

Lime Down



Solar Park

The Applicant's Response to Relevant Representations (Part 3)

May 2026

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1 Introduction

1.1 Purpose of the Document

- 1.1.1 An application (the Application) was made to the Secretary of State for Energy Security and Net Zero for a Development Consent Order (DCO) under section 37 of the Planning Act 2008 (PA 2008) for the Lime Down Solar Park (the Scheme). The Application was submitted by Lime Down Solar Park Limited (the Applicant) on 19 September 2025 and was accepted for examination on 17 October 2025. The examination into the Application commenced on 21 April 2026.
- 1.1.2 The period for registering as an Interested Party through the submission of a Relevant Representation (RR) ran from Thursday 30 October 2025 to Monday 12 January 2026. The Applicant has confirmed that it has complied with sections 56 and 51 of the Planning Act 2008 and Regulation 16 of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 in respect of publicising this period.
- 1.1.3 The Planning Inspectorate (PINS) has published a total of 4,961 RRs submitted to the Examining Authority by Interested Parties relating to the Application for the Scheme. These were published on the PINS website on Wednesday 21 January and Wednesday 4 February 2026.
- 1.1.4 The Applicant has previously submitted its response to RRs. The Applicant's response to the RRs submitted by statutory parties (including parties listed within the Book of Reference) is provided within the [Applicant's Response to Relevant Representations \(Part 1\) \[PDA-009\]](#), submitted at Procedural Deadline A (Monday 9 March 2026). The Applicant's response to RRs submitted by members of the public and non-statutory parties that had not been responded to in Part 1 was submitted in the [Applicant's Response to Relevant Representations \(Part 2\) \[PDB-004\]](#), submitted at Deadline B (Wednesday 1 April 2026).
- 1.1.5 The Applicant has since identified a limited number of omissions from those submissions. This document therefore provides the Applicant's response to the RRs submitted by statutory parties (including parties listed within the Book of Reference), where a response has not been published in either Part 1 or Part 2.

1.2 Structure of the Report

- 1.1.6 This document provides a response from the Applicant to the matters raised in the Relevant Representations and is structured as follows:
- **Table 1-1** sets out the list of acronyms used for management documents that form part of the Applicant's submission and may have been referred to by the Applicant in responding to RRs.
 - **Table 1-2** lists the parish councils that have submitted RRs for which the Applicant hasn't previously published its response.
 - **Table 1-3** lists the parties that have submitted RRs and are also listed within the **Book of Reference [APP-020]** for which the Applicant hasn't previously

published its response. These submissions are presented and responded to in full in **Section 2** of this document.

- 1.1.7 References to the Application documentation are provided in accordance with the referencing system set out in the Planning Inspectorate’s Lime Down Solar Park [Examination Library](#).
- 1.1.8 Revision suffixes have also been attached to any documents which, since submission, have been revised for and resubmitted by Deadline 1 to the Planning Inspectorate.
- 1.1.9 All documents submitted to the Planning Inspectorate on 19 September 2025 carry ‘/APP/’ within their document reference. Submissions made to the Planning Inspectorate post-submission and during the pre-examination stage carry ‘/AS/’ instead of ‘/APP/’ within the document reference, to reflect the submission being made during the pre-examination stage.

Table 1-1 List of Acronyms for Submission Documents

Acronym	Document
DCO	Development Consent Order
CR	Consultation Report (shorthand for appendices)
EIA	Environmental Impact Assessment
ES	Environmental Statement
BNG	Biodiversity Net Gain
FRADS	Flood Risk Assessment and Drainage Strategy
CEMP	Construction Environmental Management Plan
EPMP	Ecological Protection and Mitigation Plan
OEMP	Operational Environmental Management Plan
DS	Decommissioning Strategy
SRMP	Soil Resources Management Plan
SWMP	Site Waste Management Plan
PROWPPMP	Public Rights of Way and Permissive Paths Management Plan
LEMP	Landscape and Ecological Management Plan
SSCEP	Skills, Supply Chain and Employment Plan
BSMP	Battery Safety Management Plan
CTMP	Construction Traffic Management Plan
EqIA	Equality Impact Assessment
WRS	Water Resources Strategy

1.2 Tables of Parties submitting Relevant Representations

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

Examination Library Reference	Acronym	Book of Reference Plot Number	Relevant Representation Received from
RR-0547	BPC	N/A	Brokenborough Parish Council

Examination Library Reference	Acronym	Book of Reference Plot Number	Relevant Representation Received from
RR-0742	CWPC	N/A	Chippenham Without Parish Council

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

Examination Library Reference	Book of Reference Plot Number	Relevant Representation Received from
RR-0035	07-022	Adrian Andrews

2 The Applicant's responses to parish councils

2.1 Brokenborough Parish Council

Table 2-1 [RR-0547](#)

Reference	Theme	Comments/Issues Raised	Applicant's Response
BPC-001	Description and DCO Process	While solar power is widely supported when developed appropriately, this proposal represents large-scale destruction of rural landscape, with 4.5-metre-high panels spread across 18 square miles. It also includes vast battery storage units and a 20km cable route to connect to the grid—setting a precedent that could shape similar schemes across the UK.	<p>The Scheme has been designed to deliver the greatest practicable benefit from the available land and the available grid connection, whilst avoiding, minimising and/or mitigating harmful environmental effects. As per the description set out in ES Volume 1, Chapter 3: The Scheme [APP-055], the total area within the DCO Order Limits encompasses approximately 1,237 hectares (ha). Of this, the 'Solar PV Sites' comprise approximately 749.1 ha of land. Around 479.5 ha of this land is proposed to be required for installation of solar PV, battery storage, and associated infrastructure. The remaining 269.5 ha would provide areas dedicated to ecological mitigation, measurable Biodiversity Net Gain (BNG) delivery, landscaping, offsets and agricultural land managed for environmental enhancement and habitat creation.</p> <p>These mitigation measures are set out in ES Volume 1, Chapter 8: Landscape and Visual [APP-060], Figure 3-4-1 to 3-4-5.2 Landscape and Ecology Mitigation Plan (LEMP) [APP-084] and detailed within the Outline LEMP [APP-283].</p> <p>The Cable Route Corridor, which stretches approximately 22 km from 'Lime Down D' to Melksham Substation and links together the Solar PV Sites, covers approximately 463.2 ha. Approximately 17.8 ha (of which 5.9 ha overlap with the Cable Route Corridor) is proposed for Highway Improvement. These are areas within which improvements to sections of the existing highway network will be completed to facilitate access to the Scheme, such as improvements to road edge and traffic management.</p>

Reference	Theme	Comments/Issues Raised	Applicant's Response
			<p>Work will be undertaken by the Applicant and National Grid within the Existing National Grid Melksham Substation, requiring a total area of 12.8 ha. This is set out in ES Volume 1, Chapter 3: The Scheme [APP-055].</p> <p>The Applicant remains committed to delivering a Scheme that makes a meaningful contribution to the UK's transition to net zero, while also seeking to minimise adverse impacts and maximise opportunities for environmental enhancement and community benefits.</p> <p>The height of the solar PV panels has been assessed using clearly defined design parameters, including a maximum height of 4.5 metres above ground level at maximum tilt, as set out in ES Volume 1, Chapter 3: The Scheme [APP-055]. These parameters represent a realistic worst-case scenario for the purposes of the Environmental Impact Assessment.</p> <p>Mitigation measures to address landscape and visual effects, including measures that reduce the perceived height and prominence of panels in views, are set out in ES Volume 1, Chapter 8: Landscape and Visual [APP-060], ES Volume 2, Figure 3-4-1 to 3-4-5.2 LEMP [APP-084] and secured within the Outline LEMP [APP-283]. These include new and enhanced planting, retention of existing hedgerows and woodland, and landscape integration measures to reduce visual effects over time.</p> <p>ES Volume 1, Chapter 8: Landscape and Visual [APP-060] assesses the effectiveness of the mitigation measures over time and concludes that, in the majority of locations, where significant adverse visual effects are recorded, the visual effects would reduce to nonsignificant as mitigation planting establishes and matures. This demonstrates that the proposed mitigation is effective in reducing the visual effects of the Scheme. On this basis, a maximum panel height of 4.5m is not considered excessive.</p>

Reference	Theme	Comments/Issues Raised	Applicant's Response
			<p>The preparation, approval and implementation of the detailed LEMP, substantially in accordance with the Outline LEMP [APP-283], are secured through Requirement 7 in Schedule 2 to the Draft Development Consent Order (DCO) [APP-016], ensuring that the identified mitigation measures are delivered and maintained throughout the lifetime of the Scheme.</p>
BPC-002	Site Selection and Alternatives	<p>The location is unsuitable for the scheme — the applicant appears to have chosen this site for commercial convenience (working with a small number of large landowners), not because it is the best option for the environment or local communities. Alternative sites closer to the grid connection, with less potential harm, were overlooked.</p>	<p>National Policy Statement EN-3 Paragraphs 2.10.11 to 2.10.18 explain that the availability of grid connection, suitable irradiance levels, and local topography are key inputs to the selection of sites suitable for large-scale solar generation developments. The number of locations within the UK at which large-scale solar generation is suitable is therefore likely to be limited, and this is a material issue when considering how the UK is to meet the urgent need for low carbon generation as is set out in the NPSs. This point is expanded upon in the Statement of Need [APP-266] in particular in Section 4.3.</p> <p>Chapter 8 of the Statement of Need [APP-266] provides evidence to support the suitability of the proposed location of the Scheme for large-scale solar plus storage in relation to the timeliness and availability of the grid connection, transmission system operability and the decarbonisation and energy security benefits the Scheme will bring forward from this location.</p> <p>As set out in ES Volume 1, Chapter 4: Alternatives and Design Evolution [APP-056] and the Site Selection Assessment Report at ES Volume 3, Appendix 4-1: Site Selection Assessment Report [APP-185] an appraisal of alternative sites within a 20km radius of the Existing National Grid Melksham Substation has been undertaken, which concludes that there are no more suitable locations within the 20km search area than the proposed location for the Scheme.</p>
BPC-003	Landscape and Visual	<p>Harm to a protected landscape — the development borders the Cotswolds National Landscape (formerly an Area</p>	<p>The Cotswolds National Landscape (CNL) is fully assessed as a standalone receptor within ES Volume 3, Appendix 8.6: Assessment of Effects on the Special Qualities of the</p>

Reference	Theme	Comments/Issues Raised	Applicant's Response
		<p>of Outstanding Natural Beauty), and significant parts of the scheme lie within its setting, threatening the character of this protected area.</p>	<p>Cotswolds National Landscape [APP-197]. This assessment considers the effects of the Scheme on landscape character, visual amenity and the special qualities of the CNL, including tranquillity. Works within the CNL are limited to minor highways improvements, which would comprise of minor road widening at the locations shown on the Works Plan [APP-007]. Sheets 18,20 and 21 include the works, and works number 8A states that these are temporary.</p> <p>The assessment found that there would be some short-term impact to landscape character within the setting of the CNL but due to the avoidance measures embedded within the Scheme, harm to the CNL itself would be minimal with beneficial effects in the long term which would further the purposes of the designation. In respect of visual amenity, some short-term adverse effects would be experienced by a small number of visual receptors with views to and from the CNL. However, these would reduce over time as a result of the proposed mitigation.</p> <p>The assessment of effects on the special qualities of the CNL scoped out 3 Special Qualities (SQs) as there is no association with the Site. The assessment found that there are no direct effects on the remaining SQs. There are some Minor/ Negligible short-term effects on a small number of visual receptors within the setting of the CNL which affect SQ7 - Tranquillity and SQ13 - Archaeology and historic associations. However, these effects are mitigated by Year 15 when proposed vegetation has matured. The assessment also found that there would be beneficial effects on SQ 6 - Biodiversity and nature recovery as a result of the delivery of approximately 119.7 hectares of flower-rich neutral grassland (as defined in the BNG assessment) and SQ 12 - An accessible landscape as a result of the delivery of approximately 12.8km of new permissive paths within the setting of the CNL. The remaining SQs would remain entirely intact.</p> <p>The Scheme was refined through an iterative design process to avoid and reduce effects on the CNL and its setting. Panels along the edge of the CNL were removed from the Order Limits in fields C2, C3 and C4 where significant visual effects on receptors</p>

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			<p>within the CNL were identified. Panels were also removed from fields C1, C6, C8, the western section of C9 and the majority of C10, with this land now proposed for ecological mitigation to protect the setting of the CNL. In addition, panels within fields A11 and A12 were removed and the land repurposed for ecological mitigation to protect the setting of the CNL towards Sherston.</p> <p>All land parcels adjacent to the CNL are proposed to deliver habitat enhancement, informed by the CNL Management Plan and the Cotswolds National Landscape Strategy and Guidelines, to further the purposes of the designation.</p> <p>Details of the proposed landscape and ecological mitigation and enhancement measures such as the avoidance measures to remove panels from the boundary of CNL are provided in ES Volume 1, Chapter 8: Landscape and Visual [APP-060], ES Volume 2, Figure 3-4-1 to 3-4-5.2 Landscape and Ecology Mitigation Plan [APP-084] and secured within the Outline Landscape and Ecological Management Plan (LEMP) [APP-283], and the Outline Ecological Protection and Mitigation Strategy (EPMS) [APP-284].</p> <p>The preparation, approval and implementation of the detailed LEMP, substantially in accordance with the Outline LEMP [APP-283], are secured through Requirement 7 in Schedule 2 to the Draft Development Consent Order (DCO) [APP-016]. The preparation, approval and implementation of the detailed Ecological Protection and Mitigation Strategy, substantially in accordance with the Outline EPMS [APP-284], are secured through Requirement 8 in Schedule 2 to the Draft DCO [APP-016]. These requirements ensure that the identified mitigation and enhancement measures are delivered and maintained throughout the lifetime of the Scheme.</p>
BPC-004		Severe and lasting impact on the countryside — even the applicant's own assessment acknowledges major visual harm for at least 15 years, claiming	The Applicant notes that matters relating to landscape and visual impact have been addressed in the Applicant's responses to this Relevant Representation above at BPC-001.

Reference	Theme	Comments/Issues Raised	Applicant's Response
		<p>impacts will lessen thereafter. Objectors argue the damage will be more extensive and longer-lasting, as the visual simulations are misleading: they exclude worst-case winter conditions, fail to represent views from footpaths crossing the site, and do not show the effects of glint and glare from panels.</p>	<p>The landscape and visual effects of the Scheme, including the effectiveness and phasing of proposed screening and planting, are assessed in the Landscape and Visual Impact Assessment (LVIA) presented in ES Volume 1, Chapter 8: Landscape and Visual [APP-060]. The LVIA [APP-060] considers landscape and visual effects over time, including during the early years of the Scheme before planting is fully established, and identifies where significant effects may occur. NPS EN-1 recognises at para 5.10.5 that “<i>Virtually all nationally significant energy infrastructure projects will have adverse effects on the landscape, but there may also be beneficial landscape character impacts arising from mitigation.</i>”</p> <p>Mitigation measures are detailed in ES Volume 1, Chapter 8: Landscape and Visual [APP-060], Figure 3-4-1 to 3-4-5.2 Landscape and Ecology Mitigation Plan [APP-084] and the Outline Landscape and Ecological Management Plan (LEMP) [APP-283]. Proposed planting comprises a mix of native species designed to enhance biodiversity and resilience, with planting design prioritising long-term effectiveness and landscape integration. The Outline LEMP [APP-283] sets out the approach to establishment, maintenance and management of planting to ensure its effectiveness over the lifetime of the Scheme.</p> <p>The LVIA includes verified viewpoints with both summer and winter photography to demonstrate year-round changes to the landscape. Photomontages at Year 15 illustrate the effectiveness of established planting, while also demonstrating the intended retention of openness across the receiving landscape. Hedgerows on the western edge of fields within Lime Down C, which border the Cotswolds National Landscape, are proposed to be maintained at approximately 1.5 metres (or as existing if greater) to retain open views within the setting of the Cotswolds National Landscape. This management approach is set out in the Outline LEMP [APP-283].</p> <p>The photomontages presented in ES Volume 2, Figure 8-14 Baseline Photography and Photomontages [APP-103] to [APP-105] for selected viewpoints agreed with Wiltshire Council</p>

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			<p>show the proposals at Year 1 in winter which represents the worst-case scenario in terms of screening and Year 5 Summer which represents the best-case scenario. The photomontages are representative of the landscape and visual changes in the landscape and not glint and glare.</p> <p>An assessment of glint and glare effects arising from the Scheme is provided in Section 20.5 Glint and Glare in ES Volume 1, Chapter 20: Other Environmental Matters [APP-072]. The assessment considers potential effects on surrounding receptors, including road and rail users, residential properties, public rights of way, aerodromes and sensitive viewpoints within the Cotswolds National Landscape.</p> <p>The assessment concludes that, with embedded mitigation measures secured through Section 3.18 of the Outline Operational Environmental Management Plan (OEMP) [APP-278], including the use of fixed-tilt panels at a maximum height of 2.5 metres where required, no significant glint or glare effects are predicted to occur as a result of the Scheme.</p> <p>The preparation, approval and implementation of the detailed LEMP, substantially in accordance with the Outline LEMP [APP-283], and the detailed OEMP, substantially in accordance with the Outline OEMP, are secured through Requirement 7 and 14 respectively in Schedule 2 of the Draft Development Consent Order [APP-016], ensuring that mitigation planting and screening measures are delivered and maintained throughout the lifetime of the Scheme.</p>
BPC-005	Transport and Access	Construction traffic will be dangerous and highly disruptive — the area relies on narrow rural lanes used by walkers, cyclists, horse riders, farm vehicles, and residents. Construction would require thousands of HGV movements, and widening these lanes would	The effects of construction traffic on the local highway network are assessed in ES Volume 1, Chapter 13: Transport and Access [APP-065] , which considers construction vehicle routing, traffic volumes and potential impacts on highway safety and road condition. The assessment concludes that, with appropriate management measures in place, construction traffic effects can be appropriately controlled and through road condition surveys pre and post construction, any damage caused to the highway by the construction vehicles will be rectified as set out in Section

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		<p>destroy hedgerows, stone walls, and mature trees.</p>	<p>6.12 of the Outline Construction Traffic Management Plan (CTMP) [APP-287].</p> <p>Mitigation measures to manage construction traffic and protect local roads are set out in the Outline CTMP [APP-287]. The Outline CTMP [APP-287] has been developed to minimise impacts on the local highway network and includes measures for routing, scheduling of deliveries and liaison with the local highway authority.</p> <p>A road condition and dilapidation survey of minor roads not typically used by HGV traffic pre and post construction is committed to within the CTMP. The CTMP will also secure, as set out in the outline CTMP, that any damage to verges or carriageway surfaces caused by construction vehicles will be rectified to the satisfaction of the local highway authority.</p> <p>The potential effects of construction traffic on highway safety and accident risk are assessed in ES Volume 1, Chapter 13: Transport and Access [APP-065], which considers changes in traffic flows, HGV movements and accident risk on the local road network. Links experiencing traffic increases above defined assessment thresholds were taken forward for detailed analysis. Supporting technical evidence is provided in ES Volume 3, Appendix 13- 1: Transport Assessment [APP-233], which includes an assessment of baseline accident data and predicted changes in collision risk arising from construction traffic and on non-motorised user delay and amenity, including Fear and Intimidation.</p> <p><u>NMU Delay</u></p> <p>Non-motorised user delay is considered negligible given there is no existing pedestrian or cycle infrastructure on the construction routes and likely low numbers of existing NMU users.</p> <p>It is anticipated that PRow which cross the Order Limits will generally remain open during the construction phase of the Scheme. There may be some slight perceptible delay to NMU</p>

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			<p>movement if a construction vehicle is crossing a PRoW within the Order Limits. An Outline PRoW and Permissive Path Management Plan [APP-282] forms an embedded mitigation and will provide measures to ensure the effects of the construction phase on PRoW users is minimised. It contains specific measures for the temporary diversion of footpath WT GRIT 20 and bridleway WT MALW 54, where access to Cable Route Corridor works east of Grittleton, and HGV access to Lime Down E are taken respectively. These diversions are proposed to ensure significant effects to PROW users are not experienced during construction, replacement and decommissioning.</p> <p><u>NMU Amenity</u></p> <p>Pedestrian amenity is broadly defined as the relative pleasantness of a journey, and is considered to be affected by traffic flow, traffic composition and pavement width/separation from traffic. The construction routes on the road network have little existing pedestrian infrastructure and no footways, making them already unattractive as walking routes with no pedestrian amenity. However, highway widths of construction routes have been assessed ES Volume 3, Appendix 13-1: Transport Assessment [APP-233] and provide sufficient width for HGV traffic to comfortably pass pedestrians if they choose to do so.</p> <p>Fear and Intimidation for other NMU's can be assessed. Highway widths of construction routes have been assessed ES Volume 3, Appendix 13-1: Transport Assessment [APP-233] and provide sufficient width for HGV traffic to comfortably pass cyclists.</p> <p>ES Volume 3, Appendix 13-1: Transport Assessment [APP-233] concludes that the level of flow change will not result in a step change in fear and intimidation as defined in the ISEP guidance at tables 3.1, 3.2 and 3.3.</p> <p>ES Volume 3, Appendix 13-1: Transport Assessment [APP-233] concludes that on all links in the study area the significance of effect is Minor Adverse (temporary). The assessment</p>

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			<p>concludes that the level of construction traffic associated with the Scheme is unlikely to materially affect road safety on links within the Study Area, and no significant adverse effects on accident risk are anticipated.</p> <p><u>Mitigation</u></p> <p>An Outline Construction Traffic Management Plan (CTMP) [APP-287] supports the DCO Application and presents outline measures which restrict construction deliveries to the proposed construction routes and separates the public and recreational users from hazards, including, traffic management measures such as signage and banksmen, fencing, and dust and noise control.</p> <p>The preparation, approval and implementation of the final CTMP, substantially in accordance with the Outline CTMP [APP-287], are secured through Requirement 15 of Schedule 2 of the Draft Development Consent Order (DCO) [APP-016], ensuring construction traffic is managed safely throughout the construction phase of the Scheme.</p> <p>The trip generation for the construction phase has been calculated based on a detailed and realistic breakdown of the likely quantities and material volumes required to build out the various sites and cable routes. As presented in ES Volume 1, Chapter 13: Transport and Access [APP-065], the assessment assumes the Solar PV sites will generate a total of 148 HGV movements per day. In practice this number will be lower as the assessment applies a 50% uplift in vehicles movements and assumes all Solar PV sites will be constructed concurrently rather than phased as shown in the proposed construction programme.</p> <p>The proposed road widening works will be undertaken within the proposed Highway Improvement Areas. Works will include minor widening and avoid hedgerow removal or affecting stone walls and existing trees. Further details of the road widening works proposed within the Highway Improvement Areas in included in</p>

Reference	Theme	Comments/Issues Raised	Applicant's Response
			the updated Volume 3, Appendix 13-1: Transport Assessment [APP-233] submitted at Deadline 1.
BPC-006	Ecology and Biodiversity	Serious damage to wildlife and nature — the area is ecologically valuable and lies close to protected sites (including SACs, SSSIs) and ancient woodland. Perimeter fencing would cut across wildlife corridors, disrupting animals such as otters, hares, and badgers. The cable route has not been adequately surveyed for ecological impacts.	<p>Potential impacts on ecology and biodiversity are fully assessed in ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061]. This assessment considers baseline ecological conditions and evaluates likely significant effects arising during the construction, operation and decommissioning phases of the Scheme. It identifies avoidance, mitigation and enhancement measures to address potential impacts on habitats and protected and notable species. It also identifies opportunities for ecological enhancement, including the creation and long-term management of habitats, and delivery of biodiversity net gain.</p> <p>The assessment identifies embedded additional mitigation measures and concludes that, with these measures in place, significant adverse effects on ecological features are anticipated for hedgerows (in the short term only) as well as ground nesting breeding birds. Such residual effects will be at the Site to Local level of importance for these features.</p> <p>The Applicant notes that the approach to the assessment in relation to ecology and biodiversity in general is under discussion with Wiltshire Council and Natural England and is set out in the relevant Statement of Common Ground to be submitted at Deadline 2.</p> <p>The Scheme design incorporates fencing around the Solar PV Arrays that is permeable to wildlife, with the exception of deer. This means animals (excluding deer only) will be able to freely access habitats within the Solar PV Sites without the need for wildlife gates. In addition, wide buffers are retained around the peripheries of the Solar PV Sites to allow wildlife, including deer, to move between favoured habitats. Fencing will be subject to regular inspection and maintenance to ensure continued permeability to wildlife and effective functioning over the lifetime of the Scheme. Measures for ongoing ecological management</p>

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			<p>and maintenance are set out in the Outline Landscape and Ecological Management Plan (LEMP) [APP-283].</p> <p>In addition, other measures that are proposed to avoid disturbance and displacement of wildlife include timing restrictions on vegetation clearance, pre-construction ecological surveys, species-specific mitigation, and pollution prevention controls which are set out in the Outline Ecological Protection and Mitigation Strategy (EPMS) [APP-284]. Measures to protect trees and hedgerows are also set out in ES Volume 1, Chapter 10: Arboriculture [APP-062].</p> <p>The Scheme will also result in the cessation of intensive arable farming within the Solar PV Sites. As identified in ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061], this is expected to reduce the ongoing application of herbicides and pesticides, supporting improvements in habitat quality over the operational lifetime of the Scheme. The reversion of existing arable land within the Solar PV Sites to predominantly grassland habitats can be expected to benefit a wide range protected and notable species, as identified in ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061].</p> <p>Mitigation and enhancement measures are detailed in the Outline Landscape and Ecological Management Plan (LEMP) [APP-283] and the Outline EPMS [APP-284], which set out habitat creation, species protection measures, buffer zones and long-term ecological management.</p> <p>The preparation, approval and implementation of the detailed Landscape and Ecological Management Plan, substantially in accordance with the Outline LEMP [APP-283], are secured through Requirement 7 in Schedule 2 of the Draft Development Consent Order (DCO) [APP-016]. The preparation, approval and implementation of the detailed Ecological Protection and Mitigation Strategy, substantially in accordance with the Outline EPMS [APP-284], are secured through Requirement 8 in Schedule 2 of the Draft DCO [APP-016]. These requirements ensure that ecological protection and enhancement measures</p>

Reference	Theme	Comments/Issues Raised	Applicant's Response
			<p>are delivered and maintained throughout construction and operation of the Scheme.</p> <p>Potential impacts of the Scheme on designated sites for nature conservation, are assessed in ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061] and within the Habitat Regulations Assessment Report [APP-275], which considers baseline conditions and evaluates likely effects during construction, operation and decommissioning. The assessment identifies embedded and additional mitigation measures and concludes that, with these measures in place, no significant adverse effects on any designated sites are anticipated. The Applicant notes that the approach to the assessment in relation to designated sites is under discussion with Natural England and is set out in the relevant Statement of Common Ground to be submitted at Deadline 2.</p> <p>No veteran or ancient trees are proposed to be removed to facilitate the Scheme. The Scheme has been designed through an iterative process to retain existing arboricultural features as far as practicable and to avoid and reduce impacts on trees, groups of trees and woodland.</p> <p>Potential impacts on arboriculture are fully assessed in ES Volume 1, Chapter 10: Arboriculture [APP-062], which considers baseline arboricultural conditions and evaluates likely effects during construction, operation and decommissioning. This assessment identifies where tree removal or pruning may be required and concludes that, with embedded mitigation in place, no significant adverse residual effects on arboricultural features are anticipated.</p> <p>Embedded mitigation measures include sensitive siting of infrastructure, minimum offsets from retained trees, protection of root protection areas, supervision by an Arboricultural Clerk of Works, and the use of trenchless construction techniques where required to avoid impacts on high value trees. Where any unavoidable tree losses are necessary, compensatory tree and</p>

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			<p>woodland planting is proposed as part of the Scheme's landscape and ecological mitigation.</p> <p>Details of tree protection, replacement planting and long-term management are set out in the Outline Landscape and Ecological Management Plan (LEMP) [APP-283] and the Outline Construction Environmental Management Plan (CEMP) [APP-277]. The preparation, approval and implementation of detailed landscape and ecological management plans, substantially in accordance with the outline plans, are secured through requirements in Schedule 2 of the Draft Development Consent Order (DCO) [APP-016], ensuring that arboricultural mitigation measures are delivered and maintained throughout the lifetime of the Scheme.</p> <p>The scope of ecological and species-specific survey within the Cable Route Corridor is set out within section 9.6 of ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061] and was defined using a proportionate, risk based approach. Survey scope and effort across the Order Limits were targeted to areas and features where there was a reasonable likelihood of significant effects, rather than applied uniformly across the Order Limits irrespective of risk. The assessment has had regard to the short-term, temporary and construction-phase nature of works within the Cable Route Corridor, the absence of permanent operational effects, and a robust appraisal of habitat suitability for species based on baseline habitats data collected through surveys. Based on this, a reduced survey effort within the Cable Route Corridor has been undertaken compared to the Solar PV Sites. Potential impacts within the Cable Route Corridor, including temporary habitat loss, disturbance and fragmentation, have been assessed on a precautionary reasonable worst-case basis.</p> <p>The Applicant acknowledges that some areas within the Cable Route Corridor had not been subject to ecological survey at the point of finalising ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061]. Since the preparation of the Chapter, habitat surveys have now been completed across all previously</p>

Reference	Theme	Comments/Issues Raised	Applicant's Response
			<p>unsurveyed areas. The survey methodology applied was consistent with that reported in the ES Volume 3, Appendix 9-3: Ecological Baseline Report [APP-198] for the rest of the Cable Route Corridor.</p> <p>The results of these surveys have been reviewed and, in the Applicant's view, do not alter the conclusions of ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061] regarding likely significant effects. The precautionary assumptions previously applied in the ES were conservative and appropriately accounted for any uncertainty associated with unsurveyed areas. The Applicant has updated ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061] and provided a revised version at Deadline 1 with the findings of these surveys, and it is considered these do not materially change the assessment of likely significant effects presented in the chapter.</p>
BPC-007	Other Environmental Matters	Battery fire risk — the proposed Battery Energy Storage System (BESS) is extremely large. The assessment of toxic smoke and fire risk is flawed and understates the potential threat to nearby homes and the main railway line.	<p>The location of the Battery Energy Storage System (BESS) has been informed by a detailed site selection and design evolution process, as set out in ES Volume 1, Chapter 4: Alternatives and Design Evolution [APP-056]. This chapter explains that land at Lime Down D was identified as an appropriate location due to its proximity to the solar PV arrays and the on-site substation, providing operational benefits including minimising transmission losses, maximising storage efficiency, and enabling rapid and reliable grid response.</p> <p>In considering options for co-locating the BESS with the solar PV Sites, Lime Down D was selected as the preferred location due to its central position within the Scheme, effective natural and proposed screening, limited proximity to residential properties, and closeness to existing infrastructure corridors, including the railway line. Locating the BESS within an existing infrastructure corridor reduces the need for additional land take and avoids introducing new isolated infrastructure into undeveloped areas.</p> <p>The assessment concludes that siting the BESS at Lime Down D presents the lowest potential for significant adverse environmental effects. Accordingly, the proximity of the BESS to</p>

Reference	Theme	Comments/Issues Raised	Applicant's Response
			<p>the railway line does not give rise to significant safety or environmental concerns. Furthermore, during an emergency event, Network Rail can be made aware of the incident and halt trains from passing the site if it is deemed necessary to do so. As such, there are no significant adverse effects to human health anticipated as a result of the Scheme, as assessed in ES Volume 1, Chapter 18: Human Health [APP-070].</p> <p>The Applicant has followed National Fire Chiefs Council (NFCC) guidance and commissioned a Plume Assessment Study (ES Volume 3, Appendix 15-2 [APP-239]) to model toxic gas emissions and visibility impacts from a BESS fire on all sensitive receptors within a 1km radius of the BESS area.</p> <p>Six worst case BESS fire locations (i.e. locations within the BESS Area closest to sensitive receptors) have been modelled as depicted in ES Volume 2, Figure 15-5: Battery Energy Storage System Fire Emissions Study Area [APP-166]. The Concentrations of carbon monoxide (CO), formaldehyde, hydrogen chloride (HCl), hydrogen cyanide (HCN), hydrogen fluoride (HF), ammonia (NH₃), nitrogen dioxide (NO₂) and particulates from a potential BESS fire have been modelled using an air quality dispersion model to determine the likely effects on human health.</p> <p>A high-level visibility assessment has also been undertaken using the modelled particulates results to determine the effect of BESS fire emissions on visibility on the local road and rail network to inform the Outline Battery Safety Management Plan (BSMP) [APP-286].</p> <p>The Plume Assessment Study has concluded that there are no significant toxic emission or visibility impacts at all sensitive receptor locations.</p> <p>The Applicant has also committed to commissioning an additional Plume Analysis Study at the detailed design stage as stipulated in Section 5.5.9 of the Outline BSMP and secured through the DCO: <i>"..at the detailed design stage a BESS system and site</i></p>

Reference	Theme	Comments/Issues Raised	Applicant's Response
			<p><i>specific Plume Analysis study will be conducted to assess the environmental impact of a site incident to sensitive receptors within a 1 km radius. Toxic gas emissions to sensitive receptors must be below relevant public health exposure limit guidelines when the battery system of a BESS is fully consumed (burnt out), production of Particulate Matter (PM) and a visibility impact assessment on any transport links within a 1 km radius of the BESS area will also be included. The ERP produced at the detailed design stage (template outlined in Section 5.4.4) will incorporate all necessary emergency response procedures and actions based upon thermal runaway test data supplied by the BESS system provider.”</i></p> <p>The Applicant notes that the approach to BESS safety is under discussion with Dorset & Wiltshire Fire & Rescue Service (D&WFRS) and is set out in the relevant Statement of Common Ground to be submitted at Deadline 2.</p> <p>The Outline BSMP [APP-286] is secured through Requirement 6 (Battery safety management) in Schedule 2 of the Draft Development Consent Order (DCO) [APP-016], which provides that Work No. 2 must not commence until a Battery Safety Management Plan has been submitted to and approved by the relevant planning authority. The approved plan must be substantially in accordance with the Outline BSMP [APP-286]. The Draft DCO [APP-016] also requires the relevant planning authority to consult with Dorset and Wiltshire Fire and Rescue Service and the Environment Agency before determining the application, and that the Battery Safety Management Plan must be implemented as approved.</p>

Reference	Theme	Comments/Issues Raised	Applicant's Response
BPC-008	Description and DCO Process	<p>A “temporary” scheme lasting 60 years is unreasonable — most solar farms operate for 30–40 years. For local residents, a 60-year lifespan amounts to permanent transformation rather than a temporary development.</p>	<p>The Environmental Statement fully assesses the operational effects of the Scheme over a full operational life span of up to 60 years, at which point the development would be required to be decommissioned.</p> <p>At decommissioning, agricultural fields would be returned to the landowner. As infrastructure is removed, there would be an overall benefit to the character of the area with landscape proposals retained providing long term benefit towards the legacy landscape. Following decommissioning, the Site would benefit from the significantly enhanced tree and hedgerow planting that has been carried out and has matured to create a much stronger and robust landscape, retaining, and enhancing the overall character and providing considerable biodiversity benefits over the years. Due to the development, the landscape would be left in a better condition than at present. This betterment is established as a consequence of the landscape proposals resulting in greater species variety, greater age depth, enhanced structure, resilience to pest and disease and reinforcement of local landscape character across the Sites.</p> <p>The Applicant recognises the importance of restoring the land following decommissioning and is committed to ensuring that appropriate measures are secured to achieve this.</p> <p>At the end of the Scheme's operational life, all Solar PV Sites would be decommissioned and the land restored to its original use and condition as far as practicable. There will be opportunities for the retention of a range of biodiversity improvements, including established habitats, hedgerows and woodland, beyond the decommissioning of the Scheme, ultimately enhancing the ecological value of the area.</p> <p>Measures to manage decommissioning and reinstatement are set out in the Outline Decommissioning Strategy [APP-279], which has been submitted as part of the DCO Application. The Decommissioning Strategy will include robust methodologies and control points to avoid contamination of the underlying land with physical or chemical contaminants and will be applied in</p>

Reference	Theme	Comments/Issues Raised	Applicant's Response
			<p>conjunction with the Soil Resources Management Plan (SRMP) in order to promote successful reinstatement.</p> <p>A detailed Decommissioning Strategy will be prepared substantially in accordance with the Outline Decommissioning Strategy [APP-279] and must be submitted to and approved by the relevant local planning authority prior to the commencement of decommissioning. This is secured through Requirement 20 in Schedule 2 of the Draft Development Consent Order (DCO) [APP-016].</p> <p>In addition, the Applicant is seeking a time limited consent for the Scheme to have an operational period of 60 years, with decommissioning to take place following cessation of operation. This is also secured by Requirement 20 in Schedule 2 of the Draft DCO [APP-016].</p>
BPC-009	Hydrology, Flood Risk and Drainage	Increased flood risk — solar infrastructure and additional hard surfaces (roads, buildings) will increase runoff, worsening conditions in areas already prone to flooding.	<p>An assessment of the effects of the Scheme on flood risk both within the Site and the surrounding area is provided in ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [APP-063], with supporting information provided in ES Volume 3, Appendix 11-1 to 11-9: Flood Risk Assessment and Drainage Strategy [APP-210 to APP-218]. The assessment concludes that, with the embedded mitigation measures secured, the Scheme would not result in a material increase in off-site flood risk, including to adjacent communities and downstream receptors, and that any on-site flood risk would be managed such that the Scheme remains safe and operable for its lifetime.</p> <p>The assessment has been prepared in accordance with the Overarching National Policy Statement for Energy (EN-1) and the National Policy Statement for Renewable Energy Infrastructure (EN-3), together with national policy and best practice guidance and in consultation with the Environment Agency and Lead Local Flood Authority and is set out in the relevant Statements of Common Ground to be submitted at Deadline 2.</p> <p>The Outline Construction Environmental Management Plan (CEMP) [APP-277] has been developed in accordance with EN-1</p>

Reference	Theme	Comments/Issues Raised	Applicant's Response
			<p>and EN-3, to control construction-phase risks and ensure there is no material increase in off-site flood risk. In accordance with the National Policy Statement for Renewable Energy Infrastructure (EN-3) (paragraph 2.10.76).</p> <p>Requirement 13 in Schedule 2 to the Draft Development Consent Order (DCO) [APP-016] secures that no part of the authorised development can commence until a CEMP is submitted to and approved by the relevant planning authority. The CEMP must be substantially in accordance with the Outline CEMP, and all construction works must be carried out in accordance with the approved CEMP, thereby securing the mitigation measures relied upon in the assessment.</p> <p>Regarding specific concerns that panels will increase flooding, the submitted assessment presented in ES Volume 3, Appendix 11-1 ES Volume 3, Appendix 11-1: Flood Risk Assessment and Drainage Strategy - Lime Down Covering Report [APP-210] reflects established hydrological evidence that the addition of solar panels over a vegetated field does not materially increase runoff volumes, peak discharges or response times, and that changes in hydrologic response are primarily associated with alterations to ground cover beneath the panels rather than the panels themselves. Panelled areas are therefore designed so rainfall continues to drain to ground, with no creation of extensive impermeable surfaces and with controls in place to avoid any increase in discharge to watercourses.</p> <p>Measures to manage surface water runoff and drainage are set out in the outline drainage and construction management plans (ES Volume 3, Appendix 11-1 to 11-9: Flood Risk Assessment and Drainage Strategy [APP-210 to APP-218] and Outline CEMP [APP-277]) accompanying the Application. Where drainage measures are necessary, these include permeable surfacing, infiltration features, swales and attenuation storage to manage surface water and maintain existing greenfield runoff behaviour, as applicable.</p>

Reference	Theme	Comments/Issues Raised	Applicant's Response
			<p>Consistent with NPS EN-3 paragraph 2.10.84, these controls distinguish between solar PV panel areas, which drain to the existing ground and do not generally give rise to significant drainage effects, and associated infrastructure where runoff controls are required.</p> <p>The preparation, approval and implementation of the detailed drainage and construction management plans, substantially in accordance with the outline plans, are secured through Schedule 2 of the Draft DCO [APP-016]. This secures delivery and maintenance of the drainage strategy for Scheme infrastructure, together with soil and water management controls during construction, ensuring there is no material increase in off-site flood risk over the lifetime of the Scheme. Accordingly, the Applicant considers that flood risk in relation to the Scheme has been robustly and appropriately considered.</p>
BPC-010	Soils and Agriculture	Loss of high-quality farmland — the scheme would occupy around 240 hectares of Best and Most Versatile (BMV) agricultural land.	<p>The Applicant has had regard to agricultural land quality in the design and site selection process and has sought, where practicable, to locate infrastructure on lower quality land.</p> <p>ES Volume 1, Chapter 4: Alternatives and Design Evolution [APP-056] and ES Volume 3, Appendix 4-1: Site Selection Assessment Report [APP-185] explain the methodology that has been applied when identifying and evaluating potential sites for the Scheme. This includes how agricultural land has been considered and included within the search for sites, in line with relevant national policy.</p> <p>In particular, paragraph 2.10.31 of NPS EN-3 recognises that “<i>at this scale, it is likely that applicant’s developments will use some agricultural land. Applicants should explain their choice of site, noting the preference for development to be on suitable brownfield, industrial and low and medium grade agricultural land</i>”.</p> <p>In light of this policy, the Applicant’s site selection assessment focused initially on lower grade agricultural land. Brownfield sites were also considered. None of the initial sites considered were</p>

Reference	Theme	Comments/Issues Raised	Applicant's Response
			<p>deemed suitable for the Scheme, and therefore the search was broadened to include for consideration Grade 3 agricultural land together with specific areas of Grade 2 and Grade 1 agricultural land. By adopting this staged approach, the Applicant has sought to limit the use of BMV land within the Scheme, in line with the above policy.</p> <p>An assessment of the potential effects of the Scheme on soils and agricultural land is provided in ES Volume 1, Chapter 17: Soils and Agriculture [APP-069]. This chapter considers baseline agricultural land quality, including Best and Most Versatile (BMV) land, and assesses likely significant effects arising from construction, operation and decommissioning of the Scheme, together with embedded mitigation measures.</p> <p>The areas of each Agricultural Land Classification (ALC) grade affected by the Scheme are set out in ES Volume 1, Chapter 17: Soils and Agriculture [APP-069], Section 17.7. Of the agricultural land within the Solar PV Sites, approximately 477.4 hectares (around 67%) is classified as Subgrade 3b or Grade 4 and is therefore not BMV land. There is no Grade 1 land, around 30.8 hectares (approximately 4%) of Grade 2 land, and approximately 209.3 hectares (around 29%) of Subgrade 3a land. The distribution of ALC grades is shown in ES Volume 2, Figure 17-2: Agricultural Land Classification Mapping [APP-172].</p> <p>The Scheme will result in a temporary, long-term and reversible loss of agricultural land for the operational life of the Scheme. As set out in ES Volume 1, Chapter 17: Soils and Agriculture [APP-069], Section 17.10, this gives rise to a temporary, long-term moderate adverse effect on agricultural land overall, and a temporary, long-term major/moderate adverse effect on BMV land, both of which are assessed as significant. These effects are fully reported in the ES and are a matter for the Secretary of State to weigh in the planning balance against the need for the Scheme and its wider benefits. There are no significant permanent effects on agricultural land, as all land will be returned to its original use and condition as far as practicable following decommissioning, as set out in paragraphs 2.1.3 to 2.1.5 of the</p>

Reference	Theme	Comments/Issues Raised	Applicant's Response
			<p>Outline Decommissioning Strategy [APP-279], which is secured by Schedule 2, Requirement 20 of the Draft Development Consent Order (DCO) [APP-016].</p> <p>The Applicant notes that the approach to assessing the quality of the agricultural land is under discussion with Natural England and is set out in the relevant Statement of Common Ground to be submitted at Deadline 2.</p> <p>Measures to avoid and minimise effects on soils and agricultural land are embedded within the Scheme design and secured through Schedule 2, Requirement 17 of the Draft DCO [APP-016], which includes the preparation and implementation of a Soil Resources Management Plan (SRMP) in accordance with the Outline Soil Resources Management Plan (SRMP) [APP-280]. The SRMP will control soil handling, storage and reinstatement during construction, operation and decommissioning, and a requirement to prepare and implement a Decommissioning Strategy in accordance with the Outline Decommissioning Strategy [APP-279], which is secured by Schedule 2, Requirement 20 of the Draft DCO [APP-016].</p> <p>The Outline Landscape and Ecological Management Plan (LEMP) [APP-283] details how grassland and other habitat will be established beneath and between the solar panels. The detailed LEMP will be secured through Schedule 2, Requirement 7 of the Draft DCO [APP-016]. Through the establishment and maintenance of long-term grassland beneath and between the solar arrays, soil health, quality and structure are anticipated to improve over the lifetime of the Scheme, resulting in a temporary, moderate beneficial effect on soil resources at decommissioning, which is assessed as significant (ES Volume 1, Chapter 17: Soils and Agriculture [APP-069], Sections 17.10 and 17.12).</p>
BPC-011	Socio-Economics, Tourism and Recreation	Footpaths and bridleways will be harmed — a well-used network of public rights of way, including the iconic Fosse Way Roman road, would be degraded. Paths would become	A detailed assessment of the likely significance of effects from the Scheme on the use and desirability of individual PROW and recreational access to the countryside is included in ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068] and ES Volume 3, Appendix 16-2: Tourism and

Reference	Theme	Comments/Issues Raised	Applicant's Response
		<p>enclosed, industrialised corridors, with views and landscape character lost.</p>	<p>Recreation Receptor Tables [APP-241]. This assessment considers the impact on individual recreational routes, including their practical use, enjoyment and desirability. The Applicant confirms that the majority of significant adverse effects can be mitigated. However, some significant adverse effects to users of PROW and unsurfaced roads in Lime Down E during construction cannot be mitigated further. No significant residual effects are anticipated during the operational phase of the Scheme.</p> <p>The assessment in ES Volume 1, Chapter 18: Human Health [APP-070] also considers the physical and mental health impacts of changes to recreation and countryside access under the assessment topic 'open space, leisure and play', and concludes that no significant adverse effects are anticipated at any phase of the Scheme.</p> <p>The Applicant confirms that existing PROW are to be protected as far as practicable within the Scheme design, with management measures set out in the Outline Public Rights of Way and Permissive Paths Management Plan (PRoWPPMP) [APP-282], confirmed as embedded mitigation in Section 16.9 of ES Chapter 16.</p> <p>New permissive access routes have been incorporated into the Scheme design, shown as Work No. 10 on the Works Plan [APP-007] and illustrated on ES Volume 2, Figure 3-4: Landscape and Ecology Mitigation Plan [APP-084]. These are identified as additional mitigation and enhancement measures in Section 16.11 of ES Chapter 16.</p> <p>The PRoWPPMP is secured through Requirement 16 of Schedule 2 of the Draft Development Consent Order (DCO) [APP-016]. The preparation, approval and implementation of the detailed Construction Environmental Management Plan (CEMP) and Construction Traffic Management Plan (CTMP), substantially in accordance with the outline plans, are secured through Requirements 13 and 15 respectively in Schedule 2 of the Draft Development Consent Order (DCO) [APP-016], ensuring that</p>

Reference	Theme	Comments/Issues Raised	Applicant's Response
			<p>impacts on PROW and recreational routes are appropriately managed during construction.</p> <p>The approach to recreation and access has been discussed with Wiltshire Council's Public Health team and is under discussion with Wiltshire Council's Countryside Access Team and is set out in the relevant Statement of Common Ground to be submitted at Deadline 2.</p> <p>Regarding the Fosse Way, since the design presented at PEIR stage, Field C26, the westernmost part of Field C25, and the majority of Field C13 have been entirely removed from the Order Limits. Solar PV Panels have also been removed entirely from within Fields B1-B5, C24-C25, and C13. A number of fields, abutting the Fosse Way within which Solar PV Panels, will be erected have had offsets established with their boundaries and the Fosse Way, including Fields B6, C10-C12, and C22-C23. ES Volume 3, Appendix 12-1: Heritage Statement [APP-219] identified that the overall setting and significance of the Fosse Way will remain intact, and the asset will retain its legibility as a roadway within a largely agrarian landscape. Consequently, no significant effects were identified to the asset.</p> <p>The visual effects of the Scheme on the Fosse Way have been fully assessed in the LVIA in ES Volume 1, Chapter 8: Landscape and Visual [APP-060] and ES Volume 3, Appendix 8-3-2-2: Landscape and Visual Assessment Sheets (Significant) [APP-191]. The Fosse Way, identified as Receptor TR145, represents a long section of the Fosse Way from Dunley Wood to the south to Foxley Road to the North as represented by Viewpoints 14,15 and 22 – 25. Users of the Fosse Way are assessed as having Moderate Adverse Significant Effects at construction and Year 1 of operation. Construction effects would be temporary in nature and at the start of the operation phase infrastructure would be visible to varying degrees as mitigation planting is established. However, once mitigation planting matures the magnitude of change would reduce to Very Low and the effects at Year 15 would reduce to Minor and Neutral in</p>

Reference	Theme	Comments/Issues Raised	Applicant's Response
			nature, with no adverse effects identified during decommissioning.
BPC-012	Description and DCO Process	In addition to these points, the developer, Macquarie (the company linked to the (Redacted) of Thames Water), is expected to extract profits offshore while leaving behind a permanently industrialised landscape.	<p>The Applicant, Lime Down Solar Park Limited is a 100% subsidiary of IGP UK Projects Limited. Both are registered in England and Wales and subject to UK tax law and regulations. Investment may come from a range of sources, including international ones. This is common practice with UK infrastructure projects and helps fund the transition to clean energy at the scale required.</p> <p>Furthermore, the Applicant has a strong track record of developing Nationally Significant Infrastructure Project (NSIP) scale projects, notably the consented Cottom Solar Project and West Burton Solar Project, alongside a strong pipeline of further applications coming forward.</p> <p>Regarding ownership, in summer 2022, Macquarie Asset Management, via Macquarie Green Investment Group Renewable Energy Fund 2 (MGREF2) acquired a 50 per cent stake in Island Green Power (IGP). In May 2025, Macquarie Asset Management, through two other funds, purchased an additional 50% stake in IGP. These funds are managed on behalf of a diverse range of investors, including UK pension funds.</p> <p>Macquarie Group has invested in the UK's green-energy sector since 2005 and in total has arranged or invested more than £60 billion in UK infrastructure since 1999, including renewable energy projects.</p> <p>The Funding Statement [APP-019] submitted with the DCO application demonstrates that the Scheme is financially viable and adequately funded to deliver the Scheme in full.</p> <p>Finally, the Scheme is subject to legally binding Development Consent Order (DCO) requirements. The Planning Act 2008 also contains enforcement provisions regarding compliance with the terms of a DCO, including the requirement that all land will be returned to its original use and condition as far as practicable</p>

Reference	Theme	Comments/Issues Raised	Applicant's Response
			following decommissioning, as set out in paragraphs 2.1.3 to 2.1.5 of the Outline Decommissioning Strategy [APP-279] , which is secured by Schedule 2, Requirement 20 of the Draft Development Consent Order (DCO) [APP-016] .

2.2 Chippenham Without Parish Council

Table 2-2 [RR-0742](#)

Reference	Theme	Comments/Issues Raise	Applicant's Response
CWPC-001	Description and DCO Process	<p>The Parish Council will be submitting a comprehensive letter of objections to this proposal.</p> <p>These will include the overall size and scale of the project. The significant negative impact on the rural scene and landscapes, the surrounding village settings, ecology and biodiversity, hydrology, flood risk and drainage, soils and agriculture, noise and vibration, cultural heritage, transport, highways and socioeconomics, tourism and recreation all to be balanced against the potential gains of renewable energy generation and carbon reduction.</p> <p>In addition, the concentration of solar farms, battery storage and associated infrastructure within the County of Wiltshire that represents a significant</p>	<p>The Applicant notes the Council's intention to submit a detailed letter of objections covering a range of topics including landscape and visual effects, setting, ecology and biodiversity, hydrology and flood risk and drainage, soils and agriculture, noise and vibration, cultural heritage, transport, socio-economics, tourism and recreation, as well as concerns relating to cumulative development and the scale of the Scheme.</p> <p>The Applicant confirms that these matters have been assessed as part of the Environmental Impact Assessment (EIA) and are reported within the Environmental Statement (ES), including ES Volume 1, Chapter 8: Landscape and Visual [APP-060], ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061], ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [APP-063], ES Volume 1, Chapter 14: Noise and Vibration [APP-066], ES Volume 1, Chapter 12: Cultural Heritage [APP-064], ES Volume 1, Chapter 13: Transport and Access [APP-065], ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068] and ES Volume 1, Chapter 21: Cumulative and In-Combination Effects [APP-073].</p>

Reference	Theme	Comments/Issues Raise	Applicant's Response
		<p>cumulative impact and industrialisation of the countryside destroying food production and the farming industry.</p>	<p>The Applicant's Statement of Need [APP-266] provides evidence that an unprecedented capacity of new low-carbon generation schemes is urgently needed for the UK to meet its legally binding climate change targets. The government has confirmed that solar energy is at the heart of the Clean Power 2030 Mission [NPS EN-3 (2025) Paras 2.10.1 & 2.10.2]. The Statement of Need confirms that the need for the Scheme is urgent and that substantial weight should be given to the need for the Scheme [NPS EN-1 (2023) Para 3.2.9-3.2.10]. The Applicant is confident that the proposed management and mitigation measures set out in the Environmental Statement [APP-052 to APP-265] are comprehensive and robust and that the Scheme aligns with national and local planning policy; this is outlined in the Planning Statement [APP-267]. Of particular relevance are Annex A: National Policy Statement Accordance Tables and Annex B: Local Policy Accordance Tables, of the Planning Statement which set out an appraisal of the Scheme against national and local planning policies.</p> <p>Regarding food production and farming, the Applicant wishes to clarify that the Scheme is intended to complement and diversify land use for landowners, rather than replace agricultural practices. The Scheme provides a secure, weather- resilient income stream whilst still enabling the majority of land within estates which is not related to the scheme to be retained for farming and food production.</p> <p>The Applicant recognises that the Council intends to provide further detailed submissions on these matters. The Applicant will continue to engage constructively with stakeholders throughout the Examination and will respond to issues raised through the formal Examination process.</p>

3 The Applicant's responses to parties listed within the Book of Reference

3.1 Adrian Andrews

Table 3-1 [RR-0035](#)

Reference	Theme	Comments/Issues Raised	Applicant's Response
AA-001	Hydrology, Flood Risk and Drainage	I'm very concerned about the environmental risks in this part of the country. Flooding is of particular concern.	<p>An assessment of the effects of the Scheme on flood risk both within the Site and the surrounding area is provided in ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [APP-063], with supporting information provided in ES Volume 3, Appendix 11-1 to 11-9: Flood Risk Assessment and Drainage Strategy [APP-210 to APP-218]. The assessment concludes that, with the embedded mitigation measures secured, the Scheme would not result in a material increase in off-site flood risk, including to adjacent communities and downstream receptors, and that any on-site flood risk would be managed such that the Scheme remains safe and operable for its lifetime.</p> <p>The assessment has been prepared in accordance with the Overarching National Policy Statement for Energy (EN-1) and the National Policy Statement for Renewable Energy Infrastructure (EN-3), together with national policy and best practice guidance and in consultation with the Environment Agency and Lead Local Flood Authority and is set out in the relevant Statements of Common Ground to be submitted at Deadline 2.</p> <p>The Outline Construction Environmental Management Plan (CEMP) [APP-277] has been developed in accordance with EN-1 and EN-3, to control construction-phase risks and ensure there is no material increase in off-site flood risk. In accordance with the National Policy Statement for Renewable Energy Infrastructure (EN-3) (paragraph 2.10.76).</p>

Reference	Theme	Comments/Issues Raised	Applicant's Response
			<p>Requirement 13 in Schedule 2 to the Draft Development Consent Order (DCO) [APP-016] secures that no part of the authorised development can commence until a CEMP is submitted to and approved by the relevant planning authority. The CEMP must be substantially in accordance with the Outline CEMP, and all construction works must be carried out in accordance with the approved CEMP, thereby securing the mitigation measures relied upon in the assessment.</p> <p>Regarding specific concerns that panels will increase flooding, the submitted assessment presented in ES Volume 3, Appendix 11-1 ES Volume 3, Appendix 11-1: Flood Risk Assessment and Drainage Strategy - Lime Down Covering Report [APP-210] reflects established hydrological evidence that the addition of solar panels over a vegetated field does not materially increase runoff volumes, peak discharges or response times, and that changes in hydrologic response are primarily associated with alterations to ground cover beneath the panels rather than the panels themselves. Panelled areas are therefore designed so rainfall continues to drain to ground, with no creation of extensive impermeable surfaces and with controls in place to avoid any increase in discharge to watercourses.</p> <p>Measures to manage surface water runoff and drainage are set out in the outline drainage and construction management plans (ES Volume 3, Appendix 11-1 to 11-9: Flood Risk Assessment and Drainage Strategy [APP-210 to APP-218] and Outline CEMP [APP-277]) accompanying the Application. Where drainage measures are necessary, these include permeable surfacing, infiltration features, swales and attenuation storage to manage surface water and maintain greenfield runoff behaviour, as applicable.</p> <p>Consistent with NPS EN-3 paragraph 2.10.84, these controls distinguish between solar PV panel areas, which drain to the</p>

Reference	Theme	Comments/Issues Raised	Applicant's Response
			<p>existing ground and do not generally give rise to significant drainage effects, and associated infrastructure where runoff controls are required.</p> <p>The preparation, approval and implementation of the detailed drainage and construction management plans, substantially in accordance with the outline plans, are secured through Schedule 2 of the Draft DCO [APP-016]. This secures delivery and maintenance of the drainage strategy for Scheme infrastructure, together with soil and water management controls during construction, ensuring there is no material increase in off-site flood risk over the lifetime of the Scheme.</p> <p>Accordingly, the Applicant considers that flood risk in relation to the Scheme has been robustly and appropriately considered.</p>
AA-002	Other Environmental Matters	There is a proven fire risk at the battery storage sites and pollution into waterways seems inevitable.	<p>The Scheme layout also incorporates separation distances between battery containers to ensure that any isolated fire would not become widespread or lead to a major incident – as shown on ES Volume 2, Figure 3-1: Indicative Site Layout Plan [APP-081], the battery containers will be located more than 200 metres from the nearest Public Right of Way and more than 500 metres from any residential receptors.</p> <p>An Outline Battery Safety Management Plan (BSMP) [APP-286] has been prepared for the Scheme using guidance from Dorset and Wiltshire Fire and Rescue Service and incorporating recommendations of the National Fire Chiefs Council. The Outline BSMP ensures that risks associated with battery storage are appropriately mitigated. The Outline BSMP has been amended at Deadline 1 to fully accommodate the latest BESS safety requirements contained in NFPA 855 (2026) ensuring that any credible risks associated with battery storage are either prevented or fully mitigated if a BESS failure occurs.</p> <p>Section 2.4.2 of the Outline BSMP [APP-286] stipulates that: <i>“Final BESS design and site layout will have been validated</i></p>

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			<p><i>through mandatory Large Scale Fire Testing (LSFT) and rigorous consequence modelling to minimise the requirement for any D&WFRS intervention in a thermal runaway incident. LSFT must establish minimum equipment spacing distances that demonstrate there is no fire propagation to adjacent BESS enclosures or ESS equipment. D&WFRS intervention in worst case scenarios would typically be limited to boundary cooling of adjacent BESS and Energy Storage System (ESS) units to prevent the fire from spreading. This strategy will be finalised with D&WFRS and be clearly communicated in the Emergency Response Plan (ERP);</i></p> <ul style="list-style-type: none"> <i>• To ensure that fire, smoke, and any release of toxic gases does not significantly impact site operatives, first responders, and the local community; and</i> <i>• To ensure that firewater run-off is contained and tested before release or, if necessary, removed by tanker and treated offsite.”</i> <p>Section 5 of the Outline BSMP [APP-286] covers all requisite firefighting requirements for the Scheme including fire service access, firefighting water supply, and emergency planning requirements.</p> <p>The Applicant acknowledges the concern raised regarding potential water contamination in the event of a fire at the Battery Energy Storage System (BESS). The potential effects of the Scheme on hydrology and water quality have been assessed in ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [APP-063], supported by the ES Volume 3, Appendix 11-6: Flood Risk Assessment and Drainage Strategy – Lime Down D BESS [APP-215]. The BESS drainage design incorporates containment measures, including controlled drainage and isolation mechanisms, to ensure that any firewater or contaminated runoff can be retained and managed on site.</p>

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			<p>Section 6.1.1 of the Outline BSMP [APP-286] confirms that at the detailed design stage, the selected BESS will have undertaken Large Scale Fire Testing (LSFT) to fully inform inputs for risk assessment tools which will be utilised together with detailed consequence modelling to provide a comprehensive site operations and emergency response safety audit. LSFT is a mandatory requirement under NFPA 855 (2026) safety standards to demonstrate thermal insulation protection capabilities of the BESS enclosure design, validate minimum equipment spacing distances, and demonstrate that deflagrations do not occur and/or can be safely constrained.</p> <p>As set out in the Outline BSMP [APP-286], the BESS Area will have a robust and validated Emergency Response Plan (ERP), developed in consultation with Dorset & Wiltshire Fire and Rescue Service at the detailed design stage. Section 5.4 of the Outline BSMP specifies the typical emergency response protocols, procedures and safety information that will be included in the ERP. The ERP will apply to all stages of the Scheme, including construction, operation and decommissioning.</p> <p>The Applicant is currently drafting a Statement of Common Ground (SOCG) with the Environment Agency (EA) on Scheme environmental protection issues including the BESS area drainage strategy. The agreed strategy document has been appended to the Outline Battery Safety Management Plan (BSMP) [APP-286] at Deadline 1, to provide further assurance that all water pollution risks from a BESS fire are fully mitigated. The EA is a statutory consultee for the Outline BSMP [APP-286] and drainage strategies and must approve the final BSMP and drainage design at detailed design before construction of the BESS commences.</p> <p>The Outline BSMP [APP-286] is secured through Requirement 6 (Battery safety management) in Schedule 2 of the Draft Development Consent Order (DCO) [APP-016], which provides</p>

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			that Work No. 2 must not commence until a Battery Safety Management Plan has been submitted to and approved by the relevant planning authority. The approved plan must be substantially in accordance with the Outline BSMP [APP-286] . The Draft DCO [APP-016] also requires the relevant planning authority to consult with Dorset and Wiltshire Fire and Rescue Service and the Environment Agency before determining the application, and that the Battery Safety Management Plan must be implemented as approved.
AA-003	Ecology and Biodiversity	I own some land in this area and have made every effort to manage it in a sustainable and environmentally friendly way to protect the local flora and fauna. which now feels absolutely compromised by this industrial sized project.	Potential impacts of the Scheme on wildlife are assessed in ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061] , which considers baseline conditions and evaluates likely effects during construction, operation and decommissioning. The assessment identifies embedded and additional mitigation measures and concludes that, with these measures in place, no significant adverse effects are anticipated on protected and notable species of flora and fauna with the exception of skylark and hedgerows. Residual significant adverse effects on these receptors are limited to a local level of geographical importance only.