Council specialist consultee comment	It is noted that the cable route corridor has yet to be determined and that three corridors were being considered. Does the granting of a DCO usurp Wiltshire Councils powers to control the construction of Construction Vehicle Accesses? Each access point, once determined for the sites and the cable route need to be accessed on their own, individual merits; Just stating that they'd be designed to the Design Manual for Roads and Bridges (13.3.40) should not usurp our valuable input to an individual access point and agree a bespoke specification from a local knowledge and expertise point of view	Construction vehicle movements and accesses will be controlled through a CTMP which will be in substantial accord with the **Outline CTMP [EN010168/APP/7.22]** and is secured under a requirement of the **Draft DCO [EN010168/APP/3.1]**. Wiltshire Council will have the ability to review and approve the CTMP prior to construction commencing.
Wiltshire Council	Wiltshire Council specialist consultee comment	13.3.37 – The outlined CTMP will be critical once the route has been determined and each crossing point and access point will have to looked at on an individual basis so how do we input to that?	
Wiltshire Council	Wiltshire Council specialist consultee comment	13.4.26 – This is too vague and broad, so any possible DCO would have to be very much tied down to ensure due diligence, engagement and adherence to WC's concerns on individual site accesses and road crossings are actioned.	
Wiltshire Council	Wiltshire Council specialist consultee comment	13.3.30 to 13.3.40 - Construction Vehicle Access Points – we'd need to see detail designs for all new and altered access points and agree specifications and sight lines/appropriate TM depending on the speed of the road and it's usage.	Access Drawings are provided in **ES Volume 3, Appendix 13-1: Transport Assessment [EN010168/APP/6.3]**, including sight lines and traffic management proposals. Wiltshire Council will have approval powers for Detailed Design drawings through the CTMP which is be a requirement of the **Draft DCO [EN010168/APP/3.1]**.
Wiltshire Council	Wiltshire Council specialist consultee comment	13.3.30 to 13.3.40 - Will any of these accesses be decommissioned after the construction phase?	Temporary and permanent accesses are set out within **ES Volume 1, Chapter 13: Transport and Access [EN010168/APP/6.1]**. Generally, access associated with the Solar PV Sites would be permanent, whilst those associated with the Cable Route Corridor are temporary to the construction phase.
Wiltshire Council	Wiltshire Council specialist consultee comment	Where can I find the "ES Transport and Access Chapter" to comment on?	An ES chapter assessing transport and access was not available at the EIA Scoping stage. This now forms part of the DCO submission as **ES Volume 1, Chapter 13: Transport and Access [EN010168/APP/6.1]**.
Wiltshire Council	Wiltshire Council specialist consultee comment	3.3.20 to 13.3.20 – There are major works planned on the A350 to reconfigure the Bumpers Roundabout and dual from their southwards on the A350 to Laycock, so any construction near there would need to be planned and coordinated very carefully	Since the EIA Scoping and PEIR stage, the Cable Route Search Corridor has been refined into a Cable Route Corridor which has been assessed in the ES. The A350 is no longer being considered as part of the Cable Route Corridor.
Wiltshire Council	Wiltshire Council specialist consultee comment	Any contractor working on or near our network would have to comply to Wiltshire Highways Permitting Scheme	Construction vehicle movements and accesses will be controlled through a CTMP which will be in substantial accord with the **Outline CTMP [EN010168/APP/7.22]** and is secured under a requirement of the **Draft DCO [EN010168/APP/3.1]**.

Consultee	Topic	Matter Raised	Applicant Response
			Wiltshire Council will have the ability to review and approve the final CTMP prior to construction commencing.
Wiltshire Council	Wiltshire Council specialist consultee comment	It is noted that the cable width is a maximum of 50 metres wide; With this in mind, we would want any crossing point of our network to be default horizontally directionally drilled. Open cut and road closures would be the last resort and the road reconstructed to our specifications.	Not all road crossing will be horizontally directionally drilled. Where open cut cable works are undertaken, suitable traffic management will be put in place and the road will be reconstructed to Wiltshire Council's specifications.
Wiltshire Council	Wiltshire Council specialist consultee comment	The arboricultural plans do not show the TPO in Whitley. This should be a consideration for this application, however it is acknowledged that the document may have been prepared prior to the TPO being served.	New desk-based searches have been completed to inform the baseline arboricultural conditions of the study area for the ES. Any new records and relevant constraints have been fully considered as part of the impact assessment. Details of all TPO records relevant to the Scheme are included at section 10.7 of **ES Volume 1, Chapter 10: Arboriculture [EN010168/APP/6.1].** The TPO at Whitley on land at Melksham substation no longer forms part of the Scheme and therefore has not formed part of the assessment.
Wiltshire Council	Wiltshire Council specialist consultee comment	It is acknowledged that embedded mitigation of the design may avoid impacts on trees and hedgerows in relation to the solar arrays and associated works at locations A-C, part of D, and E.	This is noted by the Applicant.
Wiltshire Council	Wiltshire Council specialist consultee comment	Presuming the contrasting level of infrastructure required for the battery storage facilities within location D and land at Melksham Substation, consideration within the ES is required due to the potential significant impact on protected and unprotected trees and hedgerows.	The iterative constraints led design and embedded mitigation hierarchy described at **ES Volume 1, Chapter 10: Arboriculture [EN010168/APP/6.1]** addresses concerns raised over development intensity in specific areas. Anticipated impacts to all relevant arboricultural features are detailed in the ES. Land at Melksham substation no longer forms part of the Scheme.
Wiltshire Council	Wiltshire Council specialist consultee comment	Wiltshire Council Archaeology Service (WCAS) requires that a detailed Chapter on Cultural Heritage is included in the EIA submitted for this proposed development. We therefore welcome the clear statement in the Scoping Document that the developers intend that cultural heritage is included in a future Environmental Statement. It is WCAS policy for all solar farm developments to have been subjected to a full archaeological field evaluation (including remote sensing and trial trenching) prior to the determination of a planning application and for the results to be included in the Environmental Statement, and we see no reason why this proposal should not be treated any differently. WCAS are therefore pleased to note that the Scoping Document makes a commitment to include the results of geophysical surveys and trial trench evaluations of Areas A-E and the Melksham Substation Site within a future Environmetal Statement (Section 12.3). We will then be in a position to offer a fully informed assessment on the likely impact of the proposals upon the archaeological resource. Some geophysical surveys have already been carried out in Areas A-E and the preliminary results suggest a number of concentrations of later prehistoric and Romano-British activity, especially along the former route of the Fosse Way Roman road that once ran between Exeter and Lincoln. Some of these sites may be of high (national) significance (although trial trenching will need to be carried out in order to confirm this) and so I would also advise that the Inspector of Monuments for Historic England is consulted on this application as soon as possible, in order to obtain their assessment on the possible impacts of the proposed development on any archaeological remains of national importance.	Noted. **ES Volume 1, Chapter 12: Cultural Heritage [EN010168/APP/6.1],** supported by appendices in Volume 3 (12.1 to 12.6) has assessed the potential impact of the scheme on identified archaeological and built heritage assets, and where required appropriate mitigation is proposed (see ES Volume 3 Appendix 12.6 Archaeological Mitigation Strategy (EN010168/APP/6.3). Geophysical survey **(see ES Volume 3, Appendix 12-4: Geophysical Survey [EN010168/APP/6.3]) was tested by evaluation trial trenching (see ES Volume 3, Appendix 12-5: Interim Evaluation Trial Trenching Reports [EN010168/APP/6.3])** and was proven to be a reliable source of information. The results of the fieldwork were used to inform the **ES Volume 1, Chapter 12: Cultural Heritage [EN010168/APP/6.1].** See **Section 12.6** of **ES Volume 1, Chapter 12: Cultural Heritage [EN010168/APP/6.1]** regarding assessment methodology and **Section 12.7** regarding baseline information. Engagement has been undertaken with Historic England, outlined in Table 12-2 of **ES Volume 1, Chapter 12: Cultural Heritage [EN010168/APP/6.1],** Currently awaiting a response from the Inspector of Monuments for Historic England regarding the Pillow mound 280m south west of Surrendell Farm (NHLE 1018610).
Wiltshire Council	Wiltshire Council specialist consultee comment	As introduction the Climate Team established a planning consultation service as recently as the end of 2023. Given the resources available then and the planning policy context, it was determined that we would focus on pre-application and planning applications for 'majors', renewable energy generation and Reg3. We have not been responding to EIA screening or scoping requests as part of our BAU. I provide these observations here as we do not have access to Arcus.	No comment required.

Consultee	Topic	Matter Raised	Applicant Response
Wiltshire Council	Wiltshire Council specialist consultee comment	Nonetheless, I have been asked to provide a response to this EIA scoping request on a NSIP proposal where Wiltshire Council is a consultee. I am pleased to have this opportunity to comment on the climate change section of the Scoping Report (pp49-56) over and above the existing BAU climate team's planning consultation service.	No comment required.
Wiltshire Council	Wiltshire Council specialist consultee comment	6.1 and 6.2 provide reasonable context, it's pleasing to see reference to mitigation and adaptation of climate change. The Carbon Neutral Council plan (ref: 207) is unlikely to be of relevance here though, rather more relevant is the outward-facing delivery plan for the whole county of Wiltshire "Climate Strategy Delivery Plan for Wiltshire". https://www.wiltshire.gov.uk/media/9878/Climate-Strategy-Delivery-Plan-for-Wiltshire-September-2022/pdf/Climate-Strategy-Delivery-Plan-County_Sept22.pdf?m=1663344224697.	**ES Volume 1, Chapter 7: Climate Change [EN010168/APP/6.1]** includes a reference to the outward facing delivery plan for the whole county of Wiltshire "Climate Strategy Delivery Plan for Wiltshire" (Paragraph 7.3.38).
Wiltshire Council	Wiltshire Council specialist consultee comment	6.3.5 I would suggest it is relevant to also compare the whole life estimated GHG emissions against a BAU scenario. The BAU might be considered a continuation of current uses at the Sites - as agreed with others, but current described as "predominantly arable land and managed trees". In order to consider climate commitments made by Wiltshire Council I suggest reference to the outward-facing delivery plan for the whole county of Wiltshire "Climate Strategy Delivery Plan for Wiltshire" (as above).	The future baseline has been assessed in **ES Volume 1, Chapter 7: Climate Change [EN010168/APP/6.1].** The ES includes the comparison with the Business As Usual (BAU) scenario (see Paragraphs 7.7.2 to 7.7.7). **ES Volume 1, Chapter 7: Climate Change [EN010168/APP/6.1]** includes a reference to the outward facing delivery plan for the whole county of Wiltshire "Climate Strategy Delivery Plan for Wiltshire" (Paragraph 7.3.38).
Wiltshire Council	Wiltshire Council specialist consultee comment	6.3.7 I think it is important to note here that the science for predicting the impacts on climate change is more contentious than whether climate change is happening. The latter is arguably irrefutable, but the former is still a matter of debate. For example the UN refers to a 2.9oC rise by 2100 based on Paris Agreement requirements (https://www.unep.org/resources/emissions-gap-report-2023).	The climate change assessment is based on the latest guidance and legislative frameworks, which are comprehensively detailed in section 7.3. The methodology follows current scientific and regulatory standards, providing a robust and transparent evaluation of potential climate change impacts. **ES Volume 1, Chapter 7: Climate Change [EN010168/APP/6.1]**
Wiltshire Council	Wiltshire Council specialist consultee comment	6.4.2 Think they mean 'embodied' rather than 'embedded'. Otherwise agreed.	This has been corrected within **ES Volume 1, Chapter 7: Climate Change [EN010168/APP/6.1].**
Wiltshire Council	Wiltshire Council specialist consultee comment	6.4.6 The climate team can offer policy advice and 'common-sense' checks on carbon assessment and potential sources of carbon only. That in mind, the Table 6.1 appears reasonable generally but suggest inclusion of processing/recycling/disposal of waste materials in the Decommissioning Stage as well as Water Use. But given the method of assessment is still yet to be finalised it might be prudent to respond here to say that final judgement on the detail of what is to be included shall be reserved because we might need to secure expert services to review any assessment.	Water Use, Waste, and removal of onsite products and materials are included within the decommissioning phase assessment in paragraphs 7.10.82 to 7.10.84. Processing/recycling/disposal of waste has been assessed in Section 20.4 Materials and Waste. **ES Volume 1, Chapter 7: Climate Change [EN010168/APP/6.1].**
Wiltshire Council	Wiltshire Council specialist consultee comment	6.4.13 Climate change is acknowledged to be a cross cutting issue in development and it is agreed that it should be addressed in technical detail within relevant sections e.g. precipitation within drainage. However, it is important that the Climate Change chapter provides non-technical summaries as indicated within Table 6.2.	The **Non-Technical Summary [EN010168/APP/6.4]** includes a summary of the Climate Change chapter in non-technical language.
Wiltshire Council	Wiltshire Council specialist consultee comment	6.4.14 Additional factors that could be included at Table 6.2 are Air Quality and Wildfires.	**ES Volume 1, Chapter 7: Climate Change [EN010168/APP/6.1]** considers the impacts of wildfires and concludes no significant effects after mitigation. Air Quality is considered in **ES Volume 1, Chapter 15: Air Quality [EN010168/APP/6.1]**
Wiltshire Council	Wiltshire Council specialist consultee comment	6.4.15 As above could include reduced Air Quality and increased risk of Wildfires.	**ES Volume 1, Chapter 7: Climate Change [EN010168/APP/6.1]** considers the impacts of wildfires and concludes no significant effects after mitigation. Air Quality is considered in **ES Volume 1, Chapter 15: Air Quality [EN010168/APP/6.1]**
Wiltshire Council	Wiltshire Council specialist consultee comment	6.4.18 As above could include reduced Air Quality and increased risk of Wildfires at Table 6.3	**ES Volume 1, Chapter 7: Climate Change [EN010168/APP/6.1]** considers the impacts of wildfires and concludes no significant effects after mitigation. Air

Consultee	Topic	Matter Raised	Applicant Response
			Quality is considered in **ES Volume 1, Chapter 15: Air Quality [EN010168/APP/6.1]**
Wiltshire Council	Wiltshire Council specialist consultee comment	6.5 The Assumptions and Limitations are noted and appear reasonable.	Noted.
Wiltshire Council	Wiltshire Council specialist consultee comment	6.6 The conclusion section needs to be updated to reflect above comments, but agree with 6.6.3 regardless of these comments/suggestions.	**ES Volume 1, Chapter 7: Climate Change [EN010168/APP/6.1]** has been updated and reflects the above comments.
Wiltshire Council	Wiltshire Council specialist consultee comment	No further comments or anything urgent jumping out. However, to reiterate, this would all be classed as commercial (business) waste, with collection / disposal routes needed to be setup outside of our Waste Service remit.	All waste generated during construction, operation and decommissioning will be commercial (business) waste. The Materials and Waste section within **ES Volume 1, Chapter 20: Other Environmental Matters [EN010168/APP/6.1]** provides an assessment of effects relating to waste. The **Outline SWMP [EN010168/APP/7.16]**, **Outline CEMP [EN010168/APP/7.12]**, **Outline OEMP EN010168/APP/7.13]**, **Outline DS [EN010168/APP/7.14]** within **ES Volume 7** which accompany the application covers waste management.
Wiltshire Council	Wiltshire Council specialist consultee comment	The likely impact on the rights of way network would only become clear when a draft masterplan is produced (i.e. at outline planning). Any changes or issues could be dealt with through our legislative framework further down the line, so I don't feel an EIA is necessary for us.	This comment is noted by the Applicant. An indicative masterplan is presented in **ES Volume 2, Figure 3-1: Indicative Site Layout Plan [EN010168/APP/6.2]**.
Wiltshire Council	Wiltshire Council specialist consultee comment	We have just over 50 Public Rights of way within the site and in close proximity to the Solar Park, I have looked through the Scoping report and look forward to seeing the Rights of Way report that they plan to submit. I will be looking to see how they propose to improve and enhance the Public Rights of Way within the site and those in the surrounding areas. I will be looking to see how they plan to improve the connectivity of the Public Rights of Way network. I will be looking for them to remove stiles from within the site and if a piece of access furniture is required to contain livestock that it is the least restrictive option (pedestrian gate, medium mobility kissing gate) I would look for any ditch crossings to be made in to culvert to provide a long term minimal maintenance crossing point, the useable width on these should be 2m.	Measures within the **Outline PRoWMP [EN010168/APP/7.17]** will be implemented to minimise the effect of the Scheme on PRoW users. This includes setting back Solar PV Panels at least 15 m from PRoW and new permissive paths created to allow for better connectivity.
Wiltshire Council	Wiltshire Council specialist consultee comment	As we will be improving or removing access furniture within the solar park, I will also be looking for a financial contribution which would improve the access furniture on the Public Rights of Way leading to the solar park or Public Rights of Way that whilst not directly linked to the site would form part of a circular route.	
Wiltshire Council	Wiltshire Council specialist consultee comment	Once we receive the detailed plan for the solar park, I will carry out an inspection of the Public Rights of Way and come up with a list of works that will be required and a list of works offsite that I will be requesting a contribution for,	This comment is noted by the Applicant. An indicative masterplan is presented in **ES Volume 2, Figure 3-1: Indicative Site Layout Plan [EN010168/APP/6.2]**.
Wiltshire Council	Wiltshire Council specialist consultee comment	I will finish with this quote from the scoping report and policy "Applicants should consider and maximise opportunities to facilitate enhancements to the public rights of way and the inclusion, through site layout and design of access, of new opportunities for the public to access and cross proposed solar development sites(whether via the adoption of new public rights of way or the creation of permissive paths)"	The Applicant has considered and integrated opportunities to mitigate and enhance connectivity to PRoW within and surrounding the Solar PV Sites, where practicable. Measures within the **Outline PRoWMP [EN010168/APP/7.17]** will be implemented to minimise the effect of the Scheme on PRoW users. This includes setting back Solar PV Panels at least 15 m from PRoW and new permissive paths created to allow for better connectivity.
Wiltshire Council	Wiltshire Council specialist consultee comment	The information submitted related to a proposed solar farm at multiple sites and associated connective infrastructure, include grid substation and electrical cabling. I have reviewed the reports and appendices submitted as part of the request for scoping opinion as to the information to be provided in a future environmental statement. There are a number of potential environmental health impacts associated with a development of this nature; the environmental statement must include further details and assessment on these impacts. Please refer to the our website Advice for developers and planning agents - Wiltshire Council for detailed	The Applicant confirms a full assessment of human health effects, as defined by the Scoping Opinion, has been presented in **ES Volume 1, Chapter 18: Human Health [EN010168/APP/6.1]**. This assessment has been prepared in accordance with all relevant national and local policy and guidance, including 'Environmental advice for developers and planning agents' published by Wiltshire Council.

Consultee	Topic	Matter Raised	Applicant Response
		requirements on these potential environmental health impacts which are outlined below:	
Wiltshire Council	Wiltshire Council specialist consultee comment	The main sources of noise at solar farm developments are the inverters located within the solar inverter substations and transformers located at the grid transformers and grid substations. The inverters and associated cooling fans will create noise of a distinctive character during day time periods before the sun goes down when the solar farm is generating power. The transformers are often operational at all times and can also produce noise of a distinctive character. We will require a noise assessment carried out in accordance with BS 4142:2014 + A1: 2019 to assess the significance of any impacts on residential dwellings. The principals of good acoustic design should be employed to ensure the distances between noise sources and receptors are maximised as far as possible.	Operational noise impacts, including BESS, Conversion Units, and substations, have been assessed in accordance with BS 4142 and appropriate mitigation measures have been embedded within the design, as reported in **ES Volume 1, Chapter 14: Noise and Vibration [EN010168/APP/6.1]**.
Wiltshire Council	Wiltshire Council specialist consultee comment	Consideration must be given to possible noise and vibration impacts during site preparation and construction activities. The need for controls will be based on the location, proximity of noise-sensitive receptors and the proposed works. Whilst there are powers to control construction noise under section 61 of the Control of Pollution Act 1974 through a prior consent process, and section 60 through an enforcement notice to control noise and vibration, it is likely we will require controls through the planning process, particularly for very sensitive locations or extended construction periods.	Construction noise and vibration are considered in **ES Volume 1, Chapter 14: Noise and Vibration [EN010168/APP/6.1]** and controls on construction noise and vibration are outlined in the **Outline CEMP [EN010168/APP/7.12]**. These include a construction noise and vibration monitoring programme to be agreed with Wiltshire Council and implemented throughout the construction phases.
Wiltshire Council	Wiltshire Council specialist consultee comment	Sources of dust from roads, quarries processing material, construction activity and storage of raw material can in some cases cause significant amenity issues. Proposed developments which have the potential to adversely impact residential dwellings will be required to submit a dust management plan. The dust management plan shall set out procedures to minimise the risk of dust and particulate matter emissions, identify the operations which have a potential impact upon air quality in the locality and detail the operational control measures which are implemented to minimise any impacts.	A construction dust assessment has been undertaken for the Scheme, and mitigation measures have been proposed where required (Table 15-15 of **ES Volume 3, Appendix 15-2 EN010168/APP/7.3**) to ensure the effects are not significant. These measures have been incorporated into the **Outline Construction Environmental Management Plan [EN010168/APP/7.12].**
Wiltshire Council	Wiltshire Council specialist consultee comment	Solar panels are specifically designed to absorb, not reflect, irradiation. However, solar panels may reflect the sun's rays at certain angles, causing glint and glare impacts which may affect amenity at residential dwellings. I note that a glint and glare methodology by Pager Power is submitted within the scoping opinion documents, however no assessment of impact is included within the report. We will require the environmental statement to include further details of the glint and glare impacts on residential dwellings and whether these impacts are significant.	Noted. The Glint and Glare Assessment contained within Section 20.1 **of ES Volume 1, Chapter 20: Other Environmental Matters [EN010168/APP/6.1]** includes a full assessment of impacts on residential dwellings. The assessment concludes no significant residual effects are predicted following the implementation of embedded and additional mitigation.
Wiltshire Council	Wiltshire Council specialist consultee comment	A contaminated land assessment undertaken by Delta Simons is included within the scoping documentation. The assessment concludes that no significant contaminated land risks are associated with the development and I am satisfied with the methodology used to reach this conclusion. We will not require any further contaminated land information to be submitted, however, the applicant should remain vigilant to unexpected sources of contamination and notify the local planning authority should contamination be found during excavations and ground works.	The Applicant notes this comment.
Wiltshire Council	Wiltshire Council specialist consultee comment	The Applicant proposes to include a chapter in the ES that considers several environmental issues identified during the preparation of the Scoping Report, but for which individual standalone chapters are not needed. This proposed 'Other Environmental Matters' chapter of the ES will include separately the topics of Minerals and Waste. Taking account of the baseline conditions and potential effects identified, I concur this would be a proportionate approach to assessment for these topics.	Comment noted. The Materials and Waste section within **ES Volume 1, Chapter 20: Other Environmental Matters [EN010168/APP/6.1]** provides an assessment of effects relating to waste. The **Outline Site Waste Management Plan [EN010168/APP/7.16]**, **Outline Construction Environmental Management Plan [EN010168/APP/7.12]**, **Outline Operational Environmental Management Plan [EN010168/APP/7.13] and Outline Decommissioning Strategy [EN010168/APP/7.14]** include mitigation measures for waste.

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Wiltshire Council	Wiltshire Council specialist consultee comment	However, the Scoping Report appears to omit the related topic of 'Materials', particularly those defined in the relevant IEMA Guidance as "physical resources that are used across the lifecycle of a development. Examples include key construction materials such as concrete, aggregate, asphalt and steel". The ES should provide estimates of the likely types and quantity of the main construction materials that would be required by the scheme, including likely proportion of secondary and recycled aggregate use.	An assessment of materials used in construction is included within the Materials and Waste section of **ES Volume 1, Chapter 20: Other Environmental Matters [EN010168/APP/6.1]** which includes estimates of the likely types and quantity if the main construction materials that would be required for the Scheme in Table 20-6.
Wiltshire Council	Wiltshire Council specialist consultee comment	The general content of the Minerals and Waste sections of the Other Environmental Matters chapter is considered appropriate. However, the following matters points should also be addressed	Noted.
Wiltshire Council	Wiltshire Council specialist consultee comment	In relation to the topic of Waste, the Scoping Report states, at paragraph 21.5.5, that waste will be transported by licensed waste hauliers to waste management sites which hold the necessary regulatory authorisation and/or permits for those wastes consigned to them. The ES should explain the likely locations and consider the likely impacts of transportation of waste, including effects on people and communities living along the routes to off-site facilities.	The Materials and Waste section within **ES Volume 1, Chapter 20: Other Environmental Matters [EN010168/APP/6.1]**, provides an assessment of effects relating to waste. The **Outline Site Waste Management Plan [EN010168/APP/7.16]**, **Outline Construction Environmental Management Plan [EN010168/APP/7.12]**, **Outline Operational Environmental Management Plan [EN010168/APP/7.13] and Outline Decommissioning Strategy [EN010168/APP/7.14]** include mitigation measures for waste. Likely impacts related to transportation of waste are considered in **ES Volume 1, Chapter 13 Transport and Access [EN010168/APP/6.1]**, **ES Volume 1: Chapter 15 Air Quality [EN010168/APP/6.1]** and **ES Volume 1, Chapter 14: Noise and Vibration [EN010168/APP/6.1]**.
Wiltshire Council	Wiltshire Council specialist consultee comment	For Minerals, the Scoping Report acknowledges the Scheme has the potential to affect areas of safeguarded mineral resource and allocated and/or permitted mineral workings. At paragraph 21.4.11 it is suggested that the Scheme is for a temporary period, but paragraph 4.1.2 says the operational life of the Scheme is anticipated to be up to 60 years (plus 2-year construction and 12-24 month decommissioning phases). The ES should include, as part of the intended Mineral Resource Assessment, consideration of the potential impact of loss of access to mineral resources during the lifetime of the Scheme.	Loss of access to mineral resources during the lifetime of the Scheme is addressed in the Mineral Resource Assessment contained in Chapter **ES Volume 1, Chapter 20: Other Environmental Matters [EN010168/APP/6.1]**.
Wiltshire Council	Wiltshire Council specialist consultee comment	• The initial scoping document appears to include all relevant areas for consideration in relation to human health. The document provides clear reasoning for what is scoped in and scoped out in terms of health effects • Whilst access to baseline health data is demonstrated via reference to the JSNA we would encourage early and ongoing contact with Public Health to explore all available data on human health as set out in Section 19.4.17 • In Table 19.5, under the Social environment heading, sub section 'community identity, culture, resilience and influence' reference is made to the sense of control within the community and how this can affect anxiety. In order to assess the impact on mental wellbeing the report refers to an extensive programme of community engagement but provides no detail on what this programme will include. It would be helpful to understand the approach being taken by the applicant and further details would be welcome In relation to the last point I'm a little uncertain as to how the process works but perhaps the details on community engagement, and specifically mental wellbeing, will be covered in the PEIR, or perhaps elsewhere? The scoping report makes mention of community consultation already underway?	The Applicant confirms that the assessment scope, as set out in the Scoping Opinion, has been undertaken in **ES Volume 1, Chapter 18: Human Health [EN010168/APP/6.1]**. Baseline data in Section 18.7 of **ES Volume 1, Chapter 18: Human Health [EN010168/APP/6.1]** has been sourced with the inclusion of local health profiles provided by Wiltshire's Public Health team with whom the Applicant team retains open lines of communication. The extent of public consultation and engagement has been set out in the Statement of Community Consultation as agreed by Wiltshire Council and reported in the **Consultation Report [EN010168/APP/5.1]** and supporting **Consultation Report Appendices [EN010168/APP/5.2]**. Section 18.10 of **ES Volume 1, Chapter 18: Human Health [EN010168/APP/6.1]** has relied upon consultation feedback received to determine the sensitivity of the population to mental health changes, determine the resilience and level of influence the community has in the Scheme, and focus additional mitigation that is required where specific mental health and wellbeing concerns have been raised.
Wiltshire Council	Wiltshire Council specialist consultee comment	There is no Noise and Vibration Management Plan listed nor anything for drainage / water management Melksham is a town not a village. Warmest winter day temperatures are lower than the warmest winter day of last 30 years when adding 2 and 4 degrees respectively?	The **Outline CEMP [EN010168/APP/7.12]** includes measures to control noise and vibration, including best practicable means and a noise monitoring programme to be agreed with Wiltshire Council. This is secured through the **draft DCO [EN010168/APP/3.1]**.

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			The **Flood Risk Assessment and Drainage Strategy [EN010168/APP/6.3]** confirms that all sensitive infrastructure, including the BESS and substations, will be located outside identified flood risk areas. Drainage features are designed to ensure no flooding occurs during the 1 in 100 year plus 45% climate change event. Finished levels will be raised above local ground levels to provide further resilience.
Wiltshire Council	Traffic and Transport	Noting the red line boundary and descriptions within the submission the intention of the proposals will result in no new road construction. The requirement for new access points is noted.	The installation of new internal access tracks and improvements to existing roads will be required to be allow access to the Scheme, however, these works would not be classified as new roads.
Wiltshire Council	Traffic and Transport	However, the construction works do not appear to be of a scale that would trigger the requirement for an Environmental Impact Assessment on highways matters alone.	The transport related impacts are assessed through **ES Volume 1, Chapter 13: Transport and Access [EN010168/APP/6.1]** and **ES Volume 3: Appendix 13-1 Transport Assessment [EN010168/APP/6.3]**. The impact of the scheme has been found to range between negligible and minor. An assessment of noise and vibration and air quality from construction traffic is presented in **ES Volume 1, Chapter 14: Noise and Vibration [EN010168/APP/6.1]** and **ES Volume 1, Chapter 15: Air Quality [EN010168/APP/6.1]**, respectively. These have been informed by traffic flows set out in **ES Volume 1, Chapter 13: Transport and Access [EN010168/APP/6.1]**. Noted that the construction works in terms of their highway impacts would not be of a scale that would trigger an EIA, however the project is an EIA as it is over 50 MW in size.
Wiltshire Council	Traffic and Transport	The proposals are not secured and so the overall type and level of construction vehicle movements is still to be agreed, but is not envisaged to result in any scale of works that would require an EIA directly on highways grounds. However, the approach to assessment appears sufficiently robust to address this matter further, if required.	
Wiltshire Council	Traffic and Transport	The proposals do not initially appear to trigger Annex 1	
Wiltshire Council	Traffic and Transport	There may be other factors the result in the proposal triggering Annex 2 or 3, based on the location and sensitivity and whilst the direct vehicle movements associated with construction do not appear sufficient, the residual impacts to other matters such as air quality and noise may need to be agreed and understood. Other matters relating to severance and delay associated with the works, particularly the cabling remain.	
Wiltshire Council	Traffic and Transport	A project of this scale will generate significant temporary construction traffic although it is not anticipated that it will change traffic movements and patterns in its completed form. In matters whether the derivation of traffic numbers and types is important it should be that these matters are understood as an agreed baseline.	Traffic flows for the baseline and 'with Scheme' scenarios are set out within **ES Volume 1, Chapter 13: Transport and Access [EN010168/APP/6.1]** and **ES Volume 3: Appendix 13-1 Transport Assessment [EN010168/APP/6.3]**.
Wiltshire Council	Traffic and Transport	The project can be separated into two distinct traffic generators with impacts. The first is the installation of solar panels on the main site. The second is the cabling works, which are likely to result in a number of crossing of highways assets to which the impacts, including traffic management, duration, diversions etc are thus far unknown as the cable route has not been set.	The assessments presented in **ES Volume 1, Chapter 13: Transport and Access [EN010168/APP/6.1]** and **ES Volume 3, Appendix 13-1 Transport Assessment [EN010168/APP/6.3]** consider the traffic generated by both the Solar PV Sites and Cable Route Corridor.
Wiltshire Council	Traffic and Transport	Anticipated vehicle types, movements and duration of construction phase should be agreed now to support any other work, notably noise and air, that would rely on this data. It would be difficult to rule out all concerns relating to impacts until a cable route and methodology was agreed.	The transport related impacts are assessed through **ES Volume 1, Chapter 13: Transport and Access [EN010168/APP/6.1]** and **ES Volume 3, Appendix 13-1 Transport Assessment [EN010168/APP/6.3]**. Traffic flows set out in **ES Volume 1, Chapter 13: Transport and Access [EN010168/APP/6.1]** have been used to inform the noise and vibration and air quality assessments presented in **ES Volume 1, Chapter 14: Noise and Vibration [EN010168/APP/6.1]** and **ES Volume 1, Chapter 15: Air Quality [EN010168/APP/6.1]**, respectively. Engagement has been held with Wiltshire Council throughout the pre-submission stage and this will continue during the post-submission stages.
Wiltshire Council	Traffic and Transport	Once these matters are clearer it will be possible to establish and agree levels of activity that will need to be agreed for use by others. It will also assist in establishing that the impact of construction vehicles is entirely reversible as stated. At that time, it may be that the requirement for EIA is ruled out entirely.	
Wiltshire Council	Traffic and Transport	Further understanding is required on decommissioning and whether the cable route would remain in-situ if or when the site is decommissioned.	Decommissioning effects are set out in **ES Volume 1, Chapter 13: Transport and Access [EN010168/APP/6.1]** and **ES Volume 3: Appendix 13-1 Transport Assessment [EN010168/APP/6.3]**. As detailed in **ES Volume 1, Chapter 3: The Scheme [EN010168/APP/6.1]**, the mode of decommissioning cables would be dependent upon government policy and good practice at that time. Currently, the most environmentally acceptable option is considered to be leaving the cables in situ.

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Wiltshire Council	Traffic and Transport: Highways Position	The proposal does not initially appear to fall under Annex 1 in highways terms.	Construction movements and transport related impacts are assessed through **ES Volume 1, Chapter 13: Transport and Access [EN010168/APP/6.1]** and **ES Volume 3: Appendix 13-1 Transport Assessment ES Volume 3, Appendix 13-1 Transport Assessment [EN010168/APP/6.3]**. Noted that the construction works in terms of their highway impacts would not be of a scale that would trigger an EIA, however the project is an EIA as it is over 50 MW in size.
Wiltshire Council	Traffic and Transport: Highways Position	The proposal may fall under Annex 2 or 3 and we would recommend establishing and agreeing construction movements to assist in further screening.	
Wiltshire Council	Traffic and Transport: Highways Position	The following statements are made to assist with developing the application as part of what is considered likely to be an Environmental Statement with a specific chapter on Traffic impacts (A number of these matters are already considered in Chapter 13 of the Scoping Opinion):	Transport related impacts during the construction and decommissioning phases have been assessed in **ES Volume 1, Chapter 13: Transport and Access [EN010168/APP/6.1]** and **ES Volume 3: Appendix 13-1 Transport Assessment [EN010168/APP/6.3]**.
Wiltshire Council	Traffic and Transport: Highways Position	Commissioning and Decommissioning are to be included as part of any assessment	
Wiltshire Council	Traffic and Transport: Highways Position	The operational phase will need to evidence that traffic movements associated with the proposals will be below the threshold for any further assessment.	Transport related impacts during operation and maintenance phase have been assessed in **ES Volume 1, Chapter 13: Transport and Access [EN010168/APP/6.1]** and **ES Volume 3: Appendix 13-1 Transport Assessment [EN010168/APP/6.3]**. This includes evidence of traffic movements during the periods of Solar PV Panel and BESS Battery replacement, as well as day to day activities outside these periods.
Wiltshire Council	Traffic and Transport: Highways Position	The access routes to the grid connection and construction compounds should be depicted in the once determined.	Construction vehicle routes to the Cable Route Corridor and Construction Compounds are described in **ES Volume 1, Chapter 13: Transport and Access [EN010168/APP/6.1]**, **ES Volume 3, Appendix 13-1: Transport Assessment [EN010168/APP/6.3]** and **Outline CTMP [EN010168/APP/7.22]**. The construction vehicle routes are also presented in **ES Volume 2, Figure 13-1** to **Figure 13-2 [EN010168/APP/6.2]** and accesses are presented in **ES Volume 2, Figure 13-11** to **Figure 13-12 [EN010168/APP/6.2]**.
Wiltshire Council	Traffic and Transport: Highways Position	Any assessment should confirm the final study area and key roads included in the assessment and explain how they have been identified. A plan illustrating the extent of the study area, the expected route(s) of construction traffic and the anticipated numbers of vehicle movements (including vehicle type, peak hour and daily movements) should be included in the assessment.	The Study Area, construction vehicle routes, and construction vehicle movements area described in **ES Volume 1, Chapter 13: Transport and Access [EN010168/APP/6.1]**, **ES Volume 3, Appendix 13-1: Transport Assessment [EN010168/APP/6.3]** and **Outline CTMP [EN010168/APP/7.22]**. They are also presented in **ES Volume 2, Figure 13-1** to **Figure 13-2 [EN010168/APP/6.2]**.
Wiltshire Council	Traffic and Transport: Highways Position	The baseline evidence for all proposed access points and routes will need to be presented.	Baseline data for all construction vehicle routes is set out in Section 13.7 of **ES Volume 1, Chapter 13: Transport and Access [EN010168/APP/6.1]**.
Wiltshire Council	Traffic and Transport: Highways Position	An Abnormal Loads Transport Management Plan is to be submitted. The impacts on safety from the delivery of abnormal loads should be assessed within the assessment where significant effects are likely to arise. Appropriate measures to ensure safe transportation of abnormal loads should be included within the Abnormal Loads Transport Management Plan.	Mitigation measures to be implemented for the management of AIL movements are set out in the **Outline CTMP [EN010168/APP/7.22]**. AIL Report and is included in Appendix D of oCTMP.
Wiltshire Council	Traffic and Transport: Highways Position	Cumulative assessment should include known pre-application and sites prior to determination. It is expected this information can be provided by the Local Planning Authority.	A cumulative assessment for transport and access has been undertaken and is set out in Section 13.13 of **ES Volume 1, Chapter 13: Transport and Access [EN010168/APP/6.1]** and is summarised in **ES Volume 1, Chapter 21: Cumulative and In-Combination Effects [EN010168/APP/6.1]**. This accounts for all reasonably foreseeable and/or consented developments in proximity to the Order Limits, but not yet forming part of the baseline environment.
Wiltshire Council	Traffic and Transport: Highways Position	The locations of traffic count surveys should be shown, explaining how these locations were selected and confirm precise details of when the counts were undertaken. Effort should be made to agree these details with relevant local highway authorities. To provide assurance that the assessment of likely significant effects is supported by a robust dataset, the ES should include a justification to	The location of traffic surveys to inform the transport and access assessment is shown in **ES Volume 2, Figure 13-9: Traffic Survey Locations – Solar PV Sites [EN010168/APP/6.2]** and **ES Volume 2, Figure 13-10: Traffic Survey Locations – Cable Route Corridor [EN010168/APP/6.2]**. Details regarding the exact locations and selection process is detailed in **ES Volume 1, Chapter 13: Transport and Access [EN010168/APP/6.1]**.

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		support the extent of the survey effort, including why the traffic data is considered to be representative of traffic neutral data.	
Wiltshire Council	Traffic and Transport: Highways Position	Any assessment should assess impacts to Public Rights of Way and on walking, cycling and horse-riding receptors from the Proposed Development such as the need for temporary closures or diversions, where significant effects are likely to occur. These should be identified in any submissions and impacts on them assessed, where significant effects are likely.	An assessment of impacts to non-motorised users as a result of the Scheme is set out in **ES Volume 1, Chapter 13: Transport and Access [EN010168/APP/6.1]**.
Wiltshire Council	Traffic and Transport: Highways Position	The strategy for cabling works will inform any submissions and the impacts of severance and delay to the network and any resulting Environmental Impacts. Matters relating to degradation of highway infrastructure will need to sufficiently evidence that reparations can reverse any evidenced harms.	The strategy for works along the Cable Route Corridor is set out in the **Outline CTMP [EN010168/APP/7.22]**. This includes relevant measures for a dilapidation survey to identify and repair any defects on the highway caused by the construction of the Scheme.
Wiltshire Council	Traffic and Transport: Highways Position	The panel and BESS replacement strategies should be evidenced further to understand the impacts of these elements and whether or not they require further planning controls or EIA consideration.	The strategy for Solar PV Panel and BESS Battery replacement during the operation and maintenance phase is set out in **ES Volume 1, Chapter 13: Transport and Access [EN010168/APP/6.1]**, **ES Volume 3, Appendix 13-1: Transport Assessment [EN010168/APP/6.3]** and **Outline CTMP [EN010168/APP/7.22]**.
Wiltshire Council	Traffic and Transport: Additional Comments	At this stage the WCC highways position would be that as much of the connection from the solar farm to the point of connection is done on private land with wayleaves. Also, when the cables cross highways, works should be to thrust bore under the existing infrastructure to maintain its integrity. This is based on an expectation of large cables, with oil surround, laid parallel with 2 or 3 metres (at least) space between them – resulting in a significant trench width. The integrity of the highway, along with the maintenance of such infrastructure would be key concerns, along with the potential severance and delay whilst any works are undertaken at potentially numerous isolated locations, depending on preferred cable routes.	Much of the cable route corridor routes across private land, minimising impact on the local highway network. Where cables cross the highway, this will either be undertaken by Horizonal Directional Drilling beneath the highway or by open cut installation. Where open cut cable works are undertaken, suitable traffic management will be put in place and the road will be reconstructed to Wiltshire Council's specifications.
Wiltshire Council	Traffic and Transport: Additional Comments	We would also seek an open dialogue to input on the construction site traffic management plan as well as the traffic management plan for the cabling trench works- i.e. how it will impact the local highway network provide clear advise and address any issues that may arise from emerging proposals.	Engagement with the Local Highway Authorities regarding the potential transport and access impacts and proposed mitigation to be integrated into the Scheme has been undertaken throughout the pre-application stage and will continue through the post-application stages.
Wiltshire Council	Landscape: Introduction	The EIA Scoping Report confirms that the Landscape & Visual Impact Assessment (LVIA) will be undertaken in accordance with the 'Guidelines for Landscape and Visual Impact Assessment – Third Edition - 2013' (GLVIA3) which is appropriate for EIA development.	Noted. **ES Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1]** provides an assessment of the likely significant landscape and visual effects as a result of the Scheme.
Wiltshire Council	Landscape: Study Areas	The Scoping Report identifies preliminary study areas to be used to inform the assessment of landscape and visual effects. These are measured from the outer edge of identified development areas and include: • 0.5km study Area for the cable route corridor (The Cable Route Study Area) • 1km Study Area (The Local Study Area) • 2km Study Area (The Wider Study Area) 5km Study Area (The Outer Study Area)	Noted. **ES Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1]** identifies the study area in Section 1.5.
Wiltshire Council	Landscape: Study Areas	The extent of these preliminary study areas is considered to support a proportionate approach to assessment. It is noted at para 7.2.1. which states ''*The preliminary Study Area will be further assessed as part of the iterative design process and through consultation with the Local Planning Authority's Landscape officers and consultants at Wiltshire Council.*'' This offers some additional comfort should the refinement of the scheme during the EIA process indicate that these provisional study areas should be revised for any reason.	Noted. **ES Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1]** identifies the study area in Section 1.5.

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Wiltshire Council	Landscape: Assessment Methodology	The described assessment methodology and the industry recognised guidance listed at 7.3.1 of the scoping report and further detail included at appendix 7.2 comprise an appropriate basis for the assessment of landscape and visual effects including potential cumulative effects.	Noted.
Wiltshire Council	Landscape: Legislation, policy, and guidance	The scoping report identifies relevant National Policy Statements for NSIPs forming the framework for assessment and decision making by the Secretary of State. The scoping report references paragraphs within the National Planning Policy Framework (NPPF) 2023 and also highlights National Planning Practice Guidance (NPPG), Paragraphs 13 and 36 at section 7.4.15. The following further NPPG paragraphs are highlighted to be additionally relevant to those already referenced within the Scoping Report.	Noted. The NPPG references are included in Section 8.3 of **ES Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1].** The addition of core policies from the Wiltshire Core Strategy (2015) are included in Section 8.3 of **ES Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1].** The addition core policies from Saved District Local Plan Policies from the North Wiltshire District Local Plan (2011) are included in Section 8.3 of **ES Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1].** Reference to CRoW Act and LURA Act are included in Section 8.3 of **ES Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1],**
Wiltshire Council	Landscape: Legislation, policy, and guidance	NPPG – Natural Environment - Landscape • ‘in exercising or performing any functions in relation to, or so as to affect, land’ in National Parks and Areas of Outstanding Natural Beauty, relevant authorities ‘shall have regard’ to their purposes for which these areas are designated. • This duty is particularly important to the delivery of the statutory purposes of protected areas. It applies to all local planning authorities, not just National Park authorities, and is relevant in considering development proposals that are situated outside a National Park or Area of Outstanding Natural Beauty boundaries, but which might have an impact on their setting or protection. NPPG, Paragraph: 039 Reference ID: 8-039-20190721 - Revision date: 21 07 2019	Relevant NPPG guidance for landscape has been accounted for in the assessment presented in **ES Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1].**
Wiltshire Council	Landscape: Legislation, policy, and guidance	NPPG - Renewable and low carbon energy: ’*The National Planning Policy Framework explains that all communities have a responsibility to help increase the use and supply of green energy, but this does not mean that the need for renewable energy automatically overrides environmental protections and the planning concerns of local communities. As with other types of development, it is important that the planning concerns of local communities are properly heard in matters that directly affect them*.’ NPPG, Paragraph: 003 Reference ID: 5-003-20140306 - Revision date: 06 03 2014 ‘*In shaping local criteria for inclusion in Local Plans and considering planning applications in the meantime, it is important to be clear that:* • *the need for renewable or low carbon energy does not automatically override environmental protections;* • *cumulative impacts require particular attention, especially the increasing impact that wind turbines and large-scale solar farms can have on landscape and local amenity as the number of turbines and solar arrays in an area increases;* • *local topography is an important factor in assessing whether wind turbines and large scale solar farms could have a damaging effect on landscape and recognise that the impact can be as great in predominately flat landscapes as in hilly or mountainous areas;* • *great care should be taken to ensure heritage assets are conserved in a manner appropriate to their significance, including the impact of proposals on views important to their setting;*	

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		• *proposals in National Parks and Areas of Outstanding Natural Beauty, and in areas close to them where there could be an adverse impact on the protected area, will need careful consideration;* • *protecting local amenity is an important consideration which should be given proper weight in planning decisions.* NPPG, Paragraph: 007 Reference ID: 5-007-20140306 - Revision date: 06 03 2014 The NPPG offers guidance in relation to consideration of cumulative landscape and visual impacts of renewable energy development; • *Cumulative landscape impacts and cumulative visual impacts are best considered separately. 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. Hence, it should not be assumed that, just because no other sites will be visible from the proposed development site, the proposal will not create any cumulative impacts.* NPPG, Paragraph: 022 Reference ID: 5-022-20140306 - Revision date: 06 03 2014	
Wiltshire Council	Landscape: Wiltshire Core Strategy	The scoping report identifies Wiltshire Core Strategy as forming part of the Development Plan but stops short of identifying relevant Local Plan Policies. The following current Development Plan policies are identified to be relevant to the consideration of landscape and visual matters.	The Wiltshire Core Strategy has been accounted for in the assessment presented in **ES Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1].**
Wiltshire Council	Landscape: Wiltshire Core Strategy	Wiltshire Core Strategy (2015) Core Policy 42: Standalone renewable energy installations ‘’*Proposals for standalone renewable energy schemes will be supported subject to satisfactory resolution of all site specific constraints. In particular, proposals will need to demonstrate how impacts on the following factors have been satisfactorily assessed, including any cumulative effects, and taken into account:* *i. The landscape, particularly in and around AONBs.* *ii. The Western Wiltshire Green Belt.* *iii. The New Forest National Park. iv. Biodiversity* *iv. The historic environment including the Stonehenge and Avebury World Heritage Site and its setting.* *v. Use of the local transport network.* *vi. Residential amenity, including noise, odour, visual amenity and safety.* *vii. Best and most versatile agricultural land.* *Applicants will not be required to justify the overall need for renewable energy development, either in a national or local context.*’’	
Wiltshire Council	Landscape: Wiltshire Core Strategy	Supporting policy guidance at section 6.39 states that ‘’*The development of most standalone renewable energy installations within Wiltshire will require careful*	

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		consideration due to their potential visual and landscape impacts, especially in designated or sensitive landscapes, including AONB's and the Stonehenge and Avebury World Heritage Site, and their setting. Core Policies 51 and 59, which relate to landscape and the World Heritage site, should be considered alongside this policy. The size, location and design of renewable energy schemes should be informed by a landscape character assessment, alongside other key environmental issues as set out in Core Policy 42. This should help reduce the potential for conflict and delay when determining planning applications. Cumulative effects should be addressed as appropriate.''	
Wiltshire Council	Landscape: Wiltshire Core Strategy	Core Policy 51: Landscape The purpose of Core Policy 51 is to ensure that new development proposals protect, conserve and where possible enhance landscape character. New development must not have a harmful impact upon landscape character. The policy is clear that any negative effects arising from new development 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 (below).	
Wiltshire Council	Landscape: Wiltshire Core Strategy	Core Policy 51: Landscape *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 manmade 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.* *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.*	
Wiltshire Council	Landscape: Wiltshire Core Strategy	Core Policy 51: Landscape *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."*	
Wiltshire Council	Landscape	Core Policy 52: Green Infrastructure The purpose of CP52 is to ensure that any existing green/blue infrastructure present on development sites is retained and successfully integrated within any development proposal and that opportunities to enhance the value of onsite green / blue infrastructure is incorporated wherever this is achievable. The policy also	

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		requires that provision is made for the future ongoing maintenance of green/blue infrastructure directly associated with new development. It goes on to state that 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, which maintains the integrity and functionality of the green infrastructure network will be required.	
Wiltshire Council	Landscape	Core Policy 57: Ensuring high quality design and place shaping. The purpose of CP57 is to ensure that all new development proposals deliver a high standard of design and that a strong distinctive sense of place is maintained / created and that development proposals draw on the local context and are complementary to the locality to demonstrate how the proposal makes a positive contribution to the character of Wiltshire. The policy lists 14 separate criteria which new development should demonstrate are achieved. The following criteria are considered relevant to this application;	
Wiltshire Council	Landscape	Core Policy 57: Ensuring high quality design and place shaping. • *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.* • *the retention and enhancement of existing important landscaping 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 any losses that may occur through the development.* • *being sympathetic to and conserving historic buildings and historic landscapes.* • *making efficient use of land whilst taking account of the characteristics of the site and local context to deliver an appropriate development which relates effectively to the immediate setting and to the wider character of the area.* • *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).* *the use of high standards of building materials, finishes and landscaping…*	
Wiltshire Council	Landscape	Saved District Local Plan Policies The scoping report identifies that saved policies of the former North Wiltshire District Local Plan comprise part of the Development Plan; however, no policies are identified within the scoping report. The following saved policies from the North Wiltshire District Local Plan are identified to be relevant to the landscape and visual EIA subject matter/topic area.	
Wiltshire Council	North Wiltshire District Local Plan (2011)	Core Policy NE12: Woodland States that '*The creation, conservation enhancement and positive management of woodlands across the district [former North Wiltshire District Council – administrative area] will be supported. In particular, areas of ancient and semi-natural woodland should be protected.*' The policy recognises the value that woodlands contribute to visual amenity and nature conservation.	
Wiltshire Council	North Wiltshire District Local Plan (2011)	Core Policy NE14: Trees, site features and the control of new development. Requires that existing trees, hedges, ponds/lakes or other valued landscape or ecological site features, such as dry-stone walls, and watercourses etc. that are present within and adjoining development sites are retained and appropriately	

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		integrated within development proposals, and that appropriate provision for the preservation of existing trees and new tree planting is secured.	
Wiltshire Council	North Wiltshire District Local Plan (2011)	It is anticipated that these currently saved policies will be replaced by new policies to be included within the emerging Wiltshire Local Plan Review, including: • Policy 90: Woodland, hedgerows, and trees; • Policy 91: Conserving and enhancing Wiltshire's landscapes; and Policy 93: Green and blue infrastructure.	
Wiltshire Council	Legislation	The following legislation is considered to be relevant for new development proposed on sites within the Cotswolds National Landscape/AONB and for sites which have potential to contribute to the setting of this National Landscape designation.	
Wiltshire Council	Legislation	Countryside & Rights of Way Act 2000 (CRoW Act 2000) - Section 85, Duty of Regard. This statutory instrument places a duty on relevant authorities 'in exercising or performing any functions in relation to, or so as to affect, land' in National Parks and Areas of Outstanding Natural Beauty, relevant authorities 'shall have regard' to their purposes for which these areas are designated. This duty is particularly important to the delivery of the statutory purposes of protected areas. It applies to all local planning authorities, not just National Park authorities, and is relevant in considering development proposals that are situated outside National Park or Area of Outstanding Natural Beauty boundaries, but which might have an impact on their setting or protection. (Planning Practice Guidance - Paragraph: 039 Reference ID: 8-039-20190721 - Revision date: 21 07 2019)	Noted
Wiltshire Council	Legislation	Levelling-up and Regeneration Act 2023 (LURA 2023) - Section 245 (Protected Landscapes) This statutory instrument places a duty on relevant authorities in exercising or performing any functions in relation to, or so as to affect, land in a National Park, the Broads or an Area of Outstanding Natural Beauty (National Landscapes) in England, 'to seek to further the statutory purposes of the area'. The duty applies to local planning authorities and other decision makers in making planning decisions on development and infrastructure proposals, as well as to other public bodies and statutory undertakers. This legislation in effect increases the duty on relevant authorities to be more pro-active in its consideration of new development proposals to conserve and enhance the statutory purpose and function of Nationally Protected Landscapes. The new legislation also elevates the weight of these protected landscapes within any wider planning balancing exercises undertaken in preference of conserving and enhancing national landscapes if resulting conflict arises with other material planning considerations.	Noted
Wiltshire Council	Preliminary landscape baseline	Published Landscape Character Assessments At 7.5.34 the scoping report states, ''*The land at Melksham Substation is not located in this [North Wiltshire Landscape Character Assessment] or any other local level landscape character assessments in Wiltshire*.'' This is not correct. The Melksham Substation Study Area is divided almost centrally by the former District Council administrative areas of North Wiltshire and West Wiltshire District Councils that were present prior to the creation of the Wiltshire Council Unitary Authority.	**Figure 7.5 [EN010168/APP/6.2]** has been amended to display the appropriate information. The Land at Melksham Substation is no longer being considered as a site for the 400 kV Substation which comprises part of the Scheme, but is still included within the Cable Route Search Corridor.

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Wiltshire Council	Preliminary landscape baseline	The northern half of the study area aligns with the North Wiltshire Landscape Character Assessment and the southern half of the study area aligns with the West Wiltshire District Landscape Character Assessment.	Noted
Wiltshire Council	Preliminary landscape baseline	No reference is currently included anywhere within the scoping report to the 'West Wiltshire Landscape Character Assessment.' The Melksham Substation site is identified to fall within the following landscape character type and area within the West Wiltshire Landscape Character Assessment. • Landscape Character Type - A: Limestone Lowland. Landscape Character Area – A3: Broughton Gifford Limestone Lowland.	The Land at Melksham Substation is no longer being considered as a site for the 400 kV Substation which comprises part of the Scheme ,but is still included within the Cable Route Search Corridor. These Character Type and Area have been included in the ES
Wiltshire Council	Preliminary landscape baseline	Figure 7.5 Landscape Character Areas Figure 7.5 illustrates the applicable landscape character types and areas identified from the hierarchy of available published Landscape Character Assessments. However, the report and Figure 7.5 do not consistently, accurately or fully identify relevant landscape character types and areas at the County, District or Cotswold National Landscape/AONB level.	**Figure 7.5 [EN010168/APP/6.2]** has been amended to display the appropriate information. Refer to the Volume 2, Figure 8-5: Landscape Character Areas series **[EN010168/APP/6.2]** which identify the landscape character types and areas at the County, District or Cotswold National Landscape/AONB level: Volume 2, Figure 8-5-1: National and regional Landscape Character Areas **[EN010168/APP/6.2]**. Volume 2, Figure 8-5-2: Local Landscape Character Areas **[EN010168/APP/6.2]**.
Wiltshire Council	Preliminary landscape baseline	The 'Lime Down Site's A to E' are covered in the hierarchy of published Landscape Character Assessments by both the 'Wiltshire Landscape Character Assessment (Scale 1:50,000) – Land Use Consultants (2005)' and by the 'North Wiltshire Landscape Character Assessment (Scale 1;25,000) – White Consultants 2005'. However, Figure 7.5 only identifies the 'Landscape Character Types' and 'Landscape Character Areas' from the North Wiltshire Landscape Character Assessment. It should also include and identify landscape character types and areas from the 'Wiltshire Landscape Character Assessment' and the 'Cotswolds AONB Landscape Character Assessment.'	Noted and separate figures have been amended in the ES
Wiltshire Council	Preliminary landscape baseline	The 'Land at Melksham Substation Site' is covered in the hierarchy of published Landscape Character Assessments by the 'Wiltshire Landscape Character Assessment (Scale 1:50,000) – Land Use Consultants (2005)' and by the 'North Wiltshire Landscape Character Assessment (Scale 1;25,000, White Consultants - 2005) and also by the 'West Wiltshire District Landscape Character Assessment (Scale 1:25,000 Chris Blandford Associates (2007)'.	The Land at Melksham Substation is no longer being considered as a site for the 400 kV Substation which comprises part of the Scheme, but is still included within the Cable Route Search Corridor.
Wiltshire Council	Preliminary landscape baseline	Figure 7.5 only identifies and includes the 'Landscape Character Types' and 'Landscape Character Areas' from the North Wiltshire Landscape Character Assessment within the northern half of the study area, and the character types and character areas from the Wiltshire Landscape Character Assessment within the southern half of the study area. The Wiltshire Landscape Character Assessment applies to the whole site and study area. The North Wiltshire Landscape Character Assessment applies to the northern half of the study area, while the West Wiltshire District Landscape Character Assessment applies to the southern half of this study area.	Noted. **Figure 7.5 [EN010168/APP/6.2]** has been amended to display the appropriate information have been amended in the ES. Refer to the Volume 2, Figure 8-5: Landscape Character Areas series **[EN010168/APP/6.2]** which identify the landscape character types and areas at the County, District or Cotswold National Landscape/AONB level: Volume 2, Figure 8-5-1: National and regional Landscape Character Areas **[EN010168/APP/6.2]**. Volume 2, Figure 8-5-2: Local Landscape Character Areas **[EN010168/APP/6.2]**.
Wiltshire Council	Preliminary landscape baseline	Appendix 7.4 – Landscape Receptor Scoping Sheets In light of the above observations, it is anticipated that an additional entry should be included within the Landscape Receptor Scoping Sheets, identifying which landscape Character Types and Character Areas for 'West Wiltshire Landscape Character Assessment' will be scoped in and out for assessment i.e. Scope in: • Landscape Character Type A: Limestone Lowland • Landscape Character Area A3: Broughton Gifford Limestone Lowland	It is agreed that the 'West Wiltshire Landscape Character Assessment' will be scoped into the ES. The Land at Melksham Substation is no longer being considered as a site for the 400 kV Substation which comprises part of the Scheme, but is still included within the Cable Route Search Corridor. Therefore, the area the character assessment covers only relates to the Cable Route Search Corridor.

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		Scope out: • Landscape Character Type B: Clay River Floodplain • Landscape Character Area B1: Avon Clay River Floodplain • Landscape Character Type C: Open Clay Vale Landscape Character Area C2: Semington Open Clay Vale.	
Wiltshire Council	Preliminary visual baseline	It is not possible to provide meaningful feedback or detailed comments on the suggested viewpoint locations proposed for inclusion within the visual assessment at this time, other than to acknowledge the identified viewpoint locations as illustrated by Figures 7.7 & 7.7.1 to 7.7.6 appear to be representative of different types of visual receptors and appear to be proportionate in number. It is considered that there would be opportunity to further feedback to the applicant's project team in relation to agreeing final locations of the proposed representative viewpoint locations during further consultation through the iterative LVIA process and it would likely be necessary for the reviewer to ground truth some of these proposed locations before providing any further detailed comment or agreement.	The Applicant consulted with Wiltshire Council on 17/09/2024 to agree additional Viewpoints for inclusion in the ES. These were received on 07/11/2024 and we agreed to include the three (3) additional Viewpoints within the 1 km Study Area into the ES.
Wiltshire Council	Preliminary visual baseline	One general observation is that in terms of incorporating representative views, the majority of currently proposed viewpoints appear to be largely short distance views experienced from the perimeter edges of the sites or from public rights of way passing through the site areas. Further consideration should be given to potentially including more representative middle distance and possibly some longer distance representative viewpoints from the wider landscape, especially in the context of views towards and from the Cotswolds National Landscape / AONB where development may occupy exposed land considered to contribute to the contextual character and visual setting of this national landscape designation.	Three further viewpoints from Wiltshire Council have been requested and behave been included in the ES. These are both within the 1km Study Area.
Wiltshire Council	Potential effects and mitigation	The LVIA will obviously be used as an iterative assessment and design tool and will identify appropriate measures to mitigate identified harmful landscape and visual effects wherever possible, but it could also be used to help identify appropriate environmental opportunities to deliver environmental enhancement e.g. to the landscape fabric of the site / site features, landscape character, improved public access.	Engagement with Wiltshire Council (and other interested parties) will be undertaken to develop the approach to mitigation as set out in Section 8-8 to help identify appropriate environmental opportunities to deliver environmental enhancement and will be undertaken as part of iterative design process.
Wiltshire Council	Cumulative and in-combination effects	The Council agrees with the need to undertake an assessment of the cumulative effects of the proposed development in conjunction with other local developments. It is assumed that these incombination impacts will also be cross-referenced with the also proposed chapter on alternatives, as set out in section 2.4 to the scoping report.	**Chapter 21: Cumulative Effects and Interactions [EN010168/APP/6.1]** presents the cumulative effects assessment, which follows the methodology outlined in **Chapter 6: EIA Methodology [EN010168/APP/6.1]**. The long-list of cumulative developments was shared with Wiltshire Council on 5th November 2024 for agreement. A final list of cumulative developments was shared with Wiltshire Council on 23 May 2025. A further two cumulative developments were requested to be included in the long and short list and these developments have now been considered.
Wiltshire Council	Cumulative and in-combination effects	The importance of cumulative impact is recognised in the government's National Planning Policy Framework (NPPF) and in planning case law (Lancashire CC v Secretary of State 2007).	**Chapter 21: Cumulative Effects and Interactions [EN010168/APP/6.1]** presents the cumulative effects assessment, which follows the methodology outlined in **Chapter 6: EIA Methodology [EN010168/APP/6.1]** and considers the NPPF.
Wiltshire Council	Cumulative and in-combination effects	Given the scale of the development, it is evident that the constituent parts (referred to as areas A, B, C, D, E, as well as the underground cable connection) could constitute NSIPs in their own right. This attribute, along with the large number of electricity generating schemes proposed and recently granted planning permission in this part of Wiltshire, does mean that there is great potential for cumulative, in-combination impacts and environmental damage. Accordingly, the assessment should fully identify all appropriate local development and robustly consider impacts.	**Chapter 21: Cumulative and In-Combination Effects [EN010168/APP/6.1]** provides an assessment of cumulative effects with other developments. A long list of cumulative developments was prepared and sent to Wiltshire County Council on 5th November 2024. The Cumulative Effects Assessment follows the methodology outlined in **Chapter 6: EIA Methodology [EN010168/APP/6.1]**.

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Wiltshire Council	Landscape and visual impacts	Within the table embedded in paragraph 2.22.1, it is proposed that the landscape and visual impact chapter would "scope out" landscape receptors greater than 5.0km from all elements of the application site. Notwithstanding the more detailed commentary provided by the Council's Landscape Officer, the 5.0km radius is perhaps too limiting and does not immediately appear to be based on any local characteristics.	Landscape and visual effects for relevant representative receptors have been assessed in **ES Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1]**. Professional judgements based on experience of similar size and nature schemes has been used to identify the various Study Areas within the LVIA. Following consultation with the landscape officer at WC the Study Area for Cumulative impacts has been extended to 10km as requested.
Wiltshire Council	Arboriculture	It is unclear why the assessment of impacts to trees within the land parcels A-E and the Melksham substation should be scoped out.	The ES scopes out arboricultural impacts across Sites Lime Down A-E except for effects on ancient and veteran trees and ancient woodlands which are assessed separately. A full baseline tree survey has been untaken where required and mitigation measures and securing mechanisms are described in the ES and furthermore at section 10.9 of **ES Volume 1, Chapter 10: Arboriculture [EN010168/APP/6.1]**, where arboricultural mitigation is described). The land at Melksham substation no longer forms part of the Scheme and therefore has not formed part of the assessment.
Wiltshire Council	Hydrology, flood risk and drainage	As is acknowledged within the submitted scoping report and the commentary of the Council's Drainage Engineer, the application site is location with areas of elevated flood risk. In that context, it is unclear why the assessment of adverse impacts appears to be limited to the application site only and not surrounding land and areas outside of the site.	The assessment of flood risk extends beyond the Order Limits and considers potential offsite impacts. The Flood Risk and Drainage Strategy (**ES Volume 3, Appendix 11-1 to 11-9 [EN010168/APP/6.3])** has been developed using site-specific topographic data and the latest NaFRA2 and RoFSW datasets, alongside consultation with the EA and LLFA. These confirm that the proposed design avoids sensitive flow routes and will not increase flood risk elsewhere. While detailed hydraulic modelling has been undertaken for key infrastructure where appropriate, broad-brush modelling of the wider landholding was not considered proportionate given the raised nature of the panelled areas and limited intervention proposed. This approach was discussed with the LLFA and EA and agreed as suitable for the purposes of this assessment.
Wiltshire Council	Ground conditions and contamination	The Council's Public Protection team confirms their satisfaction with the methodology set out within the Delta Simons prepared contaminated land assessment included within the scoping report. However, the applicant should be mindful of the potential for unexpected sources of contamination and for that reason, it is perhaps premature to scope out all matters, particularly those relating to the leaching of chemicals during faulty battery incidents (fire damage, ash deposition and extinguishing waters).	As stated within **ES Volume 1, Chapter 19: Ground Conditions [EN010168/APP/6.1]** and within the **Outline Construction Environmental Management Plan [EN010168/APP/7.12]** a Discovery and Inspection Strategy will be followed in the event that unexpected sources of contamination are encountered. Operational phase contaminants have been considered and addressed via mitigations presented in Table 19-4 and 19-5 of ES Volume 1 Chapter 19.
Wiltshire Council	Transport and access	As referenced within the commentary of the Council's Highway Officer, it is advised that the construction, operational and decommissioning phase of all elements of the development are scoped in. At present, the scoping report suggests that the operational and decommissioning phases are scoped out.	Transport related impacts during construction, operation and maintenance, and decommissioning phases have been scoped in and are assessed within **ES Volume 1, Chapter 13: Transport and Access [EN010168/APP/6.1]** and within **ES Volume 3, Appendix 13-1: Transport Assessment [EN010168/APP/6.3].**
Wiltshire Council	Noise and vibration	As is referenced within the Public Protection team comment, the Council notes that noise and vibration impacts are shown as being largely scoped in. However, it remains unclear why aspects of noise and vibration are scoped out from the operational phases, most particularly traffic related impacts.	Operational traffic noise is assessed in Section 14.10 of **ES Volume 1, Chapter 14: Noise and Vibration [EN010168/APP/6.1]**. Operational vibration is scoped out on the basis that the Solar PV Panels do not use plant or equipment that generate significant vibration levels. This has been accepted by the Planning Inspectorate in their scoping opinion response.
Wiltshire Council	Air Quality	As is referenced within the Public Protection team comment, dust associated with development is an important subject for its consideration, and it would seem to be inappropriate to limit its consideration to within the CEMP, as is suggested within the scoping report. Reference to the potential impacts associated with potential BESS fire is welcomed.	Air quality impacts during construction, operation and maintenance and decommissioning are assessed in **ES Volume 1, Chapter 15: Air Quality [EN010168/APP/6.1]** and mitigation has been recommended where required. An assessment of air quality effects associated with construction dust is presented in **ES Volume 3, Appendix 15-1 [EN010168/APP/6.3]**. An assessment of air quality effects associated with a potential fire to the BESS is presented in **ES Volume 3, Appendix 15-2 [EN010168/APP/6.3]**. Mitigation measures for construction dust

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			are incorporated into the **Outline Construction Environmental Management Plan (CEMP) [EN010168/APP/7.12]**.
Wiltshire Council	Agriculture and soils	The Council notes that there is proposed to be a chapter of the ES considering the impact on agricultural and soils. As appears to be suggested in the scoping report, consideration of impacts should be given to the construction, operation and decommissioning phases as well as considering the land for the panels themselves, the route of the cable connection and substation.	The Soils and Agriculture assessment is contained within **ES Volume 1, Chapter 17: Soils and Agriculture [EN010168/APP/6.1]**. This includes an assessment of impacts during the construction, operation and decommissioning phases within the main Solar PV site, the route of the cable connection and substation.
Wiltshire Council	Agriculture and soils	However, whilst paragraph 20.4.5 notes that the land would not be primarily available for food production during the operational phase (other than grazing by livestock beneath the panels), in the very next paragraph it is then suggested that the effects on soil resources and agricultural land during the operation phase of the development can be “scoped out” on the basis that significant effects on agricultural land are likely to be restricted to the construction and decommissioning phases. This appears to be a contradiction and it should be expected that the ES will fully consider the quality of the agricultural land and soils being affected/lost, along with a consideration of alternatives which might result in a reduced impact.	The Scoping Opinion (ID 3.15.1) agrees with the Scoping Report that effects on soil and agricultural land during the operational phase of the Proposed Development can be scoped out on the basis that significant effects on soil and agricultural land are likely to be restricted to the construction and decommissioning phases. This is because the land is taken out of mainstream agricultural production as a result of constructing the Proposed Development and it is therefore appropriate to consider this impact during this phase of the Proposed Development. Similarly, the land will be returned to agricultural use as a result of decommissioning the Proposed Development, and this impact is assessed also for this phase.
Wiltshire Council	Closing text	I trust the foregoing and attached commentary will be considered by The Planning Inspectorate when formulating their scoping opinion. In the meantime, please may I once again extend my thanks for the opportunity to comment.	The Applicant notes this comment.
Yatton Keynell Parish Council	Commentary on Proposed Development	The proposed solar park lies outside of the Parish, whilst the proposed western cable corridor passes through the parish. At this time the Parish Council has no comment regarding the scoping of the Environmental Impact Assessment.	The Applicant notes this comment.
Box Parish Council	General	The Box Parish Council would like to support the resolution made by Wiltshire Council regarding the concentration of solar farms, battery storage and associated infrastructure in Wiltshire and the fact that some villages are now completely surrounded by solar farms and their continued concentration represents a significant cumulative impact and industrialisation of the countryside. It is vital that this factor is taken into account when considering this application.	**Chapter 21: Cumulative and In-Combination Effects [EN010168/APP/6.1]** provides an assessment of cumulative effects with other developments. A long list of cumulative developments was prepared and sent to Wiltshire County Council on 5th November 2024. A final list of cumulative developments was shared with Wiltshire Council on 23 May 2025. A further two cumulative developments were requested to be included in the long and short list and these developments have now been considered. The Cumulative Effects Assessment follows the methodology outlined in **Chapter 6: EIA Methodology [EN010168/APP/6.1]**.