

Post Preliminary Meeting and Issue Specific Hearing 1 (ISH1) Submissions, including written submissions of oral cases and response to hearing action point arising from ISH1

1. Preliminary Meeting – 21 April 2026

Initial Assessment of Principal Issues

- 1.1. Wiltshire Council (the Council) indicated its agreement with the ExA's initial assessment of principal issues as contained within Annex C to the Rule 6 Letter [\[PD-006\]](#).

Draft Examination Timetable

- 1.2. Wiltshire Council raised concerns regarding the draft examination timetable as contained within Annex D to the Rule 6 letter as part of its Procedural Deadline A response [\[PDA-013\]](#). The Council considered that insufficient time had been provided for the Council to adequately consider and respond to the ExA written questions and to comment on the Written Representations. The Council were seeking a minimum of 15 days to respond to the ExA questions and 6 weeks to review and comment on the Written Representations.
- 1.3. Wiltshire Council appreciates the ExA slightly amending the timetable in its Rules 8, 9, 13 and 16 Letter [\[PD-007\]](#) to extend Deadline 2 by two calendar days, and for its direction for the Council to focus its review of Written Representations to those submitted by statutory bodies. Furthermore, the Council welcomes the additional three calendar days for the responses to ExA Questions 1 at Deadline 3.
- 1.4. The Council also requested that the ExA schedule further provision within the timetable for additional hearings, or to keep the need for additional hearings under review, in order for the evidence to be appropriately considered and examined. The Council was specifically seeking hearings on the following topic areas:
 - **Draft DCO** – A further ISH is considered likely to be required given the Council's unresolved concerns as set out in Appendix A to its Relevant Representation [\[RR-4934\]](#) and additional Requirements would be set out in its Written Representation and Local Impact Report.
 - **Ecology and Biodiversity** – On account of the scale and nature of the scheme across predominantly greenfield land, the potential for significant adverse effects on protected species, the need for the competent authority to conduct a Habitats Regulations Assessment (HRA) and the complex and still evolving nature of the Biodiversity Net Gain (BNG) submission, the Council considers a dedicated ISH on this topic will be required.

- **Flood Risk and Drainage** – The LLFA considers flood risk and drainage to be a principal unresolved issue. Given the scale of the development, the methodological dispute over assessment adequacy, and the reliance on - post consent controls, the LLFA considers a dedicated ISH on flood risk and drainage would be appropriate and would materially assist the Examination.
- **Highways and Transport** – The Council considers that an ISH is required on this topic given the number of unresolved issues, including the lack of clarity on enforceable powers, the lack of indemnity provision and acceptable works monitoring, the concern over the adequacy of the network to accommodate the construction traffic proposed, and the concern that the number of HGV movements have been underestimated. The hearing could also explore further mitigation measures to protect vulnerable road users.
- **Landscape and Visual** – The Council considers that an ISH is required due to:
 - It is the Council's position that the currently assessed levels of landscape and visual harms and benefits assessed to date are not considered accurate or reliable to be taken form to inform the ExA's wider planning balance exercise. The Council is concerned that the Landscape and Visual Impact Assessment generally underestimate the resulting negative effects and overestimate the positive effects for this project based on incorrect judgements of receptor Value, Susceptibility, Sensitivity and Magnitude used within the assessment. The Council believes that these issues should be further discussed to ensure that the ExA has accurate landscape and visual assessment findings and to inform its wider planning balance considerations.
 - The Council does not consider that the project is 'landscape-led' as claimed by the Applicant. The Council believes that what a landscape-led project is should be explored.
 - The Council considers that the DCO submission does not appropriately consider the full potential of the project for significant adverse effects on the Cotswolds National Landscape and its setting, including matters of relative tranquillity. The additionally submitted Tranquillity Technical Note [[PDA-010](#)] does not suitably address this matter and therefore the Council considers that this matter should be explored in more detail.
 - There are no indicative details as to where the vast quantities of topsoil and subsoil will be stored or distributed for later use in land restoration proposals. This could be on areas reserved for landscape and / or ecological mitigation and embedded mitigation, or close to high value features. The ISH is considered necessary to further understand typically where, and in what form, anticipated waste soils would or could be theoretically stockpiled, without impacting on sensitive receptors or embedded mitigation proposals.

- The basis for determining the Zone of Influence for cumulative landscape assessment is based on a 10km radial area of search from LDSP solar panel areas A to E without any project specific topic matter reasoning for this. The cumulative landscape and visual assessment findings do not appropriately include or consider the full potential for cumulative landscape effects or sequential visual effects with existing operational solar farms located within the Limestone Lowland Landscape Character Type.
 - **Noise and Vibration** – The Council considers that an ISH on noise and vibration should be scheduled on a precautionary basis due to the outstanding concerns that the Council has. However, it may be possible to address these issues in updated management plans, for example through improved mitigation measures, although there are also concerns with regards to enforcement activity. The Council would request that the ExA keep the need for a noise and vibration hearing under review during the course of the Examination.
- 1.5. Wiltshire Council welcomes the ExA reserving an additional week for hearings (week commencing 21 September 2026) in its Rules 8, 9, 13 and 16 Letter [[PD-007](#)].
- 1.6. The Council sought an extension to the deadline for the initial submission of the Statement of Common Ground between the Applicant and itself from 1 May (Deadline 1) to 15 May as the initial draft was only received from the Applicant on 15 April, noting that it had been expected to be received during week commencing 23 March. The extension sought would enable council officers to fully review the document to ensure that it was of genuine usefulness to the ExA, rather than a rushed document. The Council was seeking sufficient time to enable it to respond as required in its role as Host Authority.
- 1.7. Wiltshire Council appreciates the ExA moving the deadline for submission of initial Statement of Common Grounds from Deadline 1 to Deadline 2 (22 May 2026) within its Rules 8, 9, 13 and 16 Letter [[PD-007](#)].

Procedural Decisions Made by the ExA

- 1.8. The Council indicated that it was helpful to receive direction that there would be a Statement of Common Ground between the Applicant and Stop Lime Down. It noted that there may be other stakeholders, for example Town and Parish Councils, who may wish to have a Statement of Common Ground as well. The Council requested that the ExA consider any further requests favourably.

Any Other Matters

- 1.9. The Council expressed its support for the matter raised by Stop Lime Down regarding reserving space for the press at future hearings relating to this scheme.

2. Issue Specific Hearing 1 – 22 April 2026

The Draft Development Consent Order (dDCO)

- 2.1. The Council welcomed the indication from the Applicant that further detail would be provided at Deadline 1 following questioning from the ExA on Requirement 20 Decommissioning and Land Restoration. This is an area that the Council has previously expressed concerns [[RR-4934](#)].
- 2.2. The Council indicated that it had concerns regarding the Book of Reference [[APP-020](#)] and associated plans, as it had also found them difficult to interpret and were unclear about the exact rights were being sought over land in which the Council had an interest. A detailed response on this matter would be provided by the Council at Deadline 1 as part of its Written Representation.
- 2.3. The Council highlighted that it was engaged in active discussions with the Applicant regarding the Draft DCO. Whilst some progress has been made, with respects of having Protective Provisions for the benefit of the Local Highway Authority for example, the Council has a number of outstanding concerns in relation to the Draft DCO as currently drafted [[RR-4934](#)]. The Council will also be seeking additional and / or amended Requirements and these will be set out in the Council's Written Representation and Local Impact Report, which will be submitted at Deadline 1.

Alternatives

- 2.4. In response to the question posed by the ExA to the Council in its role as LLFA, the Council indicated that the Section 19 (Flood and Water Management Act 2010) reports were published on its website. A preliminary review did not identify any published reports within the Lime Down Solar Park project area, however the Council took an action to clarify this within its post hearing submission to be submitted at Deadline 1A.
- 2.5. With regards to alternatives, the Council noted the Applicant's submissions with regards to 132kv versus 400kv schemes. However, the Council queried whether if the Applicant had proceeded on the basis of a 132kv scheme, whether that would have resulted in lower impacts, specifically lower environmental harm and lower construction impacts.
- 2.6. The Council also considered that there should be alignment regarding construction phasing and grid connection timeframes, noting that the construction period was said to be approximately 2-years starting in 2027, and the grid connection was expected to take place by late 2030. This alignment would ensure that the scheme had not been constructed but left for a long period without connection to the grid. The Council indicated that this could minimise disruption to residents and perhaps minimise any identified harm.

- 2.7. The Council welcomed the ExA questioning and response from the Applicant that an update on outstanding ecological surveys would be provided at Deadline 1A. The Council has also raised this matter as a concern within its Relevant Representation [[RR-4934](#)]. The Council would make further representation once it had had a chance to review the Applicant's submission.

Action Point 5 Response

- 2.8. Following further review, Wiltshire Council can confirm that it has undertaken Section 19 flooding investigation reports for Whitley and Beanacre, reflecting historical flooding events in these locations. The investigations relate to areas identified for proposed Lime Down Solar Park infrastructure works, including battery installations and associated cable-laying activities, which remain forthcoming.
- 2.9. These investigations are not within the Gauze Brook catchment and do not relate to flooding events in Corston or Rodbourne. No Section 19 reports have been undertaken for Corston or Rodbourne.
- 2.10. A summary of the key flood risk considerations and their relevance to the Lime Down Solar Park (LDSP) proposals from the [Wiltshire Council Section 19 Flood Investigation \(September 2014\)](#) is contained below.
- 2.11. The September 2014 event resulted from extreme (>1 in 150-year) rainfall, which generated significant surface water (pluvial) runoff. This led to widespread flooding where drainage systems were exceeded, and flows followed established overland pathways and local catchment routes.

Hydrological Context and Connectivity:

- 2.12. The investigation identifies flooding across several parishes within the Bristol Avon and By Brook catchment systems, including:
- Melksham and Melksham Without (Shaw, Atworth, Whitley)
 - Trowbridge
 - Corsham
 - Nettleton & Burton.
- 2.13. Applying a strict hydrological connectivity test, the relevant to LDSP is as follows:
- 2.14. Directly connected downstream receptors:
- Melksham and Melksham Without (Shaw, Atworth, Whitley)
 - Trowbridge
- 2.15. These locations lie within the immediate downstream catchment of the site, with runoff conveyed via ordinary watercourses and tributaries to the Bristol Avon system.

2.16. Secondary (partial) connectivity:

- Corsham
- Nettleton & Burton

2.17. These areas are located within adjacent headwater sub-catchments (notably the By Brook system) and may be influenced depending on local flow routing within the wider catchment.

Flood Mechanism:

2.18. The Section 19 findings indicate that flooding was:

- Generated by rapid runoff from rural and upland areas
- Conveyed via overland flow routes, dry valleys and ditch networks
- Triggered where local drainage and culvert capacity was exceeded.

2.19. This confirms that flood risk is pathway-driven and catchment-based, rather than limited to mapped fluvial floodplains.

Implications for LDSP:

2.20. Within this framework, the LDSP site forms part of the upstream contributing catchment, influencing downstream flood risk through runoff generation and conveyance.

2.21. Accordingly, the key sensitivities for the scheme are:

- Maintaining established overland flow pathways across the site
- Managing runoff rates and volumes to avoid increasing downstream flood risk
- Protecting directly connected receptors, particularly within the Melksham and Trowbridge areas
- Understanding sub-catchment routing, particularly toward the By Brook and Avon systems
- Accounting for local drainage constraints, including culverts, ditches and highway drainage that are susceptible to exceedance.

Summary:

2.22. The Section 19 evidence demonstrates that flooding in this area is driven by intense rainfall interacting with rural catchment processes and defined surface flow pathways.

2.23. For LDSP, the principal consideration is therefore the management of runoff within a hydrologically connected catchment, with potential implications for clearly defined downstream receptors, rather than a wider or diffuse geographic area.

[8 May 2026]