Lime Down
Solar Park

Written Summary of the Oral Submissions at the Open Floor Hearing 1 and the Applicant's Responses

May 2026

Revision 1

Planning Inspectorate Reference: EN010168

Document Reference: EXAM/9.19

The Infrastructure Planning (Examination Procedure) Rules 2010

Rules 8(1)(c)

List of Contents

1 Introduction 1
1.1 Purpose of this Document 1
2 Summary of Matters Raised in Oral Submissions at Open Floor Hearing 1 and the Applicant's Responses 2
2.1 Ashton Hawker 2
2.2 Matthew Rose 8
2.3 Rachel Hamblin 16
2.4 Neil Mostyn Hamilton 20
2.5 Simon Durrant 25
2.6 January Farrington 30
2.7 Simon Cox 35
2.8 Ann Skinner 46
2.9 Kim Morgan 53
2.10 Stuart Fisher 56
2.11 Christine Macnee 63
2.12 Darren Rawlings 68
2.13 Michael Holstead 71
2.14 Michael Pitt 81
2.15 Andrew Calderbank 86
2.16 Sarah Sorby 90
2.17 Andrew Greenhill 97
2.18 Matthew Hood 101
2.19 Charles Purkess 107
2.20 Anna-Kate Fuller 112
2.21 Freddie Spickernell 119
2.22 Hugh Roche 123
2.23 Dr Emma Vaux 126
2.24 Jonathan Seymour Williams 134
2.25 Steffi Dampney 138
2.26 Rosie Clark 140
2.27 Stewart Dobson 143

2.28 Richard Jeffcoate 147
2.29 Lawrence Copeland 151
2.30 Claire Maxwell 154
2.31 Lesley Bennet 159
2.32 Fiona Shipsey 164
2.33 Alex Frost 177
2.34 Richard Skeffington 188
2.35 Dr John Oglesby 198
2.36 Martin Smith 212
2.37 Phillip Davey 220
2.38 Tony McAleavy 224
2.39 Helen King 231
2.40 Tracey Worcester 240
2.41 Sean Magee 248
2.42 Sue Godwin 254
2.43 Jodie Collier 259
2.44 Charles Edward Buchan 268
2.45 Isabel Ross 275
2.46 Nicholas Clark 283
2.47 Phillip Moore 290
2.48 Paul Simmons 294
2.49 Gavin Grant 308
2.50 Helen Hood 313
2.51 Clare Stokes 317
2.52 GDPR-LDSF-030 323
2.53 Henry Jodrell 334
2.54 Sara Sorby (on behalf of St Paul Malmesbury Without Parish Council) 341
2.55 Lesley Palmer (on behalf of Grittleton Parish Council) 367
2.56 Nick Haire (on behalf of Sopworth Parish Meeting / Sopworth village) 390
2.57 George Clarke (on behalf of Easton Grey Parish) 398
2.58 Adrian Temple-Brown (on behalf of North Wiltshire Friends of the Earth) 413
2.59 Dan Pike (on behalf of Community Action: Whitley and Shaw and Melksham Without Parish Council) 421
2.60 John Buckley (on behalf of Luckington & Alderton Parish Council) 428

2.61 Jon Atkey (Councillor representing By Brook Ward) 450
2.62 Anne Henshaw (on behalf of CPRE Wiltshire – Campaign to Protect Rural England) 463
2.63 John Eavis 476
2.64 Roddy Seymour-Williams 488
2.65 Peter Phillips 504
2.66 Willa Gibb 506
2.67 John Baillie 515
3 References 521

1 Introduction

1.1 Purpose of this Document

1.1.1 This document provides the Applicant's response to the oral submissions made to the Planning Inspectorate at the Open Floor Hearing (OFH1) held in connection with the Lime Down Solar Project on 21 April 2026. The Open Floor Hearing provided the opportunity for registered Interested Parties (IPs), statutory consultees and members of the local community to make oral representations on matters relevant to the application. Speakers were invited by the Examining Authority (ExA) to submit written summaries of their oral representations to the Examination by Deadline 1A.

1.1.2 The individuals and organisations who spoke at the Open Floor Hearing include local residents, landowners, and community representatives. A full list of speakers and the capacity in which they spoke is recorded in the Open Floor Hearing transcript and the ExA's published event records.

1.1.3 This document sets out the Applicant's response to the matters raised during the Open Floor Hearing. The responses are grouped by speaker and the Applicant has provided a full response to each speaker. Where speakers made similar points, the Applicant has repeated the response so that the speaker only has to review the entry relating to their oral submission. Where the Applicant has already made commitments or provided relevant mitigation, the applicable application or examination documents are identified.

2 Summary of Matters Raised in Oral Submissions at Open Floor Hearing 1 and the Applicant's Responses

2.1 Ashton Hawker

Reference	Comments/Issue raised	Applicant's Response
AHa-001	Ashton Hawker represents a long-established family farming business near Hullavington and objects to the Scheme on grounds of significant economic and agricultural harm. The Scheme includes compulsory acquisition of land they own and around 100 acres of rented land, materially affecting the viability of the business. Mr Hawker urged the ExA to give significant weight to the permanent loss of productive land, employment, skills and local food supply, emphasising that these impacts cannot be reversed.	The Applicant understands that the land in question is located within the Cable Route Corridor of the Scheme as set out in the **Book of Reference [APP-020].** The land along the cable route will be returned to agricultural use and losses incurred during the construction period will be compensated for. The Applicant is keen to draw attention to the **Land Rights Negotiations Tracker [PDA-004]** and the desire to enter into voluntary negotiations. The Applicant encourages all parties along the Cable Route Corridor to engage in discussions over the voluntary agreement to ensure practical concerns can be accounted for. With regards to the anticipated effects to the farming business affected by cable routing, these are likely to be temporary and restricted to the width required for cable trenching works and any associated haul route, or entry and exit pits for horizontal directional drilling operations. Where fields have been bisected, working practices around cable laying works should allow for access to be maintained to both sides of the Cable Route Corridor to allow for agricultural work to be continued even during

Reference	Comments/Issue raised	Applicant's Response
		construction. The **Outline Construction Environmental Management Plan (CEMP) [APP-277]** furthermore commits to the reinstatement of land affected by cabling works as soon as practicable to allow for agricultural work on the land to recommence as usual as soon as construction of that section of cable route is complete. This is secured through Requirement 13 of Schedule 2 to the **Draft DCO [APP-016]**.
AHa-002	Mr Hawker explained that the farm depends on local supply chains, currently purchasing about 800 tonnes of grain and 1,000 tonnes of straw from nearby farms, including land within the Scheme. The loss of this supply would force sourcing from further afield, increasing costs, carbon emissions and risks to feed security. This, in turn, would jeopardise the farm's ability to meet milk and beef supply contracts, including to a high-end supermarket, which he stated are critical to the business's viability. The business employs 11 local staff, supports 10–20 seasonal roles each year, and underpins a wider network of local contractors, vets, and suppliers. Mr Hawker stated that if the Scheme proceeds, downsizing and redundancies would be unavoidable, with wider knock-on economic impacts. Apprenticeships and	In addressing the points raised about the reliance on local supply chains, the Applicant welcomes further input through this process to help address the issues raised, particularly specific concerns around local supply chains and business viability, as part of ongoing negotiations. It would be helpful to understand the volume of the 800 tonnes of grain and 1,000 tonnes of straw comes from land potentially impacted by the Scheme. It is important to clarify that the Scheme involves a temporary and reversible use of limited areas of agricultural land, and the design of the Scheme ensures that any impacts to production are kept to a minimum. While additional transport emissions for supply of grain/straw have not been specifically assessed within **ES Volume 1, Chapter 7: Climate Change [APP-059]** Greenhouse Gas Assessment, it is considered that

Reference	Comments/Issue raised	Applicant's Response
	student placements provided by the farm would also be lost.	these would not be significant in terms of the wider Scheme impacts. With regards to the comments relating to Loss of agricultural revenue (and thus resultant impacts on employment) as a result of temporary works to construct the Cable Route Corridor, these can be compensated either through voluntary agreement with the Applicant, or through the application of compulsory acquisition powers. The anticipated effects to the farming business affected by cable routing works are likely to be temporary and restricted to the width required for cable construction works. The **Outline CEMP [APP-277]**, secured by Requirement 13 in Schedule 2 to the **Draft DCO [APP-016]** furthermore commits to the reinstatement of land affected by cabling works as soon as practicable to allow for agricultural work on the land to recommence as soon as construction of that section of cable route is complete. Should redundancies be required as a result of the Scheme, affected workers would be eligible for accessing skills and employment support measures as secured through the **Outline Skills, Supply Chain and Employment Plan (SSCEP) [APP-285]**, secured by Requirement 18 in Schedule 2 to the **Draft DCO [APP-016]**. The Applicant understands the importance of local

Reference	Comments/Issue raised	Applicant's Response
		skill sharing and uplifting and so has committed to improving local skills through the measures set out in the **Outline SSCEP [APP-285]**. The Applicant considers that these measures provide a good opportunity for the Applicant and Hawker Farms to engage in respect of a common benefit for the local area.
AHa-003	Mr Hawker highlighted that a substantial proportion of the land affected is Grade 3a (best and most versatile agricultural land), including 33% of the solar PV and 70% of the cable route—which conflicts with national policy objectives to protect productive farmland for food security.	The energy National Policy Statements (NPSs) do not contain specific policy in relation to food security, although there is policy regarding the use of best and most versatile land more generally (see for instance the Overarching National Policy Statement for energy (EN-1) (NPS EN-1) (Ref 1) paragraph 5.11.34). Food security is also referenced in Policy 4: Addressing Climate Change of Wiltshire's Draft Local Plan (Ref 6), which provides that development proposals must support a move to a carbon neutrality and adaption to climate change by, amongst other things, protecting high grade agricultural land for future use and to help support food security. Analysis in the government's Land Use Framework (Ref 11) confirms that there is enough land to deliver the government's objectives for nature restoration and development without reducing domestic food production or compromising on these objectives. In relation to renewable energy infrastructure, the Land Use

Reference	Comments/Issue raised	Applicant's Response
		Framework (Ref 11) estimates that the amount of land in England required to meet renewable energy objectives in 2050 would be around 1% of England's total land and around 2% of the Utilised Agricultural Area. The Framework accepts that there is inherent uncertainty in forecasting the electricity mix to 2050 and that this land use figure for renewables could be over 2%, but it still represents a very small proportion or the total Utilised Agricultural Area. On that basis, it is not considered that the Scheme will compromise the nation's food security. With regard to the protection of best and most versatile agricultural land more generally, the Scheme is compliant with NPS EN-1 (Ref 1) paragraph 5.11.34. As set out in **ES Volume 3 Appendix 4-1: Site Selection Assessment Report [APP-185]**, the Applicant has taken a sequential approach to including best and most versatile land in its search for suitable sites. In the initial stages of site selection, the Applicant identified and assessed potential development areas (PDAs) on grade 4, 5 and non-agricultural land. The Applicant also considered brownfield sites within the 20 km search area. None of the initial PDAs or brownfield sites were considered suitable for the Scheme due to constraints unrelated to agricultural land classification (such as site size and existing development uses), therefore it was

Reference	Comments/Issue raised	Applicant's Response
		necessary to reintroduce BMV land into the search criteria The search was therefore expanded to include Grade 3 and some Grade 2 agricultural land.

2.2 Matthew Rose

Reference	Comments/Issue raised	Applicant's Response
MR-001	Matthew Rose has lived in Hullavington for approximately 20 years and objects to the Scheme on grounds of harm to the natural environment, landscape character, and personal wellbeing. Mr Rose explained that he regularly uses local routes and landscapes including Bradfield Wood, Pig Lane and Gauze Brook Bridge, which currently provide open, tranquil countryside and meaningful daily interaction with nature. He stated that these experiences, such as views across open fields, wildlife encounters, and the peace and quiet of the area, are factors integral to his mental wellbeing. He believes the Scheme would replace this environment with an industrial landscape of solar panels, substations, fencing and construction traffic, fundamentally altering the character of the area and degrading the experience of walking, running and cycling. Mr Rose also expressed concern that the development would displace local wildlife, including species such as hares and skylarks, reducing biodiversity and the quality of the natural environment.	The Applicant notes Mr Rose's first-hand experience of living in Hullavington and his concerns around interaction with nature particularly along Bradfield Wood, Pig Lane and Gauze Brook Bridge. Regarding the concerns surrounding landscape character, an assessment of landscape and visual effects is provided in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060].** The LVIA assesses effects on identified landscape and visual receptors, including residential properties and users of public rights of way, and identifies where significant effects may occur. The LVIA recognises that as a consequence of the development that there would be long term adverse effects on the Landscape Character of the area as well as long term significant adverse effects to 10 Visual Receptors, all of which are local PRoW which are either within or directly adjacent to the proposed arrays. The footpaths through Bradfield Wood (Receptors TP128, TP130 and TP131) have been fully assessed in the LVIA. It found that users of these three footpaths would experience Major Moderate Adverse effects. These effects are due to near distance views of solar

Reference	Comments/Issue raised	Applicant's Response
		infrastructure where mitigation measures such as new hedgerows will are not be appropriate to the character of the legacy landscape. E.g.: where footpaths diagonally cross fields. Users of Pig Lane (Receptor TR166) are assessed as experiencing Moderate/Minor Adverse effects during Construction and Year 1 reducing to Minor Neutral and Year 15 once mitigation has established. Footpath (TP155) crosses Gauze Brook Bridge, through an area of woodland associated with the Footpath. The footpath crosses parcel D13 where there will be views to infrastructure in close proximity. The LVIA recorded Major/Moderate (Adverse Significant) effects during Construction and Year 1 reducing to Moderate / Minor Neutral at Year 15 once mitigation has established. The Applicant acknowledges that there will be some significant effects which cannot be mitigated as a result of the Scheme such as those set out above. The Applicant has made every effort to minimise these effects where practicable and notes any residual significant effects are matters which will have to be considered in the planning balance when the DCO is determined by the Examining Authority. Mitigation measures to address landscape and visual effects are set out in **ES Volume 1, Chapter 8:**

Reference	Comments/Issue raised	Applicant's Response
		Landscape and Visual [APP-060], Figure 3-4-1 to 3-4-5.2 Landscape and Ecology Mitigation Plan [APP-084] and detailed within the **Outline Landscape and Ecological Mitigation Plan (LEMP) [APP-283]** and the **Outline Ecological Protection and Mitigation Strategy (EPMS) [APP-284].** These documents include proposals for new and enhanced planting, retention of existing hedgerows and woodland, and landscape integration measures to reduce visual effects over time. The preparation, approval and implementation of detailed landscape and ecological management plans, substantially in accordance with the **Outline LEMP [APP-283]** and **Outline EPMS [APP-284],** are secured through requirements in Schedule 2 of the **Draft DCO [APP-016],** ensuring that the identified mitigation measures are delivered and maintained throughout the lifetime of the Scheme. Regarding the concerns around the impact of the Scheme on mental health, the assessment in **ES Volume 1, Chapter 18: Human Health [APP-070]** considers the physical and mental health impacts of changes to recreation and access to the countryside under the assessment topic 'open space, leisure and play', and the wider wellbeing impacts from 'noise and

Reference	Comments/Issue raised	Applicant's Response
		vibration' as a result of the Scheme. The assessment concludes that no significant adverse effects to mental health and wellbeing are anticipated at any phase of the Scheme. Mitigation measures to reduce construction noise, and to minimise impacts to PRoW users are secured through the **Outline CEMP [APP-277]** and **Outline Public Rights of Way** and **Permissive Paths Management Plan (PRoWPPMP) [APP-282]** by Requirements 13 and 16 in Schedule 2 to the **Draft DCO [APP-016]**. In response to the concerns around the displacement of local wildlife, the Applicant confirms potential impacts of the Scheme on ecology and biodiversity are fully assessed in **ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061],** which considers baseline conditions and evaluates likely effects during construction, operation and decommissioning. The assessment identifies embedded and additional mitigation measures and concludes that, with these measures in place, no unacceptable significant adverse effects on ecology and biodiversity are anticipated. Potential impacts of the Scheme on brown hares are assessed in **ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061].** The assessment concludes

Reference	Comments/Issue raised	Applicant's Response
		that, with embedded mitigation in place, no significant adverse effects on brown hares are anticipated, including as a result of displacement impacts. The Scheme design retains extensive areas of grassland and field margin habitats, which provide suitable foraging and shelter opportunities for hares. The assessment also notes that brown hares are known to take shelter beneath solar panels on operational solar sites, where the retention of grassland beneath and between arrays can provide suitable habitat conditions. The assessment in **ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061]** also identifies skylarks as a key species of conservation interest within the Scheme area. It concludes that approximately 71.5% of the quantified number of territories belonging to the current skylark population will be displaced from the Solar PV Sites. This is expected to give rise to an adverse residual effect at a Local level which is transparently reported. Skylark-specific mitigation and habitat enhancement measures are incorporated into the Scheme design to reduce effects as far as practicable. These include the provision of suitably large, open set-aside and grassland habitats designed to provide appropriate breeding and foraging conditions. These measures are illustrated in **ES Volume 2, Figure 3-4: Landscape and Ecological**

Reference	Comments/Issue raised	Applicant's Response
		Mitigation Plan [APP-084] and detailed in the **Outline LEMP [APP-283].** The preparation, approval and implementation of the detailed Landscape and Ecological Management Plan, substantially in accordance with the **Outline LEMP [APP-283],** is secured through Requirement 7 in Schedule 2 of the **Draft DCO [APP-016],** ensuring that skylark mitigation measures will be delivered and maintained throughout the lifetime of the Scheme. Lastly, regarding the concerns raised around construction traffic, as concluded in **ES Volume 1, Chapter 13: Transport and Access [APP-065]** the impacts of construction traffic would be temporary and would not result in any significant transport effects. Construction traffic will be controlled through measures set out in the **Outline Construction Traffic Management Plan (CTMP) [APP-287]** and **Outline PRoWPPMP [APP-282]** to ensure impacts to NMUs along highways and PRoW are minimised as far as practicable. Final CTMPs and a PRoWPPMP would be prepared post consent and must be substantially in accordance with the **Outline CTMP [APP-287]** and **Outline PRoWPPMP [APP-282],** respectively, and approved by the relevant local planning authorities (in

Reference	Comments/Issue raised	Applicant's Response
		consultation with the relevant highway authorities), as secured by Requirement 15 and Requirement 16 in Schedule 2 of the **Draft DCO [APP-016].**
MR-002	Mr Rose does not consider the proposed mitigation effective. In particular, he stated that tree and hedge planting is unlikely to provide meaningful screening, either because of low survival rates or the long time required for planting to mature. He highlighted that affected public rights of way would, even post-construction, be experienced as narrow, enclosed and noisy corridors, bounded by fencing and infrastructure, rather than open countryside.	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 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. As per section 1.3 of the **Outline LEMP [APP-283]** *"Any plants and trees which are found to be dying, damaged or diseased following planting will be replaced with the same species and specification for Years 1-5 of the Scheme, as per the timetable in Annexe A. Thereafter, replacement planting will be required for any significant failures."* The higher frequency of maintenance during years 1-5 is deemed effective for ensuring that the tree and hedge planting is closely monitored when it is first establishing (and therefore most at risk of failure).

Reference	Comments/Issue raised	Applicant's Response
		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 DCO [APP-016],** ensuring that mitigation planting and screening measures are delivered and maintained throughout the lifetime of the Scheme. The LVIA recognises the change to the visual amenity and associated adverse effects to users of those PRoW that are located within the array itself or directly adjacent. The design of the Scheme has embedded buffers into the proposed layout, specifically a 15m offset to any proposed infrastructure on either side of any PRoW. Where PRoW directly cross the array, this creates a corridor with a minimum width of 30m wide between proposed fencelines through the array. There would then be a gap of 4m between the fence line and the proposed panels resulting in a minimum total width of 38m between the panels where PRoW cross the arrays.

2.3 Rachel Hamblin

Reference	Comments/Issue raised	Applicant's Response
RH-001	Ms Hamblin is a clinical psychologist who grew up in Hullavington and has returned to the area to raise her family. She objects to the Scheme on grounds of mental health and wellbeing, which she considers a public health concern. She explained that access to natural, open countryside is a well-established protective factor for mental health and is a key reason many residents choose to live in the area. She believes the Scheme would replace this accessible green environment with an industrial landscape, removing a vital source of psychological restoration and thereby lowering overall mental wellbeing for local communities. She raised particular concern about noise and disruption, both during construction and operation. Drawing on established psychological evidence, including a large-scale, ten-year study of over two million people, Ms Hamblin stated that exposure to chronic noise from traffic and industrial activity is linked to increased stress hormones, sleep disruption, and elevated risks of anxiety, depression, and suicide. She does not accept the Applicant's conclusion that the Scheme would not have a significant effect on mental	The Applicant welcomes Ms Hamblin's professional opinion with regards to the mental health and wellbeing effects of the Scheme. With regards to the influence of the open countryside on mental health the assessment in **ES Volume 1, Chapter 18: Human Health [APP-070]** considers the physical and mental health impacts of changes to recreation and access to the countryside under the assessment topic 'open space, leisure and play', and the wider wellbeing impacts from 'noise and vibration' as a result of the Scheme. The assessment concludes that no significant adverse effects to mental health and wellbeing are anticipated at any phase of the Scheme. Mitigation measures to reduce construction noise, and to minimise impacts to PRoW users are secured through the **Outline CEMP [APP-277]** and **Outline PRoWPPMP [APP-282]** by Requirements 13 and 16 in Schedule 2 to the **Draft DCO [APP-016]**. The Applicant disagrees that the Scheme would create an 'industrial landscape'. An assessment of landscape and visual effects is provided in the Landscape and Visual Impact Assessment (LVIA) presented in **ES Volume 1, Chapter 8: Landscape and Visual [APP-**

Reference	Comments/Issue raised	Applicant's Response
	health, stating that this position is not supported by the evidence base. In summary, Ms Hamblin considers that the Scheme would cause harm through the loss of protective green space, the introduction of long-term industrial noise and disturbance, and a decline in quality of life for village residents. She urged that these mental health impacts be given significant weight in the examination. Ms Hamblin was invited by the ExA to submit supporting research and references at Deadline 1A.	**060]**. The LVIA assesses effects on identified landscape and visual receptors, including residential properties and users of public rights of way, and identifies where significant effects may occur. As outlined above **ES Volume 1, Chapter 18: Human Health [APP-070]** has considered the results presented in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]** and concludes no significant adverse effects are anticipated as a result of the Scheme. The Applicant will review the research referenced by Ms Hamblin once submitted and will respond directly. The Applicant recognises the potential health impacts from sources such as noise, and the impacts that increased stress can have on sleep and mental health and wellbeing, and has sought to address these in a proportionate and comprehensive manner through the assessment criteria used in **ES Volume 1, Chapter 18: Human Health [APP-070]**. The Applicant seeks to clarify that this assessment is undertaken at a population level across the 2km Study Area to identify vulnerable health groups and where impacts may disproportionately affect health outcomes, and does not assess impacts upon individuals. The Applicant is confident that the methodology used within the assessment of human health is robust, and that the

Reference	Comments/Issue raised	Applicant's Response
		assessment outcomes identify that there is no significant adverse effect to health and wellbeing to the affected population in the 2 km Study Area at any phase of the Scheme. With regards to the comments around noise and mental health, while there is evidence to link chronic exposure to noise with a variety of adverse health effects, the levels at residential properties from the Scheme, as provided in Table 8 and Table 9 of **ES Volume 3, Appendix 14-4 Noise Modelling [APP-237]**, are below the associated thresholds identified in WHO Environmental Noise Guidelines, which collate the associated research. This supports the conclusion that significant adverse effects on health and quality of life are not expected. Moreover, as concluded in **ES Volume 1, Chapter 13: Transport and Access [APP-065]** the impacts of construction traffic would be temporary and would not result in any significant transport effects. Furthermore, the **Outline Operational Environmental Management Plan (OEMP) [APP-278]** commits to noise levels from the Scheme at residential dwellings being the same as or below those modelled in the ES. This provides assurance that the stated levels will be achieved in practice.

Reference	Comments/Issue raised	Applicant's Response
		The preparation, approval and implementation of the detailed OEMP, substantially in accordance with the outline plan, are secured through Requirement 14 of Schedule 2 of the **Draft DCO [APP-016]**, ensuring operational noise is appropriately controlled throughout the lifetime of the Scheme. To provide further reassurance around the noise levels associated with transport through Hullavington, the applicant points to the conclusions presented in **ES Volume 1, Chapter 13: Transport and Access [APP-065]** which sets out that the impacts of construction traffic would be temporary and would not result in any significant transport effects. Construction traffic will be controlled through measures set out in the **Outline CTMP [APP-287]** and **Outline PRoWPPMP [APP-282]** to ensure impacts to NMUs along highways and PRoW are minimised as far as practicable. Final CTMPs and a PRoWPPMP would be prepared post consent and must be substantially in accordance with the **Outline CTMP [APP-287]** and **Outline PRoWPPMP [APP-282]**, respectively, and approved by the relevant local planning authorities (in consultation with the relevant highway authorities), as secured by Requirement 15 and Requirement 16 in Schedule 2 of the **Draft DCO [APP-016]**.

2.4 Neil Mostyn Hamilton

Reference	Comments/Issue raised	Applicant's Response
NMH-001	Neil Mostyn Hamilton lives at Bradfield Manor, a Grade I listed building, and objects to the Scheme on grounds of heritage and landscape harm. He stated that the setting of a Grade I listed building is integral to its significance and argued that the Scheme would severely damage that setting by surrounding the property with large-scale solar panels, battery energy storage system (**BESS**) and associated infrastructure. He emphasised that the uninterrupted views of surrounding farmland and ancient woodland form part of the historic character of Bradfield Manor, which he considers would be fundamentally harmed by the Scheme.	The Applicant notes the cultural importance of Bradfield Manor as one of the five Grade I listed buildings scoped into **ES Volume 1, Chapter 12: Cultural Heritage [APP-064].** With regards to the impacts on the setting of Bradfield Manor, **ES Volume 1, Chapter 12: Cultural Heritage [APP-064]**, supported by **ES Volume 3, Appendix 12.1: Heritage Statement [APP-219],** has assessed a potential for a moderate / minor adverse effect on the setting of Bradfield Manor Farmhouse, which is not significant (less than substantial harm at the lower end in NPPF (Ref 4) terms) during the construction, operation and decommissioning phases. Site visits were undertaken with Historic England on the 28th March 2025, which included visiting land adjacent to Grade I Listed Bradfield Manor Farmhouse. A second site visit with Historic England was undertaken in the grounds of Bradfield Manor Farmhouse on 22 May 2025 (see table 12-2 in **ES Volume 1, Chapter 12: Cultural Heritage [APP-064]**). Feedback provided during the site visits was used to inform the Scheme design and assessment provided in

Reference	Comments/Issue raised	Applicant's Response
		ES Volume 1, Chapter 12: Cultural Heritage [APP-064]. As stated in **ES Volume 3, Appendix 12.1: Heritage Statement [APP-219]** when considering the contribution of setting to the significance of the Grade I Listed Bradfield Manor Farmhouse (National Heritage List for England (NHLE): 1198808), the asset is largely defined and experienced from within the Bradfield Manor Farmhouse grounds, in particular the walled courtyard to the south-west of the asset, where the full architectural interest of its south-facing primary elevation can be appreciated. Lime Down D is located within agricultural land to the north of asset. Following advice provided by Historic England panels in Field D5 were set back away from Grade I Listed Bradfield Manor Farmhouse and enhanced screening is proposed along existing hedgerows. Views of the proposed BESS and 400 kV Substation from Bradfield Manor Farmhouse will be largely mitigated by the proposed new woodland belt along the south-eastern boundary of Field D3 which, in combination with the existing woodland block west of D1 and south of D22, provides extensive screening in views to and from Bradfield Manor Farmhouse. It was identified that there would be a moderate / minor (not significant) adverse effect to the asset (less than substantial harm at the

Reference	Comments/Issue raised	Applicant's Response
		lower end in NPPF (Ref 4) terms) as a result of indirect (i.e. setting) impacts. With regards to the visual impacts of the Scheme on the residents of Bradfield Manor, an assessment of landscape and visual effects is provided in the Landscape and Visual Impact Assessment (LVIA) presented in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]**. The LVIA assesses effects on identified landscape and visual receptors, including residential properties and users of public rights of way, and identifies where significant effects may occur. The LVIA has assessed visual effects to occupiers of Bradfield Manor (RI068) as being Moderate Adverse and Significant at Construction and Year 1, reducing to Moderate / Minor at Year 15 following the establishment of the proposed mitigation planting.
NMH-002	Mr Hamilton questioned why key infrastructure, including BESS and grid-related elements, could not be located closer to the existing grid connection, rather than within the immediate setting of a nationally important heritage asset. He stated that no realistic alternative sites appear to have been properly considered.	In relation to alternative sites considered for the BESS, please see section 4.7 of **ES Volume 1, Chapter 4: Alternatives and Design Evolution [APP-056].** The location of the BESS at Lime Down D is considered to represent the best of the options considered with the least overall effects because it is centrally located, well screened and is not close to too many residential receptors. The other options considered included an option close to the point of connection at the Existing

Reference	Comments/Issue raised	Applicant's Response
		National Grid Melksham Substation, but this was discounted for the reasons set out in section 4.7 of **ES Volume 1, Chapter 4: Alternatives and Design Evolution [APP-056],** including likely landscape and visual effects. As to heritage impacts of the proposed location, please see response to NMH-001 above.
NMH-003	In conclusion, Mr Hamilton argued that the degree of harm to the historic environment and local landscape is disproportionate to the contribution the Scheme would make toward net zero objectives, and that this imbalance weighs strongly against granting consent.	The Applicant disagrees that the degree of harm to the historic environment and local landscape is disproportionate to the benefits it would provide. Please see the response to NMH-001 above which sets out the effects on Bradfield Manor specifically. Any significant effects are clearly presented in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]** and **ES Volume 1, Chapter 12: Cultural Heritage [APP-064]** in sections 8.11 and 12.11 respectively. The Applicant acknowledges that there will be some significant effects which cannot be mitigated as a result of the Scheme such as the long term adverse effects on the Landscape Character of the area (as presented in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]**) as well as long term significant adverse effects to 10 Visual Receptors, all of which are local

Reference	Comments/Issue raised	Applicant's Response
		PRoW which are either within or directly adjacent to the proposed arrays. These are matters which will have to be considered in the planning balance when the DCO is determined by the Examining Authority.

2.5 Simon Durrant

Reference	Comments/Issue raised	Applicant's Response
SD-001	Simon Durrant is a resident of Hullavington who objects to the Scheme due to its impact on tranquillity and noise. He explained that he regularly walks and cycles in the area and values the silence and rural character of the countryside, which he considers fundamental to its enjoyment. Mr Durrant raised strong concerns about noise pollution, arguing that the Applicant significantly underestimates likely noise impacts. He stated that inverter units and associated infrastructure are claimed to generate noise levels of around 50 dBA but asserted that in reality these can reach around 90 dBA, comparable to the sound of a passing train, and may be louder under certain operating conditions. He also expressed concern that noise would travel well beyond the assessment distance used by the Applicant.	The Applicant notes Mr Durrant's comments around his perception of tranquillity in the area surrounding the Scheme and the potential for adverse landscape and noise impacts. With regards to tranquillity, an assessment of landscape and visual effects is provided in the Landscape and Visual Impact Assessment (LVIA) presented in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]**. The LVIA assesses effects on identified landscape and visual receptors, including residential properties and users of public rights of way, and identifies where significant effects may occur. The LVIA recognises that as a consequence of the development that there would be long term adverse effects on the Landscape Character of the area as well as long term significant adverse effects to 10 Visual Receptors, all of which are local PRoW which are either within or directly adjacent to the proposed arrays. A Technical Note on Tranquillity was prepared by applicant and submitted post submission (PDA-010) which considers the effect of the Scheme on Tranquillity within the Cotswold National Landscape (CNL). The Technical Note provides a summary of where tranquillity is considered within the landscape and visual, cultural heritage, transport and

Reference	Comments/Issue raised	Applicant's Response
		access, noise and vibration, and socio-economics, tourism and recreation chapters and appendices of the Environmental Statement (ES) for the Scheme. The Technical Note shows how alignment with the CNL Board's Tranquillity Position Statement has been achieved. Regarding the potential for noise pollution in Hullavington and the surrounding area, the Applicant disagrees that the assessments underestimate the impacts. The noise contours presented in **ES Volume 2, Figure 14-2 Daytime Operational Noise Contours [APP-160]** and **ES Volume 2, Figure 14-3 Night-time Operational Noise Contours [APP-161]** are the result of a robust assessment using internationally recognised standards for sound propagation and are based on a series of reasonable worst-case assumptions, such as wind in the direction of the receptor, as well as a range of mitigation measures as described in Section 14.9 of **ES Volume 1, Chapter 14: Noise and Vibration [APP-066]**. These figures show that operational noise from the Scheme would typically be below 30 dB in Hullavington and typically between 20 and 50 dB on Public Rights of Way (PRoW). These levels are below WHO guidelines on moderate community annoyance and are akin to the existing ambient sound environment in the area as evidenced by the baseline sound survey

Reference	Comments/Issue raised	Applicant's Response
		results given in Table 1 of **ES Volume 3, Appendix 14-3: Baseline Noise Survey [APP-236]**. As such, while Scheme infrastructure will be heard at times, the enjoyment of bridleways, and PRoW in general, with respect to the sound level experienced, is not expected to be significantly adversely affected by the operation of the Scheme. While it is true that some plant has sound power levels around 90 dB, as presented in Table 5 of **Appendix 14-4 Noise Modelling [APP-237]**, this is not a level that would ever be experienced either on a PRoW or in a house or garden. A sound power level of 90 dB for a static piece of plant drops to around a sound pressure level of 56 dB at 20m, the level of regular conversation, and around 35 dB at 300m, quieter than many household appliances. The **Outline OEMP [APP-278]** commits to noise levels from the Scheme at residential dwellings being the same as or below those modelled in the ES. This provides assurance that the stated levels will be achieved in practice. The preparation, approval and implementation of the detailed OEMP, substantially in accordance with the outline plan, are secured through Requirement 14 of Schedule 2 of the **Draft DCO [APP-016]**, ensuring

Reference	Comments/Issue raised	Applicant's Response
		operational noise is appropriately controlled throughout the lifetime of the Scheme. Moreover, the assessment in **ES Volume 1, Chapter 18: Human Health [APP-070]** draws upon the conclusions on ES Volume 1, Chapter 8: Landscape and Visual [APP-060] and ES Volume 1, Chapter 14: Noise and Vibration [APP-066] (amongst others) to assess the physical and mental health impacts of changes to recreation and access to the countryside, including along PRoWs and other recreational routes, under the assessment topic 'open space, leisure and play', and the wider wellbeing impacts from 'noise and vibration' as a result of the Scheme. The assessment concludes that no significant adverse effects to mental health and wellbeing are anticipated at any phase of the Scheme. Mitigation measures to reduce construction noise, and to minimise impacts to PRoW users are secured through the **Outline CEMP [APP-277]** and **Outline PRoWPPMP [APP-282]** by Requirements 13 and 16 in Schedule 2 to the **Draft DCO [APP-016]**.
SD-002	Mr Durrant further criticised the proposed BESS, arguing that it would increase environmental pollution rather than reduce it. He stated that approximately 13% of energy is lost through transmission, conversion and	The Applicant acknowledges that BESS units have a typical Round Trip Efficiency of approximately 88%, or 12% of energy lost to align with assertion of 13%, however, storing renewable energy that would otherwise be curtailed or wasted entirely is an essential

Reference	Comments/Issue raised	Applicant's Response
	storage processes, undermining the claimed environmental benefits of the Scheme. He disputes the assertion that BESS take surplus energy to cover demand peaks, referring to *gridwatch.co.uk*. He alleged that they are subsidised by the taxpayer yet do not contribute to lower electricity costs to consumers, and are designed to generate large profits for their owners at the expense of the local community.	mechanism for achieving a flexible, decarbonised energy system. The BESS will operate to support the operation of the solar component of the Scheme by responding to market signals, storing energy during periods when electricity generation is high, such as when solar or wind generation is at a peak, and releasing it when supplies of low carbon energy are lower to meet demand. This helps to balance supply and demand and displaces carbon intensive sources such as fossil fuel generation from the grid. The Scheme is a privately financed development and does not receive state or taxpayer subsidies.

2.6 January Farrington

Reference	Comments/Issue raised	Applicant's Response
JF-001	January Farrington objects to the Scheme primarily due to its scale and the risks it poses to the viability of her family's thoroughbred stud farm, West Park Farm, which forms part of an international bloodstock business built over many years.	The Applicant notes the objection to the Scheme and the concern raised regarding the viability of West Park Farm. As an equestrian facility, potential impacts on West Park Farm have been considered and assessed. Potential impacts on public rights of way such as bridleways and byways have also been considered as specific recreational receptors in the assessment in the **ES Volume 1, Chapter 16: Socio Economics, Tourism and Recreation [APP-068]**. The likely effects on West Park Farm in particular are specifically and individually assessed in **ES Volume 3, Appendix 16-2: Tourism and Recreation Receptor Tables [APP-241]**, which identifies up to a moderate-minor adverse effect due to immediate views of Lime Down D from within the equestrian facilities, and on hacking routes nearby. This is not however, considered a significant effect.
JF-002	Ms Farrington explained that the farm depends on a calm, quiet and stable environment for the welfare of high-value, sensitive horses, and that the Scheme would create a real risk to that environment. Ms Farrington stated that ongoing uncertainty has already	The Applicant acknowledges the importance of tranquillity on West Park Farm, however, given the buffer of approximately 500m between the Schemes' Order Limits and the facility, no significant effects to West Park Farm are anticipated at any phase of the

Reference	Comments/Issue raised	Applicant's Response
	forced the business to pause investment, and that the stud farm, like other rural businesses, has been treated as collateral damage within the Scheme.	Scheme. No significant residual effects to the operation, business or recreational use to the facility have been identified. Construction noise effects would be controlled through the implementation of the **Outline CEMP [APP-277]**, secured through Requirement 13 of Schedule 2 to the **Draft DCO [APP-016]**. In particular, Sections 2.5 and 3.9 of the **Outline CEMP [APP-277]** set out a range of embedded mitigation measures, including adherence to best practicable means in accordance with BS 5228, restrictions on core construction working hours, management of out-of-hours working through Section 61 agreements where required, use of temporary acoustic fencing around HDD compounds where necessary, and implementation of additional site-specific mitigation measures where activities have the potential to affect nearby noise-sensitive receptors. Additional mitigation measures include the careful siting and orientation of temporary construction compounds and plant, use of quieter plant where practicable, and offsetting noisy construction activities away from neighbouring paddocks and sensitive receptors where reasonably practicable. The **Outline CEMP [APP-277]** also includes measures relating to

Reference	Comments/Issue raised	Applicant's Response
		lighting control and traffic management to minimise disturbance during construction. Assessment of noise impacts for all human receptors have been assessed in **ES Volume 1, Chapter 14: Noise and Vibration [APP-066].** With regards to horses, as there is currently no established regulatory guidance for assessing noise induced behavioural change in livestock or horses, the approach where noise for humans and horses are considered in terms of a receptor are addressed as potential amenity impacts on equestrian facilities, including private stables, paddocks, stud farms and riding schools, which have been assessed in **ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068**] and its supporting **ES Volume 3, Appendix 16-2: Tourism and Recreation Receptor Tables [APP-241].** The chapter concludes there would be no significant residual effects to their operation or recreational use as a result of noise impacts, subject to implementation of embedded and additional mitigation measures with any mitigation requirements (such as noise screening and visual screening between onsite infrastructure and neighbouring paddocks). These are secured through the **Outline LEMP [APP-283]** and **Outline CEMP [APP-277]** by Requirements 7 and 13

Reference	Comments/Issue raised	Applicant's Response
		respectively in **Schedule 2 to the Draft DCO [APP-016].** The approach where noise for humans and horses are considered in terms of a receptor are addressed as potential amenity impacts on equestrian facilities, including private stables, paddocks, stud farms and riding schools aligns with an accepted methodology based on expert advice in other DCO's, including Sunnica Energy Farm, where the Secretary of State (SoS) agreed with the methodology that an animals processing of decibel levels is sufficiently similar to a humans' that the established human-noise threshold is a fair benchmark for noise impacts to be considered. The Scheme's approach has assessed the likely direct impact of construction on equestrian facilities, and accessibility and amenity impacts on those facilities and surrounding rights of way used for hacking. Furthermore, the Applicant, notes a summary from the British Horse Society from August 2025 which contains a section on glint and glare: "*The society has no evidence of 'glint and glare' from solar panels and no evidence of horses reacting to it or of it being detrimental to the health and wellbeing of horses. Reports from sites with both solar panels and horses, including a solar array beside an arena used for riding*

Reference	Comments/Issue raised	Applicant's Response
		horses, indicate no reflection and no reaction from or impact on horse or rider." The view put forward by the British Horse Society is that, whilst horses may initially react to new solar infrastructure, this is no different from how they might respond to any unfamiliar change in their environment, and is something they generally adapt to quickly. Any reaction is therefore attributed to a change in surroundings, rather than to anything specific about the panels themselves.

2.7 Simon Cox

Reference	Comments/Issue raised	Applicant's Response
SC-001	Simon Cox is an auditor with extensive experience reviewing health and safety management systems and objects to the Scheme on safety and access grounds. He stated that the worst-case assumptions used by the Applicant for the BESS are unrealistically limited. In particular, he argued that the assessment should be expanded to consider multiple neighbouring battery containers igniting, potentially before fire service attendance, rather than a single-unit failure scenario. He referenced real-world examples of BESS fires, including the Carnegie Road BESS fire (Liverpool, 15 September 2020) and Witpit Lane fire (Cirencester, 28 March 2025), where multiple units were involved. Mr Cox raised concerns that the current safety assessment does not adequately reflect credible worst-case risks and called for a whole-site analysis of BESS fire scenarios, rather than isolated container-level modelling.	The Applicant points out that the two referenced "real-world" UK BESS fires involved old generation legacy systems that were not compliant with National Fire Protection Association 855 and integrated NMC pouch cell, air-cooled battery systems; these older systems will not be considered for the Scheme. These old types of systems were involved in approx. a third of BESS failure events listed in the Electric Power Research Institute (EPRI) BESS Failure Incident database (Ref 13). Section 4.1.30 of the **Outline Battery Safety Management Plan (BSMP) [APP-286]** stipulates the selected BESS design will integrate: "*Battery liquid cooling systems with automated fail-safe operation (air cooling systems will not be considered for the Scheme)*." Section 4.1.22 of the **Outline BSMP [APP-286]** describes the indicative BESS layout: "*The indicative BESS layout conforms to NFPA 855 (2026) (Ref 3) 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 equipment spacing*

Reference	Comments/Issue raised	Applicant's Response
		recommendations (if UL 9540A (Ref 6) testing shows propagation does not occur), and also in compliance with equipment spacing integration which exceeds the minimum equipment spacing distances from the illustrative BESS 5 MWh design validated through LSFT in 2025. This illustrative design evidence-based spacing is considered safe practice by NFCC guidelines." As the illustrative BESS design demonstrated that a fire did not propagate during Large Scale Fire Testing (LSFT) then the Applicant has demonstrated that the loss of a single BESS enclosure is a credible worst-case event for the safety and risk assessment documentation submitted as part of the DCO application. LSFT involves deliberately burning a complete BESS enclosure to evaluate thermal exposure, heat release rates, burn duration, maximum temperatures and, critically, the potential for fire propagation to adjacent battery containers or associated equipment. The purpose of this testing is expressly to validate minimum equipment spacing and to demonstrate that cascading or multi-container ignition does not occur where tested layouts and mitigation measures are implemented. These tests therefore explicitly address the type of multi-unit fire behaviour referenced by Mr Cox, including

Reference	Comments/Issue raised	Applicant's Response
		scenarios observed in real-world incidents, by requiring evidence that propagation risk is controlled through design rather than reliance on emergency intervention. As now mandated under NFPA 855 (2026) (Ref 14) the Applicant will only be able to select a BESS system that has undertaken LSFT. At the detailed design stage, the selected BESS LSFT data will be leveraged to fully inform inputs for risk assessment tools which will be utilised together with detailed consequence modelling to provide a comprehensive site operations and emergency response safety audit, this is stipulated in the **Outline BSMP [APP-286]** pre-construction requirements (Section 6). Sections 6.1.3 and 6.1.4 of the **Outline BSMP [APP-286]** mandate the key risk analysis reports which consider how to prevent and mitigate a multi-BESS failure incident. These reports must be provided at the detailed design stage and are BESS system and site layout specific. Section 2.4.2 of the **Outline BSMP [APP-286]** stipulates: "*Final BESS design and site layout will have been validated through mandatory Large Scale Fire Testing (LSFT) and rigorous consequence modelling to minimise the requirement for any D&WFRS intervention in a thermal runaway incident. LSFT must establish*

Reference	Comments/Issue raised	Applicant's Response
		minimum equipment spacing distances that demonstrate there is no fire propagation to adjacent BESS enclosures or ESS equipment. D&WFRS intervention in worst case scenarios would typically be limited to boundary cooling of adjacent BESS and Energy Storage System (ESS) units to prevent the fire from spreading. This strategy will be finalised with D&WFRS and be clearly communicated in the Emergency Response Plan (ERP); *To ensure that fire, smoke, and any release of toxic gases does not significantly impact site operatives, first responders, and the local community; and* *To ensure that firewater run-off is contained and tested before release or, if necessary, removed by tanker and treated offsite*. The **Outline BSMP [APP-286]** is secured through Requirement 6 (Battery safety management) in Schedule 2 of the **Draft DCO [APP-016]**, which provides that Work No. 2 must not commence until a Battery Safety Management Plan has been submitted to and approved by the relevant planning authority. The approved plan must be substantially in accordance with the **Outline BSMP [APP-286]**. The **Draft DCO [APP-016]** also requires the relevant planning authority to consult with Dorset and Wiltshire Fire and Rescue

Reference	Comments/Issue raised	Applicant's Response
		Service and the Environment Agency before determining the application, and that the Battery Safety Management Plan must be implemented as approved. The BESS fire emissions assessment (as detailed in **ES Volume 3, Appendix 15-2: BESS Fire Emissions Modelling [APP-239]**) has been undertaken using professional judgement in the absence of specific regulatory guidance, and adopts a conservative, worst case approach throughout. The assessment demonstrates that, even under worst case assumptions, a BESS fire would not result in significant effects on human health or safety. The modelling assumes: • Worst case BESS fire locations within the BESS area closest to sensitive receptors; • Worst case release height, temperature and plume parameters; and • Use of five years of hourly meteorological data, with the maximum predicted concentration extracted at each receptor, assuming the fire coincides with the poorest dispersion conditions. Given the inherent uncertainty in available BESS fire emissions data, a sensitivity test was also undertaken whereby emission rates were doubled. Even under this highly conservative sensitivity test, predicted

Reference	Comments/Issue raised	Applicant's Response
		concentrations remained well below the relevant health-based thresholds. The Applicant has followed National Fire Chiefs Council (NFCC) guidance (Ref 15) and undertaken BESS Fire Emissions Modelling (see **ES Volume 3, Appendix 15-2: BESS Fire Emissions Modelling [APP-239])** to model toxic gas emissions and visibility impacts from a BESS fire on sensitive receptors within a 1km radius of the BESS area. The fire emissions modelled in the report were based upon recent UK Health Security Agency (UKHSA) requests for DCO BESS projects which explore both immediate air quality impacts together with annual UK air quality requirements. The UKHSA stated in their relevant representation **[RR-4798]** that "*Following our review of the submitted documentation the UKSHA are satisfied that the proposed development should not result in any significant adverse impact on public health"*. The Applicant has also committed to commissioning an additional Plume Analysis Study at the detailed design stage as stipulated in Section 5.5.9 of the **Outline BSMP [APP-286]** and secured through the **Draft DCO [APP-016]**: *"..at the detailed design stage a BESS system and site specific Plume Analysis study will be conducted to assess the environmental impact of a site*

Reference	Comments/Issue raised	Applicant's Response
		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." It is not appropriate to undertake a fixed, whole-site quantitative fire consequence assessment at the DCO stage, as the detailed BESS technology, enclosure design, protection systems and empirically tested spacing parameters are not yet defined. As such, any site-wide modelling undertaken at this stage would be hypothetical and would not reflect the tested performance of the actual system to be installed. National guidance recognises this limitation and instead requires that site-specific Emergency Response Plans (ERPs) are developed once the final BESS design is confirmed and validated through testing.

Reference	Comments/Issue raised	Applicant's Response
		The development, approval and implementation of both the final BESS design and the site-specific ERP are secured through the DCO requirements, ensuring that safety controls are enforceable and subject to regulatory oversight. This approach ensures that credible worst-case risks, including the potential for multi-unit fire involvement, are appropriately addressed through evidence led design, mandatory testing, and secured operational controls, rather than through conservative but unrepresentative hypothetical modelling at an earlier stage.
SC-002	Mr Cox also expressed concern about development traffic, stating that increased Heavy Goods Vehicles (**HGV**) movements on narrow rural roads would make them unsafe and discourage use by non-motorised users, including pedestrians, cyclists and equestrians. He stated that this would result in loss of access to local amenities and routes that are currently well used.	**ES Volume 1, Chapter 13: Transport and Access [APP-065]** assesses the impact on Non-Motorised User (NMU) delay and amenity, including Fear and Intimidation. All impacts are concluded to be not significant and will be temporary. NMU delay is considered negligible given there is no existing pedestrian or cycle infrastructure on the construction routes and likely low numbers of existing NMU users. It is anticipated that PRoW which cross the Order Limits will generally remain open during the construction phase of the Scheme. There may be some slight perceptible delay to NMU movement if a construction vehicle is crossing a PRoW within the Order Limits. An

Reference	Comments/Issue raised	Applicant's Response
		Outline PRoWPPMP [APP-282] forms an embedded mitigation and will provide measures to ensure the effects of the construction phase on PRoW users is minimised. The **Outline PRoWPPMP [APP-282]** 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 unreasonable effects to PRoW users are not experienced during construction, replacement and decommissioning. In terms of NMU amenity, pedestrian amenity is broadly defined as the relative pleasantness of a journey, and can be affected by traffic flow, traffic composition and pavement width/separation from traffic. The construction routes on the road network have little existing pedestrian infrastructure and no footways, making them already unattractive as walking routes with no pedestrian amenity so this cannot be assessed. Fear and Intimidation for other NMU's can be assessed. Highway widths of construction routes have been assessed in **ES Volume 3, Appendix 13-1: Transport**

Reference	Comments/Issue raised	Applicant's Response
		Assessment [APP-233] and provide sufficient width for HGV traffic to comfortably pass cyclists. **ES Volume 1, Chapter 13 Transport and Access [APP-065]** 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 (Ref 8). **ES Volume 1, Chapter 13 Transport and Access [APP-065]** concludes that on all links in the study area the significance of effect is Minor Adverse (temporary). On 12 March 2025 it was agreed in a scoping meeting with Wiltshire Council that PRoW surveys were not required, due to likely low numbers of PRoW users and the proposed mitigation during the construction period. In terms of mitigation, an **Outline CTMP [APP-287]** supports the DCO Application and presents outline measures which restrict construction deliveries to the proposed construction routes and times, separating the public and recreational users from hazards, including, traffic management measures such as signage and banksmen, fencing, and dust and noise control.

Reference	Comments/Issue raised	Applicant's Response
SC-003	Mr Cox considered that both the BESS risk assessment and the traffic impact on non-motor users require more realistic and robust assessment.	The Applicant disputes the claim that the BESS risk assessment presented in the **Outline BSMP [APP-286]** is not robust and refers Mr Cox to their response to SC-001 which sets out the reasoning behind this. Moreover**, ES Volume 1, Chapter 13.1: Transport and Access [APP-065]** assesses the impact on Non-Motorised User (NMU) delay and amenity, including Fear and Intimidation. All impacts are concluded to be not significant and will be temporary.

2.8 Ann Skinner

Reference	Comments/Issue raised	Applicant's Response
AS-001	Ann Skinner is a chartered ecologist with over 40 years' experience, including 25 years as a senior national conservation adviser with the Environment Agency. She raised significant environmental concerns relating to the Scheme. Ms Skinner stated that her primary concern was the impact on the water environment. She stated that construction and decommissioning across such a large area would inevitably cause soil compaction and soil loss, altering hydrological regimes and making the land more prone to both flooding and drought. She emphasised that soil compaction is notoriously difficult to remediate and that these impacts would be hard, if not impossible, to reverse once the Scheme is implemented.	The Applicant notes the concern raised by Ms Skinner and acknowledges the expertise and experience cited from their career. Any potential impacts relating to matters raised concerning soil compaction and hydrological regimes have been considered and managed through ongoing consultation with relevant statutory bodies, including the Environment Agency, Natural England, and the Lead Local Flood Authority, which have played a critical role in the Scheme's development. In recognising that soil compaction, soil loss and vegetation condition are relevant pathways by which construction and decommissioning activities could affect runoff, infiltration and water quality if not properly managed. These pathways have therefore been assessed and are controlled through embedded mitigation, rather than assumed away. For Solar PV Panel areas, the principal hydrological risk is not that the panels themselves act as impermeable hardstanding. The panels are mounted above ground and drain to the existing ground beneath and between panel rows. The relevant risk pathway is the condition of the ground receiving that rainfall,

Reference	Comments/Issue raised	Applicant's Response
		including soil structure, vegetation cover and whether any preferential flow routes are created during construction. These matters are controlled through the **Outline CEMP [APP-277]**, the **Outline Soil Resources Management Plan (SRMP) [APP-280]**, the **Outline LEMP [APP-283]** and the **Outline OEMP [APP-278]**. Specifically, the **Outline SRMP [APP 280]** identifies appropriate soil handling windows with regard to rainfall and soil moisture conditions and sets out best practice methods for handling, storage and replacement of soils to minimise the risk of damage and compaction. The Outline SRMP is secured by Requirement 17 of Schedule 2 of the **Draft DCO [APP-016].** The assessment approach therefore distinguishes between the wider panelled fields and genuinely impermeable infrastructure. The panelled fields would remain largely permeable and vegetated, with rainfall continuing to drain to ground. By contrast, impermeable infrastructure, including substations, the BESS Area, permanent hardstanding and access tie-ins, has been assessed quantitatively through **ES Volume 3, Appendices 11-1 to 11-9: Flood Risk Assessment and Drainage Strategy [APP-210 to**

Reference	Comments/Issue raised	Applicant's Response
		218], with attenuation and controlled discharge provided where required. The submitted evidence and mitigation target the factors that control runoff response in practice: soil compaction, bare ground, vegetation establishment and flow connectivity. Construction controls include defined working areas, management of trafficking routes, appropriate plant selection, temporary drainage and sediment control measures, working in suitable ground conditions, and restoration of disturbed ground. Operational controls include the establishment and maintenance of permanent ground cover beneath and between arrays, including at panel drip-line locations. On that basis, the Applicant does not accept that the Scheme would inevitably alter hydrological regimes or make the land more prone to flooding or drought. The relevant risks have been identified, assessed and controlled through secured management plans and DCO Requirements.
AS-002	Ms Skinner also expressed concern about confusion and inconsistency in the Applicant's approach to environmental measures, questioning what constitutes mitigation, what is compensation, and what would genuinely deliver biodiversity net gain (**BNG**). She considered many of the proposed measures to be	Potential impacts on ecology and biodiversity are fully assessed in **ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061].** The assessment identifies avoidance, mitigation and enhancement measures to address potential impacts on habitats and protected and notable species. It also identifies opportunities for

Reference	Comments/Issue raised	Applicant's Response
	unrealistic, particularly the establishment of species-rich grassland beneath and between solar panels. She criticised the reliance on tree and shrub planting to reduce visual effects, noting the practical difficulties of sourcing sufficient quantities of locally grown, disease-free nursery stock, and the uncertainty over long-term success. She stated that, given the number of omissions, uncertainties and assumptions, it is not possible to accurately determine or quantify the overall environmental impacts of the Scheme.	ecological enhancement, including the creation and long-term management of habitats, and delivery of biodiversity net gain. The Scheme is expected to deliver an overall net gain for biodiversity as a result of the cessation of agricultural practices combined with delivery of considerable habitat creation and enhancement measures. This is quantified through the use of the DEFRA published **Biodiversity Net Gain Assessment. Appendix Statutory Biodiversity Metric Calculation [APP-274]** with further details provided with the **Biodiversity Net Gain Assessment Report [APP-273]** which demonstrates in excess of 10% BNG will result from the Scheme. As described within the **Biodiversity Net Gain Assessment Report [APP-273],** the assessment has assumed all grassland which is to be established beneath and between solar panels will not comprise species-rich grassland. Grassland beneath and between solar panels is expected to comprise the species-poor habitat type 'Modified Grassland' which is a realistic target based on the Applicant's experience of the types and condition of habitats which typically develop at large-scale ground mounted solar Schemes. Grassland to be established within

Reference	Comments/Issue raised	Applicant's Response
		undeveloped buffer zones and easements is expected to be of higher structural and species diversity which is of higher value for biodiversity generally. A comprehensive package of habitat creation and enhancement measures are shown in **ES Volume 2, Figure 3-4: Landscape and Ecological Mitigation Plan [APP-084]** and detailed in the **Outline 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. These measures have been carefully designed based on the extensive knowledge of ecological conditions at the Order Limits collected through comprehensive desk studies and field surveys, as well as extensive professional experience of ecological enhancement measures which are both feasible and appropriate for the Scheme. 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

Reference	Comments/Issue raised	Applicant's Response
		Schedule 2 of the **Draft DCO [APP-016]**, ensuring that mitigation planting and screening measures are delivered and maintained throughout the lifetime of the Scheme.
AS-003	Ms Skinner further criticised what she described as a low level of ambition for BNG, contrasting it with higher BNG targets being adopted elsewhere, which she indicated could be more readily achieved on intensively farmed land.	The Applicant disputes the claim that the Scheme has low ambitions around BNG targets. The Scheme is expected to deliver an overall net gain for biodiversity as a result of the cessation of agricultural practices combined with delivery of considerable habitat creation and enhancement measures. This is quantified through the use of the DEFRA published **Biodiversity Net Gain Assessment. Appendix Statutory Biodiversity Metric Calculation [APP-274]** with further details provided with the **Biodiversity Net Gain Assessment Report [APP-273]** which demonstrates in excess of 10% BNG will result from the Scheme. A comprehensive package of habitat creation and enhancement measures are shown in **ES Volume 2, Figure 3-4: Landscape and Ecological Mitigation Plan [APP-084]** and detailed in the **Outline LEMP [APP-283].** These measures have been carefully designed based on the extensive knowledge of ecological conditions at the Order Limits collected through comprehensive desk studies and field surveys, as well as extensive professional experience of

Reference	Comments/Issue raised	Applicant's Response
		ecological enhancement measures which are both feasible and appropriate for the Scheme.

2.9 Kim Morgan

Reference	Comments/Issue raised	Applicant's Response
KM-001	Kim Morgan has lived locally for over 30 years and objects to the Scheme due to flood risk. She stated that she has personally witnessed five flood events since 1996, affecting her village and surrounding area. Ms Morgan criticised the Applicant's **Flood Risk Assessment (FRA) [APP-210]**, stating that it fails to quantify surface water runoff outside the red-line application boundary. She explained that modelling of extreme rainfall and exceedance flows is limited and obscured, and that there is no convincing evidence showing where surface water runoff would go after heavy rainfall. She stated that the proposed drainage strategy does not demonstrate that runoff rates would be controlled to greenfield conditions, nor that downstream impacts have been properly assessed or mitigated. Ms Morgan also referred to past experience with flooding interventions, stating that the efforts of the Environment Agency, Wiltshire Council, and National Highways to address flooding problems in the area have not been effective, leaving communities vulnerable.	The Applicant acknowledges the flooding experiences described by Ms Morgan and recognises that parts of the local area are susceptible to flooding during periods of heavy rainfall. The Scheme has been assessed and designed with this existing context in mind, with the objective of ensuring that it does not increase flood risk or worsen those existing conditions. The Applicant does not agree that the Flood Risk Assessment fails to quantify or control surface water runoff, or that downstream impacts have not been assessed. The assessment distinguishes between Solar PV Panel areas and impermeable infrastructure. Solar PV Panels are mounted above ground and drain to the existing ground beneath and between panel rows. These areas remain permeable and are not connected to a positive drainage system that would collect and discharge runoff beyond the Order limits. As such, they do not create a new point source of runoff requiring off-site routing or modelling of discharge locations. By contrast, impermeable infrastructure, including substations, the BESS Area and associated hardstanding, is subject to quantitative drainage

Reference	Comments/Issue raised	Applicant's Response
		design. As set out in **ES Volume 3, Appendices 11-1 to 11-9: Flood Risk Assessment and Drainage Strategies [APP-210 to APP-218],** runoff from these areas is calculated and controlled through attenuation and restricted discharge so that greenfield runoff rates are not exceeded, with allowance for climate change. This ensures that runoff from the Scheme does not increase flood risk elsewhere. In terms of runoff pathways, the FRA identifies existing catchments, flow routes and receiving watercourses within and downstream of the Order limits. The Scheme does not introduce new off-site discharge points from the wider Solar PV areas, and therefore does not alter the fundamental routing of surface water beyond the site. Where formal drainage is proposed, discharge locations will be defined at detailed design stage and will remain consistent with the assessed drainage principles. Exceedance flows are addressed through the embedded design approach, whereby runoff from impermeable areas is retained and managed within site drainage systems, and runoff from permeable areas continues to follow existing overland flow pathways. There is no reliance on uncontrolled exceedance flows being directed off-site.

Reference	Comments/Issue raised	Applicant's Response
		The assessment presented in **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [APP-063]** concludes that, with the embedded mitigation and drainage controls in place, the Scheme would not increase flood risk off-site. Existing flooding would continue to occur under the same wider catchment conditions, but would not be exacerbated by the Scheme. On that basis, the Applicant considers that surface water runoff, runoff pathways and downstream effects have been appropriately assessed, and the assertion that these matters have not been quantified or demonstrated is not accepted.

2.10 Stuart Fisher

Reference	Comments/Issue raised	Applicant's Response
SF-001	Stuart Fisher lives in Corston, close to an existing solar array, and objects to the Scheme primarily on grounds of landscape character, long-term change, and permanence of harm. He regularly walks the countryside and states that the area supports tourism, with visitors using local shops, pubs, accommodation and services that depend on the quality of the surrounding landscape. Mr Fisher expresses concern that there is insufficient information on the final removal and disposal of solar panels and BESS, noting that installation and decommissioning are themselves highly disruptive. Mr Fisher questions whether assurances that the countryside will be restored after 60 years can be relied upon, raising doubts about whether the Applicant or its backers remain accountable so far into the future.	The Applicant acknowledges that there will be some significant impacts on Corston as a result of the Scheme including visual impacts to transport receptors on the A429 Kingway Bridge North to Chippenham Road, Corston (TR007) and socioeconomic effects on users of bridleway MALW54 and the unsurfaced roads parallel to, and crossing the railway (Cabbage Lane) in Lime Down E both during the construction phase which may be a source of concern for local residents. The Secretary of State will balance those potential impacts and changes against the urgent need and critical national priority for the Scheme as set out in Government policy. The Applicant has assessed adverse impacts arising from the Scheme and has also set out within the **ES [APP-052 – APP-065]** the steps taken to avoid, mitigate and minimise these impacts as far as possible, and has prepared a number of management plans that will ensure that impacts are kept to a minimum. These management plans are secured in the **Draft DCO [APP-016].** As per the conclusions of **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]** Moderate Adverse

Reference	Comments/Issue raised	Applicant's Response
		(significant) visual effects are reported on A429 Kingway Bridge North to Chippenhan Road, Corston, A429 Kingway Bridge, (TR007) during Construction. These effects are temporary reducing to Moderate / Minor Adverse (not significant) by year 1 of operation. The Visual Effects of the Scheme on the village of Corston (Receptor RS015) have also been assessed in the LVIA which recorded Minor Adverse Effects during Construction and Year 1 reducing to Minor Neutral by Year 15 (both of which are considered not significant). This is due to the distance of the nearest solar sites in field parcels E2, E3, and E4 and the layers of intervening vegetation. With regards to the concerns around tourism, the potential effects of the Scheme on tourism and recreation are assessed in **ES Volume 1, Chapter 16: Socio Economics, Tourism and Recreation [APP-068]**, supported by **ES Volume 3, Appendix 16-2: Tourism and Recreation Receptor Tables [APP-241]**. The assessment identifies a worst-case scenario in which a temporary loss of up to 50 tourism-related jobs and £1.76 million in annual spending could occur locally during construction, and a long-term loss of up to 11 tourism-related jobs/ £395,000 in visitor spending per annum could occur during the operational phase of the Scheme. This represents a precautionary estimate

Reference	Comments/Issue raised	Applicant's Response
		based on conservative assumptions. The assessment concludes that, while some localised effects on tourism receptors are anticipated to occur, significant adverse effects on the wider tourism economy are not anticipated. Additional mitigation measures (which were not quantified for inclusion in the assessment of potential losses to employment) secured in the **Outline SSCEP [APP-285]** seek to reduce tourism employment losses through focussing on local recruitment, promoting local suppliers where practicable, and through providing retraining opportunities for workers in tourism-dependent industries. This is secured through Requirement 18 of Schedule 2 to the **Draft DCO [APP-016]**. The assessment in the **ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]** and the supporting **ES Volume 3, Appendix 16-2: Tourism and Recreation Receptor Tables [APP-241]** has assessed the likely impacts on PRoWs in the Corston area likely to be affected by the Scheme. The Applicant confirms that within Lime Down E, significant adverse effects are anticipated solely to recreational users of bridleway MALW54 and the unsurfaced roads parallel to, and crossing the railway (Cabbage Lane) in Lime Down E, as a result of the construction of the Scheme. Therefore, this will be considered in the

Reference	Comments/Issue raised	Applicant's Response
		planning balance when the DCO is determined. No significant effects are anticipated to any other route in the Corston area, or at any other phase of the Scheme. The Applicant has committed to ensuring the use of PRoWs is protected as much as possible during construction through the implementation of embedded and additional mitigation measures (such as controlling of HGV movements, signage, banksmen and reinstatement of surfaces once construction works are complete) set out in the **Outline CTMP [APP-287]** and **Outline PRoWPPMP [APP-282]**, secured respectively by Requirements 15 and 16 in Schedule 2 to the **Draft DCO [APP-016]**. During the operation of the Scheme, effects on PRoW users shall be mitigated through the use of offset buffers to onsite infrastructure, landscape screening planting, biodiversity enhancement planting, and the provision of permissive paths to increase PRoW network connectivity. These measures are secured through the **Outline LEMP [APP-283]** and **Outline PRoWPPMP [APP-282]**, secured respectively by Requirements 7 and 16 in Schedule 2 to the **Draft DCO [APP-016]**. The Applicant confirms that the approach to PRoW impacts and highway safety are under discussion with Wiltshire Council's Countryside Access Team and Highways Team (as part of discussions with Wiltshire

Reference	Comments/Issue raised	Applicant's Response
		Council in general). Additional discussions specific to PRoWs are being undertaken with the British Horse Society, and the Wiltshire Bridleway Association. Progress on each of these discussions will be set out in the relevant Statements of Common Ground with each of these parties, to be submitted at Deadline 2. Regarding the concerns around final removal and disposal of solar panels and BESS, these aspects are outlined in Section 3.6, Decommissioning of **ES Volume 1, Chapter 3: The Scheme [APP-055]**. An **Outline Decommissioning Strategy [APP-279]** has been prepared as part of the EIA and submitted with the DCO Application. This sets out the general principles to be followed in the decommissioning phase of the Scheme. The **Draft DCO [APP-016]** includes a Requirement that a detailed Decommissioning Strategy would be prepared substantially in accordance with the **Outline Decommissioning Strategy [APP-279]** and approved by the relevant authorities at that time of decommissioning, in advance of the commencement of decommissioning works, and would include timescales and transportation methods. The detailed Decommissioning Strategy would ensure that decommissioning was undertaken safely and with

Reference	Comments/Issue raised	Applicant's Response
		regard to the environmental legislation at the time of decommissioning, including relevant waste legislation.
SF-002	Mr Fisher criticises the Applicant's assessment of visual impact, stating that the viewpoint material is not representative of the current countryside and understates likely effects. Mr Fisher argues that alternative locations closer to the grid connection and less sensitive landscapes, such as Ministry of Defence land (Imber firing range) or the disused quarry site at Westbury, should be properly considered, and that the existing agricultural countryside of North Wiltshire is irreversibly altered by the Scheme.	The Applicant disputes the claim that the viewpoint material is not representative of the current surroundings or underestimates effects. The LVIA **[APP-060]** includes verified viewpoints with both summer and winter photography to demonstrate year-round changes to the landscape **[APP-103 to APP105]**. The locations of these viewpoints were agreed in consultation with Wiltshire Council and Officers from the Cotswolds National Landscape. Photomontages at Year 15 illustrate the effectiveness of established planting, while also demonstrating the intended retention of openness across the receiving landscape. Regarding the alternative locations mentioned in Mr Fisher's comment, please refer to paragraph 4.3.13 of **ES Volume 1, Chapter 4: Alternatives and Design Evolution [APP-056]** which sets out why the Applicant considers the Ministry of Defence land and disused quarry referenced by SF-002 to be unsuitable. The Salisbury Plain (including the Imber firing range) is heavily constrained due to its classification as a Special Protection Area, a Site of Special Scientific Interest, a Special Area of Conservation and a Special

Reference	Comments/Issue raised	Applicant's Response
		Landscape Area. It is currently partially used by the Ministry of Defence. There are also a number of scheduled monuments nearby. The disused quarry at Westbury is also covered by the Salisbury Plain Special Protection Area mitigation zone and the Special Landscape Area for the Salisbury Plain. Its topography makes it unsuitable for solar development in its current state or within the timescales required for the Scheme.

2.11 Christine Macnee

Reference	Comments/Issue raised	Applicant's Response
ChM-001	Christine Macnee lives in Corston and objects to the Scheme due to its scale, location and cumulative impact. She states that the Scheme is disproportionately large for the area and would cause lasting harm to the landscape and the communities that depend on it. Ms Macnee explains that the countryside around the villages is not just scenery but fundamental to daily life, wellbeing and community connections, and that the Scheme would change this landscape beyond recognition. Ms Macnee refers to the stress, anxiety and disrupted sleep experienced by residents over an extended period as a result of uncertainty caused by the Scheme.	The Applicant acknowledges that there will be some significant impacts on Corston as a result of the Scheme which may be a source of concern for local residents. These include visual impacts as reported in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]** to transport receptors on the A429 Kingway Bridge North to Chippenham Road, Corston (TR007), and socioeconomic effects as reported in **ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]** on users of bridleway MALW54 and the unsurfaced roads parallel to, and crossing the railway (Cabbage Lane) in Lime Down E both during the construction phase. The Secretary of State will balance those potential impacts and changes against the urgent need and critical national priority for the Scheme as set out in Government policy. The Applicant has assessed adverse impacts arising from the Scheme and has also set out within the technical chapters of the **ES [APP-052 – APP-065]** the steps taken to avoid, mitigate and minimise these impacts as far as possible, and has prepared a number of management plans that will ensure that impacts are kept to a minimum. These management plans are secured in the **Draft DCO [APP-016].**With regards to the concerns around the cumulative impact of the Scheme, the Applicant confirms cumulative

Reference	Comments/Issue raised	Applicant's Response
		effects have been carefully considered in accordance with Planning Inspectorate Advice Note 17 (Ref 10) and the relevant requirements in NPS EN-1 (Ref 1), the National Policy Statement for renewable energy infrastructure (EN-3) (NPS EN-3) (Ref 2) and the National Policy Statement for electricity networks infrastructure (EN-5) (NPS EN-5) (Ref 3) requirements as set out in **ES Volume 1, Chapter 21 Cumulative and In-Combination Effects** [**APP-074**]. **ES Volume 1, Chapter 21 Cumulative and In-Combination Effects** [**APP-074**] and **ES Volume 3, Appendix 21-1 Long List of In-Combination Effects and Cumulative Developments [APP-264]** set out the approach and conclusions of the ES technical chapters [**APP-052 to APP-074**] cumulative assessments. Taking a conservative worse case approach, significant cumulative effects are identified at a limited and discrete number of receptors comprising tourism and recreation impacts during the construction phase on Corsham Park, PRoW WT|CORM|122, PRoW WT|HULL|29, and Sustrans Cycle Route 403, and on skylark at a District level. To mitigate these potential effects inter project communication will take place wherever possible, for example through the co-ordination of construction planning and construction vehicle deliveries and routes.

Reference	Comments/Issue raised	Applicant's Response
		With regards to uncertainty caused by the Scheme, the Applicant has sought to undertake pre-application consultation in as robust a form as practicable, to allow interested parties to have access to as much information as available at the time of consulting as possible, to help alleviate concerns about the potential future impacts of the Scheme on people's lives. The **Consultation Report [APP-022]** sets out the Applicant's approach to pre-application consultation and demonstrates how consultation was undertaken with a wide range of stakeholders, including local communities, community organisations, statutory consultees and those with an interest in land. This has included in-person events and online communications, with consultation materials provided both digitally and in hard-form, and free-to-use communication channels to respond back to the Applicant team. The Applicant has sought to engage with communities ahead of construction through the implementation of a Community Liaison Group, as secured through Requirement 4 in Schedule 2 to the **Draft DCO [APP-016]**. Whilst this group is set up for the construction phase of the Scheme, the Applicant has committed to providing a designated community contact within the Scheme's operation and maintenance team during the operational lifetime of the Scheme, with a dedicated Community Liaison Manager committed to during peak replacement events and

Reference	Comments/Issue raised	Applicant's Response
		decommissioning. This is secured through the **Outline OEMP [APP-279]** and **Outline Decommissioning Strategy (DS) [APP 279]** by Requirements 14 and 20 in Schedule 2 to the **Draft DCO [APP-016]**.
ChM-002	Ms Macnee raises concerns about economic harm, stating that productive farmland would be lost, tourism would be negatively affected, and associated hospitality businesses would suffer, with some rural pubs and businesses potentially becoming unviable. She describes the burdens of the Scheme as falling on local communities, while the benefits flow elsewhere.	An assessment of the likely effects of the Scheme on the local economy and employment is provided in **ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]**. This chapter considers potential impacts on construction and engineering sectors, agricultural activity, tourism-related businesses, and wider local economic conditions during construction, operation and decommissioning. Supporting evidence is provided in **ES Volume 3, Appendix 16-3: Socio Economics, Tourism and Recreation – Summary of Non-Significant Effects [APP-242]**, which summarises that effects on the local economy and economic prosperity are assessed as negligible to minor beneficial, with construction expenditure and employment generation contributing positive, temporary effects on local economic activity. The assessment therefore concludes that the Scheme would not result in significant adverse effects on local businesses or the wider local economy, and that socio-economic benefits, including job creation and local supply-chain opportunities, are expected during the construction phase, with more modest economic

Reference	Comments/Issue raised	Applicant's Response
		and skills and supply chain opportunities during the operational phase.

2.12 Darren Rawlings

Reference	Comments/Issue raised	Applicant's Response
DR-001	Darren Rawlings lives close to the A429 road bridge over the Gauze Brook in Corston and has done so for approximately 23 years. He raises concerns that the Scheme would significantly exacerbate the flood risk to his home. Mr Rawlings states that his property has flooded on multiple occasions, most recently during the November 2024 flooding event, which he understands to have been described as a one-in-40-year event, during which floodwater rose rapidly once the capacity of the bridge was exceeded. He acknowledges the need to achieve net zero, but stresses that any approved Scheme must include adequate mitigation to address its impact on flood risk to the existing built environment. Mr Rawlings states that the current Scheme does not demonstrate sufficient attenuation to prevent increased flooding and considers that properly designed and effective attenuation within the Scheme is essential. He was asked by the ExA to submit a map outlining the bridge referred to previously.	The Applicant acknowledges the flooding experienced at the A429 bridge over Gauze Brook in Corston, including the mechanism described whereby flood levels increase once the capacity of the bridge is exceeded. The Applicant does not agree that the Scheme would exacerbate flood risk at this location or that additional attenuation is required to offset Scheme effects. Fluvial flood risk associated with Gauze Brook, including the influence of structures such as the A429 bridge, has been assessed through site-specific hydraulic modelling for Lime Down D, as presented in the **ES Volume 3**, **Appendix 11-6: Flood Risk Assessment and Drainage Strategy: Lime Down D / BESS [APP-215]**. This assessment has informed the layout of the Scheme to ensure that the function of the floodplain and conveyance along Gauze Brook is maintained. The Scheme does not introduce built development within the floodplain that would materially displace floodwater or alter channel conveyance. Solar PV Panels are mounted above ground on piles, and floodplain storage calculations confirm that any

Reference	Comments/Issue raised	Applicant's Response
		displacement associated with panel supports is negligible. The Scheme therefore does not affect the operation of the bridge or the controls on flood levels at this location. In terms of surface water runoff, the Scheme does not generate a material increase in runoff to the Gauze Brook catchment. Solar PV Panel areas remain permeable and drain to ground, rather than discharging as a concentrated flow to the watercourse. Where impermeable infrastructure is introduced within Lime Down D, including the BESS Area and substations, runoff is attenuated and discharged at a controlled rate so that greenfield runoff rates are not exceeded, as set out in **ES Volume 3, Appendices 11-1 to 11-9: Flood Risk Assessment and Drainage Strategy [APP-210 to APP-218]**. The Scheme therefore does not increase peak flows within Gauze Brook or place additional pressure on the A429 bridge during flood events. Flooding associated with exceedance of the bridge capacity would continue to be governed by wider catchment conditions rather than the presence of the Scheme. On that basis, the Applicant considers that the Scheme would not exacerbate flooding at Corston or at Mr Rawlings' property, and that the proposed approach to

Reference	Comments/Issue raised	Applicant's Response
		runoff management and floodplain design is appropriate.

2.13 Michael Holstead

Reference	Comments/Issue raised	Applicant's Response
MH-001	Michael Holstead is a chartered engineer and resident of Corston who objects to the Scheme due to safety risks associated with the BESS. He states that the proposed firefighting water provision is inadequate when tested against credible real-world scenarios, noting that major BESS fires (such as the September 2025 Boulder City BESS fire and the March 2025 Cirencester BESS fire) have required significantly greater flow rates and volumes than those proposed. He highlights that each battery container has a capacity comparable to multiple electric vehicles and that a fire involving multiple containers could require millions of litres of water, far exceeding on-site provision. He raises concerns about the containment and disposal of contaminated firefighting water, including the risk of persistent chemicals entering soil and underlying aquifers. He questions whether the risk of thermal runaway spreading between adjacent containers has been adequately assessed or mitigated, given the close proximity of units.	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 (D&WFRS) and incorporating recommendations of the National Fire Chiefs Council (NFCC) (Ref 15). The **Outline BSMP [APP-286]** is fully compliant with the original NFCC Guidance and the revised 2026 guidance. The revised guidance integrates revisions and refinements to the 2024 draft which were already included in the **Outline BSMP [APP-286]**, except that the Applicant will still integrate a 10m vegetation clearance distance around BESS enclosures. The **Outline BSMP [APP-286]** is secured through Requirement 6 in Schedule 2 of the **Draft DCO [APP-016],** which provides that Work No. 2 must not commence until a Battery Safety Management Plan has been submitted to and approved by the relevant planning authority. The approved plan must be substantially in accordance with the **Outline 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 (EA) before determining the

Reference	Comments/Issue raised	Applicant's Response
		application, and that the Battery Safety Management Plan must be implemented as approved. The Applicant is in the process of agreeing a Statement of Common Ground with D&WFRS and the EA to provide assurance that all safety and emergency response requirements are fulfilled. The Applicant notes that the referenced Cirencester BESS fire involved older, legacy battery systems that are not compliant with NFPA 855 (Ref 14) and integrated NMC pouch cell, air-cooled battery systems; these older systems will not be considered for the Scheme. These types of systems account for approximately a third of BESS failure events listed in the Electric Power Research Institute (EPRI) database (Ref 13). The Applicant has not reviewed any credible report on water volumes used for the Boulder City BESS fire; however, the local fire department has publicly posted on their social media that firefighters were stood down within 5 hours and vacated the site within 7 hours of the incident alert. Firefighting tactics and water volume requirements for Electric Vehicle (EV) fires are not comparable to emergency response requirements for credible BESS

Reference	Comments/Issue raised	Applicant's Response
		failure scenarios. Most current BESS systems are designed to safely burn out without internal fire suppression systems (to remove the risk of stranded energy in the battery systems), Large Scale Fire Testing (LSFT) must be conducted to demonstrate that loss will be safely limited to one container without the intervention of fire fighters. Most of these BESS enclosures integrate lithium iron phosphate (LFP) prismatic cells and have demonstrated fire propagation does not occur to other BESS enclosures at distances ranging from 15cm – 100cm to adjacent or back-to-back BESS enclosures with spacing of 3-3.5 metres across from the next row / block of BESS enclosures. These BESS designs integrate high levels of thermal insulation to prevent a fire from spreading to adjacent BESS enclosures. The insulation is designed to ensure that external heat from a BESS fire does not increase internal temperatures of adjacent BESS to critical levels i.e. <100C. The illustrative BESS enclosure and site layout integrated equipment spacing from a BESS supplier which had conducted LSFT with spacing of 150mm between adjacent BESS enclosures with BESS unit heat flux measurement panels located 2.5 metres from the BESS and an egress heat flux gauge at 1.25m

Reference	Comments/Issue raised	Applicant's Response
		from the BESS (positioned at the front and back side of the initiating BESS enclosure). Fire did not propagate between BESS enclosures and heat flux data at heat flux locations was within limits to demonstrate that safety and propagation risks are mitigated. Original NFCC guidance (2023) and revised NFCC guidance (2026) (Ref 15) permit site layout distances to be validated through evidence-based reduction i.e. LSFT (full scale fire test data). Therefore, the Applicant's illustrative BESS site layout 3.5m with 0.9m back-to-back spacing is compliant with fully validated by LSFT. The **Outline BSMP [APP-286]** specifies that the indicative site design will accommodate as follows: *"The BESS Area will contain a minimum of two firefighting water storage units of no less than 228,000 litres in capacity, capable of delivering 1900 litres per minute for 4 hours (exceeding NFCC guidance)."* Section 5.3.2 of the **Outline BSMP [APP-286]** stipulates that: *"The firefighting water requirement will be fully assessed at the detailed design stage based upon analysis of Large Scale Fire Testing (LSFT) of the*

Reference	Comments/Issue raised	Applicant's Response
		BESS design plus any additional BESS fire and explosion test data by an independent Fire Protection Engineer and water storage volumes will be agreed with D&WFRS during detailed design; and *If an internal BESS water based fixed suppression system (automatic or dry pipe) is integrated in the BESS enclosures a separate water supply and water containment system will be integrated. Any process water from the suppression system will be contained and subjected to the same accredited testing and characterisation regime as firewater runoff before any discharge or off-site removal."* In the event of a fire, the expected approach would be defensive firefighting, focusing on cooling nearby battery units to prevent fire spread rather than actively extinguishing the affected unit. This is known as "boundary cooling" and involves intermittent use of water spray or mist during the most intense phase of the fire, which typically lasts one to three hours. Modern battery systems are designed and tested to show that fires can be safely contained within a single unit without spreading, which significantly limits water use. National and international fire authorities advise against directing large volumes of water directly onto battery systems, and claims that millions of litres are

Reference	Comments/Issue raised	Applicant's Response
		required are based on unrealistic firefighting assumptions that are neither necessary nor appropriate. The Applicant acknowledges the concerns raised by Mr Holstead regarding the potential for contaminated firefighting water and the need to ensure that any such water is appropriately contained and managed to protect the water environment. However, does not agree that the Scheme presents an unmitigated risk to soils, groundwater or surface water receptors from firefighting water given the mitigation measures set out in **Outline BSMP [APP-286]** and **Firewater Containment and Drainage Strategy – Lime Down BESS [EN010168/EXAM/9.8]**. At this stage, the design is not committed to specific drainage components or layouts. However, the detailed design will include a controlled, sealed and isolatable drainage system for the BESS Area, with appropriate containment, treatment, interception and isolation measures to prevent spills, leaks or firefighting water from affecting ground or controlled waters. The system will be capable of retaining firefighting water within the BESS compound during an incident.

Reference	Comments/Issue raised	Applicant's Response
		response will include isolation of the drainage system to retain water within the BESS Area. Any stored water would then be removed and managed off-site in accordance with relevant environmental regulations, rather than being discharged to the environment. The detailed design will be secured through the DCO process and accords with the drainage principles set out in **ES Volume 3, Appendix 11-6: Flood Risk Assessment and Drainage Strategy - Lime Down D / BESS [APP-215]**, which requires that runoff from engineered areas is controlled and does not increase risk to the surrounding environment.
MH-002	Mr Holstead also challenges the robustness of the Scheme's overall risk assessments, arguing that low-probability but high-impact events do occur and must be properly considered. He states that the dismissal of terrorism risk is not credible, describing the BESS as a soft target, and questions whether sufficient assessment has been undertaken in relation to security and cyber risks within the supply chain, which he considers inconsistent with government policy on protecting public safety.	Terrorism risk has been assessed within **ES Volume 3, Appendix 20-6: Long List of Major Accidents and Disasters [APP-263].** The Scheme is unlikely to be a target for these types of incidents due to its rural location and number of exposed targets. Should such an event arise, national guidance would be followed.
MH-003	Following Mr Holstead's evidence, the ExA asked questions seeking clarification on whether the proposed firefighting water volumes and containment	The Applicant's response to MH-001 validates the proposed firefighting water volumes for the indicative site design and for the detailed design stage. The

Reference	Comments/Issue raised	Applicant's Response
	measures were sufficient when tested against credible worst-case scenarios, including large-scale or multi-unit BESS fires. The ExA also queried the basis for his concerns regarding risk assessment methodology, including how low-probability, high-impact events should be treated within safety assessments, and the implications for environmental protection, particularly groundwater and aquifers.	Applicant has provided 456,000 litres of firefighting water for the indicative design which exceeds NFCC guidance of 180,000 litres (Ref 15). Firefighting water volume will be decided at the detailed design stage once a BESS design is selected, Section 5.3.2 of the **Outline BSMP [APP-286]** stipulates that: *"The firefighting water requirement will be fully assessed at the detailed design stage based upon analysis of Large Scale Fire Testing (LSFT) of the BESS design plus any additional BESS fire and explosion test data by an independent Fire Protection Engineer and water storage volumes will be agreed with D&WFRS during detailed design; and* *If an internal BESS water based fixed suppression system (automatic or dry pipe) is integrated in the BESS enclosures a separate water supply and water containment system will be integrated. Any process water from the suppression system will be contained and subjected to the same accredited testing and characterisation regime as firewater runoff before any discharge or off-site removal."* The Applicant confirms that firefighting water containment for the BESS has been designed on the

Reference	Comments/Issue raised	Applicant's Response
		basis of credible incident scenarios, including the potential for multiple units to be involved, and is not limited to routine or minor events. The approach set out in the **Outline BSMP [APP-286]** and the standalone **Firewater Containment and Drainage Strategy – Lime Down BESS [EN010168/EXAM/9.8]** is to contain and isolate firefighting water within the BESS Area, rather than allow discharge to the environment. This is achieved through a sealed and isolatable drainage system, capable of retaining firefighting water and rainfall during an incident. The design is based on a risk-based and proportionate assessment of credible scenarios. It does not assume an unbounded worst-case event requiring unlimited volumes of water, but instead ensures that for credible events the system can be isolated and water retained and subsequently removed from site. This approach aligns with established good practice, where containment and control of contaminated water is the primary mechanism for environmental protection. At this stage, specific volumes and detailed layout are not fixed. These will be confirmed at detailed design stage. However, the governing principle is that firefighting water will be contained within the BESS

Reference	Comments/Issue raised	Applicant's Response
		compound, preventing uncontrolled release to soils, groundwater or surface waters, including in low-probability, high-impact scenarios. On that basis, the Applicant considers that the proposed containment approach is sufficient for credible worst-case scenarios and provides appropriate protection to the water environment, including groundwater and aquifers.

2.14 Michael Pitt

Reference	Comments/Issue raised	Applicant's Response
MP-001	Michael Pitt speaks in a personal capacity as a resident of Foxley and raises objections to the Scheme based on site selection, location and logistics. He notes that the Applicant accepts there are numerous alternative sites, but questions why the Scheme has been chosen in particular, which he considers one of the worst possible locations. He asks why the Applicant regards the Cotswolds as a suitable place for a large-scale solar installation, noting that all other sites considered lie outside the Cotswolds, which he identifies as one of England's most important landscapes. He also queries why a site so remote from the National Grid has been selected, highlighting the need for approximately 22km of 400 kV underground cabling, including tunnelling beneath the M4 motorway and crossing major infrastructure and constraints. Mr Pitt describes the Scheme as involving approximately 878 ha of industrial infrastructure, located very close to nine South Cotswold villages, and states that the resulting harm to the environment, landscape and local communities is disproportionate to the benefits claimed, significantly affecting quality of life.	With regard to site selection and the length of the cable route corridor, the Applicant has assessed a total of 12 potential development areas (include the proposed Solar PV Sites for the Scheme), against standardised assessment criteria as set out in Annex D of the **Site Selection Assessment Report [APP-185]**. This includes sites closer to the Existing National Grid Melksham Substation. However, all of the alternative sites assessed are constrained. The details of the constraints are set out in further detail in Annex D of the **Site Selection Assessment Report [APP-185]** but include factors such as site size, heritage constraints, flood risk, landscape effects, existing land uses and land availability. PDA 10 (which forms the Solar PV Sites for the Scheme) did not reveal any major constraints and is considered suitable for solar development at the scale proposed and is deliverable within the required timescales. In considering the Scheme's location adjacent to the Cotswolds National Landscape, it is noted that National Landscapes (formerly AONBs) are designated areas of land within England, Wales and Northern Ireland safeguarded in the national interest for their

Reference	Comments/Issue raised	Applicant's Response
		distinctive character and beauty. The legal designation is 'Area of Outstanding Natural Beauty'. National Landscapes are designated under the Countryside and Rights of Way Act 2000, with the primary statutory purpose to conserve and enhance natural beauty (Section 82) and a duty on all authorities to "seek to further" this purpose (Section 85). Guidance for relevant authorities on seeking to further the purposes of Protected Landscapes sets out how the Protected Landscapes duty is intended to operate and provides broad principles to guide relevant authorities in complying with it. 'Protected Landscapes' refers to National Parks, the Norfolk and Suffolk Broads and National Landscapes (formerly areas of outstanding natural beauty (AONBs)) in England. Section 245 (Protected Landscapes) of the Levelling-up and Regeneration Act 2023 (LURA) amends the duty on relevant authorities in respect of their functions which affect land in National Parks, National Landscapes, and the Norfolk and Suffolk Broads (collectively referred to as Protected Landscapes) in England. Relevant authorities must now 'seek to

Reference	Comments/Issue raised	Applicant's Response
		further' the statutory purposes of Protected Landscapes. This replaces the previous duty on relevant authorities to 'have regard to' their statutory purposes. The Cotswolds National Landscape (CNL) is fully assessed as a standalone receptor within **ES Volume 3, Appendix 8-6: Assessment of Effects on the Cotswolds National Landscape and its Special Qualities [APP-197]**. This assessment considers the effects of the Scheme on landscape character, visual amenity and the special qualities of the CNL, including tranquillity. 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 have been avoided from the Order Limits in fields C2, C3 and C4 where significant visual effects on receptors within the CNL were identified. Panels have also been avoided 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 have been avoided and the land repurposed for ecological mitigation to protect the setting of the CNL towards Sherston.

Reference	Comments/Issue raised	Applicant's Response
		All land parcels adjacent to the CNL are proposed to deliver habitat enhancement, informed by the CNL Management Plan and the Cotswolds National Landscape Strategy and Guidelines, to further the purposes of the designation. Details of the proposed landscape and ecological mitigation and enhancement measures are provided in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060], Figure 3-4-1 to 3-4-5.2 Landscape and Ecology Mitigation Plan [APP-084]** and the **Outline LEMP [APP-283],** and the **Outline EPMS [APP-284]**. With regard to the concerns around impact on communities along the Cable Route Corridor, the Applicant confirms that impacts on communities have been considered as part of the assessment of 'community identity, culture, influence and resilience' in **ES Volume 1, Chapter 18: Human Health [APP-070]**. The Applicant has considered how changes to perceptions of rurality, community sense of place, pride, engagement and difference in consideration of importance of different aspects of the Scheme (for example opposing views on harms versus benefits) may lead to a degree of impact to communities. The assessment has considered that this is likely to be up to a minor adverse effect on local communities and

Reference	Comments/Issue raised	Applicant's Response
		thus on residents' mental health and wellbeing. This is not considered a significant effect. Community liaison is also directly secured through Requirement 4 in Schedule 2 to the **Draft DCO [APP-016]** through the provision of a community liaison group during the Scheme's construction, operation and decommissioning. This group will act as an intermediary between the public and the onsite contractors to ensure community concerns and any information they need are communicated and responded to, so as to reduce community anxiety and impacts on mental wellbeing, and to assist in directing the public to mental health support if required.

2.15 Andrew Calderbank

Reference	Comments/Issue raised	Applicant's Response
AC-001	Andrew Calderbank raises concerns about the risk of increased off-site flooding arising from the Scheme. He states that the Scheme does not adequately consider or mitigate the combined effects of runoff from multiple PV sites, and that the assessment treats sites in isolation rather than examining their cumulative impact. He highlights a watercourse he refers to as Norton Brook, which he states is unnamed in the Applicant's documentation (particularly its **Waterbodies in a River Basin Management Plan [APP-012]**) and represents a significant omission from detailed consideration. He explains that the brook has a history of flooding to both properties and roads, drains a large catchment area within the Scheme, and would receive runoff from almost all of the solar sites. Mr Calderbank states that the combined effect of drainage into Norton Brook has not been adequately assessed. Mr Calderbank argues that a proper assessment requires establishing a current baseline for the watercourse through investigation of actual flow behaviour, rather than relying on assumptions or limited modelling. Mr Calderbank notes that existing flood risks are already present in the area and states	The Applicant does not agree that the Scheme fails to consider cumulative runoff effects or that it would increase flood risk to downstream receptors. The assessment has been undertaken across the Scheme as a whole and within the context of the contributing catchments. All elements of the Scheme are required to demonstrate that there is no increase in flood risk off-site. For impermeable infrastructure, runoff is attenuated and discharged at greenfield rates, with allowance for climate change, as set out in **ES Volume 3, Appendices 11-1 to 11-9: Flood Risk Assessment and Drainage Strategy [APP-210 to APP-218]**. Solar PV Panel areas remain permeable and continue to drain to ground, and do not generate a new connected discharge to watercourses. On that basis, there is no increase in peak flows entering downstream systems, either individually or in combination. Any neighbouring or local developments would be subject to the same planning and policy requirements to manage runoff and demonstrate no increase in flood risk, and therefore would not give rise to uncontrolled cumulative effects.

Reference	Comments/Issue raised	Applicant's Response
	that the development should not exacerbate them. He is asked by the ExA to submit a source identifying the watercourse he referred to earlier.	In relation to the watercourse referred to by Mr Calderbank as "Norton Brook", the assessment considers the relevant catchments, flow pathways and receiving watercourses within and downstream of the Order limits, including local drainage features and ordinary watercourses. The assessment is based on how the catchment functions hydrologically, and the relevant drainage pathways and downstream receptors have therefore been considered. With the embedded mitigation incorporated into the Scheme design, including maintaining permeable ground conditions across Solar PV Panel areas and controlling runoff from impermeable infrastructure to greenfield rates with climate change allowance, the assessment demonstrates that there would be no increase in runoff rates or peak flows reaching downstream receptors. On that basis, the Applicant does not consider that the Scheme would result in increased flood risk or adverse downstream effects within the receiving catchment. In terms of the assessment methodology, flood risk from watercourses has been defined using established UK approaches, including FEH-based hydrological estimation and hydraulic modelling where appropriate, in accordance with Environment Agency guidance and

Reference	Comments/Issue raised	Applicant's Response
		standard industry practice. Where available, Environment Agency datasets have been used to inform baseline flood extents and behaviour. In addition, site-specific hydraulic modelling has been undertaken for Gauze Brook to provide a more detailed understanding of flood levels, depths and flow behaviour in that catchment. These methods are specifically designed to quantify peak flows and flood behaviour across a full range of design events, including events that have not been observed historically and future climate conditions. Local observations of flooding and flow behaviour are recognised and have informed understanding of how the catchment responds during specific events. However, such observations represent individual events and cannot define the full range of flood risk required for assessment. FEH-based methods provide a consistent and robust basis for estimating flows and testing flood behaviour across relevant return periods, which is necessary to demonstrate that development does not increase flood risk. On that basis, the Applicant considers that the assessment methodology is appropriate and sufficiently detailed, and that the Scheme would not increase flows or exacerbate flooding in downstream

Reference	Comments/Issue raised	Applicant's Response
		watercourses, including those referred to by Mr Calderbank.

2.16 Sarah Sorby

Reference	Comments/Issue raised	Applicant's Response
SS-001	Sarah Sorby objects to the Scheme due to its visual and noise impacts and the effects on bridleways, particularly MAL61 and MAL63. She explains that part of MAL63 runs alongside a Site of Special Scientific Interest (**SSSI**), and that this bridleway would become the main access route for construction traffic to reach the fields. She states that the bridleways would have little protection from construction activity, making them unappealing, unsafe and dangerous for users, particularly equestrians. Ms Sorby raises concerns that, once operational, the bridleways would be enclosed by high security fencing and solar panels up to 4.5m high, creating an intimidating environment for horses. She also highlights the effects of glint and glare and the noise generated by the panels and associated infrastructure, which she believes would further discourage use of the bridleway network.	**ES Volume 1, Chapter 8: Landscape and Visual Assessment [APP-060]** recognises the change to the visual amenity and associated adverse effects to users of those PRoW that are located within the array itself or directly adjacent. The design of the Scheme has embedded buffers into the proposed layout, specifically a 15m offset to any proposed infrastructure on either side of any PRoW. Where PRoW directly cross the array, this creates a corridor with a minimum width of 30m wide between proposed fencelines through the array. There would then be a gap of 4m between the fence line and the proposed panels resulting in a minimum total width of 38m between the panels where PRoW cross the arrays. Specifically in relation to SS-001s reference to WT|MALW|63 (referred to by speaker as MAL63) (LVIA Receptor number TP181), this is a Public Footpath that rises up the valley side from Bridleway WT|MALW|61 diagonally across arable fields divided by hedgerows to field boundaries following the contour to Rodbourne Bottom Drive. This PRoW runs adjacent and through (respectively) the SSSI at Harries Ground, Rodbourne as reported by SS-001. No infrastructure is proposed adjacent to this section of the PRoW. There are mid to

Reference	Comments/Issue raised	Applicant's Response
		long distance cross valley views north over the railway line from the western end of the Footpath to the north towards Site E. No panels are proposed in fields E7, E9 or E10, however field E6 is proposed for a new 132kV substation. Construction activities of the substation in E6 and construction of panels within field E11 would be visible in middle to long distance cross valley views. During construction the LVIA identified Moderate Adverse Significant effects to users of this section of Footpath. Photomontages for VP55 demonstrate that the worst-case scenario footprint of the 132kV substation in E11 would be visible beyond some intervening vegetation. By Year 15 mitigation planting in E6 and E9 and proposed new woodlands, would screen views. At Year 1, the LVIA identified Moderate Adverse Significant effects to users of this section of Public Footpath, however following the establishment of the mitigation planting, including new planting along the boundaries of fields E6 and E9 and proposed new woodlands, effects would reduce to Minor and Neutral and no longer significant. In regard to WT|MALW|61 (referred to by speaker as MAL61) (LVIA Receptor number TP173), this is a long section of Bridleway which is flanked on either side by mature hedges and hedgerow trees. It follows relatively low-lying land which rises up to the east. The

Reference	Comments/Issue raised	Applicant's Response
		valley landscape extends to the west, rising to Bincombe Wood. The Bridleway passes directly through Site E with parcels E23, E24, E25, E27 to the west and E28 to the east. Although views are predominantly screened by intervening hedgerows, there are views through gaps at field entrances. During the construction phase, there would be filtered views towards construction activities (including a 132kV substation which is proposed within E28) through gaps in the intervening vegetation and where hedgerows are thinner. Construction access to Site E crosses the Bridleway between E24 and E28 would cause temporary disruption during construction. There would also be short term temporary works associated with the cable route corridor. The LVIA has identified Moderate / Minor Adverse effects to users of this section of Bridleway during construction. At Year 1 the LVIA identified Moderate / Minor Adverse effects to users of this section of Bridleway as the hedgerow enhancement to the boundaries of the adjacent fields would have a limited effect initially. However, by Year 15, the proposed mitigation planting would have established screening views of the adjacent infrastructure, and as such the LVIA identifies a Minor but Neutral effect to users of this section of Bridleway.

Reference	Comments/Issue raised	Applicant's Response
		The assessment of public rights of way and unsurfaced roads in **ES Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]** and the supporting **ES Volume 3, Appendix 16 2 Tourism and Recreation Receptor Tables [APP-241]** considers impacts with respect to the safety, accessibility, and user experience and desirability of these routes. This therefore considers the landscape and visual impact as part of this assessment. The assessment on the public rights of way and unsurfaced roads affected by Lime Down E, during construction and operation, finds no residual significant adverse effect to the recreational use of bridleway MALW61 or footpath MALW63 at any phase of the Scheme. This is as a result of the removal of field E30 from the Solar PV array, and the mitigation measures set out in the **Outline CTMP [APP-287]** and **Outline PRoWPPMP [APP 282]** (for example, HGV movement control, signage, banksmen for crossing points), secured respectively by Requirements 15 and 16 in Schedule 2 to the **Draft DCO [APP-016]**. The Applicant confirms that the landscape mitigation measures and specific PRoW mitigation measures as described above have been discussed with representatives of the British Horse Society to ensure that these measures are suitable to protect the safety and amenity of equestrian bridleway users during

Reference	Comments/Issue raised	Applicant's Response
		construction and the operation of the Scheme. The extent of current discussions, and points for ongoing discussion, are set out in the Statement of Common Ground, to be submitted at Deadline 2. Glint and glare effects upon PRoW and bridleways have been assessed in Section 8 of **ES Volume 3, Appendix 20-4: Solar Photovoltaic Glint and Glare Study [APP-261]**. No significant effects are predicted as the sensitivity of receptors is considered to be low. Regarding the concerns around noise generated by the panels and associated infrastructure, paragraph 4.1.2 of the **Outline PRoWPPMP [APP-282]** commits to all Scheme infrastructure, including fencing, being at least 15 m away from any PRoW. This means that noise levels from inverter units with silencers would be below 52 dB on PRoW. With reference to **ES Volume 3, Figure 2-4 Streets, Rights of Way and Access Plans [APP-080]** and **ES Volume 3, Figure 14-2 Daytime Operational Noise Contours [APP-160]**, operational noise associated with the Scheme would typically be between 20 and 52 dB L_{Aeq} on bridleways. Noise from the Scheme on MAL63 is likely to be around 30 dB whereas for MAL61 this will be exceeded in the immediate vicinity of the conversion units before falling back to 30 dB at the northern and

Reference	Comments/Issue raised	Applicant's Response
		southern ends. These levels are below WHO guidelines on moderate community annoyance and are akin to the existing ambient sound environment in the area as evidenced by the baseline sound survey results given in Table 1 of **ES Volume 3, Appendix 14-3: Baseline Noise Survey [APP-236]**. As such, while Scheme infrastructure will be heard at times, the enjoyment of bridleways, and PRoW in general, with respect to the sound level experienced, is not expected to be significantly adversely affected by the operation of the Scheme. Regarding the concerns that MALW61 and MALW63 would become the main construction route for traffic, the Applicant confirms it is not proposed for construction traffic to route along MALW61 or MALW63. HGV vehicles will deliver materials to the northern compound in Lime Down E. From this point Solar PV equipment will be distributed around Lime Down E via tractor and trailer. Rather than routing along MALW61, vehicles will route via Solar PV Site Access 17 and use internal access tracks, only routing directly across MALW61 via access 17a and 17b to access the southern compound and area of Lime Down E to the east.

Reference	Comments/Issue raised	Applicant's Response
		The crossing will be managed in accordance with the measures set out in the **Outline CTMP [APP-287]** and **Outline PRoWPPMP [APP-282]** to ensure impacts to NMUs along highways and PRoW are minimised as far as practicable. Final CTMPs and a PRoWPPMP would be prepared post consent and must be substantially in accordance with the **Outline CTMP [APP-287]** and **Outline PRoWPPMP [APP-282]**, respectively, and approved by the relevant local planning authorities (in consultation with the relevant highway authorities), as secured by Requirement 15 and Requirement 16 in Schedule 2 of the **Draft DCO [APP-016]**.

2.17 Andrew Greenhill

Reference	Comments/Issue raised	Applicant's Response
AG-001	Andrew Greenhill is a tenant farmer, farming approximately 185 acres, of which around 85 acres are included within the Scheme. He states that the land proposed for solar panels comprises the most productive fields on the farm, and that their loss would significantly affect the viability of the business. He explains that the reduction in farmed land would limit his ability to produce excess straw and grain, which are currently supplied to other local farms, with knock-on effects for both his own business and the wider agricultural economy.	The Applicant acknowledges the tenancy arrangement which is in place between Mr Greenhill and the landowner of land at Rodbourne Bottom., and fields E32, E33 and E34 of the Scheme The Applicant recognises there is an inherent productivity of these land parcels, in terms of potential agricultural crop yield and a strong capacity for the generation of Solar Photovoltaic energy. On balance, the Applicant considers this parcel to represent the most efficient energy-generating land within the Scheme, delivering the highest megawatt-per-hectare ratio across the Scheme's Solar PV Site. In this context, while a small area of Grade 2 agricultural land is included, its allocation to solar generation is considered to be justified and in line with planning policy (see in particular NPS EN-1 (Ref 1) paragraph 5.11.34). The **Planning Statement [APP-267]** (see from paragraph 8.3.241 onwards) sets out further details of why the inclusion of Grade 2 land is considered to be justified. This includes (but is not limited to): • That the Applicant took a sequential approach to site selection, focussing first on non-BMV land and

Reference	Comments/Issue raised	Applicant's Response
		latterly including Grade 3 agricultural land and some small areas of Grade 2, in order to minimise the impacts on BMV land. • In the design evolution of the Scheme generally, the Applicant has sought to minimise the amount of BMV land used wherever practicable; and • Regarding inclusion of fields E32, E33 and E34, it is considered that the inclusion of these fields is necessary for the operation of the Scheme, particularly to offset losses caused by removals from the Order Limits and design changes during design evolution which has reduced the areas identified for Solar PV Panels. This includes removals to protect the setting of the CNL, removals to minimise heritage impacts, impacts on public rights of way, and due to landscape a visibility matters. The Applicant is cognisant of the impact the Scheme could have on wider agricultural employment associated with tenancies and contracts and so seeks to source ways of retaining agricultural workers, providing reskilling opportunities, or providing re-employment as supported by the measures secured in the **Outline SSCEP [APP-285]**. The Applicant has been in discussions with landowners and these discussions have included arrangements regarding existing tenancies, excluding any subletting arrangements. Whilst a worst case could involve the

Reference	Comments/Issue raised	Applicant's Response
		termination of an agricultural tenancy or contract in its current form, alternative operational and management opportunities are available connected to the Scheme should consent be granted. These will be secured either by direct voluntary arrangement between the respective parties and the Applicant, or through the measures secured in the **Outline SSCEP [APP-285]** by Requirement 18 in Schedule 2 to the **Draft DCO [APP-016]**.
AG-002	Mr Greenhill raises concerns about the security of his tenancy, stating his understanding that the land included in the Scheme could be reclaimed for industrial use with one year's notice. He asks whether he has been included in the **Book of Reference [APP-020]** as a party whose land and interests are potentially affected by the development.	The Applicant can confirm that the respondent is included within the **Book of Reference [APP-020].** Furthermore, the Applicant notes the concerns raised regarding the security of existing tenancy arrangements and confirms that while the operation, continuation, variation or termination of a private tenancy arrangement is confidential between the relevant parties, and could change due to a vast number of reasons unrelated to the Scheme, the Applicant understands the required opportunities are in place to facilitate any change or termination to the tenancy should it be required. Whilst a worst case could involve the termination of an agricultural tenancy or contract in its current form, alternative operational and management opportunities are available connected to the Scheme should consent

Reference	Comments/Issue raised	Applicant's Response
		be granted. These will be secured either by direct voluntary arrangement between the respective parties and the Applicant, or through the measures secured in the **Outline SSCEP [APP-285]** by Requirement 18 in Schedule 2 to the **Draft DCO [APP-016].**

2.18 Matthew Hood

Reference	Comments/Issue raised	Applicant's Response
MH-001	Matthew Hood is a chartered engineer who raises concerns about the lack of a thorough safety investigation, particularly in relation to the BESS and accountability in the event of an incident. He states that risks associated with thermal runaway, the release of toxic and explosive gases, and cascading failures have not been adequately addressed. He notes that there have been over 120 serious BESS fires since 2021 and asserts that thermal runaway should not be regarded as unlikely over the 60-year life of the Scheme. Mr Hood highlights the proximity of the BESS to the main railway line serving South Wales, stating that it is located approximately 85m from the line, with around four trains per hour passing the site. He raises concern that an explosion or major fire could derail a train, creating the further risk of a collision with an oncoming service, significantly increasing the potential consequences of an incident. He asks the ExA to consider whether the Railway Inspectorate should also be required to approve a safety case for the development, given the risks identified. Following his submission, the ExA asked Mr Hood to provide details of the safety incident database	The EPRI BESS failure database logs 59 BESS fires since 2021 (Ref 13). The EPRI database notes: "*The failure rate dropped by 98% from 2018 to 2024 as lessons learned from early failures have been incorporated into the latest designs and best practices*." An **Outline 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 safety objectives for the design of the BESS site are listed in Section 2.4 of the **Outline BSMP [APP-286]**. The **Outline BSMP [APP-286]** was amended at Deadline 1 to fully accommodate the latest BESS safety requirements contained in NFPA 855 (2026) (Ref 14) ensuring that any credible risks associated with battery storage are either prevented or fully mitigated if a BESS failure occurs. Section 2.4.2 of the **Outline BSMP [APP-286]** stipulates that: *"Final BESS design and site layout will have been validated through mandatory Large Scale Fire Testing (LSFT) and rigorous consequence modelling to minimise the requirement for any D&WFRS intervention in a thermal runaway incident.*

Reference	Comments/Issue raised	Applicant's Response
	he referred to and to submit references to the scientific studies he mentioned in support of his evidence.	*LSFT must establish minimum equipment spacing distances that demonstrate there is no fire propagation to adjacent BESS enclosures or ESS equipment. D&WFRS intervention in worst case scenarios would typically be limited to boundary cooling of adjacent BESS and Energy Storage System (ESS) units to prevent the fire from spreading. This strategy will be finalised with D&WFRS and be clearly communicated in the Emergency Response Plan (ERP);* *To ensure that fire, smoke, and any release of toxic gases does not significantly impact site operatives, first responders, and the local community; and* *To ensure that firewater run-off is contained and tested before release or, if necessary, removed by tanker and treated offsite."* As now mandated under NFPA 855 (2026) (Ref 14) the Applicant will only be able to select a BESS system that has undertaken Large Scale Fire Testing (LSFT). At the detailed design stage, the selected BESS LSFT data will be leveraged to fully inform inputs for risk assessment tools which will be utilised together with detailed consequence modelling to provide a comprehensive site operations and emergency response safety audit, this is stipulated in the **Outline BSMP [APP-286]** pre-construction requirements

Reference	Comments/Issue raised	Applicant's Response
		(Section 6). The objective of the test is to evaluate the thermal exposure impacts from a developed BESS enclosure, to determine propagation risk to adjacent BESS or equipment. Testing also defines the length of burn, duration of Peak Heat Release Rate, maximum burn temperatures, etc. 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 and is fully compliant with NFCC guidance (Ref 15). The Applicant is currently drafting a Statement of Common Ground with the Environment Agency on Scheme environmental protection issues including the BESS area drainage strategy. The agreed strategy document (**Firewater Containment and Drainage Strategy – Lime Down D Battery Energy Storage System [EN010168/EXAM/9.8]**) has been submitted 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.

Reference	Comments/Issue raised	Applicant's Response
		Final comprehensive risk assessment reports, BESS design and site-specific consequence modelling, and detailed Emergency Response Plans (ERPs) can only be drafted when based upon the specific BESS design selected at the detailed design stage. Key safety content requires that all equipment within the BESS area is defined, battery system operating limits and test data are fully defined, and the BESS failure protection system is defined. Incident response tactics require significant test data and rigorous consequence modelling from the specific BESS design to develop safe protocols for incident response. Section 5.4.9 – 5.4.11 of the **Outline BSMP [APP-286]** stipulates that the ERP will follow NFCC (Ref 15) and NFPA 855 (2026) (Ref 14) guidelines and stipulates the minimum content that an ERP must contain, including: *"Emergency procedures for all credible hazards and risks, including building, infrastructure and vehicle fire, wildfires, impacts on local respondents, impacts on transport infrastructure."* All risk assessments to be conducted at detailed design for BESS projects required by the Health and Safety Executive (HSE) to assess fire and explosion risk are stipulated in Section 6.1.5 of the **Outline BSMP [APP-286]**.

Reference	Comments/Issue raised	Applicant's Response
		NFPA 855 (2026) (Ref 14) defines a safe BESS exclusion zone as follows: "*Potential debris impact radius is defined as 100 feet (ft) or 30.5 metres (m) i.e. this is a typical explosion risk safe exclusion zone radius as modelling and previous BESS incidents typically show 25 m to be maximum radius*." The railway line referred to is located at a substantially greater distance, such that direct thermal effects, blast overpressure or debris impacts capable of affecting rail operations are not anticipated under credible worst-case scenarios. Further explosion prevention, mitigation, and safety requirements for the Scheme are stipulated in the **Outline BSMP [APP-286]** at the following sections: 1.1.6 – 1.1.7, 4.1.3 – 4.1.10, 4.1.18, 4.1.27, 4.1.30 - 4.1.33, 4.1.36 – 4.1.39, 5.1.3, and 5.1.6. The Applicant has followed National Fire Chiefs Council guidance (Ref 15) and commissioned a BESS fire emissions assessment (as detailed in **ES Volume 3, Appendix 15-2: BESS Fire Emissions Modelling [APP-239]**) to model toxic gas emissions and visibility impacts from a BESS fire on sensitive receptors within a 1km radius of the BESS area. The fire emissions modelled in the report were based upon recent UK Health Security Agency (UKHSA) requests for DCO

Reference	Comments/Issue raised	Applicant's Response
		BESS projects which explore both immediate air quality impacts together with annual UK air quality requirements. The UKHSA stated in their relevant representation **[RR-4798]** that "*Following our review of the submitted documentation the UKSHA are satisfied that the proposed development should not result in any significant adverse impact on public health".* The spacing distances of the illustrative BESS site design are based upon LSFT where no fire propagation occurred; therefore this is a credible worst-case scenario.

2.19 Charles Purkess

Reference	Comments/Issue raised	Applicant's Response
CP-001	Charles Purkess has lived locally for approximately 25 years and objects to the Scheme due to its impact on woodlands, nature, bridleways and the wider rural landscape. He states that the development would destroy what he describes as a "rural ideal", fundamentally changing the character of the countryside that residents value and rely upon. He expresses concern that the Scheme would damage the agricultural fabric of the area, with knock-on effects for the rural economy and the mental health of local people. Mr Purkess states that the cumulative loss of countryside, along with industrialisation of farmland, would undermine both community wellbeing and economic resilience. Mr Purkess also argues that there are better and faster ways to reduce carbon emissions while preserving existing agricultural land use. He highlights the cultivation of hemp as an example, stating that it can sequester between 8 and 22 tonnes of CO_2 per hectare and be used in building products and construction materials, allowing climate objectives to be met without removing productive farmland from use.	The Applicant acknowledges Mr Purkess's lived experience of the local area, however, disagrees that the Scheme would destroy a "rural ideal". The Applicant has sought to robustly and comprehensively assess the potential impacts of the Scheme in the **ES [APP-052 to APP-265],** and mitigate them as required through the management pans secured through the Requirements in Schedule 2 of the **Draft DCO [APP-016].** This has been done to fully demonstrate the potential impacts of the Scheme against its benefits (including but not limited to energy production, economic, employment and skills, local ecology and biodiversity benefits) so that these matters can be considered in the planning balance when the DCO is determined. However, as with other DCO developments the Applicant recognises that there will be some significant effects which cannot be mitigated as a result of the Scheme such as the long term adverse effects on the Landscape Character of the area (as presented **in ES Volume 1, Chapter 8: Landscape and Visual [APP-060]**) as well as long term significant adverse effects to 10 Visual Receptors, all of which are local PRoW which are either within or directly adjacent to the

Reference	Comments/Issue raised	Applicant's Response
		proposed arrays. These are matters which will have to be considered in the planning balance when the DCO is determined by the Examining Authority. With regard to the concerns around mental health and local people, the impacts on communities have been considered as part of the assessment of "community identity, culture, influence and resilience" in **ES Volume 1, Chapter 18: Human Health [APP-070]**. The Applicant has considered how changes to perceptions of rurality, community sense of place, pride, engagement and difference in consideration of importance of different aspects of the Scheme (for example opposing views on harms versus benefits) may lead to a degree of impact to communities. The assessment has considered that this is likely to be up to a minor adverse effect on local communities and thus on residents' mental health and wellbeing. This is not considered a significant effect. Community liaison is also directly secured through Requirement 4 in Schedule 2 to the **Draft DCO [APP-016]** through the provision of a community liaison group during the Scheme's construction, operation and decommissioning. This group will act as an intermediary between the public and the onsite contractors to ensure community concerns and any

Reference	Comments/Issue raised	Applicant's Response
		information they need are communicated and responded to, so as to reduce community anxiety and impacts on mental wellbeing, and to assist in directing the public to mental health support if required. Regarding the concern around the cumulative loss of countryside, the Applicant confirms cumulative effects have been carefully considered in accordance with Planning Inspectorate Advice Note 17 (Ref 10) and the relevant NPS EN-1 (Ref 1), NPS EN-3 (Ref 2) and NPS EN-5 (Ref 3) requirements as set out in **ES Volume 1, Chapter 21 Cumulative and In-Combination Effects [APP-074]**. The chapter sets out the approach and conclusions of the **ES** [**APP-052 to APP-074**] technical chapter cumulative assessments. Taking a conservative worse case approach, significant cumulative effects are identified at a limited and discrete number of receptors comprising tourism and recreation impacts during the construction phase on Corsham Park, PRoW WT|CORM|122, PRoW WT|HULL|29, and Sustrans Cycle Route 403, and on skylark at a District level. Regarding the need for the Scheme, Section 3.2 of the **Statement of Need** [**APP-266**] describes that it is the Government's policy to rapidly increase the supply of low carbon electricity to support the UK meeting its

Reference	Comments/Issue raised	Applicant's Response
		legally binding climate change targets. Section 3.3 of the Statement of Need explains that solar generation is a critical part of the UK's strategy to achieve net zero by 2050. The Climate Change Committee in their Seven Carbon budget report state that "emissions are most effectively mitigated at their source". The Clean Power 2030 Action Plan (Ref 5) reinforces the deployment of large-scale solar as a critical part of the Government's plan to deliver a clean electricity system by 2030 and keep it clean beyond 2030, to prepare the UK for the rapid growth in power demand expected over the 2030s and 2040s as the country pursues the electrification of heat in buildings, transport, and industry. With regard to the concern around removing productive farmland from use, while the Scheme would result in the land beneath solar panels being removed from primary agricultural production, there will be no loss of agricultural land. Allowing the soil to recover under long-term grassland will provide ecological benefits, including accumulation of organic matter and carbon sequestration, without the need for fertiliser (and pesticide) inputs as are typically required for land under arable cultivation.

Reference	Comments/Issue raised	Applicant's Response
		Hemp cultivation is a form of biogenic carbon sequestration. While biogenic carbon sequestration is needed to balance residual emissions, long-lived emissions as those arising from fossil fuels should be reduced at source or offset by engineered removals. Schemes like Lime Down aim to reduce emissions at source and reduce the fossil fuel reliance. As fossil fuel emissions transfer carbon from geological storage into the active atmosphere, these emissions cannot be compensated by biogenic sequestration.

2.20 Anna-Kate Fuller

Reference	Comments/Issue raised	Applicant's Response
AKF-001	Anna-Kate Fuller grew up in the local area and raises concerns about the loss of tranquillity resulting from the industrialisation of the countryside. She states that the Applicant's conclusion of no significant noise impact is based on an assumed baseline level of existing noise that does not reflect the reality of the area, which she describes as very quiet. She asserts that the Applicant has not clearly explained what noise levels will actually be experienced at nearby homes, particularly at night, when background noise levels are lowest.	The Applicant notes Ms Fullers lived experience of growing up in the local area and addresses her specific points raised below. Regarding the concerns around the loss of tranquillity and industrialisation of the countryside, an assessment of landscape and visual effects is provided in the Landscape and Visual Impact Assessment (LVIA) presented in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]**. The LVIA assesses effects on identified landscape and visual receptors, including residential properties and users of public rights of way, and identifies where significant effects may occur. The LVIA recognises that as a consequence of the development that there would be long term adverse effects on the Landscape Character of the area as well as long term significant adverse effects to 10 Visual Receptors, all of which are local PRoW which are either within or directly adjacent to the proposed arrays. The Applicant disputes the claims that the baseline noise levels used in the assessment do not reflect the reality of the local area. Representative background sound levels for the area were derived from a

Reference	Comments/Issue raised	Applicant's Response
		statistical analysis of a comprehensive baseline noise survey as described in **ES Volume 3, Appendix 14-3: Baseline Noise Survey [APP-236]**. While the background sound will vary, the levels used in the assessment, as provided in Table 8 and Table 9 of **ES Volume 3, Appendix 14-4 Noise Modelling [APP-237]**, are typically 30-40 dB L_{Aeq} which is considered quiet and typical of the local area. The noise levels likely experienced at nearby homes are also provided in Table 8 and Table 9 of **ES Volume 3, Appendix 14-4 Noise Modelling [APP-237]**, for the daytime and night-time respectively, and show that levels are likely to be below or just above the typical existing background sound. The **Outline OEMP [APP-278]** commits to noise levels from the Scheme at residential dwellings being the same as or below those modelled in the ES. The preparation, approval and implementation of the detailed OEMP, substantially in accordance with the outline plan, are secured through Requirement 14 of Schedule 2 of the **Draft DCO [APP-016]**, ensuring operational noise is appropriately controlled throughout the lifetime of the Scheme.
AKF-002	She also raises concerns about traffic impacts, stating that the Scheme would generate over 20,000	The Applicant notes Ms Fullers concerns around traffic impacts. An updated breakdown of Trip Generation

Reference	Comments/Issue raised	Applicant's Response
	additional vehicle movements. Ms Fuller explains that this would place pressure on the already limited passing provision and introduce a volume of heavy traffic that would make local routes significantly more dangerous for cyclists and pedestrians, fundamentally changing how residents are able to use and move through the area.	Calculations was provided in Annex E to **ES Volume 3, Appendix 13-1 Transport Assessment [APP-233]** at Deadline 1. This presents specific assessed quantities of material volumes and component type/numbers for each Lime Down Solar PV Site. Includes fencing, aggregates for access tracks, PV modules and mounting structures substation equipment. The assessment presented in the updated Annex J of **ES Volume 3, Appendix 13-1: Transport Assessment [APP-233]** submitted at Deadline 1 demonstrates adequate carriageway width or frequency of passing place opportunity to pass at least an HGV and a light vehicle as requested in comments provided by Wiltshire Council in its response (August 2025) to the Transport Assessment Scoping Note and confirmed in Paragraph 4 of 'Appendix A - Highways and Transport Document Review - Detailed Comments'. This confirms that no passing bay or widening improvements are needed to accommodate these movements on the construction route outside of the Order Limts. The distances between passing points outside of the Order Limits are all within 150 m with forward visibility extending to the next passing point and beyond. This is within the generally accepted distance of 200 metres.

Reference	Comments/Issue raised	Applicant's Response
		As set out in the **Outline CTMP [APP-287]**, a booking system will be set up to manage arrivals and departures to the Order Limits. This will be implemented in coordination with banksmen, which will be able to hold back any cross-over, should there be any delays on the roads. This will prevent HGVs generated by the Scheme passing each other in opposite directions on the local roads forming part of the construction routes and will be confirmed as part of the final CTMP. Excessive widening of existing rural routes to allow two HGVs to pass would be over engineering, because of the following reasons: • Temporary nature of the construction period; • The level of hourly HGV trips when considering a realistic construction programme; • Delivery times during the construction phase are limited to those times set out in the **Outline CTMP [APP-287]**. There will be no HGV construction trips outside of these hours; • There would be a much greater impact on hedgerow, trees and character; and • Low level of existing HGVs on the proposed HGV construction routes.

Reference	Comments/Issue raised	Applicant's Response
		Information included in **ES Volume 3, Appendix 13-1: Transport Assessment [APP-233**] submitted at Deadline 1 of Examination demonstrates that there is adequate carriageway width and/or passing place opportunity for two HGVs along the proposed construction routes. **ES Volume 1, Chapter 13 Transport and Access [APP-065]** assesses the impact on Non-Motorised User (NMU) delay and amenity, including Fear and Intimidation. All impacts are concluded to be not significant and will be temporary. NMU delay is considered negligible given there is no existing pedestrian or cycle infrastructure on the construction routes and likely low numbers of existing NMU users. It is anticipated that PRoW which cross the Order Limits will generally remain open during the construction phase of the Scheme. There may be some slight perceptible delay to NMU movement if a construction vehicle is crossing a PRoW within the Order Limits. An **Outline PRoWPPMP [APP-282** forms an embedded mitigation and will provide measures to ensure the effects of the construction phase on PRoW users is minimised.

Reference	Comments/Issue raised	Applicant's Response
		The **Outline PRoWPPMP [APP-282]** contain specific measures for the temporary diversion of footpath WT|GRIT|20 and bridleway WT|MALW|54, where access to Cable Route Corridor works east of Grittleton, and HGV access to Lime Down E are taken respectively. These diversions are proposed to ensure unreasonable effects to PRoW users are not experienced during construction, replacement and decommissioning. In terms of NMU amenity, pedestrian amenity is broadly defined as the relative pleasantness of a journey, and can be affected by traffic flow, traffic composition and pavement width/separation from traffic. The construction routes on the road network have little existing pedestrian infrastructure and no footways, making them already unattractive as walking routes with no pedestrian amenity so this cannot be assessed. Fear and Intimidation for other NMU's can be assessed. Highway widths of construction routes have been assessed in **ES Volume 3, Appendix 13-1: Transport Assessment [APP-233**] and provide sufficient width for HGV traffic to comfortably pass cyclists.

Reference	Comments/Issue raised	Applicant's Response
		ES Volume 1, Chapter 13 Transport and Access [APP-065] 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 (Ref 8). **ES Volume 1, Chapter 13 Transport and Access [APP-065]** concludes that on all links in the study area the significance of effect is Minor Adverse (temporary). In terms of mitigation, an **Outline CTMP [APP-287]** supports the DCO Application and presents outline measures which restrict construction deliveries to the proposed construction routes and times, separating the public and recreational users from hazards, including, traffic management measures such as signage and banksmen, fencing, and dust and noise control.

2.21 Freddie Spickernell

Reference	Comments/Issue raised	Applicant's Response
FSp-001	Freddie Spickernell is the owner of the Vine Tree Pub and raises concerns that the Scheme would threaten the viability of his business. He explains that the pub relies on its rural setting and surrounding landscape, which attracts walkers, cyclists and tourists, and that the Scheme would fundamentally alter this environment and reduce the pub's appeal. He refers to estimates by Wiltshire Council indicating a potential loss of £1.8 million in tourism income to the area. Mr Spickernell highlights the impact on local employment, stating that the loss of the pub would result in the loss of jobs and the removal of an important community meeting place for the village.	The Applicant notes the concerns raised regarding the viability of the Vine Tree Pub and acknowledges the importance of ensuring this remains an important place for the community to engage. Whilst individual businesses were not assessed in **ES Volume 1 Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]**, the Applicant recognises that the location of The Vine Tree in Norton gives it an increased sensitivity to changes in economic conditions and visitor spending as a tourism and visitor-dependent business. The Applicant has sought to minimise impacts upon neighbouring properties and amenity through the mitigation measures secured by requirements in Schedule 2 to the **Draft DCO [APP-016]**. The Applicant has assessed that there is a likely worst-case temporary loss of £1.76 million Gross Value Added (GVA) per annum as a result of the Scheme's construction. This is a temporary effect, anticipated to occur during construction, based on a worst-case scenario determined by likely significant effects from the Scheme as assessed in **ES Volume 1 Chapter 16:**

Reference	Comments/Issue raised	Applicant's Response
		Socio-Economics, Tourism and Recreation [APP-068] and its supporting appendices. With regards to the points raised around the accessibility of the pub to walkers, cyclists and tourists, the Applicant confirms that the proposed traffic routes, managed via the **Outline CTMP [APP-287] and Outline OEMP [APP-278**], are designed to utilise the most appropriate highway corridors. These plans do not propose routes that would limit or restrict the main routes serving the Vine Tree Pub, to either vehicle or recreational users, ensuring that the business remains accessible to customers at all times. To support the appeal of the area for visitors, the Scheme includes the provision of new non-vehicular permissive paths (Work No. 10), as shown on the **Works Plan [APP-007]**. These additional routes are specifically designed to improve connectivity to the wider Public Rights of Way (PRoW) network and encourage recreational activity in the vicinity, including routes within Lime Down B, nearest to the Vine Tree Pub. In addressing the concern raised in regard to employment opportunities that the Vine Tree Pub offers, particularly to those seeking their first employment opportunity, the Applicant has committed

Reference	Comments/Issue raised	Applicant's Response
		to measures to enhance local employment and skills development, and means to reduce tourism employment losses through focussing on local recruitment, promoting local suppliers where practicable, and through providing retraining opportunities for workers in tourism-dependent industries. This is secured through the **Outline SSCEP [APP-285]**, by Requirement 18 in Schedule 2 to the **Draft DCO [APP-016]**. Should the Scheme impact upon patronage to the pub affecting its viability as a business, the operators of The Vine Tree would be eligible to benefit from those measures, subject to the final SSCEP being agreed by Wiltshire Council and any other stakeholders.
FSp-002	Mr Spickernell also briefly raises concerns about flood risk, noting that the pub is located at the bottom of a hill in a known flash-flood area, which he fears could be exacerbated by the development.	The Applicant acknowledges the concerns raised by Mr Spickernell regarding flooding at a local low point and the potential for increased runoff from the Scheme. The Scheme has been designed so that it does not increase surface water runoff or peak flows leaving the site. Solar PV Panel areas remain permeable and continue to drain to ground, rather than generating a new concentrated discharge. Where impermeable infrastructure is introduced, runoff is attenuated and discharged at greenfield rates, with allowance for

Reference	Comments/Issue raised	Applicant's Response
		climate change, as set out in **ES Volume 3, Appendices 11-1 to 11-9: Flood Risk Assessment and Drainage Strategy [APP-210 to APP-218]**. On that basis, the Scheme does not introduce additional runoff that would increase the volume or rate of water reaching local low points, including locations at the bottom of slopes where flooding may occur. Existing flooding mechanisms associated with topography and intense rainfall would continue to operate, but would not be exacerbated by the Scheme. The assessment presented in **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [APP-063]** concludes that, with the embedded mitigation and drainage controls in place, the Scheme would not increase flood risk off-site. On that basis, the Applicant considers that the Scheme would not increase flood risk at the location referred to by Mr Spickernell.

2.22 Hugh Roche

Reference	Comments/Issue raised	Applicant's Response
HR-001	Hugh Roche objects to the Scheme on grounds that the land identified by the Applicant is neither empty nor degraded, but actively valued and used countryside. He states that the development would introduce industrialisation into what he describes as a timeless rural landscape, adversely affecting tranquillity, noise levels, and enjoyment of the land. He questions whether the location is genuinely the right place for the Scheme, asking why the proposed grid connection point is so distant from the site. Mr Roche also asks why it is considered necessary to sacrifice a nationally important landscape, particularly when, in his view, there are many more appropriate alternative locations that would avoid such harm.	The Applicant notes Mr Roche's concerns around the industrialisation of the landscape. **ES Volume 1, Chapter 8 Landscape and Visual [APP-060]** has undertaken a robust assessment of the sensitivity (nature of the receptor) of landscape receptors. The judgement on landscape sensitivity is based on consideration of both the landscape receptor's value and its susceptibility to change arising from the Scheme. For details on how landscape value and susceptibility is assessed please refer to Section 1.6 of **ES Volume 3, Appendix 8-1 LVIA Methodology [APP-187]**. For landscape receptors, value concerns the importance of the landscape resource as evidenced by the presence of landscape designations and professional judgement. Susceptibility is concerned with the landscape's ability to absorb change brought about by the Scheme. Tables 8-1-2 and Table 8-1-3 of **ES Volume 3, Appendix 8-1 LVIA Methodology [APP-060]** provide criteria for determining landscape value for both designated and undesignated landscapes. Landscape value is based on factors such as natural and cultural

Reference	Comments/Issue raised	Applicant's Response
		heritage, its condition, associations, distinctiveness, and recreational opportunities and how it is perceived. Value assessments are included for all landscape receptors and are set out within **ES Volume 3, Appendix 8-3-2-2 Landscape and Visual Assessment Sheets (Significant) [APP-191].** Regarding the concerns around noise levels generated by the Scheme, the noise impacts from the operation of the Scheme and its components are assessed in Section 14.10 of **ES Volume 1, Chapter 14: Noise and Vibration [APP-066]**. As shown in Table 8 of **ES Volume 3, Appendix 14-4: Noise Modelling [APP-237]**, levels would typically be below or slightly above the existing background sound in the area. The **Outline OEMP [APP-278]** commits to noise levels from the Scheme at residential dwellings being the same as or below those modelled in the ES. This provides assurance that significant effects from operational noise will be avoided, while allowing flexibility in how this is achieved. The preparation, approval and implementation of the detailed OEMP, substantially in accordance with the outline plan, are secured through Requirement 14 of Schedule 2 of the **Draft DCO [APP-016]**, ensuring

Reference	Comments/Issue raised	Applicant's Response
		operational noise is appropriately controlled throughout the lifetime of the Scheme. Regarding the location of the Scheme and its distance from the point of connection at Melksham, the Applicant has considered and assessed alternative locations, including those closer to the point of connection, as reported in **ES Volume 3, Appendix 4-1: Site Selection Assessment Repot [APP-185].** However, the locations considered closer to the point of connection were assessed to be unsuitable alternatives for the Scheme based on the assessment criteria identified due to a number of constraints, including likely heritage effects, flood risk, existing land uses, land availability and site size.

2.23 Dr Emma Vaux

Reference	Comments/Issue raised	Applicant's Response
EV-001	Dr Emma Vaux objects to the Scheme due to its siting, scale and disproportionate impact on her home and the surrounding environment. She states that Grain Store Barn is a domestic dwelling but was not properly identified as such in the Applicant's original plans, meaning that the true residential impacts at this location were not fully understood or assessed from the outset. As a result, she considers that the level of harm to residents at this location has been underestimated. She asserts that hedgerows alone would not adequately mitigate construction noise, construction traffic, operational noise or cumulative impacts, given the proximity of the development to her home. Dr Vaux also raises concerns about water safety, referring to the effects of piling, trenching, ground disturbance and the installation of BESS, which she believes introduce additional risks that have not been properly addressed. She asks that substantial weight be given to these harms.	The Applicant wishes to clarify that the residences located at the Grain Store Barn have been fully assessed and confirms that the submitted application documents correctly identify residential receptors, including the Grain Store Barn, and recognises that an amendment to a map layer during the PEIR & Statutory Consultation was made to clarify that the property lay outside the project boundary. More specifically, **ES Volume 1, Chapter 8 Landscape and Visual [APP-060] [APP-060]** identifies the Grain Store Barn, Farleaze as Residential Receptor RG020. This group of residential properties was identified during the initial Scoping exercise and is included within Appendix 7.5 Visual Receptor Scoping Sheets of EIA Scoping Report (Appendices Part 1 of 3) submitted to the Secretary of State on 16 July 2024. RG020 is also shown on Figure 7.11.3 Residential Receptors Lime Down C as contained within Appendix 7.6 of the EIA Scoping Report (Appendices Part 2 of 3) submitted to the Secretary of State on 16 July 2024. A series of buffers have been embedded into the layout of the Scheme, which includes for a 50m offset from the curtilage of all residential properties. These

Reference	Comments/Issue raised	Applicant's Response
		buffers have been applied to the group of properties known as Grain Store Barn. The Scheme has been designed to accommodate these residential properties, and infrastructure has been set back to allow separation and space for mitigation. Specifically with regard to the juxtaposition of Grain Store Barn, through the iterative design process this property is located approximately 140m to the nearest panels (located within field C18) to the south east of the Barn to the east of Pig Lane, and beyond established roadside hedgerows. To the west of the properties is field C15 with field C14 located north east of the properties. Panels within field C15 would be located approximately 205m from the properties themselves and 190m from the domestic curtilage, with panels within C14 located approximately 170m from the properties and 160m from the domestic curtilage. Landscape mitigation proposals are shown on **Figure 3-4-1 to 3-4-5.2 Landscape and Ecology Mitigation Plan [APP-084]** and include for a new section of new Native Hedgerow With Trees along the edge of the order limits to the west of the properties with an area of proposed Low Density Scrub beyond to provide screening of the proposed infrastructure within field

Reference	Comments/Issue raised	Applicant's Response
		C15, with Hedgerow Reinforcement provided along the existing hedgerow on the boundary of fields C15 and C14 to the north to help screen views into field C14. There is also an area of land to the north of Grain Store Barn that sits within the Order Limits that contains existing tree planting that it is intended to retain under the heading of Existing Vegetation to be Retained and Enhanced. The LVIA recognises the change in views from these properties and identifies a Major / Moderate Significant Adverse effect to occupiers during the construction phase and at Year 1. However, by Year 15 mitigation planting would filter views of the proposed infrastructure and reduce visibility of the Scheme resulting in Moderate / Minor Adverse effects, which are not considered Significant. Glint and glare impacts upon Grain Store Barn have been assessed within **ES Volume 3, Appendix 20-4**: **Solar Photovoltaic Glint and Glare Assessment [APP-261]** as dwelling receptor 249. A low impact is predicted upon this dwelling, as it is considered that existing vegetation and intervening terrain would reduce the possible duration of solar reflections to less than 3 months per year.

Reference	Comments/Issue raised	Applicant's Response
		Furthermore, the Grain Store Barn has been identified and assessed within **ES Volume 1, Chapter 14: Noise and Vibration [APP-066]** as receptor R45. Construction noise levels at R45 are presented in Table 14-18 of **Chapter 14: Noise and Vibration [APP-066]** and operational noise levels are presented in Table 8 and Table 9 of **Appendix 14-4 Noise Modelling [APP-237]**, for the daytime and night-time respectively. The operational noise levels, which are based on a robust assessment using internationally recognised standards for sound propagation and a series of reasonable worst-case assumptions, such as wind in the direction of the receptor from all sound sources, demonstrate that levels from the Scheme would be typical of the existing background sound in the area. It is agreed that hedgerows alone would not mitigate construction or operational noise. Construction noise is more effectively mitigated through best practicable means and operational noise through mitigation at source. Details of these measures are provided in the **Outline CEMP [APP-277]** and **Outline OEMP [APP-278]** respectively. The preparation, approval and implementation of the Environment Management Plans is secured through

Reference	Comments/Issue raised	Applicant's Response
		Requirement 13 and 14 in Schedule 2 of the **Draft DCO [APP-016]**, ensuring that construction and operational noise are appropriately controlled. With regard to in-combination effects, the In-Combination Effects Matrix set out in **ES Volume 3, Appendix 21-1 Long List of In-Combination Effects and Cumulative Developments [APP-264]** sets out the receptors and technical disciplines considered. Grain Store Barn is identified as an In-Combination Effects receptor during the construction phase (for combined landscape and visual and noise effects) and the operational phase (for combined landscape and visual, noise and glint and glare effects) in **ES Volume 3, Appendix 21-1 Long List of In-Combination Effects and Cumulative Developments [APP-264]**. A major/moderate adverse effect on Grain Store Barn is identified within the **ES Volume 1, Chapter 8 Landscape and Visual [APP-060]** during the construction phase and Year 1 of operation. With implementation of the secured management and mitigation measures, effect interactions when combined with noise and glint and glare are not identified as increasing the significance of the reported landscape and visual effect because the residual noise and glint and glare effects are identified as low during the construction and operational phases, see **Section**

Reference	Comments/Issue raised	Applicant's Response
		21-5 including **Table 21-7**of **ES Volume 1, Chapter 21 Cumulative and In-Combination Effects [APP-073].** Regarding the concerns relating to construction traffic, as concluded in **ES Volume 1, Chapter 13: Transport and Access [APP-065]** the impacts of construction traffic would be temporary and would not result in any significant transport effects. Construction traffic will be controlled through measures set out in the **Outline CTMP [APP-287]** and **Outline PRoWPPMP [APP-282]** to ensure impacts to NMUs along highways and PRoW are minimised as far as practicable. Final CTMPs and a PRoWPPMP would be prepared post consent and must be substantially in accordance with the **Outline CTMP [APP-287]** and **Outline PRoWPPMP [APP-282]**, respectively, and approved by the relevant local planning authorities (in consultation with the relevant highway authorities), as secured by Requirement 15 and Requirement 16 in Schedule 2 of the **Draft DCO [APP-016]**. In relation to air quality effects associated with the Battery Energy Storage System (BESS), Grain Store Barn is located outside the BESS fire emissions study area, as shown on **ES Volume 2, Figure 15-5: BESS Fire Emissions Study Area [APP-166]**. The BESS fire emissions assessment, reported in **ES Volume 3,**

Reference	Comments/Issue raised	Applicant's Response
		Appendix 15-2: BESS Fire Emissions Modelling [APP-239], concludes that no significant air quality effects would arise as a result of a BESS fire incident. The assessment considered a range of representative receptor locations, including receptors in closer proximity to the BESS than Grain Store Barn, and demonstrated that predicted pollutant concentrations would not exceed relevant assessment criteria. On this basis, air quality effects at Grain Store Barn resulting from a BESS fire incident would also not be significant. Accordingly, while the concerns raised are noted, the air quality assessment indicates that effects at Grain Store Barn would not be significant, and the conclusions remain appropriate. Regarding the concerns pertaining to ground disturbance, the Applicant confirms risks to the Principal Aquifer and specifically to potable abstractions from the aquifer, such as Private Water Supplies, are considered in **ES Volume 1, Chapter 19 Ground Conditions [APP-071]** and mitigation is outlined. Hydrogeological risk registers which provide an initial understanding of the risk to sensitive groundwater receptors from construction activity are set out in the following documents:

Reference	Comments/Issue raised	Applicant's Response
		• **BESS and Substation - Preliminary Geotechnical Risk Register [EN010168/EXAM/9.12];** • **Cable Route Avoidance Areas - Preliminary Geotechnical Risk Register [EN010168/EXAM/9.13]; and** • **Cable Route Corridor Mining Risk - Technical Memorandum [EN010168/EXAM/9.14].** Further to this, prior to the commencement of any construction work, a Foundation Works Risk Assessment will be undertaken for all substation and BESS locations (secured via the **Outline CEMP [APP-277])** to ensure that residual risks to groundwater will be appropriately mitigated and managed on a location-specific basis. Where potential contaminant sources are identified in **ES Volume 1, Chapter 19 Ground Conditions [APP-071]**, an assessment of risk to receptors has been made and appropriate mitigation applied. Where unexpected contamination is encountered in disturbed soils, this will be handled in line with the Discovery & Inspection Strategy within the **Outline CEMP [APP-277]** to help effectively manage contaminant impacted soils.

2.24 Jonathan Seymour Williams

Reference	Comments/Issue raised	Applicant's Response
JSW-001	Jonathan Seymour Williams, a resident of Farleaze Farm, located at the centre of the Scheme, objected to the Scheme on the grounds of landscape, heritage and water impacts, and the lack of effective consultation. He stated that the development conflicts with national and local planning objectives and undermines the long-established agricultural and historic character of the area, including the setting of the Fosse Way and nearby listed buildings, including his own home. He emphasised that the surrounding landscape is not incidental but integral to the significance of heritage assets and their setting, and that the Scheme would permanently sever the relationship between the Fosse Way and its open countryside context. He argued that once this relationship is lost, it cannot be restored. Mr Williams also expressed concern about water impacts and the absence of a holistic, landscape-wide approach to planning, stating that despite living at the centre of the Scheme for over 30 years, he has not been properly consulted by the Applicant. He concluded that the Scheme represents poor site selection and should not be granted consent.	The Applicant wishes to confirm that Farleaze Farm has been assessed throughout within the Environmental Statement and is highlighted below in more detail. Alongside opportunities to attend statutory in person and online events, the Applicant met with JSW-001 on site in February 2025 to discuss more targeted concerns and any opportunities which the Scheme may be able to offer the property. With regards to the concerns around landscape, the Applicant confirms an assessment of landscape and visual effects is provided in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]**. The LVIA assesses effects on identified landscape and visual receptors, including residential properties and users of public rights of way, and identifies where significant effects may occur. The LVIA recognises that as a consequence of the development that there would be long term adverse effects on the Landscape Character of the area as well as long term significant adverse effects to 10 Visual Receptors, all of which are local PRoW which are either within or directly adjacent to the proposed arrays and will therefore be considered in the planning balance when the DCO is determined.

Reference	Comments/Issue raised	Applicant's Response
		Concerning the comments made on heritage assets and their setting, **ES Volume 1, Chapter 12: Cultural Heritage [APP-064],** supported by **ES Volume 3, Appendices 12-1 to 12-8 [APP-219 to APP-232]** has assessed the potential impact of the Scheme on heritage assets. Where required appropriate mitigation is proposed. See **Section 12.9 of ES Volume 1, Chapter 12: Cultural Heritage [APP-064]** for embedded mitigation and **Section 12.11** for additional mitigation. No direct impacts have been identified to listed buildings. Identified impacts to listed buildings would be indirect and related to elements of their setting that contribute to their significance. No significant effects were identified to any Listed Buildings as a result of impacts caused by the Scheme. Since the design presented at PEIR stage, Field C26, the westernmost part of Field C25, and the majority of Field C13 have been entirely removed from the Order Limits. Solar PV Panels have also been removed entirely from within Fields B1-B5, C24-C25, and C13. A number of fields abutting the Fosse Way within which Solar PV Panels will be erected have had offsets established with their boundaries with Fosse Way, including Fields B6, C10-C12, and C22-C23**. ES Volume 3, Appendix 12-1: Heritage Statement [APP-219]** identified that the overall setting and

Reference	Comments/Issue raised	Applicant's Response
		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. **ES Volume 1, Chapter 12: Cultural Heritage [APP-064]**, supported by **ES Volume 3 Appendix 12-7: Historic Landscape Assessment [APP-231]**, has assessed the potential impact of the Scheme on the historic landscape character. No significant effects were identified on the historic landscape character as a result of impacts caused by the Scheme. The Applicant acknowledges the concerns raised by Mr Williams in relation to potential water impacts and the need for a holistic understanding of how the Scheme interacts with the wider landscape. **ES Volume 3, Appendices 11-1 to 11-9: Flood Risk Assessment and Drainage Strategies [APP 210-218]** have been undertaken across the Scheme and within the context of the contributing catchments, rather than on a field-by-field basis in isolation. The assessment considers how runoff is generated, routed and received within the wider landscape, including interactions with downstream receptors. The Scheme has been designed so that it does not increase flood risk off-site. Solar PV Panel areas

Reference	Comments/Issue raised	Applicant's Response
		remain permeable and continue to drain to ground, and do not generate a new connected discharge. Where impermeable infrastructure is introduced, runoff is attenuated and discharged at greenfield rates, with allowance for climate change, as set out in **ES Volume 3, Appendices 11-1 to 11-9: Flood Risk Assessment and Drainage Strategies [APP 210-218].** On that basis, the Applicant considers that water environment effects have been assessed at an appropriate, landscape-wide scale, and that the Scheme would not increase runoff or exacerbate flooding within or beyond the Order limits. As a result of the reasoning set out above, it is the Applicant's position that the Scheme complies with the relevant national and local planning policy. Further details of the Scheme's compliance is provided in the **Planning Statement [APP-267]**.

2.25 Steffi Dampney

Reference	Comments/Issue raised	Applicant's Response
SD-001	Steffi Dampney, a chartered sport and performance psychologist and resident of Farleaze, objected to the Scheme on the grounds of its impact on mental health and wellbeing. She explained that exposure to undisturbed natural landscapes is essential for nervous-system regulation, stress recovery and sleep, and that the countryside functions as a public health resource, not merely an amenity. She said that replacing open rural land with industrial-scale solar infrastructure would remove "soft fascination" environments that allow mental restoration, and replace them with visually and cognitively demanding features that increase stress and anxiety. She referred to established psychological and neuroscientific evidence showing that such changes can lead to chronic stress, sleep disruption and reduced emotional resilience. Ms Dampney concluded that industrialising over 2,000 acres of countryside would represent the loss of a crucial therapeutic landscape, with long-term consequences for community wellbeing, and should be treated as a serious public health harm within the planning balance.	The Applicant notes the concern regarding impacts to mental health and wellbeing associated with the change in landscape as a result of the Scheme. **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]** recognises that as a consequence of the development that there would be long term adverse effects on the Landscape Character of the area, however, these are mitigated as far as practicable through embedded buffers and screening. The assessment presented in **ES Volume 1, Chapter 18: Human Health [APP-070]** has considered the physical and mental health impacts of changes to recreation and access to the countryside under the assessment topic 'open space, leisure and play'. The assessment concludes that no significant adverse effects to mental health and wellbeing are anticipated at any phase of the Scheme. The Applicant will review the research referenced by Ms Dampney once submitted and will respond directly. The Applicant recognises the potential health impacts that increased stress can have on sleep and mental health and wellbeing, and has sought to address these in a proportionate and comprehensive manner through

Reference	Comments/Issue raised	Applicant's Response
	ExA asked Ms Dampney to submit the studies referenced.	the assessment criteria used in **ES Volume 1, Chapter 18: Human Health [APP-070]**. The Applicant is confident that the methodology used within the assessment of human health is robust, and that the assessment outcomes identify that there is no significant adverse effect to health and wellbeing to the affected population in the 2 km Study Area at any phase of the Scheme.

2.26 Rosie Clark

Reference	Comments/Issue raised	Applicant's Response
RC-001	Rosie Clark, a resident of Farleaze, objects to the Scheme due to the risk it poses to private water supplies and human health. She explains that her household relies entirely on a private borehole, located close to the proposed panels and substations and within a Source Protection Zone, drawing from an aquifer identified as highly vulnerable to pollution. She raises particular concern about piling, trenching, construction chemicals, herbicides and long-term panel degradation, which she says could create pathways for aquifer contamination, with no reliable evidence base on the long-term impacts of large-scale solar developments on groundwater. She states that there are no long-term studies into the health effects of consuming water contaminated in this way, and that no baseline monitoring or credible remediation measures are proposed. Ms Clark argues that this represents an unknown but potentially serious and irreversible risk, requiring application of the precautionary principle, and urges the ExA to refuse the application, or at minimum impose strict, independently monitored and legally binding protections for private water supplies.	The Applicant acknowledges Ms Clark's concerns around private water supplies, particularly given the reliance of her property on a private borehole. Risks to the Principal Aquifer and specifically to potable abstractions from the aquifer, such as Private Water Supplies, are considered in **ES Volume 1, Chapter 19: Ground Conditions [APP-071]** and mitigation is outlined. Hydrogeological risk registers which provide an initial understanding of the risk to sensitive groundwater receptors from construction activity are set out in the following documents: • **BESS and Substation - Preliminary Geotechnical Risk Register [EN010168/EXAM/9.12];** • **Cable Route Avoidance Areas - Preliminary Geotechnical Risk Register [EN010168/EXAM/9.13]; and** • **Cable Route Corridor Mining Risk - Technical Memorandum [EN010168/EXAM/9.14].** The presence of a Private Water Supply abstraction at Farleaze is considered in the Preliminary Risk Assessment within **ES Volume 3, Appendix 19-3: Lime Down C Desk Study [APP-249]** and no unacceptable risk was considered to be present.

Reference	Comments/Issue raised	Applicant's Response
		However, it will be considered in specific risk assessments related to the use of piled foundations of HDD trenchless techniques. In respect of this, prior to the commencement of any construction work, a Foundation Works Risk Assessment will be undertaken for all substation and BESS locations (secured via the **Outline CEMP [APP-277])** to ensure that residual risks to groundwater will be appropriately mitigated and managed on a location-specific basis. Any chemicals utilised in the Construction Phase will only be used if necessary. Management of such substances will be via the **Outline CEMP [APP-277]** and in line with best practice. The management of the use of herbicides during the Operational Phase are outlined in the **Outline OEMP [APP-278]** and any herbicides required will be used in line with manufacturers guidance appropriate for the site setting. Regarding the concerns raised on consuming contaminated water, the assessment of likely human health impacts from contamination to groundwater drinking sources are based on the assessments set out in **ES Volume 1, Chapter 11 Hydrology, Flood**

Reference	Comments/Issue raised	Applicant's Response
		Risk and Drainage [APP-063] and **Chapter 19: Ground Conditions [APP-071]**, and the mitigation of construction phase risks, pollution prevention and incident response as secured through the **Outline CEMP [APP-277]** by Requirement 13 in Schedule 2 to the **Draft DCO [APP-016]**. With these in place, the assessment in **ES Volume 1, Chapter 18: Human Health [APP-070]** finds no residual significant adverse effects to human health.

2.27 Stewart Dobson

Reference	Comments/Issue raised	Applicant's Response
SD-001	Stewart Dobson, a long-term resident of Grittleton for 40 years, objects to the Scheme due to its harm to wellbeing, public rights of way, and biodiversity. He explains that his daily walking routes, particularly footpath GRIT20, are an essential part of his physical exercise, social interaction and mental wellbeing, and that the Scheme would block or degrade these routes through construction compounds, cabling and increased HGV traffic. He states that the resulting loss of safe, accessible local walks would force residents to drive elsewhere to exercise, undermining both health and community cohesion. He also raises concerns about ecological impacts, particularly to skylarks, citing the Applicant's own assessment (ecology and biodiversity report) that skylarks would be permanently displaced for the lifetime of the Scheme, constituting a significant adverse effect. Mr Dobson argues that mitigation claims are insufficient and that the Scheme would cause long-term harm to both people and wildlife, removing valued local amenity and biodiversity, and should therefore be refused.	The assessment in **ES Volume 1, Chapter 18: Human Health [APP-070]** considers the physical and mental health impacts of changes to recreation and access to the countryside, including along PRoWs and other recreational routes, under the assessment topic 'open space, leisure and play'. The assessment concludes that no significant adverse effects to mental health and wellbeing are anticipated at any phase of the Scheme. Mitigation measures to reduce construction impacts to PRoW users are secured through the **Outline PRoWPPMP [APP-282]** by Requirement 16 in Schedule 2 to the **Draft DCO [APP-016]**. In regard to PRoW, the Applicant has designed the Scheme to incorporate embedded buffers with a 15 m offset to any proposed infrastructure on either side of any PRoW. Where PRoW directly cross solar arrays, this creates a corridor with a minimum width of 30 m wide between proposed fencelines. There would then be a gap of 4 m between the fence line and the proposed Solar PV Panel which results in a minimum total width of 38 m. **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]** recognises the change to the visual

Reference	Comments/Issue raised	Applicant's Response
		amenity and associated adverse effects to users of those PRoW that are located within the array itself or directly adjacent. The assessment of impacts on PRoWs in **ES Volume 3, Appendix 16-2: Tourism and Recreation Receptors [APP-241]** has included specific assessment of footpath GRIT20. As set out in the **Outline PRoWPPMP [APP-282]**, GRIT20 will be temporarily diverted for the duration of the two-year construction phase. The diversion is proposed to ensure unreasonable effects to PRoW users are not experienced during construction, replacement, and decommissioning. The diversion will run adjacent to the construction compound to the north and east and provide continues access to the wider PRoW network. Once construction is complete, the PRoW will return to its existing alignment. Construction traffic will also be controlled through measures set out in the **Outline CTMP [APP-287]** to ensure impacts to NMUs along highways and PRoW are minimised as far as practicable. Final CTMPs and a PRoWPPMP would be prepared post consent and must be substantially in accordance and approved by the relevant local planning authorities (in consultation with the relevant highway authorities), as secured by

Reference	Comments/Issue raised	Applicant's Response
		Requirement 15 and Requirement 16 in Schedule 2 of the **Draft DCO [APP-016]**. Potential impacts on ecology and biodiversity are fully assessed in **ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061].** The assessment identifies embedded and additional mitigation measures and concludes that, with these measures in place, no unacceptable significant adverse effects on ecology and biodiversity are anticipated The assessment in **ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061]** identifies skylarks as a key species of conservation interest within the Scheme area. It concludes that approximately 71.5% of the quantified number of territories belonging to the current skylark population will be displaced from the Solar PV Sites. This is expected to give rise to an adverse residual effect at a Local level which is transparently reported. Skylark-specific mitigation and habitat enhancement measures are incorporated into the Scheme design to reduce effects as far as practicable. These include the provision of suitably large, open set-aside and grassland habitats designed to provide appropriate breeding and foraging conditions. These measures are illustrated in **ES Volume 2, Figure 3-4:**

Reference	Comments/Issue raised	Applicant's Response
		Landscape and Ecological Mitigation Plan [APP-084] and detailed in the **Outline LEMP [APP-283].** The preparation, approval and implementation of the detailed Landscape and Ecological Management Plan, substantially in accordance with the **Outline LEMP [APP-283],** is secured through Requirement 7 in Schedule 2 of the **Draft DCO [APP-016],** ensuring that skylark mitigation measures will be delivered and maintained throughout the lifetime of the Scheme.

2.28 Richard Jeffcoate

Reference	Comments/Issue raised	Applicant's Response
RJ-001	Richard Jeffcoate, a long-term resident of Grittleton for 35 years, objects to the Scheme due to the unsuitability of local roads for construction traffic. He explains that the street that runs through the centre of the village is historically narrow and relies on on-street parking, effectively making it single-track in places. He describes existing traffic problems, including vehicles mounting pavements and damage to parked cars, and raises concerns about safety for pedestrians and emergency vehicles. He states that the road is proposed as a route for construction traffic and abnormal indivisible loads associated with the cable route and construction compound. Mr Jeffcoate argues that additional HGV traffic would exacerbate an already unsafe situation, cause harm to the Grittleton Conservation Area, and result in impacts that are beyond mitigation.	The assessment presented in the updated **Annex J** of **ES Volume 3, Appendix 13-1: Transport Assessment [APP-233]** submitted at Deadline 1 demonstrates adequate carriageway width or frequency of passing place opportunity to pass at least an HGV and a light vehicle as requested in comments provided by Wiltshire Council in its response (August 2025) to the Transport Assessment Scoping Note and confirmed in Paragraph 4 of 'Appendix A - Highways and Transport Document Review - Detailed Comments'. This confirms that no passing bay or widening improvements are needed to accommodate these movements on the construction route outside of the Order Limits. The distances between passing points outside of the Order Limits are all within 150 m with forward visibility extending to the next passing point and beyond. This is within the generally accepted distance of 200 metres. As set out in the **Outline CTMP [APP-287]**, a booking system will be set up to manage arrivals and departures to the Order Limits. This will be implemented in coordination with banksmen, which will be able to hold back any cross-over, should there be any delays on the roads. This will prevent HGVs

Reference	Comments/Issue raised	Applicant's Response
		generated by the Scheme passing each other in opposite directions on the local roads forming part of the construction routes and will be confirmed as part of the final CTMP. Excessive widening of existing rural routes to allow two HGVs to pass would be over engineering, because of the following reasons: • Temporary nature of the construction period; • The level of hourly HGV trips when considering a realistic construction programme; • Delivery times during the construction phase are limited to those times set out in the **Outline CTMP [APP-287]**. There will be no HGV construction trips outside of these hours; • There would be a much greater impact on hedgerow, trees and character; and • Low level of existing HGVs on the proposed HGV construction routes. Information included in **ES Volume 3, Appendix 13-1: Transport Assessment [APP-233**] submitted at Deadline 1 of Examination demonstrates that there is adequate carriageway width and/or passing place opportunity for two HGVs along the proposed construction routes.

Reference	Comments/Issue raised	Applicant's Response
		As presented in **ES Volume 3, Appendix 13-1: Transport Assessment [APP-233]** each of the two cable route corridor accesses to the east of Grittleton are expected to be in use for approximately 90 non-consecutive days over the construction phase, each generating approximately 8 HGV movements a day and 32 total movements per day of use. The existing road through Grittleton is already used by HGVs and as concluded in **ES Volume 3, Appendix 13-1: Transport Assessment [APP-233]** will not result in any significant transport impacts. The potential effects of construction traffic on the local highway network are assessed in **ES Volume 1, Chapter 13: Transport and Access [APP-065]**, which considers construction vehicle movements, traffic volumes, road safety and effects on road users. This included the capacity of local roads and infrastructure to accommodate construction vehicles. The assessment concludes that the level of construction traffic associated with the Scheme is unlikely to materially affect road safety on links within the Study Area, and no significant adverse effects on accident risk are anticipated. As set out in the **Outline CTMP [APP-287]**, pre-construction, interim and post-construction Road

Reference	Comments/Issue raised	Applicant's Response
		Condition Surveys will be undertaken to repair any damage caused to verges during the construction period. The details of these surveys will be confirmed as part of the Final CTMP. Regarding potential effects on the Grittleton Conservation Area, no significant effects have been identified as a result of the Scheme (see **ES Volume 1, Chapter 12: Cultural Heritage [APP-064]**, supported by **ES Volume 3, Appendix 12-1: Heritage Statement [APP-219]**).

2.29 Lawrence Copeland

Reference	Comments/Issue raised	Applicant's Response
LC-001	Lawrence Copeland, speaking on behalf of Grittleton, Sevington and Leigh Delamere Village Hall Charity, objects to the Scheme due to its impact on the viability of the village hall and associated community facilities. Referring to the **Outline Construction Traffic Management Plan [APP-287]**, he explains that the proposed cable route access points (REF-101 and REF-102) and construction compound are located extremely close to the village hall and children's playground, resulting in regular HGV, Large Goods Vehicles (**LGV**) and construction worker traffic passing immediately alongside these facilities. He states that the timing and frequency of construction traffic would directly conflict with the hall's core daytime activities, including wellbeing and fitness classes, undermining the quiet environment these uses depend on. He warns that disruption, noise and reduced accessibility are likely to cause hirers to relocate, threatening the hall's business model and financial sustainability. Mr Copeland argues that although the disruption is described as temporary, loss of regular users may be permanent, putting the long-term survival of the village	The Applicant has previously responded to Relevant Representations made by Mr Copeland on behalf of the Grittleton, Sevington and Leigh Delamere Village Hall and Recreation Ground **[RR-1746]** at Section 4.39 of the **Applicant's Response to Relevant Representations (Part 1) [PDA-009]**. Grittleton Village Hall has been assessed as a specific recreational receptor in **ES Volume 3, Appendix 16-2: Tourism and Recreation Receptor Tables [APP-241]**. This identifies that during construction, a residual medium-term temporary moderate-minor adverse effect is anticipated to users of these facilities. Whilst this indicates there is some level of disruption to access anticipated to the village hall in Grittleton, this is not a significant effect, subject to the implementation of additional mitigation measures to control HGV movements to and from the construction compound. These measures are set out in the **Outline CTMP [APP-287]**, secured by Requirement 15 in Schedule 2 to the **Draft DCO [APP-016]**. The Applicant does not consider it likely that the village hall at Grittleton and its associated facilities are likely to be at risk of closure as a result of the Scheme, as no significant adverse effect to the use and operation of

Reference	Comments/Issue raised	Applicant's Response
	hall at risk, and asks the ExA to give weight to the community and socio-economic harm arising from the Scheme.	the facility is anticipated. Therefore, the Applicant has not assessed the community and socio-economic impact of its closure. Regarding the potential effects on wellbeing raised by Mr Copeland, the Applicant has considered the likely effects on health and wellbeing as a result of impacts to 'open space, leisure and play' facilities in **ES Volume 1 Chapter 18: Human Health [APP-070]**. Again, this identifies that whilst there is some level of adverse effect predicted as a result of the Scheme (overall a minor adverse effect), this is anticipated to be temporary and is not considered a significant effect. Regarding construction traffic associated with the Scheme, as presented in **ES Volume 3, Appendix 13-1: Transport Assessment [APP-233]** each of the two cable route corridor accesses to the east of Grittleton are expected to be in use for approximately 90 non-consecutive days over the construction phase, each generating approximately 8 HGV movements a day and 32 total movements per day of use. The existing road through Grittleton is already used by HGVs and as concluded in **ES Volume 3, Appendix 13-1: Transport Assessment [APP-233]** will not result in any significant transport impacts.

Reference	Comments/Issue raised	Applicant's Response
		Construction traffic will be controlled through measures set out in the **Outline CTMP [APP-287]** and **Outline PRoWPPMP [APP-282]** to ensure impacts to NMUs along highways and PRoW are minimised as far as practicable. Final CTMPs and a PRoWPPMP would be prepared post consent and must be substantially in accordance with the **Outline CTMP [APP-287]** and **Outline PRoWPPMP [APP-282]**, respectively, and approved by the relevant local planning authorities (in consultation with the relevant highway authorities), as secured by Requirement 15 and Requirement 16 in Schedule 2 of the **Draft DCO [APP-016]**. Regarding noise effects associated with the Scheme, Table 14-21 of **ES Volume 1, Chapter 14: Noise and Vibration [APP-066]** shows that the impact of construction traffic noise on Alderton Road will be low and therefore the village hall should not be significantly affected.

2.30 Claire Maxwell

Reference	Comments/Issue raised	Applicant's Response
CIM-001	Claire Maxwell, a retired GP from Chippenham currently living in Alderton, objects to the Scheme due to its impact on mental health, wellbeing and pressure on local health services. Referring to the relevant representations in HH-01, she notes that a very high number of representations relate to mental health concerns, emphasising that mental health is a particular reason why many people choose to live in the countryside for access to tranquillity, green space, walking and cycling. She states that the Applicant's suggested mitigation, including permissive paths between 4.5m panels and planting that may take 15 years to mature, does not realistically compensate for the loss of visual amenity, calm and accessible green space. She is also concerned about noise impacts, particularly at night, noting evidence that persistent low-level noise can increase stress hormones and contribute to anxiety, depression and behavioural issues, especially in children. Ms Maxwell argues that the Scheme would increase demand on already overstretched GP and mental health services, with limited alternatives for support,	The assessment in **ES Volume 1, Chapter 18: Human Health [APP-070]** considers the physical and mental health impacts of changes to recreation and access to the countryside under the assessment topic 'open space, leisure and play', and the wider wellbeing impacts from 'noise and vibration' as a result of the Scheme. The assessment concludes that no significant adverse effects to mental health and wellbeing are anticipated at any phase of the Scheme. Mitigation measures to reduce construction noise, and to minimise impacts to PRoW users are secured through the **Outline CEMP [APP-277]** and **Outline PRoWPPMP [APP-282]** by Requirements 13 and 16 in Schedule 2 to the **Draft DCO [APP-016]**. The Applicant recognises the potential health impacts from sources such as noise, and the impacts that increased stress can have on sleep and mental health and wellbeing, and has sought to address these in a proportionate and comprehensive manner through the assessment criteria used in **ES Volume 1, Chapter 18: Human Health [APP-070]**. The Applicant seeks to clarify that this assessment is undertaken at a population level across the 2 km Study Area to identify vulnerable health groups and where impacts may

Reference	Comments/Issue raised	Applicant's Response
	and that the cumulative effect of multiple solar developments would leave residents with nowhere to retreat for restorative benefit. She states that the Scheme would result in long-term public health harm and should be given significant weight in the planning balance.	disproportionately affect health outcomes, and does not assess impacts upon individuals. The Applicant is confident that the methodology used within the assessment of human health is robust, and that the assessment outcomes identify that there is no significant adverse effect to health and wellbeing to the affected population in the 2 km Study Area at any phase of the Scheme. The assessment in **ES Volume 1, Chapter 18: Human Health [APP-070]** does not identify any residual significant adverse effects to physical or mental health and wellbeing at any phase of the Scheme, and therefore, it is not considered likely that there would be a significant uplift in demand for public healthcare services from the resident population. Furthermore, any uplift in demand for healthcare services associated with the temporary workforce for construction is likely to be spread across the area within 20 km of the Scheme, within which workers are likely to be accommodated. The Applicant is committed to support workers in registering with GPs in proximity to where they are accommodated and where there is greatest availability. This should help to further reduce any additional pressure on existing healthcare services.

Reference	Comments/Issue raised	Applicant's Response
		This is secured through the **Outline CEMP [APP-277]** via Requirement 13 of the **Draft DCO [APP-016]**. Based on the assessment of effects reported in the ES, the effects on human health are considered to attract a neutral weight in the planning balance, as set out in the **Planning Statement [APP-267]**. Regarding the potential effects on visual amenity mentioned by Ms Maxwell, an assessment of landscape and visual effects is provided in the Landscape and Visual Impact Assessment (LVIA) presented in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]**. The LVIA assesses effects on identified landscape and visual receptors, including residential properties and users of public rights of way, and identifies where significant effects may occur. The LVIA recognises that as a consequence of the development that there would be long term adverse effects on the Landscape Character of the area as well as long term significant adverse effects to 10 Visual Receptors, all of which are local PRoW which are either within or directly adjacent to the proposed arrays. **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]** recognises the change to the visual amenity and associated adverse effects to users of

Reference	Comments/Issue raised	Applicant's Response
		those PRoW that are located within the array itself or directly adjacent. The design of the Scheme has embedded buffers into the proposed layout, specifically a 15m offset to any proposed infrastructure on either side of any PRoW. Where PRoW directly cross the array, this creates a corridor with a minimum width of 30m wide between proposed fencelines through the array. There would then be a gap of 4m between the fence line and the proposed panels resulting in a minimum total width of 38m between the panels where PRoW cross the arrays. Regarding potential night-time noise effects associated with the Scheme, night-time noise levels are presented in Table 9 of **ES Volume 3, Appendix 14-4: Noise Modelling [APP-237]**. Levels would typically be below or slightly above the existing quiet background sound in the area and below WHO guideline levels on suitable night-time conditions for sleeping, even with windows open. Therefore, night-time noise from the Scheme is not considered to lead to significant effects on residents. Regarding the concern around the cumulative loss of countryside, the Applicant confirms cumulative effects have been carefully considered in accordance with Planning Inspectorate Advice Note 17 (Ref 10) and the

Reference	Comments/Issue raised	Applicant's Response
		relevant NPS EN-1 (Ref 1), NPS EN-3 (Ref 2) and NPS EN-5 (Ref 3) requirements as set out in **ES Volume 1, Chapter 21 Cumulative and In-Combination Effects [APP-074**]. The chapter sets out the approach and conclusions of the **ES** [**APP-052 to APP-074**] technical chapter cumulative assessments. Taking a conservative worse case approach, significant cumulative effects are identified at a limited and discrete number of receptors comprising tourism and recreation impacts during the construction phase on Corsham Park, PRoW WT|CORM|122, PRoW WT|HULL|29, and Sustrans Cycle Route 403, and on skylark at a District level.

2.31 Lesley Bennet

Reference	Comments/Issue raised	Applicant's Response
LB-001	Lesley Bennet, a former trustee of Wiltshire Wildlife Trust for 12 years and former Chair of Wiltshire Wildlife Community Energy, spoke in support of the Scheme. She explained that she has extensive experience in environmental matters and renewable energy projects, has also served as a councillor, and has lived in the local area for approximately 40 years. She stated that she knows the area well, having regularly walked and travelled across it with her family over many years.	The Applicant notes this comment and welcomes the support for the Scheme.
LB-002	Ms Bennet addressed what she described as misleading and oversimplified messaging associated with "Stop Lime Down" posters and social media campaigns, which she said have discouraged those who support the Scheme from speaking publicly. She stated that recent publicity had claimed the Scheme would cover 18 square miles, whereas in her view the actual above-ground development would amount to approximately 2.9 square miles, with a further area proposed for environmental mitigation. She explained that this mitigation would include new trees and hedgerows, which she considered a material benefit.	The **ES [APP-052 to APP-265]**, **Statement of Need [APP-266]**, and **Planning Statement [APP-267]** provide an assessment of the adverse and beneficial effects associated with the Scheme, an explanation of why the Scheme is needed and the benefits of solar energy generation, and the other benefits associated with the Scheme. The total area within the Order Limits encompasses approximately 1,237 hectares (ha). Of this, around 479.5 ha of land is proposed as being required for installation of solar PV, battery storage, and associated infrastructure. The remaining 269.5 ha would provide areas dedicated to ecological mitigation, measurable Biodiversity Net Gain (BNG) delivery, landscaping, and

Reference	Comments/Issue raised	Applicant's Response
		agricultural land managed for environmental enhancement and habitat creation.
LB-003	Ms Bennet referred to the proposed cable route to Melksham, noting that while the trench would extend for approximately 15 miles, it would be narrow and reinstated once completed. She compared this to existing underground gas pipelines and water mains, stating that once works are complete the land would be restored and the countryside would revert to its former appearance.	The Applicant notes this comment and welcomes the support for the Scheme.
LB-004	Addressing concerns that the Scheme would represent an industrialisation of the countryside and lead to loss of wildlife, Ms Bennet disagreed with these characterisations. Drawing on her experience with existing solar installations associated with the Wiltshire Wildlife Trust, she stated that solar arrays can lead to significant biodiversity benefits once operational. She explained that soils are rested, wildflowers can establish, and habitats can be created for birds, hares, hedgehogs and other species. She stated that adjacent farmland may benefit from increased pollinators and that sheep grazing beneath panels is achievable and already occurs at other local solar farms.	The Applicant notes this comment and welcomes the support for the Scheme's environmental improvements and biodiversity benefits.

Reference	Comments/Issue raised	Applicant's Response
LB-005	Ms Bennet further disputed claims that agricultural land would be sealed beneath glass and steel, stating that panels are raised above ground and allow grass and vegetation to continue growing beneath them. She also addressed concerns regarding panel height, explaining that the tallest panels would only reach their maximum height for limited periods in the early morning and late evening, and that for most of the day they would sit at a lower level.	The Applicant notes this comment and welcomes the support for the Scheme.
LB-006	Turning to flood risk, Ms Bennet acknowledged that flooding concerns had been raised but stated that she was confident these matters would be properly assessed and addressed through an outline construction management plan, informed by expert scrutiny.	The Applicant notes this comment and welcomes the support and agrees that potential flood risk has been addressed within the **Outline CEMP [APP-277]**, **Outline OEMP [APP-278]** and within **ES Volume 3, Appendix 11-1 to 11-9: Flood Risk Assessment and Drainage Strategies [APP-210 to APP-218].**
LB-007	Ms Bennett also addressed heritage concerns, stating that the Fosse Way would not be directly affected by the Scheme and would continue to function as it currently does. She noted that subsequent design changes had increased separation between panels and heritage assets.	The Applicant welcomes the support by Ms Bennett and agrees that, as identified in **ES Volume 3, Appendix 12-1: Heritage Statement [APP-219]**, the overall setting and significance of the Fosse Way will remain intact, and the asset will retain its legibility as a roadway within a largely agrarian landscape. Consequently, no significant effects were identified to the asset. As highlighted by Ms Bennett, extensive consideration has been given to the design of the Scheme adjacent

Reference	Comments/Issue raised	Applicant's Response
		to the Fosse Way. Field C26, the westernmost part of Field C25, and the majority of Field C13 have been entirely removed from the Order Limits. Solar PV Panels have also been removed entirely from within Fields B1-B5, C24-C25, and C13. A number of fields abutting the Fosse Way within which Solar PV Panels will be erected have had offsets established with their boundaries with Fosse Way, including Fields B6, C10-C12, and C22-C23.
LB-008	In conclusion, Ms Bennet stated that supporting the Scheme would help Wiltshire meet national renewable energy targets, combat climate change and strengthen the electricity grid, enabling wider deployment of rooftop and smaller-scale solar locally. She highlighted potential economic benefits, including business rates payable to Wiltshire Council, which she estimated to be in the region of three-quarters of a million pounds per year, and the establishment of a community fund, expected to be approximately £250,000 annually. She considered these benefits to be fair and concluded that the Scheme would deliver a range of local and environmental benefits.	The Applicant welcomes the support provided in this representation for the Scheme. Section 7.4 of the **Statement of Need [APP-266]** explains that the inclusion of BESS as part of the Scheme will provide the National Energy System Operator with a cost-effective tool to help manage power flows on the grid in the vicinity of the Scheme over its operational life. Section 7.6 of the **Statement of Need [APP-266]** concludes that the development of a large-scale solar development connecting at Melksham provides the potential to help decarbonise local electricity demand to the benefit of consumers both locally and nationally, and that the Scheme will also not impact the local electricity distribution networks by either causing any connection delays for smaller Schemes or consumer loads.

Reference	Comments/Issue raised	Applicant's Response
		The Applicant confirms Wiltshire Council would benefit from business rates as a result of the leasing of the land used for Solar PV Arrays, BESS and substations from the respective landowners. However, the Applicant has not sought to specifically determine the monetary extent of this prior to consent but estimates that this could be more than £500,000 per annum. The Applicant furthermore confirms they are committed to providing a Community Benefit Fund to allow for community-driven benefits that are not necessarily associated with the Scheme itself. The purpose is to establish a means to recognise local community needs that the Applicant wants to be able to contribute towards in recognition of the local impact of the Scheme. The final contributions will be determined following DCO consent being granted. The Applicant acknowledges the Community Benefit Fund is separate from the DCO process and so has sought to provide the Community Benefit Fund voluntarily even though it won't add favourable weight in the planning balance.

2.32 Fiona Shipsey

Reference	Comments/Issue raised	Applicant's Response
FSh-001	Fiona Shipsey has lived for almost 20 years on the edge of South Sherston (Site A), within the Area of Outstanding Natural Beauty (AONB), and described regular use of local footpaths for daily walks, which she values for quiet reflection, peace and connection with nature. She explained that these routes are used to experience birdsong, wildlife and seasonal change, citing sightings of bluebells, hares, skylarks, deer, kites and finches. She stated that these walks form part of the Sherston Walks booklet and are enjoyed by residents and visitors.	The Applicant has designed the Scheme to incorporate embedded buffers with a 15 m offset to any proposed infrastructure on either side of any PRoW. Where PRoW directly cross solar arrays, this creates a corridor with a minimum width of 30 m wide between proposed fencelines. There would then be a gap of 4 m between the fence line and the proposed Solar PV Panel which results in a minimum total width of 38 m. **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]** assesses effects on identified landscape and visual receptors, including users of PRoW. This recognises that there would be long term adverse effects on the Landscape Character of the area and long term significant adverse effects to 10 Visual Receptors, all of which are local PRoW within or directly adjacent to the proposed solar arrays. An assessment of the likely effects of the Scheme on the use and desirability of individual PRoW and recreational access to the countryside is also included in **ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]** and **ES Volume 3, Appendix 16-2: Tourism and Recreation Receptor Tables [APP-241]**. This considered the

Reference	Comments/Issue raised	Applicant's Response
		impact on individual recreational routes, including their practical use, enjoyment and desirability and 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. Potential impacts of the Scheme on ecology and biodiversity are assessed in **ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061]**, which considers baseline conditions and evaluates likely effects during construction, operation and decommissioning. The assessment identifies embedded and additional mitigation measures and concludes that, with these measures in place, no unacceptable significant adverse effects on ecology and biodiversity are anticipated. Bluebells are a floral species primarily associated with hedgerows and woodlands. As described within **ES Chapter 9: Ecology and Biodiversity [APP-061],** such habitats will be primarily retained and protected as part of the Scheme design and through the implementation of protective buffers, maintained at least 15 m from hedgerows and woodland edges,

Reference	Comments/Issue raised	Applicant's Response
		meaning associated ground flora (including bluebells) will be safeguarded. Potential impacts of the Scheme on brown hares are assessed in **ES Chapter 9: Ecology and Biodiversity [APP-061].** The assessment concludes that, with embedded mitigation in place, no significant adverse effects on brown hares are anticipated. The Scheme design retains extensive areas of grassland and field margin habitats, which provide suitable foraging and shelter opportunities for hares. The assessment also notes that brown hares are known to take shelter beneath solar panels on operational solar sites, where the retention of grassland beneath and between arrays can provide suitable habitat conditions. The assessment also identifies skylarks as a key species of conservation interest within the Scheme area. It concludes that approximately 71.5% of the quantified number of territories belonging to the current skylark population will be displaced from the Solar PV Sites. This is expected to give rise to an adverse residual effect at a Local level which is transparently reported. Skylark-specific mitigation and habitat enhancement measures are incorporated into the Scheme design to reduce effects as far as practicable. These include the provision of suitably large, open set-

Reference	Comments/Issue raised	Applicant's Response
		aside and grassland habitats designed to provide appropriate breeding and foraging conditions. This includes Fields A11 and A12 within Lime Down A, which can be expected to support a number of skylark territories. These measures are illustrated in **ES Volume 2, Figure 3-4: Landscape and Ecological Mitigation Plan [APP-084]** and detailed in the **Outline LEMP [APP-283**]. Potential impacts on other breeding and wintering bird assemblages recorded within the Order Limits, including red kites and several finches are fully assessed in **ES Chapter 9: Ecology and Biodiversity [APP-061].** The assessment concludes that no significant adverse effects on such assemblages are anticipated during construction or operation With regards to the routes publicised as 'Sherston Walks', these was considered within **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]** with 'Sherston Walk 2' recognised for the purposes of the assessment as a Recreational Route passing through the Scheme. As such a Sequential Visual Assessment has been undertaken for users of this route, with Sequential Effects not considered to be any greater than those effects identified for the individual sections as set out within **ES Volume 3, Appendix 8-3-2-2:**

Reference	Comments/Issue raised	Applicant's Response
		Landscape and Visual Assessment Sheets (Significant) [APP-191], these being: Commonwood Lane (TR143), BOAT WT|SHER|35 (TP089), Footpath WT|SHER|18 (TP091), Footpath WT|LUCK|35 (TP077) and Alderton Road (TR040). **ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]** and **ES Volume 3, Appendix 16-2: Tourism and Recreation Receptor Tables [APP-241]** also confirms no significant effects are anticipated to PRoW in the Sherston Walks (as available on the Sherston Parish Council website) that interact with the Order Limits. No other effects to PRoW in and around Sherston which are located away from the Order Limits, nor specific local roads used by the Sherston Walks, were scoped as requiring individual assessment.
FSh-002	Ms Shipsey expressed concern that both she and others would be deterred from using these footpaths during and after construction, referring to the Applicant's acceptance that tree and hedge planting would take many years to mature and screen the proposed 4.5m panels, conversion units and substations. She said that visualisations show footpaths which are currently peaceful and tranquil, including the extension of Commonwood Lane, would	The Applicant has designed the Scheme to incorporate embedded buffers with a 15 m offset to any proposed infrastructure on either side of any PRoW. Where PRoW directly cross solar arrays, this creates a corridor with a minimum width of 30 m wide between proposed fencelines. There would then be a gap of 4 m between the fence line and the proposed Solar PV Panel which results in a minimum total width of 38 m.

Reference	Comments/Issue raised	Applicant's Response
	in places feel like a high-security fenced tunnel. She further argued that if planting were ever to grow tall enough to screen the infrastructure, this would itself obscure valued views of the landscape.	**ES Volume 1, Chapter 8: Landscape and Visual [APP-060]** assesses effects on identified landscape and visual receptors, including users of PRoW. This recognises that there would be long term adverse effects on the Landscape Character of the area and long term significant adverse effects to 10 Visual Receptors, all of which are local PRoW within or directly adjacent to the proposed solar arrays. An assessment of the likely effects of the Scheme on the use and desirability of individual PRoW and recreational access to the countryside is also included in **ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]** and **ES Volume 3, Appendix 16-2: Tourism and Recreation Receptor Tables [APP-241]**. This considered the impact on individual recreational routes, including their practical use, enjoyment and desirability and 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. Commonwood Lane extends to the south as Byway WT|SHER|35 (Receptor TP089) and Byway

Reference	Comments/Issue raised	Applicant's Response
		WT|LUCK|57 (receptor TP092) to connect with the Fosse Way. The Byways are predominantly lined with mature hedgerows which provide screening of the proposed solar infrastructure but there are open views in some places. These receptors are fully assessed in the **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]** which identifies Moderate Adverse Significant effects for both receptors during Construction and Year 1 which reduces to Moderate/Minor Neutral at Year 15 as a result of the maturing mitigation measures proposed. **ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]** and **ES Volume 3, Appendix 16-2: Tourism and Recreation Receptor Tables [APP-241]** confirm that byway open to all traffic LUCK57/SHER35 (the 'extension' of Commonwood Lane linking to the Fosse Way) crosses Lime Down C, and is likely to experience a long-term moderate-minor adverse effect to users during the operational lifetime of the Scheme which is not considered significant. The route will be supported by landscape screening planting that enhances its predominantly hedge-lined and woodland character, with a minimum 15 m offset to the nearest fencing for Solar PV infrastructure which is secured through the **Outline LEMP [APP-283]** and **Outline PRoWPPMP**

Reference	Comments/Issue raised	Applicant's Response
		[APP-282] through Requirements 7 and 16 respectively in Schedule 2 of the **Draft DCO [APP-016]**. Construction traffic would be controlled through measures set out in the **Outline CTMP [APP-287]** and **Outline PRoWPPMP [APP-282]** to ensure impacts to NMUs and PRoW are minimised as far as practicable. Final CTMPs and a PRoWPPMP would be prepared post consent and must be substantially in accordance with the **Outline CTMP [APP-287]** and **Outline PRoWPPMP [APP-282]**, respectively, and approved by the relevant local planning authorities (in consultation with the relevant highway authorities), as secured by Requirement 15 and Requirement 16 in Schedule 2 of the **Draft DCO [APP-016]**.
FSh-003	Ms Shipsey highlighted the Fosse Way as an ancient heritage asset with delicate verges and objected to any damage to it, particularly the permanent loss of almost 1.5 acres. She noted that this area is used by families and elderly people as a safe, flat walking route. She also raised concerns about fields which are no longer designated for panels but remain within the industrial site plan, stating that these fields are used by hundreds of skylarks, a species of conservation concern. She said retaining the fields within the site	Since the design presented in the PEIR, Field C26, the westernmost part of Field C25, and the majority of Field C13 have been entirely removed from the Order Limits. Solar PV Panels have also been removed entirely from within Fields B1-B5, C24-C25, and C13. A number of fields abutting the Fosse Way within which Solar PV Panels will be erected have had offsets established with their boundaries with Fosse Way, including Fields B6, C10-C12, and C22-C23.

Reference	Comments/Issue raised	Applicant's Response
	boundary creates anxiety about future change of use, as the land would no longer be designated as agricultural.	In regard to cultural heritage, **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 as a result of the Scheme were identified to the asset within **ES Volume 1, Chapter 12: Cultural Heritage [APP-064]**. **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]** recognises the change to the visual amenity and associated adverse effects to users of the Fosse Way, and identifies Moderate Adverse Significant effects to users of TR145 during construction and at Year 1, reducing to Moderate / Minor Adverse and not significant at Year 15 as a result in the mitigation planting alongside the Fosse Way which provides screening for views of solar arrays (see **ES Volume 2, Figure 8-14: Baseline Photography and Photomontages Part 1 and 2 [APP-103 to 104**] for VP 15, 22-25 and photomontages for VP 14). As a long distance recreational routes, **ES Volume 3, Appendix 16-2: Tourism and Recreation Receptors [APP-241]** has included specific assessment of the Fosse Way as a nationally important recreation route due to its historical value. This is due to direct views of

Reference	Comments/Issue raised	Applicant's Response
		Lime Down B and C. Whilst mitigation measures to offset built infrastructure, and transport and PRoW mitigation is to be applied, due to its high sensitivity, it is anticipated the Scheme will have a significant adverse effect on the Fosse Way as a recreational route throughout the Scheme's construction, operation and decommissioning. This is a matter which will have to be considered in the planning balance when the DCO is determined. in **ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061]** identifies skylarks as a key species of conservation interest within the Scheme area. It concludes that approximately 71.5% of the quantified number of territories belonging to the current skylark population will be displaced from the Solar PV Sites. This gives rise to an adverse residual effect at a Local level, however, skylark-specific mitigation and habitat enhancement measures are incorporated into the Scheme design to reduce effects as far as practicable, such as the provision of suitably large, open set-aside and grassland habitats designed to provide appropriate breeding and foraging conditions. These measures are illustrated in **ES Volume 2, Figure 3-4: Landscape and Ecological Mitigation Plan [APP-084]** and detailed in the **Outline LEMP [APP-283].** A final LEMP, substantially in accordance

Reference	Comments/Issue raised	Applicant's Response
		with the **Outline LEMP [APP-283],** is secured through Requirement 7 in Schedule 2 of the **Draft DCO [APP-016]** to ensure skylark mitigation measures are delivered and maintained throughout the lifetime of the Scheme. The **Outline CTMP [APP-287]** confirms that pre-construction, interim, and post-construction Road Condition Surveys will be undertaken to repair any damage caused to highways, such as the Fosse Way, including verges during the construction period. The details of these surveys will be confirmed as part of the Final CTMP as secured by Requirement 15 in Schedule 2 of the **Draft DCO [APP-016]**.
FSh-004	In conclusion, Ms Shipsey described significant personal distress at the prospect of the Scheme proceeding, stating that the project's lifespan equates to a human lifetime and that the landscape would be changed forever. She said the Scheme would permanently remove the joy she derives from walking her local footpaths and expressed deep concern about the long-term consequences for the countryside.	The DCO is applying for a 60 Year consent. Whilst it is recognised that the Scheme, if consented, would be in place for a long period of time, it is temporary and would require decommissioning after the 60-year period and the land returned back to the control of landowners. It is the position of the Applicant that, following decommissioning of the Scheme, the landscape would be left in a better condition than current day. This betterment is established as a consequence of the landscape proposals resulting in greater species variety, greater age depth, enhanced structure,

Reference	Comments/Issue raised	Applicant's Response
		resilience to pest and disease and reinforcement of local landscape character across the Sites. At decommissioning, as infrastructure is removed, there would be an overall benefit to the character of the area with landscape mitigation retained providing long term benefit towards legacy landscape. Following decommissioning, the site would benefit from the significantly enhanced tree and hedgerow planting that has been carried out and has matured to create a much stronger and robust landscape, retaining, and enhancing the overall character and providing considerable biodiversity benefits over the years. Due to the development, the landscape would be left in a better condition than current day. This betterment is established as a consequence of the landscape proposals resulting in greater species variety, greater age depth, enhanced structure, resilience to pest and disease and reinforcement of local landscape character across the Sites. The defining legacy of the landscape would be the robust framework of features that have improved through the mitigation and landscape enhancements. This mitigation in turn would give rise to long-term wider benefits, including maintaining and enhancing

Reference	Comments/Issue raised	Applicant's Response
		biodiversity and in promoting the resilience of ecosystems. The assessment in **ES Volume 1, Chapter 18: Human Health [APP-070]** considers the physical and mental health impacts of changes to recreation and access to the countryside under the assessment topic 'open space, leisure and play'. The assessment concludes that no significant adverse effects to mental health and wellbeing are anticipated at any phase of the Scheme. Mitigation measures to reduce construction impacts to PRoW users are secured through the **Outline PRoWPPMP [APP-282]** by Requirement 16 in Schedule 2 to the **Draft DCO [APP-016]**.

2.33 Alex Frost

Reference	Comments/Issue raised	Applicant's Response
AF-001	Alex Frost spoke on behalf of a working stud farm which would become an isolated area of green fields surrounded by the Scheme, particularly Sites A, B and C. He objected strongly to the Scheme, explaining that the Scheme would engulf the wider Badminton area, which is home to a concentration of equine businesses and hosts the most well-attended horse trials in the UK, attracting over 200,000 visitors each year. He stated that this equestrian activity is critical to the local economy and to the area's global reputation as a leading equine centre. He explained that although the business has a turnover of over £1 million, margins are extremely tight, the stud is due to report a loss following recent government tax changes, and the business is highly vulnerable to further adverse impacts.	The Applicant has previously responded to Relevant Representations made by Mr Frost **[RR-0098]** at Section 6.20 of the **Applicant's Response to Relevant Representations (Part 1) [PDA-009]**. Equestrian facilities, including private stables and paddocks, studs, riding schools, and on public rights of way such as bridleways and byways have been considered as specific recreational receptors in the assessment in the **ES Volume 1, Chapter 16: Socio Economics, Tourism and Recreation [APP-068]**. The likely effects on these locations and receptors are specifically and individually assessed in **ES Volume 3, Appendix 16-2: Tourism and Recreation Receptor Tables [APP-241]**. The Applicant confirms that the majority of significant adverse effects can be mitigated, however understands that some significant adverse effects to users of routes in Lime Down E, and to the equestrian business at Park Farm, Yatton Keynell cannot be mitigated further during construction and will therefore be considered in the planning balance when the DCO is determined. No significant residual effects are anticipated during the operational phase of the Scheme. The Applicant has committed to ensuring the operation or recreational use of equestrian facilities

Reference	Comments/Issue raised	Applicant's Response
		and PRoWs is protected as much as practicable through the implementation of embedded and additional mitigation measures set out in the **Outline CTMP [APP-287]** and **Outline PRoWPPMP [APP 282]**, secured respectively by Requirements 15 and 16 in Schedule 2 to the **Draft DCO [APP-016]**. The Applicant also confirms that the Badminton Horse Trials has been assessed specifically as a tourism receptor in **ES Volume 3, Appendix 16-2: Tourism and Recreation Receptor Tables [APP-241]** in recognition of its international importance as an event. The Scheme is likely to have long-term moderate minor adverse effect on the event due to occluded long-distance views of the Scheme and influence on the surrounding area, with some amount of additional pressure on the road network (M4 Junction 18 and A46) during construction. These effects are not significant effects, and therefore are not anticipated to have a significant effect on the wider area's reputation for equine businesses.
AF-002	Mr Frost explained that successful racehorse breeding depends on a quiet and stable environment and stated that research shows horses are highly sensitive to noise, with stress responses including elevated heart rate and cortisol levels. He referred to a peer-reviewed	Assessment of noise impacts for all sensitive human receptors have been assessed in **ES Volume 1, Chapter 14: Noise and Vibration [APP-066]**. With regards to horses, as there is currently no established regulatory guidance for assessing noise induced

Reference	Comments/Issue raised	Applicant's Response
	study indicating that around 22% of horses exhibit significant noise-related anxiety behaviours, including agitation and flight responses, and said these effects can be prolonged even with low-level continuous noise. He argued that stress negatively affects conception rates, increases risks during pregnancy and foaling, and creates risks of injury to mares and foals. He also stated that earlier in the year a member of staff had been injured due to noise from traffic, and emphasised that silence is fundamental to the operation and safety of the stud. He concluded that industrial noise from the development, particularly during construction, is incompatible with a working stud farm.	behavioural change in livestock or horses, the approach where noise for humans and horses are considered in terms of a receptor are addressed as potential amenity impacts on equestrian facilities, including private stables, paddocks, stud farms and riding schools, which have been assessed in **ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]** and its supporting **ES Volume 3, Appendix 16-2: Tourism and Recreation Receptor Tables [APP-241]**. This approach where noise for humans and horses are considered in terms of a receptor are addressed as potential amenity impacts on equestrian facilities, including private stables, paddocks, stud farms and riding schools aligns with an accepted methodology based on expert advice in other DCO's, including Sunnica Energy Farm, where the Secretary of State (SoS) agreed with the methodology that an animals processing of decibel levels is sufficiently similar to a humans' that the established human-noise threshold is a fair benchmark for noise impacts to be considered. The Scheme's approach has assessed the likely direct impact of construction on equestrian facilities, and accessibility and amenity impacts on those facilities and surrounding rights of way used for hacking.

Reference	Comments/Issue raised	Applicant's Response
		The equestrian facilities at Ladyswood Farm and Stud have been assessed as a specific receptor in **ES Volume 3 Appendix 16-2: Tourism and Recreation Receptor Tables [APP-241]**. During construction, a medium-term temporary moderate-minor adverse effect has been identified, as a result of proximity to the construction of the Solar PV Arrays, a construction compound, cabling works, and HGV traffic on access and hacking routes. The Applicant has sought to mitigate these as much as possible through removing Solar PV Array areas (fields designated B2-B4 and A11-A12), and embedding design, transport, and PRoW mitigation into the Scheme ahead of DCO submission. This has included providing landscape screening around Solar PV infrastructure, siting the construction compound in B1 as far as practicable from the paddocks at Ladyswood Farm & Stud, providing banksmen and speed limits where accesses interact with PROWs, through specifying HGV access routes to the Scheme, and through ensuring PRoWs are kept open as much as practicable through construction, and entirely during the operational phase of the Scheme. These measures are secured through the **Works Plan [APP-007]**, **Outline LEMP [APP-283]**, **Outline CEMP [APP-277]**, **Outline CTMP [APP-287]** and **Outline PRoWPPMP**

Reference	Comments/Issue raised	Applicant's Response
		[APP 282] by Requirements 5, 7, 13, 15, and 16 respectively in Schedule 2 to the **Draft DCO [APP-016]**. As a result, the effects on Ladyswood Farm & Stud are not anticipated to be significant. This also applies to individually assessed PRoWs around Ladyswood, which subject to implementation of mitigation are not anticipated to experience significant adverse effects at any phase of the Scheme.
AF-003	Mr Frost also raised concerns about glint and glare from solar panels, stating that reflected light can startle horses and lead to unpredictable and dangerous behaviour, particularly among breeding stock and young horses. He explained that the stud relies on local bridleways across the proposed Scheme site to educate young horses. He further highlighted the wider rural network supported by the stud, including vets, farriers, feed suppliers, racing yards and contract farmers, and referred to the international reputation of the area, including the nearby Egerton Stud, known for housing the family of Frankel. He stated that if breeding operations were compromised, the impacts would extend beyond his own business. He also raised concerns about BESS fire risk and the potential for water contamination, noting that repeated requests for the Applicant to visit the stud and assess these risks	Effects of glint and glare upon PRoW have been considered within Section 8 of **ES Volume 3, Appendix 20-4: Solar Photovoltaic Glint and Glare Assessment [APP-261]**. No significant impacts are predicted upon bridleways as the sensitivity of receptors is considered to be low. This is in line with guidance produced by the British Horse Society (Ref 12), which states that *"the incidence of glare or dazzle [from solar panels] is very low compared with glass [...] Any reflection is unlikely to be a direct problem to horses, riders or carriage-drivers because of the angles and distances involved."* Furthermore, the Applicant, notes a summary from the British Horse Society from August 2025 which contains a section on glint and glare: *"The society has no evidence of 'glint and glare' from solar panels and no evidence of horses reacting to it or of it being*

Reference	Comments/Issue raised	Applicant's Response
	had been declined, and that no local veterinarians had been consulted.	*detrimental to the health and wellbeing of horses. Reports from sites with both solar panels and horses, including a solar array beside an arena used for riding horses, indicate no reflection and no reaction from or impact on horse or rider."* Therefore, it is the British Horse Society's position is that, although horses may initially react to new solar infrastructure, this is no different from how they might respond to any unfamiliar change in their environment and is something they generally adapt to quickly. Any reaction is therefore attributed to a change in surroundings, rather than to anything specific about the panels themselves. The assessment of impacts of the Scheme on PRoW user experience and amenity in **ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]** has also, to a limited extent, considered glint and glare impact on users. This has not substantially altered the assessment methodology as glint and glare impacts are anticipated to be limited to times of day around sunrise and sunset where low sun angle is already a consideration for PRoW users, including equestrians. In regard to concerns around BESS fire risk, the Applicant has prepared **Outline BSMP [APP-286]** for the Scheme using guidance from Dorset and Wiltshire

Reference	Comments/Issue raised	Applicant's Response
		Fire and Rescue Service and incorporating recommendations of the National Fire Chiefs Council. The safety objectives for the design of the BESS are listed in Section 2.4 of the **Outline BSMP [APP-286]**. The **Outline BSMP [APP-286]** has been amended at Deadline 1 to fully accommodate the latest BESS safety requirements contained in NFPA 855 (2026) (Ref 14) ensuring that any credible risks associated with battery storage are either prevented or fully mitigated if a BESS failure occurs. As now mandated under NFPA 855 (2026) (Ref 14), the Applicant will only be able to select a BESS system that has undertaken Large Scale Fire Testing (LSFT). At the detailed design stage, the selected BESS LSFT data will be leveraged to fully inform inputs for risk assessment tools which will be utilised together with detailed consequence modelling to provide a comprehensive site operations and emergency response safety audit, this is stipulated in the **Outline BSMP [APP-286]** pre-construction requirements (Section 6). Section 2.4.2 of the **Outline BSMP [APP-286]** stipulates that: *"Final BESS design and site layout will have been validated through mandatory Large Scale Fire Testing (LSFT) and rigorous consequence*

Reference	Comments/Issue raised	Applicant's Response
		modelling to minimise the requirement for any D&WFRS intervention in a thermal runaway incident. LSFT must establish minimum equipment spacing distances that demonstrate there is no fire propagation to adjacent BESS enclosures or ESS equipment. D&WFRS intervention in worst case scenarios would typically be limited to boundary cooling of adjacent BESS and Energy Storage System (ESS) units to prevent the fire from spreading. This strategy will be finalised with D&WFRS and be clearly communicated in the Emergency Response Plan (ERP); *• To ensure that fire, smoke, and any release of toxic gases does not significantly impact site operatives, first responders, and the local community; and* *• To ensure that firewater run-off is contained and tested before release or, if necessary, removed by tanker and treated offsite."* Section 5 of the **Outline BSMP [APP-286]** covers all requisite firefighting requirements for the Scheme including fire service access, firefighting water supply, and emergency planning requirements. The Applicant is currently drafting a Statement of Common Ground (SOCG) with the Environment Agency (EA) on Scheme environmental protection

Reference	Comments/Issue raised	Applicant's Response
		issues including the BESS area drainage strategy. The agreed strategy document has been submitted 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. The **Outline BSMP [APP-286]** is secured through Requirement 6 (Battery safety management) in Schedule 2 of the **Draft DCO [APP-016]**, which provides that Work No. 2 must not commence until a Battery Safety Management Plan has been submitted to and approved by the relevant planning authority. The approved plan must be substantially in accordance with the Outline Battery Safety Management Plan. The Draft DCO also requires the relevant planning authority to consult with Dorset and Wiltshire Fire and Rescue Service and the Environment Agency before determining the application, and that the Battery Safety Management Plan must be implemented as approved. The Scheme includes a controlled and isolatable drainage approach for the BESS, as set out in the **Outline BSMP [APP-286]** and the standalone

Reference	Comments/Issue raised	Applicant's Response
		Firewater Containment and Drainage Strategy. This ensures that, in the event of an incident, firefighting water and any contaminants would be contained within the BESS Area and would not be discharged to the surrounding environment. On that basis, there is no pathway by which contaminated water would enter surrounding land, watercourses or groundwater, and therefore no mechanism for impact to livestock, including horses, or the wider rural environment.
AF-004	In conclusion, Mr Frost stated that the Scheme threatens a financially fragile but vital rural business, the safety of its staff, the welfare of its animals, and the wider equestrian economy. He asked that these impacts be fully recognised and that consent for the Scheme be refused.	While the concerns raised are acknowledged, the Applicant maintains that the Scheme does not pose a threat to local rural businesses or the local equestrian economy. The equestrian facilities at Ladyswood Farm & Stud have been assessed as a specific receptor in **ES Volume 3 Appendix 16-2 Tourism and Recreation Receptor Tables [APP-241]**. During construction, a medium-term temporary moderate-minor (non-significant) adverse effect has been identified and mitigation measures proposed as set out above. In the event that reductions to employment at Ladyswood Farm & Stud occur as a result of impacts from the Scheme, affected workers would be eligible

Reference	Comments/Issue raised	Applicant's Response
		for accessing skills and employment support measures as secured through the **Outline Skills, Supply Chain and Employment Plan (SSCEP) [APP-285]**, secured by Requirement 18 in Schedule 2 to the **Draft DCO [APP-016]**. The Applicant understands the importance of local skill sharing and uplifting and so has committed to improving local skills through the measures set out in the **Outline SSCEP [APP-285]**. The Applicant considers that these measures provide a good opportunity for the Applicant and Mr Frost to engage in respect of a common benefit for the local area. The Applicant is also confident that the methodology used within the assessment in **ES Volume 1, Chapter 18: Human Health [APP-070]** is robust, and that the assessment outcomes identify that there is no significant adverse effect to health and wellbeing to the affected population in the 2 km Study Area (which includes Ladyswood) at any phase of the Scheme. As such, no significant safety risk to staff employed by Mr Frost is anticipated at any phase of the Scheme.

2.34 Richard Skeffington

Reference	Comments/Issue raised	Applicant's Response
RS-001	Richard Skeffington, a retired professor of environmental science from the University of Reading and a resident of Sherston, spoke drawing on over twenty years' experience as an environmental scientist in the electricity industry, where he assessed and sought to mitigate the environmental effects of power generation. He described the Scheme as destructive and noted that many issues could be addressed, he focused specifically on flooding and the science underpinning flood risk.	The Applicant notes Mr Skeffington's concern regarding flood risk. Detailed responses to specific points raised are provided in RS-001 to 005 below.
RS-002	Mr Skeffington explained that the Applicant had produced an FRA which concluded that, both without the development and with the solar panels in place, the risk of flooding would be negligible to low. He stated that the lived experience of flooding would suggest otherwise. He argued that one reason for this discrepancy was that the FRA was primarily focused on protecting the Applicant's own assets, such as relocating panels away from areas expected to flood, rather than on the safety of people living on, travelling through or using the land, or those living downstream	The Applicant notes Mr Skeffington's concern and clarifies that the conclusion of "negligible to low" flood risk is not limited to the protection of Scheme infrastructure, but reflects the location of the Scheme and the outcome of the flood risk assessment as a whole. The majority of the Order limits are located in areas of low flood risk, with more limited areas of higher flood risk identified and taken into account through the design. The FRA does not rely solely on avoidance of these areas, but demonstrates that the Scheme would not increase flood risk elsewhere. Solar PV Panels are

Reference	Comments/Issue raised	Applicant's Response
	on the River Avon, who he considered would also be put at risk by the Scheme.	mounted above ground and allow floodwater to pass beneath them, with negligible displacement of floodplain storage. Where impermeable infrastructure is introduced, runoff is attenuated and discharged at greenfield rates, with allowance for climate change, as set out in **ES Volume 3, Appendices 11-1 to 11-9: Flood Risk Assessment and Drainage Strategy [APP-210 to APP-218]**, ensuring that peak flows to receiving watercourses are not increased. The FRA is not limited to considering risk to the Applicant's assets. It assesses flood risk to and from the Scheme, including potential effects on third-party receptors and downstream catchments, as set out in **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [APP-063]**. The assessment therefore considers the safety of people, property and infrastructure within and beyond the Order limits. The conclusion of low flood risk is based on a comprehensive assessment of all relevant sources of flooding, not solely fluvial flood risk. The FRA considers fluvial, surface water, groundwater, reservoir and artificial sources of flooding using a combination of Environment Agency datasets, hydraulic modelling where appropriate, topographic data and site-specific appraisal. These sources have been reviewed together

Reference	Comments/Issue raised	Applicant's Response
		and provide a consistent understanding of flood behaviour across the Scheme. While local flood events may vary in extent and mechanism, the available data broadly aligns with the assessed flood extents and risk profile. On that basis, the Applicant considers that the assessment appropriately reflects both the baseline conditions and the design of the Scheme, and demonstrates that the development would not increase flood risk to people, property or infrastructure, including downstream receptors such as the River Avon.
RS-003	Mr Skeffington referred to National Policy Statement (**NPS**) EN-1, which he said sets out 23 minimum requirements for a FRA. In his view, the Applicant's FRA met only six of these requirements. He noted that the Applicant had carried out modelling of extreme rainfall scenarios affecting the small watercourses crossing the site, and that this modelling showed flooding would be devastating. However, he stated that the Applicant concluded that flood risk would be negligible, without explaining how this conclusion was reached.	The Applicant does not agree with the assertion that the Flood Risk Assessment meets only a limited number of the requirements set out in NPS EN-1 (Ref 1) paragraph 5.8.15. The FRA, supported by **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [APP-063]** and **ES Volume 3, Appendices 11-1 to 11-9: Flood Risk Assessment and Drainage Strategy [APP-210 to APP-218]**, has been prepared in accordance with these requirements as follows: The assessment is proportionate to the scale, nature and location of the Scheme, with a tiered approach applied. Environment Agency datasets and screening inform the baseline, with site-specific appraisal and targeted hydraulic modelling undertaken where

Reference	Comments/Issue raised	Applicant's Response
		required, including detailed modelling for Gauze Brook to reflect local conditions. Flood risk to and from the Scheme has been assessed. The FRA considers the potential for the Scheme to be affected by flooding and the potential for the Scheme to influence flood risk elsewhere, including downstream receptors, and demonstrates that there is no increase in flood risk off-site. Climate change has been incorporated using current Environment Agency allowances. These are applied to both hydrological estimation and drainage design, and the assessment is undertaken over the operational lifetime of the Scheme. The FRA has been prepared by suitably qualified and experienced practitioners and has informed the Scheme design iteratively, including layout refinement and the siting of infrastructure. The assessment considers the function of floodplain, watercourses and existing infrastructure, including how these operate during flood events and how exceedance and residual risks are managed. The vulnerability of receptors has been considered. More sensitive infrastructure is located outside areas of higher flood risk, and the Scheme is designed so

Reference	Comments/Issue raised	Applicant's Response
		that it remains safe and operational during flood events, with no increase in risk to users or surrounding receptors. All relevant sources of flooding have been assessed, including fluvial, surface water, groundwater and artificial sources. The FRA considers flood mechanisms, likelihood and behaviour, supported by modelling, mapping and site-specific understanding. Opportunities to reduce flood risk have been identified and embedded within the design. These include maintaining permeable ground conditions across Solar PV areas, controlling runoff from impermeable infrastructure, and avoiding disruption to natural flow pathways. A range of flood events, including extreme events, has been considered to assess effects on people, property and the environment, in line with national and local planning policy, including NPS EN-1 (Ref 1), and Environment Agency guidance. Residual risks have been assessed, including exceedance scenarios. The Scheme is designed so that these risks can be managed safely and do not result in an increase in flood risk elsewhere.

Reference	Comments/Issue raised	Applicant's Response
		The assessment considers how drainage and infiltration may change as a result of the Scheme, including: • Existing surface water drainage arrangements are described across the site, including catchments, flow routes and receiving watercourses. • Baseline runoff characteristics are established using Environment Agency data, modelling and site-specific appraisal. • Surface water from impermeable areas is managed through attenuation and controlled discharge at greenfield rates, with climate change allowance. • Sustainable drainage principles are applied proportionately, with infiltration and discharge control considered in line with the drainage hierarchy. • Drainage design is integrated with the Scheme layout, maintaining existing flow pathways and avoiding the creation of new preferential routes. • The Scheme supports improved vegetation cover and soil condition, which contributes to surface water management. • Runoff from the completed Scheme is controlled so that it does not impact receptors elsewhere.

Reference	Comments/Issue raised	Applicant's Response
		• Drainage systems will be designed to be maintainable over the lifetime of the Scheme, secured through the DCO process. Measures are included to ensure the Scheme remains safe and operational during flood events throughout its lifetime without increasing flood risk elsewhere, including maintaining floodplain function and controlling runoff from engineered areas. Construction phase flood risk is addressed through embedded mitigation, including the **Outline CEMP [APP-277]** and **Outline SRMP [APP-280]**, which control runoff, sediment and working practices. The FRA is supported by appropriate data and information, including Environment Agency datasets, hydraulic modelling, topographic survey data and consideration of historical flood events, providing a robust evidence base. In relation to the comment that modelling shows severe flooding but the conclusion is that risk is negligible, this reflects a misunderstanding of the purpose of the assessment. The FRA identifies where flooding may occur under a range of events and uses this information to inform the design and mitigation. The conclusion of negligible to low flood risk reflects the location of the Scheme, the embedded mitigation

Reference	Comments/Issue raised	Applicant's Response
		and the outcome that the Scheme does not increase flood risk elsewhere. On that basis, the Applicant considers that the FRA meets the requirements of NPS EN-1 (Ref 1) paragraph 5.8.15, in line with national and local policy and Environment Agency guidance, and that the conclusions reached are appropriate and supported by the evidence presented.
RS-004	Mr Skeffington also raised concerns about the hydraulic effects of solar panels, explaining that water runoff concentrates at the lower edges of panels, increasing local deposition by a factor of between 6 and 10. He stated that the use of very large panels would exacerbate this effect. He said the Applicant claimed this would have no impact, relying solely on a 13-year-old, untested model from the United States to support this conclusion.	The Applicant acknowledges the point raised by Mr Skeffington regarding the concentration of runoff at the lower edge of Solar PV Panels. The Applicant does not agree that this effect results in an increase in flood risk or that the assessment relies on a single or untested source. It is recognised that Solar PV Panels redistribute rainfall locally, with some concentration at panel drip-lines. This is a well understood physical process. The key consideration is whether that local redistribution translates into a meaningful increase in runoff at field or catchment scale. The evidence base and policy position confirm that it does not, provided ground conditions are appropriately managed. The controlling factors for runoff response are:

Reference	Comments/Issue raised	Applicant's Response
		• Ground cover condition, including the presence of permanent vegetation; • Soil structure and compaction; • Surface roughness and infiltration capacity; and • Flow connectivity across the site. Solar PV Panels are mounted above ground and are not connected to a drainage network. They do not behave as impermeable hardstanding and do not generate a new, connected discharge leaving the site. The redistributed rainfall drains to permeable, vegetated ground beneath and between panel rows, where it is dissipated and infiltrated. The Applicant's approach is consistent with national policy. NPS EN-3 (Ref 2) confirms that solar PV panels drain to the existing ground and that the impact on drainage will not, in general, be significant. The assessment at Lime Down applies this position through a risk-led framework, whereby: • Panel areas are treated as permeable and managed through secured soil and vegetation controls; and • Genuinely impermeable infrastructure is subject to quantitative drainage design, including attenuation and controlled discharge, as set out in the **ES**

Reference	Comments/Issue raised	Applicant's Response
		Volume 3, Appendices 11-1 to 11-9 [APP-210 to APP-218]. The assessment is not based on a single study. It is supported by a wider peer-reviewed evidence base, which shows that where vegetation is maintained and soil condition is managed, changes in runoff volume and peak flow are negligible. Where increases have been observed, these are associated with degraded ground conditions such as bare or compacted soils, which are addressed through embedded mitigation secured through the **Outline CEMP [APP-277]** and **Outline SRMP [APP-280]**, and through operational land management. On that basis, while localised drip-line effects are acknowledged, they do not translate into increased runoff at a site or catchment scale. The Scheme therefore does not increase runoff or flood risk off-site.
RS-005	In conclusion, Mr Skeffington stated that, in his view, the scientific evidence does not support the Applicant's conclusions on flood risk.	Please see responses RS-001 to RS-005 above which set out why the Applicant considers the FRA to be robust and in line with scientific evidence.

2.35 Dr John Oglesby

Reference	Comments/Issue raised	Applicant's Response
JO-001	Dr John Oglesby and his wife, Jane, have lived for around 20 years just south of Sherston in an area that would be surrounded on three sides by Site A of the Scheme. He stated they strongly oppose the Scheme and argued that once the natural environment is destroyed it is gone forever. He framed the issue as extending beyond present-day residents and businesses, stating that local people are custodians of the countryside for future generations.	The Applicant notes this comment. Dr. Oglesby's property is located adjacent to Field A4 and approximately 150 m west of Field A11 and 150 m east of Field A1 within Lime Down A. Fields A1, A4 and A11 are proposed to accommodate landscape planting, biodiversity mitigation and enhancement measures, rather than solar infrastructure. The Scheme has been designed to retain and enhance existing landscape features surrounding these fields, including the retention and reinforcement of existing hedgerows, additional native planting, woodland and scrub planting, and species-rich grassland creation, which would provide visual filtering and ecological enhancement in the vicinity of the property. The **Outline LEMP [APP-283]** confirms that the overarching aim of the planting strategy is to "provide landscape and visual mitigation through screening of the Scheme, where necessary", alongside ecological enhancement and strengthening of green infrastructure connectivity. The **Outline LEMP [APP-283]** also sets out the framework for the planting, management and long-term monitoring of landscape and ecological mitigation and enhancement habitats across the Scheme, including

Reference	Comments/Issue raised	Applicant's Response
		hedgerow reinforcement, woodland planting, species-rich grassland establishment and habitat connectivity measures. 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 DCO [APP-016]**. In addition, 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 the identified landscape mitigation, planting and biodiversity enhancement measures would be implemented and maintained throughout the lifetime of the Scheme.
JO-002	Dr Oglesby argued that the Scheme would destroy countryside, heritage, landscapes and ecosystems across a wide area of valuable natural environment. He described the richness of indigenous wildlife, including hares, deer, insects and diverse birdlife such as skylarks, crossbills, lapwings, raptors, barn owls, buzzards and kites, which he said greatly enrich local life. He rejected the suggestion that biodiversity could	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

Reference	Comments/Issue raised	Applicant's Response
	be improved through solar development in this location, stating that the land already supports rich specialist farmland habitats and species recognised as being in national rapid decline. He said these habitats should be protected and that the Scheme would also end the winter murmuration seen over the large stubble fields of Site A.	on habitats and protected and notable species. It also identifies opportunities for ecological enhancement, including the creation and long-term management of habitats, and delivery of biodiversity net gain. The assessment concludes that no significant unacceptable adverse effects on ecology and biodiversity are anticipated during construction or operation The Scheme is expected to deliver an overall net gain for biodiversity as a result of the cessation of agricultural practices combined with delivery of considerable habitat creation and enhancement measures. This is quantified through the use of the DEFRA published **Statutory Biodiversity Metric [APP-274]** with further details provided with the **BNG Assessment Report [APP-273]** which demonstrates in excess of 10% BNG will result from the Scheme. Potential impacts of the Scheme on wintering species of birds are assessed in **ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061]**. It concludes that, with embedded mitigation in place, no unacceptable significant adverse effects on wintering bird populations are anticipated. Whilst rotational arable farming practices will cease in most of Lime Down A (including the provision of winter stubble following harvest of crops), habitats to be created

Reference	Comments/Issue raised	Applicant's Response
		within fields given to Solar PV Panels will represent suitable foraging habitat for farmland winter birds, which can be expected to continue to utilise the fields during the Operation and Maintenance phase of the Scheme.
JO-003	Dr Oglesby explained that local footpaths, bridleways and cycleways would be severely degraded and the overall ambience of the area would be fundamentally affected. He described daily personal use of these routes for walking the dog, photography, and accessing local pubs, and the fences and cameras would ruin the experience. He also described his wife's enjoyment of cycling on local roads with expansive views across heritage countryside, which he said would be replaced by screening hedges or an industrial landscape of plastic and metal, including 4.5m high solar panels and 7m tall substation transformers located within a few hundred metres of their home.	The Applicant has designed the Scheme to incorporate embedded buffers with a 15 m offset to any proposed infrastructure on either side of any PRoW. Where PRoW directly cross solar arrays, this creates a corridor with a minimum width of 30 m wide between proposed fencelines. There would then be a gap of 4 m between the fence line and the proposed Solar PV Panel which results in a minimum total width of 38 m. **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]** assesses effects on identified landscape and visual receptors, including users of PRoW. This recognises that there would be long term adverse effects on the Landscape Character of the area and long term significant adverse effects to 10 Visual Receptors, all of which are local PRoW within or directly adjacent to the proposed solar arrays. An assessment of the likely effects of the Scheme on the use and desirability of individual PRoW and recreational access to the countryside is also included in **ES Volume 1, Chapter 16: Socio-Economics,**

Reference	Comments/Issue raised	Applicant's Response
		Tourism and Recreation [APP-068] and **ES Volume 3, Appendix 16-2: Tourism and Recreation Receptor Tables [APP-241]**. This considered the impact on individual recreational routes, including their practical use, enjoyment and desirability and 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. As concluded in **ES Volume 1, Chapter 13: Transport and Access [APP-065]** the impacts of construction traffic would be temporary and would not result in any significant transport effects. Construction traffic will be controlled through measures set out in the **Outline CTMP [APP-287]** and **Outline PRoWPPMP [APP-282]** to ensure impacts to NMUs along highways and PRoW are minimised as far as practicable. Final CTMPs and a PRoWPPMP would be prepared post consent and must be substantially in accordance with the **Outline CTMP [APP-287]** and **Outline PRoWPPMP [APP-282]**, respectively, and approved by the relevant local planning authorities (in consultation with the relevant highway authorities), as

Reference	Comments/Issue raised	Applicant's Response
		secured by Requirement 15 and Requirement 16 in Schedule 2 of the **Draft DCO [APP-016]**.
JO-004	Dr Oglesby stated that the Scheme would permanently deface land of significant natural beauty and historical importance, reducing the area's attractiveness for tourism and harming local businesses such as pubs, hotels and B&Bs not only during construction but permanently. He expected their two local pubs would not survive and argued that the Scheme would destroy the heart of local communities and described the emotional toll of the Scheme. He stated that their lives have been on hold since the Scheme emerged and this has affected their plans for a peaceful retirement.	**ES Volume 1, Chapter 8: Landscape and Visual [APP-060]** has assessed effects on landscape and visual receptors and **ES Volume 1, Chapter 12: Cultural Heritage [APP-064]**, supported by **ES Volume 3, Appendix 12-1 to 12-7 [APP-219 to APP232]**, has assessed the potential impact of the Scheme on heritage assets. Where required appropriate mitigation has been proposed to minimise landscape and visual and cultural heritage impacts as far as practicable. This mitigation is presented in Section 8.9 and 8.11 and Section 12.9 and 12.11 of **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]** and **ES Volume 1, Chapter 12: Cultural Heritage [APP-064]**, respectively. **ES Volume 1, Chapter 12: Cultural Heritage [APP-064]**, supported by **ES Volume 3, Appendix 12-7: Historic Landscape Assessment [APP-231]**, assessed the potential impact of the Scheme on the historic landscape character. No significant effects were identified on the historic landscape character as a result of impacts caused by the Scheme.

Reference	Comments/Issue raised	Applicant's Response
		The potential effects of the Scheme on tourism and recreation has been assessed in **ES Volume 1, Chapter 16: Socio Economics, Tourism and Recreation [APP-068]**, supported by **ES Volume 3, Appendix 16-2: Tourism and Recreation Receptor Tables [APP-241]**. The assessment identifies a worst-case scenario in which a temporary loss of up to 50 tourism-related jobs and £1.76 million in annual spending could occur locally during construction, and a long-term loss of up to 11 tourism-related jobs/ £395,000 in visitor spending per annum could occur during the operational phase of the Scheme. This represents a precautionary estimate based on conservative assumptions. The assessment concludes that, while some localised effects on tourism receptors are anticipated to occur, significant adverse effects on the wider tourism economy are not anticipated. Additional mitigation measures (which were not quantified for inclusion in the assessment of potential losses to employment) secured in the **Outline SSCEP [APP-285]** seek to reduce tourism employment losses through focussing on local recruitment, promoting local suppliers where practicable, and through providing retraining opportunities for workers in tourism-dependent industries. This is secured through

Reference	Comments/Issue raised	Applicant's Response
		Requirement 18 of Schedule 2 to the **Draft DCO [APP-016]**. The Applicant has sought to undertake pre-application consultation in as robust a form as practicable, to allow interested parties to have access to as much information as available at the time of consulting as possible, to help alleviate concerns about the potential future impacts of the Scheme on people's lives. The **Consultation Report [APP-022]** sets out the Applicant's approach to pre-application consultation and demonstrates how consultation was undertaken with a wide range of stakeholders, including local communities, community organisations, statutory consultees and those with an interest in land. This has included in-person events and online communications, with consultation materials provided both digitally and in hard-form, and free-to-use communication channels to respond back to the Applicant team. The Applicant has sought to engage with communities ahead of construction through the implementation of a Community Liaison Group, as secured through Requirement 4 in Schedule 2 to the **Draft DCO [APP-016]**. Whilst this group is set up for the construction phase of the Scheme, the Applicant has committed to providing a designated community contact within the

Reference	Comments/Issue raised	Applicant's Response
		Scheme's operation and maintenance team during the operational lifetime of the Scheme, with a dedicated Community Liaison Manager committed to during peak replacement events and decommissioning. This is secured through the **Outline OEMP [APP-279]** and **Outline DS [APP 279]** by Requirements 14 and 20 in Schedule 2 to the **Draft DCO [APP-016]**.
JO-005	Finally, Dr Oglesby raised concerns about transport and safety, explaining that rural infrastructure supports light local traffic and that residents feel relatively safe using local roads as cyclists or horse riders. He stated that the development would introduce hundreds of HGV movements daily over several years of construction, damaging roads, creating congestion, potholes and damaged verges, and making travel unsafe. He added that many local roads are already prone to flooding, which would be exacerbated by runoff from the fields, increasing danger for journeys towards the M4 and risking vehicle damage. In conclusion, he stated that North Wiltshire is a special historic landscape deserving protection and argued that the Scheme is driven solely by financial gain at the expense of countryside that has been wildlife-rich and unspoilt for hundreds of years.	**ES Volume 1, Chapter 13: Transport and Access [APP-065]** assess the impact on Non-Motorised User (NMU) delay and amenity, including Fear and Intimidation. All impacts are concluded to be not significant and will be temporary. NMU delay is considered negligible given there is no existing pedestrian or cycle infrastructure on the construction routes and likely low numbers of existing NMU users. It is anticipated that PRoW which cross the Order Limits will generally remain open during the construction phase of the Scheme. There may be some slight perceptible delay to NMU movement if a construction vehicle is crossing a PRoW within the Order Limits. An **Outline PRoWPPMP [APP-282]** forms an embedded mitigation and will provide measures to ensure the effects of the construction phase on PRoW users is minimised.

Reference	Comments/Issue raised	Applicant's Response
		The construction routes on the road network have little existing pedestrian infrastructure and no footways, making them already unattractive as walking routes with no pedestrian amenity so this cannot be assessed. Highway widths of construction routes have been assessed and provide sufficient width for HGV traffic to comfortably pass cyclists. The Applicant finds 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 (Ref 8). The **Outline PRoWPPMP [APP-282]** contain specific measures for the temporary diversion of footpath WT|GRIT|20 and bridleway WT|MALW|54, where access to Cable Route Corridor works east of Grittleton, and HGV access to Lime Down E are taken respectively. These diversions are proposed to ensure unreasonable effects to PRoW users are not experienced during construction, replacement and decommissioning. **ES Volume 1, Chapter 13: Transport and Access [APP-065]** concludes that effects to all links in the study area as a result of construction traffic would be Minor Adverse (temporary). An updated breakdown of Trip Generation Calculations was provided at Annex E to **ES Volume 3, Appendix 13-1: Transport**

Reference	Comments/Issue raised	Applicant's Response
		Assessment [APP-233] at Deadline 1. This presents specific assessed quantities of material volumes and component type/numbers for each Lime Down Solar PV Site. Includes fencing, aggregates for access tracks, PV modules and mounting structures substation equipment. The assessment presented in the updated Annex J of **ES Volume 3, Appendix 13-1: Transport Assessment [APP-233]** submitted at Deadline 1 demonstrates adequate carriageway width or frequency of passing place opportunity to pass at least an HGV and a light vehicle as requested in comments provided by Wiltshire Council in its response (August 2025) to the Transport Assessment Scoping Note and confirmed in Paragraph 4 of 'Appendix A - Highways and Transport Document Review - Detailed Comments'. This confirms that no passing bay or widening improvements are needed to accommodate these movements on the construction route outside of the Order Limits. The distances between passing points outside of the Order Limits are all within 150 m with forward visibility extending to the next passing point and beyond. This is within the generally accepted distance of 200 metres.

Reference	Comments/Issue raised	Applicant's Response
		Information included in **ES Volume 3, Appendix 13-1: Transport Assessment [APP-233]** submitted at Deadline 1 of Examination also demonstrates that there is adequate carriageway width and/or passing place opportunity for two HGVs along the proposed construction routes. Excessive widening of existing rural routes to allow two HGVs to pass would be over engineering, because of the following reasons: • Temporary nature of the construction period; • The level of hourly HGV trips when considering a realistic construction programme; • Delivery times during the construction phase are limited to those times set out in the **Outline CTMP [APP-287]**. There will be no HGV construction trips outside of these hours; • There would be a much greater impact on hedgerow, trees and character; and • Low level of existing HGVs on the proposed HGV construction routes. An **Outline CTMP [APP-287]** supports the DCO Application and presents outline measures which restrict construction deliveries to the proposed construction routes and times, separating the public and recreational users from hazards, including, traffic management measures such as signage and

Reference	Comments/Issue raised	Applicant's Response
		banksmen, fencing and dust and noise control. Pre-construction, interim and post-construction Road Condition Surveys will be undertaken to repair any damage caused to verges during the construction period. The details of these surveys will be confirmed as part of the Final CTMP. In regard to drainage, the Scheme has been designed so that it does not increase runoff or peak flows leaving the site. Solar PV Panel areas remain permeable and continue to drain to ground, and do not generate a new connected discharge to the highway network. Where impermeable infrastructure is introduced, runoff is attenuated and discharged at greenfield rates, with allowance for climate change, as set out in **ES Volume 3, Appendix 11-1 to 11-9 [APP-210 to APP-218]**. The assessment considers how water moves through the catchment and demonstrates that the Scheme would not increase the volume or rate of water reaching downstream receptors, including local roads that may currently experience flooding. Existing flooding mechanisms would remain but would not be exacerbated by the Scheme. On that basis, the Applicant considers that the Scheme would not increase flood risk to the local road network.

Reference	Comments/Issue raised	Applicant's Response
		The Applicant also notes the concerns regarding the reasons behind the Scheme. The Scheme aims to help meet national targets for clean energy and net zero targets set out in legislation and policy. The aim is to deliver long term environmental benefit alongside a secure energy supply. The Applicant recognises that both landowners and the local community are key stakeholders. While landowners will receive a lease income, as in normal in any commercial lease agreements, the Scheme also aims to deliver wider benefits, including biodiversity enhancements, opportunities for local supply chain involvement, and onsite and offsite community benefit initiatives, which will be developed in consultation with local representatives.

2.36 Martin Smith

Reference	Comments/Issue raised	Applicant's Response
MS-001	Martin Smith, a Wiltshire Councillor for the Sherston division, Cabinet Member for Highways and Transport, and a board member of the Cotswolds National Landscape (**CNL**), spoke on behalf of areas affected by the Scheme. He stated that there is broad consensus on the need for renewable energy and emphasised that the local community is not opposed to solar developments that are sensitive in scale, appropriate in location, sympathetic to its surroundings, and developed in partnership with communities rather than against them, while protecting the landscapes that climate action seeks to preserve.	The Applicant notes this comment and welcomes the support for solar developments.
MS-002	Mr Smith explained that Wiltshire is already contributing significantly to renewable energy provision, noting that in 2023 there were 42 solar farms across the county with a further 12 in development, and that this number has since increased. However, he stated that the Scheme and its cumulative impacts are unprecedented in the area and would permanently and fundamentally change its character. He described the appeal of the area as lying in its unspoilt natural beauty, which attracts thousands of tourists each year and underpins local pride. He expressed concern that the Scheme would transform this landscape into an	Regarding the concern around the cumulative loss of countryside, the Applicant confirms cumulative effects have been carefully considered in accordance with Planning Inspectorate Advice Note 17 (Ref 10) and the relevant NPS EN-1 (Ref 1), NPS EN-3 (Ref 2) and NPS EN-5 (Ref 3) requirements as set out in **ES Volume 1, Chapter 21: Cumulative and In-Combination Effects [APP-074]**. The chapter sets out the approach and conclusions of the ES **[APP-052 to APP-074]** technical chapter cumulative assessments. Taking a conservative worse case approach, significant cumulative effects are identified at a limited and

Reference	Comments/Issue raised	Applicant's Response
	industrialised area and replace rural peace and quiet with the constant noise of electrical infrastructure.	discrete number of receptors comprising tourism and recreation impacts during the construction phase on Corsham Park, PRoW WT|CORM|122, PRoW WT|HULL|29, and Sustrans Cycle Route 403, and on skylark at a District level. An assessment of landscape and visual effects is presented in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]**. This assesses effects on identified landscape and visual receptors, including residential properties and users of public rights of way, and identifies where significant effects may occur. The assessment recognises that as a consequence of the development that there would be long term adverse effects on the Landscape Character of the area as well as long term significant adverse effects to 10 Visual Receptors, all of which are local PRoW which are either within or directly adjacent to the proposed arrays.
MS-003	Mr Smith highlighted the sheer scale of the Scheme, stating that it takes approximately half an hour to drive from one end of the site to the other. He said that large expanses of solar panels would be visible from many roads, rural footpaths, and from within the CNL itself. Beyond visual impacts, he raised serious concerns about logistics and transport, stating that it had been	The Scheme has been designed to deliver the greatest possible benefit from the available land and the available grid connection, whilst avoiding, minimising and/or mitigating harmful environmental effects. The scale of development within the Order Limits has been significantly reduced from the layout assessed in the PEIR through an iterative design process undertaken

Reference	Comments/Issue raised	Applicant's Response
	estimated that nearly 60,000 HGV movements would be required to install the panels, with a further 13,000 HGV movements needed to construct the cable route.	in response to consultation and in accordance with the mitigation hierarchy to avoid, reduce and mitigate adverse effects. **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]** recognises the change to the visual amenity and associated adverse effects to users of PRoW. The design of the Scheme has embedded buffers into the proposed layout, specifically a 15m offset to any proposed infrastructure on either side of any PRoW. Where PRoW directly cross the array, this creates a corridor with a minimum width of 30m wide between proposed fencelines through the array. There would then be a gap of 4m between the fence line and the proposed panels resulting in a minimum total width of 38m between the panels where PRoW cross the arrays. The CNL is fully assessed as a standalone receptor within **ES Volume 3, Appendix 8-6: Assessment of Effects on the Cotswolds National Landscape and its Special Qualities [APP-197]**. This assessment considers the effects of the Scheme on landscape character, visual amenity and the special qualities of the CNL, including tranquillity. The Scheme was refined through an iterative design process to avoid and reduce effects on the CNL and its

Reference	Comments/Issue raised	Applicant's Response
		setting. Panels along the edge of the CNL have been avoided from the Order Limits in fields C2, C3 and C4 where significant visual effects on receptors within the CNL were identified. Panels have also been avoided 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 have been avoided and the land repurposed for ecological mitigation to protect the setting of the CNL towards Sherston. All land parcels adjacent to the CNL are proposed to deliver habitat enhancement, informed by the CNL Management Plan and the Cotswolds National Landscape Strategy and Guidelines, to further the purposes of the designation. The assumption of a total of 73,000 HGV movements for the Construction Phase is an overestimation to present a robust, worst-case assessment. An updated breakdown of Trip Generation Calculations is provided at Annex E of **ES Volume 3, Appendix 13-1: Transport Assessment [APP-233]** at Deadline 1 which presents specific assessed quantities of material volumes and component type/numbers for each Solar PV Site, including fencing, aggregates for access

Reference	Comments/Issue raised	Applicant's Response
		tracks, PV modules and mounting structures substation equipment.
MS-004	He explained that local country lanes are narrow, winding and unsuitable for this volume and size of traffic and said the Applicant's proposed road layout changes implicitly recognise this constraint. Drawing on his experience as Cabinet Member for Highways, he stated that poorly managed road closures and construction traffic can quickly bring rural areas to a standstill. He described local roads as lifelines for rural communities, providing access to schools, workplaces, hospitals and other essential services, and warned that disruption would have significant consequences.	The assessment presented in the updated Annex J of **ES Volume 3, Appendix 13-1: Transport Assessment [APP-233]** submitted at Deadline 1 demonstrates adequate carriageway width or frequency of passing place opportunity to pass at least an HGV and a light vehicle as requested in comments provided by Wiltshire Council in its response (August 2025) to the Transport Assessment Scoping Note and confirmed in Paragraph 4 of 'Appendix A - Highways and Transport Document Review - Detailed Comments'. This confirms that no passing bay or widening improvements are needed to accommodate these movements on the construction route outside of the Order Limits. The distances between passing points outside of the Order Limits are all within 150 m with forward visibility extending to the next passing point and beyond. This is within the generally accepted distance of 200 m. As set out in the **Outline CTMP [APP-287]**, a booking system will be set up to manage arrivals and departures to the Order Limits. This will be implemented in coordination with banksmen, which will be able to hold back any cross-over, should there be

Reference	Comments/Issue raised	Applicant's Response
		any delays on the roads. This will prevent HGVs generated by the Scheme passing each other in opposite directions on the local roads forming part of the construction routes and will be confirmed as part of the final CTMP. Excessive widening of existing rural routes to allow two HGVs to pass would be over engineering, because of the following reasons: • Temporary nature of the construction period; • The level of hourly HGV trips when considering a realistic construction programme; • Delivery times during the construction phase are limited to those times set out in the **Outline CTMP [APP-287]**. There will be no HGV construction trips outside of these hours; • There would be a much greater impact on hedgerow, trees and character; and • Low level of existing HGVs on the proposed HGV construction routes. Information included in **ES Volume 3, Appendix 13-1: Transport Assessment [APP-233]** submitted at Deadline 1 of Examination demonstrates that there is adequate carriageway width and/or passing place

Reference	Comments/Issue raised	Applicant's Response
		opportunity for two HGVs along the proposed construction routes. As the assessment in **ES Volume 1, Chapter 13: Transport and Access [APP-065]** finds no significant adverse effect to transport and highway users, and suitable mitigation measures are secured through the **Outline CTMP [APP-287]** by Requirement 15 of schedule 2 to the **Draft DCO [APP-016]**, the Applicant is confident that there is no residual significant effect to communities or non-vehicular users of the highway network. This is confirmed in the assessment in **ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]** which finds no significant adverse effects to recreational users of the public highway or specific impact on assessed industries. Furthermore, the assessment in **ES Volume 1, Chapter 18: Human Health [APP-070]** finds no significant adverse effects to community cohesion or connectivity as a result of traffic movement from the Scheme, nor any significant effects on resident access to services such as healthcare.
MS-005	In conclusion, Mr Smith reiterated that renewable energy must be delivered responsibly and intelligently, and getting this wrong could damage landscapes,	The Applicant acknowledges that there will be impacts on the community as a result of the Scheme which may be a source of concern for local residents. The Secretary of State will balance those potential impacts

Reference	Comments/Issue raised	Applicant's Response
	livelihoods, communities and public trust in the energy transition itself.	and changes against the urgent need and critical national priority for the Scheme as set out in Government policy. The Applicant has assessed adverse impacts arising from the Scheme and has also set out within the ES **[APP-052 to APP-065]** the steps taken to avoid, mitigate and minimise these impacts as far as possible, and has prepared a number of management plans that will ensure that impacts are kept to a minimum. These management plans are secured in the **Draft DCO [APP-016].**
MS-006	In response to a question, Mr Smith clarified that the estimate of approximately 60,000 HGV movements was produced by an independent consultant engaged by Stop Lime Down, and confirmed that this evidence would be submitted into the examination.	The Applicant notes this comment and welcomes continued engagement with Mr Smith, both in his role as Transport and Highways lead for Wiltshire Council, and as Councillor for Sherston, alongside ongoing engagements with Wiltshire Council highways officers.

2.37 Phillip Davey

Reference	Comments/Issue raised	Applicant's Response
PD-001	Philip Davey, a resident of Leigh Delamere, explained that while his village lies approximately three miles south of the Scheme, it is already less than half a mile from a newly consented 220-acre solar farm at Leigh Delamere and two miles from a further 210-acre solar farm near Kington St Michael. He stated that his focus was on cumulative impact, particularly the combined effects on landscape character and visual amenity when the Scheme is considered alongside other solar and BESS developments within the relevant zone of influence.	The consented solar farms at Leigh Delamere (PL/2021/06100) and at Kington St Michael (20/05893/SCO) are both taken into consideration within each of the ES technical chapters **[APP-052 to APP-072]** cumulative assessments. The Lime Down Scheme assessments have therefore taken these Schemes into consideration along with other consented or proposed Schemes within the cumulative study areas defined in **ES Volume 1, Chapter 21: Cumulative and In-Combination Effects [APP-073]** and shown on **ES Volume 2, Figure 21-1: Location of Short List Cumulative Developments [APP-178]** and **ES Volume 2, Figure 21-2: Location of Cumulative Solar Infrastructure in Proximity to Lime Down Index [APP-179]**. Taking a conservative worse case approach, significant cumulative effects are identified at a limited and discrete number of receptors comprising tourism and recreation impacts during the construction phase on Corsham Park, PRoW WT|CORM|122, PRoW WT|HULL|29, and Sustrans Cycle Route 403, and on skylark at a District level.
PD-002	Mr Davey explained that the Scheme comes at a time when North Wiltshire is experiencing a proliferation	The Applicant would respectfully disagree that the ES is misleading because existing, operational solar and

Reference	Comments/Issue raised	Applicant's Response
	and concentration of solar and related development, a position acknowledged within the Applicant's own Environmental Statement. He referred to the cumulative impact evidence, which identifies 38 developments, of which 25 (around 64%) relate solely to solar or BESS infrastructure. However, he highlighted that this shortlist excludes existing, operational solar and BESS Schemes, making it misleading and failing to present a true and accurate picture of the overall concentration of development in the area.	BESS Schemes, such as those located on Hill Hayes Lane, Hullavington and at Corston for example, are taken into consideration as part of the baseline environment within each of the ES technical chapters **[APP 052 to APP-072]**.
PD-003	Mr Davey referred to a separate shortlist in the final chapter of **Chapter 21: Chapter 21 Cumulative and In Combination Effects [APP-073]**, covering developments that have been granted consent and are at various stages of construction, all of which are considered capable of giving rise to cumulative impacts. He stated that the legislation governing Environmental Impact Assessment requires consideration of both existing and approved development when assessing cumulative effects, not just those that are proposed.	Existing Schemes are considered within each ES technical chapter **[APP-052 to APP-072]** and forms part of the baseline environment. Cumulative Schemes are considered in addition to the reported baseline environment and, therefore, cumulative effects (baseline plus the additional short-listed proposed Schemes) are reported separately within each of the ES technical chapter **[APP-052 to APP-072]** with a summary of those identified effects provided within **ES Volume 1, Chapter 21: Cumulative and In-Combination Effects [APP-073]**.
PD-004	Mr Davey criticised the Applicant's conclusion that clustering of solar Schemes within the zone of influence is not problematic because the developments	Cumulative effects have been carefully considered in accordance with Planning Inspectorate Advice Note 17 (Ref 10) and the relevant NPS EN-1 (Ref 1), NPS EN-

Reference	Comments/Issue raised	Applicant's Response
	are not intervisible. He argued that neither the relevant legislation nor guidance identifies intervisibility as the sole or determinative test for cumulative impact. He expressed concern that the scale, proliferation and geographic concentration of solar and BESS development within a relatively limited area should itself be regarded as a matter of serious concern.	3 (Ref 2) and NPS EN-5 (Ref 3Ref 2) requirements as set out in **ES Volume 1, Chapter 21: Cumulative and In-Combination Effects [APP-074]**. **ES Volume 1, Chapter 21: Cumulative and In-Combination Effects [APP-074]** and the associated **ES Volume 3, Appendix 21-1: Long List of In-Combination Effects and Cumulative Developments [APP-264]** set out the approach and conclusions cumulative assessments within each ES technical chapter **[APP-052 to APP-074]**. Taking a conservative worse case approach, significant cumulative effects are identified at a limited and discrete number of receptors comprising tourism and recreation impacts during the construction phase on Corsham Park, PRoW WT|CORM|122, PRoW WT|HULL|29, and Sustrans Cycle Route 403, and on skylark at a District level. In relation of landscape and visual, a Cumulative Landscape Assessment of the Scheme (which includes the Cable Route Corridor) is set out in Section 4 of **ES Volume 3, Appendix 8-3-2-2: Landscape and Visual Assessment Sheets (Significant) [APP-191]**. This presents an assessment of the Scheme against a future baseline position containing the included 14 CD sites within the 10km Study Area. Despite the intensification of solar developments within the

Reference	Comments/Issue raised	Applicant's Response
		landscape, it was found that the Scheme and Cumulative Development Sites would not increase the Significance of Effects. Cumulative visual effects were assessed within a 2 km Study Area. No cumulative visual effects were recorded within the 2km or 10km Study Area.
PD-005	In conclusion, Mr Davey stated that the size and scale of the Scheme represents a tipping point, and that cumulative impacts on the landscape and visual character of North Wiltshire would be profound. He urged the ExA to robustly interrogate and scrutinise the Applicant's cumulative impact conclusions, which he described as technically flawed, materially misleading and of questionable objective value.	See Applicant's response to PD-001 above.

2.38 Tony McAleavy

Reference	Comments/Issue raised	Applicant's Response
TM-001	Tony McAleavy, a historian and author of a detailed study of Malmesbury Abbey in the Middle Ages, addressed the environmental submissions relating to landscape, archaeology and heritage. He argued that these submissions are fundamentally flawed in both methodology and findings.	**ES Volume 1, Chapter 12: Cultural Heritage [APP-064]**, supported by **ES Volume 3: Appendix 12-1 to 12-7 [APP-219 to APP-232]** has assessed the potential impact of the Scheme on heritage assets. Section 12.6 and Section 12.7 of **ES Volume 1, Chapter 12: Cultural Heritage [APP-064]** present the assessment methodology and baseline information. Assessment work has been undertaken in consultation with Wiltshire Council and Historic England and the methodology is considered to be agreed with both stakeholders (see Table 12-2 of **ES Volume 1, Chapter 12: Cultural Heritage [APP-064]**).
TM-002	Mr McAleavy stated that the impact assessment is incorrectly framed around the artificial subdivision of the project into five sites and fails to assess the holistic impact on the wider historic landscape between Malmesbury and Chippenham. He argued that this broader area constitutes a distinctive, ancient and fragile rural environment which would be severely harmed by the large-scale intrusion of solar panels.	**ES Volume 1, Chapter 12: Cultural Heritage [APP-064]**, supported by **ES Volume 3: Appendix 12-1 to 12-7 [APP-219 to APP-232]** has assessed the potential impact of the Scheme as a whole on heritage assets. Where reporting has been organised by Solar PV Site (e.g. **ES Volume 3, Appendix 12-2: Archaeological Desk-Based Assessments [APP-220 to APP-221]** and **ES Volume 3, Appendix 12-5: Interim Evaluation Trial Trenching Reports [APP-222 to APP-229]**), this is in line with standard

Reference	Comments/Issue raised	Applicant's Response
		approaches that have been applied in other DCO solar Schemes. **ES Volume 1, Chapter 12: Cultural Heritage [APP-064]**, supported by **ES Volume 3, Appendix 12-7: Historic Landscape Assessment [APP-231]**, assesses the potential impact of the Scheme on historic landscape character of land within the Scheme, located between Malmesbury and Chippenham, and no significant effects have been identified. No impacts have been identified to historic landscape character of land in the area surrounding the Scheme. As stated in Paragraph 12.10.18 of **ES Volume 1, Chapter 12: Cultural Heritage [APP-064]** impacts to elements that contribute to the historic landscape character will be minimal, temporary and reversible (for example the removal of discrete sections of hedgerow). Elements that characterise the historic landscape within the Order Limits will be retained and any temporary change to land use will be ended following decommissioning. As such the Scheme will not alter the ability to understand or experience the historic landscape of land with the Order Limits and the legibility of the historic landscape in the area between Malmesbury and Chippenham will be maintained.

Reference	Comments/Issue raised	Applicant's Response
TM-003	Mr McAleavy explained that the landscape is fundamentally agricultural in character and has been shaped by farming for over 5,000 years. He described how the area was first cultivated by Neolithic farmers who built the long barrows at Luckington around 3000 BC and has since been reshaped by successive generations from the Bronze Age, Iron Age, Roman, Anglo-Saxon, medieval and modern periods. He argued that this long-evolved, productive landscape would be catastrophically harmed by the Scheme.	**ES Volume 1, Chapter 12: Cultural Heritage [APP-064]**, supported by **ES, Volume 3, Appendix 12-7: Historic Landscape Assessment [APP-231]**, assesses the potential impact of the Scheme on the historic landscape character and no significant effects have been identified. The landscape within the Order Limits is characterised by post-medieval or modern enclosure (including amalgamated fields, assarts, piecemeal enclosure, planned enclosure, prairie fields and reorganised fields). With the exception of a few areas where ridge and furrow earthworks have been identified, surviving remnants of agricultural activity predating the post-medieval period survive only as buried archaeological features. **ES Volume 1, Chapter 12: Cultural Heritage [APP-064]**, supported by **ES Volume 3, Appendix 12-2 to 12-5 [APP-220 to APP-230]** assess the potential impact of the Scheme on identified archaeological assets. Where required, appropriate mitigation is proposed and is presented in Section 12.9 and Section 12.11 of **ES Volume 1, Chapter 12: Cultural Heritage [APP-064]**. An overarching archaeological mitigation strategy is provided in **ES Volume 3, Appendix 12-6 Archaeological Mitigation Strategy [APP-230]**.

Reference	Comments/Issue raised	Applicant's Response
		Extensive archaeological assessment has been undertaken to support the assessment in **ES Volume 1, Chapter 12: Cultural Heritage [APP-064]**. Desk-based research (**ES Volume 3, Appendix 12-2: Archaeological Desk-Based Assessments [APP-220 to APP-221]**) and archaeological evaluation (**ES Volume 3, Appendix 12-3: Air Photo and LiDAR Mapping and Interpretation**, **ES Volume 3, Appendix 12-4: Archaeological Geophysical Survey Reports**, and **ES Volume 3, Appendix 12.5: Interim Evaluation Trial Trenching Reports [APP-222 to APP-229]**) have successfully been used to identify archaeological sites and have informed the overarching archaeological mitigation strategy is provided in **ES Volume 3, Appendix 12-6 Archaeological Mitigation Strategy [APP-230]**. Archaeological assessment work has been undertaken in consultation with Wiltshire Council and Historic England. (see Table 12-2 of **ES Volume 1, Chapter 12: Cultural Heritage [APP-064]**). The Applicant understands the reference to the long barrows at Luckington as relating to the Scheduled remains of Long barrow 600m north of Hebden Farm (NHLE 1010395) and Giant's Cave: a chambered long barrow 750m south west of Allengrove Farm (NHLE

Reference	Comments/Issue raised	Applicant's Response
		1010394) and, which are located c.2.2km and 2.3km respectively to the west of the Scheme and would not be impacted upon by the development.
TM-004	Mr McAleavy criticised the approach of assessing heritage harm solely by reference to the absence of designated heritage assets within individual fields, stating that this fails to capture the wider historic significance of the land. He explained that these fields were worked by Bronze Age communities associated with the round barrows at Foxley, supplied food to the Roman town at Easton Grey along the Fosse Way, and later formed part of a Saxon royal estate centre at Cowage Farm. He further noted that land within four of the five Lime Down Sites belonged historically to Malmesbury Abbey and was farmed by monks for centuries, supporting the religious and intellectual life of one of medieval England's most important monasteries. He identified this as just one example of the national significance of this section of the Fosse Way.	See the Applicant's response to TM-003 for detail regarding historic landscape character, archaeological assessment and mitigation. Annex 1 of **ES Volume 3, Appendix 12-1: Heritage Statement [APP-219]** details assets scoped in for assessment and was used for consultation with Historic England and Wiltshire Council. Scoped in assets are considered to be agreed with both stakeholders. While it is noted that Malmsbury Abbey and Conservation Area are located on a prominent position and are visible within the wider landscape, there is no relationship with land within the Order Limits and these Assets. Consequently, they were scoped out of the assessment. Likewise there is no potential for impact to the Scheduled Romano-British settlement, earthwork enclosure and a section of the Fosse Way, 415m west of Whatley Manor (NHLE reference 1013354), which is located to the east of Easton Grey or the Scheduled Early medieval settlement, palace, church and Bronze Age ring ditches 340m east of Cowage Farm (NHLE reference

Reference	Comments/Issue raised	Applicant's Response
		1018389). Consequently, both assets were scoped out of assessment. **ES Volume 3, Appendix 12-1: Heritage Statement [APP-219]** details the historical ownership of land within the Scheme, including areas that once belonged to Malmesbury Abbey. The holdings of Malmesbury Abbey passed to the crown following its dissolution in the early 16th Century and were subsequently sold off to different landowners. As stated in **ES Volume 3, Appendix 12-7: Historic Landscape Assessment [APP-231],** the majority of the landscape within the Order Limits is characterised by a field pattern comprising post-medieval and modern enclosure and as such does not relate to the earlier medieval landscape when parts of the Scheme belonged to the land holdings of Malmesbury Abbey. The Applicant highlights that the Fosse Way is a non-designated heritage assets and, as such, is not designated as being of a national significance. Since the design presented in the PEIR, 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

Reference	Comments/Issue raised	Applicant's Response
		Solar PV Panels will be erected have had offsets established with their boundaries with 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 within **ES Volume 1, Chapter 12: Cultural Heritage [APP-064**].
TM-005	In conclusion, Mr McAleavy stated that the historic landscape forms an essential part of the setting of nearby heritage assets. He argued that introducing solar panels would make the landscape far less coherent and cohesive in heritage terms, and that by downplaying this issue the Applicant had failed to properly evaluate the highly damaging cumulative and synergistic effects of the Scheme.	See the Applicant's response to TM-003 for detail regarding historic landscape character, archaeological assessment and mitigation.

2.39 Helen King

Reference	Comments/Issue raised	Applicant's Response
HK-001	Helen King stated that she has lived and worked in Malmesbury for 40 years. While she expressed support for renewable energy in principle, she argued that this is the wrong project and poses significant risks to the local countryside and ecology, as well as to community safety, health, wellbeing and the local economy. Her objection focussed on wellbeing, safety and the economy.	The Applicant acknowledges the concerns regarding wellbeing, safety and the local economy. Detailed responses to specific points are provided below in HK 002-005.
HK-002	Ms King described her strong attachment to the local open countryside and explained that she regularly relies on walking and cycling along lanes and footpaths within the project area. She explained that she is living with cancer and that access to nature in a calm and peaceful environment is important for both her physical and mental health. She stated that if the countryside were covered with acres of 4.5m solar panels and industrial-style fencing, it would no longer feel like a natural environment, and that many local residents and visitors, would feel its loss.	With regards to socio-economic impacts such as recreational access to the land, a detailed assessment of the likely significance of effects from the Scheme on the use and desirability of individual PRoW and recreational access to the countryside is included in **ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]** and **ES Volume 3, Appendix 16-2: Tourism and Recreation Receptor Tables [APP-241]**. This assessment considers the impact on individual recreational routes (including PRoWs and long-distance recreation 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 PRoWs and unsurfaced roads in Lime Down E during

Reference	Comments/Issue raised	Applicant's Response
		construction cannot be mitigated further and as such will have to be considered in the planning balance when consent for the Scheme is being determined. No significant residual effects are anticipated during the operational phase of the Scheme. The assessment in **ES Volume 1, Chapter 18: Human Health [APP-070]** considers the physical and mental health impacts of changes to recreation and access to the countryside under the assessment topic 'open space, leisure and play'. The assessment concludes that no significant adverse effects to mental health and wellbeing are anticipated at any phase of the Scheme. Mitigation measures to reduce construction impacts to PRoW users are secured through the **Outline PRoWPPMP [APP-282]** by Requirement 16 in Schedule 2 to the **Draft DCO [APP-016]**. Impacts on communities have been considered as part of the assessment of 'community identity, culture, influence and resilience' in **ES Volume 1, Chapter 18: Human Health [APP-070]**. The Applicant has considered how changes to perceptions of rurality, community sense of place, pride, engagement and difference in consideration of importance of different aspects of the Scheme (for example opposing views on harms versus benefits) may lead to a degree of

Reference	Comments/Issue raised	Applicant's Response
		impact to communities. The assessment has considered that this is likely to be up to a minor adverse effect on local communities and thus on residents' mental health and wellbeing. This is not considered a significant effect. Community liaison is also directly secured through Requirement 4 in Schedule 2 to the **Draft DCO [APP-016]** through the provision of a community liaison group during the Scheme's construction, operation and decommissioning. This group will act as an intermediary between the public and the onsite contractors to ensure community concerns and any information they need are communicated and responded to, so as to reduce community anxiety and impacts on mental wellbeing, and to assist in directing the public to mental health support if required. With regards to the assessment of landscape and visual effects, this is presented **in ES Volume 1, Chapter 8: Landscape and Visual [APP-060]**. This assesses effects on identified landscape and visual receptors, including residential properties and users of public rights of way, and identifies where significant effects may occur. The LVIA recognises that as a consequence of the development that there would be long term adverse effects on the Landscape Character

Reference	Comments/Issue raised	Applicant's Response
		of the area as well as long term significant adverse effects to 10 Visual Receptors, all of which are local PRoW which are either within or directly adjacent to the proposed arrays.
HK-003	Ms King raised concerns about traffic impacts, stating that construction traffic and diverted local traffic using narrow and winding roads would significantly increase risks to all road users. She said that additional traffic would also be pushed through Malmesbury, a historic town with road layouts dating back to Saxon times which are already at capacity. She referred to specific routes through the town, including Abbey Row, Gloucester Road and Bristol Street, describing them as narrow roads with narrow pavements where vehicles already struggle to manoeuvre and where risks to pedestrians have been repeatedly raised by residents. She argued that the project would compound these existing problems.	HGV construction routes are shown in **Figure 4.1** and **Figure 4.2** of the **Outline CTMP [APP-287]**. None of the proposed HGV construction routes will route through Malmesbury or use the roads named. Given the distance from site and the proposed construction route, traffic impacts of links within Malmesbury will be non-material and were not identified or requested for assessment at scoping. **ES Volume 1, Chapter 13: Transport and Access [APP-065]** assess the impact on Non-Motorised User (NMU) delay and amenity, including Fear and Intimidation. All impacts are concluded to be not significant and will be temporary. NMU delay is considered negligible given there is no existing pedestrian or cycle infrastructure on the construction routes and likely low numbers of existing NMU users. In terms of NMU amenity, pedestrian amenity is broadly defined as the relative pleasantness of a journey, and can be affected by traffic flow, traffic

Reference	Comments/Issue raised	Applicant's Response
		composition and pavement width/separation from traffic. The construction routes on the road network have little existing pedestrian infrastructure and no footways, making them already unattractive as walking routes with no pedestrian amenity so this cannot be assessed. Fear and Intimidation for other NMU's can be assessed. Highway widths of construction routes have been assessed in **ES Volume 3, Appendix 13-1: Transport Assessment [APP-233]** and provide sufficient width for HGV traffic to comfortably pass cyclists. **ES Volume 1, Chapter 13: Transport and Access [APP-065]** 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 (Ref 8). **ES Volume 1, Chapter 13: Transport and Access [APP-065]** conclude that on all links in the study area the significance of effect is Minor Adverse (temporary). In relation to mitigation, an **Outline CTMP [APP-287]** supports the DCO Application and presents outline measures which restrict construction deliveries to the proposed construction routes and times, separating the

Reference	Comments/Issue raised	Applicant's Response
		public and recreational users from hazards, including, traffic management measures such as signage and banksmen, fencing, and dust and noise control.
HK-004	She also highlighted the importance of tourism to the local economy, explaining that people visit this part of Wiltshire for its open countryside, heritage and opportunities for walking and cycling. She referred to routes such as the Wiltshire Cycle Route, the historic Fosse Way and the North Wessex Way, parts of which fall within the Scheme area. She argued that if the development proceeds, the experience of peace, nature and open views would be lost, and questioned whether the area would lose visitors due to construction traffic, tall solar panels and industrial fencing.	With regards to the assessment of impacts on long-distance recreational routes, **ES Volume 3, Appendix 16-2: Tourism and Recreation Receptors [APP-241]** has identified the Wiltshire Way as a regionally important cycle route, and the Fosse Way as a nationally important historic route. Due to their high sensitivity, it is anticipated the Scheme will have a significant adverse effect on these routes throughout the Scheme's construction and decommissioning (and for the Fosse Way during operation), a matter which will have to be considered in the planning balance when the DCO is determined. The North Wessex Way was not identified for assessment as it is not designated as a specific route that is likely to have substantial recreational use. That notwithstanding, available information shows the North Wessex Way route passing to the north of Lime Down A, where fields A1, A11 and A12 are largely excluded from Solar PV array infrastructure and instead planted for landscape and ecological mitigation. As such, the Applicant does not consider that the immediate historic

Reference	Comments/Issue raised	Applicant's Response
		or visual context of the North Wessex Way is likely to be significantly affected by the Scheme.
HK-005	In conclusion, Ms King argued that as visitor experience declines, fewer people would come, leading to harm to cafés, pubs, shops and local businesses. She stated that the community is being asked to bear significant costs while the benefits flow elsewhere, noting that the energy would not serve the local area and that profits would go to an overseas corporation. She concluded that the Scheme would be significantly detrimental to the community.	The potential effects of the Scheme on tourism and recreation are assessed in **ES Volume 1, Chapter 16: Socio Economics, Tourism and Recreation [APP-068]**, supported by **ES Volume 3, Appendix 16-2: Tourism and Recreation Receptor Tables [APP-241]**. The assessment identifies a worst-case scenario in which a temporary loss of up to 50 tourism-related jobs and £1.76 million in annual spending could occur locally during construction, and a long-term loss of up to 11 tourism-related jobs/ £395,000 in visitor spending per annum could occur during the operational phase of the Scheme. This represents a precautionary estimate based on conservative assumptions. The assessment concludes that, while some localised effects on tourism receptors are anticipated to occur, significant adverse effects on the wider tourism economy are not anticipated. Additional mitigation measures (which were not quantified for inclusion in the assessment of potential losses to employment) secured in the **Outline SSCEP [APP-285]** seek to reduce tourism employment losses through focussing on local recruitment, promoting local suppliers where practicable, and through providing retraining opportunities for workers in tourism-dependent

Reference	Comments/Issue raised	Applicant's Response
		industries. This is secured through Requirement 18 of Schedule 2 to the **Draft DCO [APP-016]**. Impacts on communities have been considered as part of the assessment of 'community identity, culture, influence and resilience' in **ES Volume 1, Chapter 18: Human Health [APP-070]**. The Applicant has considered how changes to perceptions of rurality, community sense of place, pride, engagement and difference in consideration of importance of different aspects of the Scheme (for example opposing views on harms versus benefits) may lead to a degree of impact to communities. The assessment has considered that this is likely to be up to a minor adverse effect on local communities and thus on residents' mental health and wellbeing. This is not considered a significant effect. Community liaison is also directly secured through Requirement 4 in Schedule 2 to the **Draft DCO [APP-016]** through the provision of a community liaison group during the Scheme's construction, operation and decommissioning. This group will act as an intermediary between the public and the onsite contractors to ensure community concerns and any information they need are communicated and responded to, so as to reduce community anxiety and

Reference	Comments/Issue raised	Applicant's Response
		impacts on mental wellbeing, and to assist in directing the public to mental health support if required.

2.40 Tracey Worcester

Reference	Comments/Issue raised	Applicant's Response
TW-001	Tracey Worcester explained that for over 35 years she has walked and ridden across the affected fields and cycled the surrounding lanes, which she described as currently unspoilt and exceptionally beautiful countryside. She acknowledged suggestions that reducing panel height from 4.5m to 3m might lessen visual impact, but argued that regardless of height, the installation of around 2,000 solar panels would fundamentally change the character of the area, replacing open countryside with black panels, metal security fencing and constant industrial noise.	An assessment of landscape and visual effects is presented in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]**. This assesses effects on identified landscape and visual receptors, including residential properties and users of public rights of way, and identifies where significant effects may occur. The LVIA recognises that as a consequence of the development that there would be long term adverse effects on the Landscape Character of the area as well as long term significant adverse effects to 10 Visual Receptors, all of which are local PRoW which are either within or directly adjacent to the proposed arrays. With regards to the noise impacts from the Scheme, the noise contours presented in **Figure 14-2 Daytime Operational Noise Contours [APP-160]** and **Figure 14-3 Night-time Operational Noise Contours [APP-161]** show that operational noise from the Scheme would typically be between 20 and 50 dB LpA on PRoW. These levels are below WHO guidelines on moderate community annoyance and are akin to the existing ambient sound environment in the area as evidenced by the baseline sound survey results given in Table 1 of **ES Volume 3, Appendix 14-3: Baseline**

Reference	Comments/Issue raised	Applicant's Response
		Noise Survey [APP-236]. As such, while Scheme infrastructure will be heard at times, the enjoyment of bridleways, and PRoW in general, with respect to the sound level experienced, is not expected to be significantly adversely affected by the operation of the Scheme.
TW-002	Ms Worcester stated that this transformation would deter tourists from visiting the area, leading to reduced footfall for local towns and villages and harming shops, pubs, hotels and short-term accommodation businesses. She argued that the local economy would therefore suffer as a direct consequence of the development.	The potential effects of the Scheme on tourism and recreation are assessed in **ES Volume 1, Chapter 16: Socio Economics, Tourism and Recreation [APP-068]**, supported by **ES Volume 3, Appendix 16-2: Tourism and Recreation Receptor Tables [APP-241]**. The assessment identifies a worst-case scenario in which a temporary loss of up to 50 tourism-related jobs and £1.76 million in annual spending could occur locally during construction, and a long-term loss of up to 11 tourism-related jobs/ £395,000 in visitor spending per annum could occur during the operational phase of the Scheme. This represents a precautionary estimate based on conservative assumptions. The assessment concludes that, while some localised effects on tourism receptors are anticipated to occur, significant adverse effects on the wider tourism economy are not anticipated. Additional mitigation measures (which were not quantified for inclusion in the assessment of potential losses to employment) secured in the **Outline SSCEP [APP-285]** seek to reduce tourism

Reference	Comments/Issue raised	Applicant's Response
		employment losses through focussing on local recruitment, promoting local suppliers where practicable, and through providing retraining opportunities for workers in tourism-dependent industries. This is secured through Requirement 18 of Schedule 2 to the **Draft DCO [APP-016]**.
TW-003	Ms Worcester also raised concerns about the long-term environmental impacts of the project, questioning how hundreds of thousands of panels would be managed when they require replacement during and at the end of the project's 60-year lifespan. She stated that current recycling options are limited and that the Applicant has not provided a clear or credible plan for managing this volume of waste.	With regards to waste impacts from panels during replacement and decommissioning, the Applicant acknowledges this comment. It is likely that the solar PV panels and battery waste generated by the Scheme, during operation and maintenance and decommissioning phases, would be managed by specialist regional or national facilities; these facilities would be developed over the operation and maintenance phase of the Scheme in response to demand generated by the UK-wide solar energy industry. The Waste Electrical and Electronic Equipment (WEEE) Regulations place obligations on companies who place solar PV panels and batteries on the market to finance the costs of collection, treatment, recovery and environmentally sound disposal; and the landfill tax strongly incentivise reuse, recycling and recovery (Ref 18).

Reference	Comments/Issue raised	Applicant's Response
		The preparation and implementation of the detailed OEMP, substantially in accordance with the **Outline OEMP [APP 278]**, is secured through Requirement 14 in Schedule 2 of the **Draft DCO [APP-016]**. The preparation and implementation of the detailed Decommissioning Strategy, substantially in accordance with the **Outline DS [APP 279**], is secured through Requirement 20 in Schedule 2 of the **Draft DCO [APP-016]**.
TW-004	Ms Worcester further expressed concern about construction impacts on the narrow rural lanes, stating that increased traffic and heavy machinery would bring significant noise, disruption and physical damage to buildings, ancient hedgerows and verges which provide important wildlife habitat and biodiversity. She referenced research suggesting that solar panels can act as sensory traps for bats by mimicking the echolocation signature of water, potentially altering bat behaviour and leading to reduced activity and habitat avoidance. She also referred to the fragmentation effect, explaining that large solar arrays can break connections between bat habitats and disrupt how bats forage and move across the landscape.	With regards to transport and access impacts, the assessment presented in the updated Annex J of **ES Volume 3, Appendix 13-1: Transport Assessment [APP-233]** submitted at Deadline 1 demonstrates adequate carriageway width or frequency of passing place opportunity to pass at least an HGV and a light vehicle as requested in comments provided by Wiltshire Council in its response (August 2025) to the Transport Assessment Scoping Note and confirmed in Paragraph 4 of 'Appendix A - Highways and Transport Document Review - Detailed Comments'. This confirms that no passing bay or widening improvements are needed to accommodate these movements on the construction route outside of the Order Limits. The distances between passing points outside of the Order Limits are all within 150 m with

Reference	Comments/Issue raised	Applicant's Response
		forward visibility extending to the next passing point and beyond. This is within the generally accepted distance of 200 metres. As set out in the **Outline CTMP [APP-287]**, a booking system will be set up to manage arrivals and departures to the Order Limits. This will be implemented in coordination with banksmen, which will be able to hold back any cross-over, should there be any delays on the roads. This will prevent HGVs generated by the Scheme passing each other in opposite directions on the local roads forming part of the construction routes and will be confirmed as part of the final CTMP. Excessive widening of existing rural routes to allow two HGVs to pass would be over engineering, because of the following reasons: • Temporary nature of the construction period; • The level of hourly HGV trips when considering a realistic construction programme; • Delivery times during the construction phase are limited to those times set out in the **Outline CTMP [APP-287]**. There will be no HGV construction trips outside of these hours; • There would be a much greater impact on hedgerow, trees and character; and

Reference	Comments/Issue raised	Applicant's Response
		• Low level of existing HGVs on the proposed HGV construction routes. Information included in **ES Volume 3, Appendix 13-1: Transport Assessment [APP-233**] submitted at Deadline 1 of Examination demonstrates that there is adequate carriageway width and/or passing place opportunity for two HGVs along the proposed construction routes. With regard to the noise and vibration impacts, construction traffic noise impacts are summarised in Table 14-21 and the following paragraphs of **ES Volume 1, Chapter 14: Noise and Vibration [APP-066]**. While construction vehicles themselves will be heard at times the overall impact on daily noise exposure is low and not expected to lead to significant adverse effects. With regards to the comment on bat behaviour, and ecological impacts, the adoption and use of land within solar arrays by foraging and commuting bats is poorly understood. Section 9.10.187 of **ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061]** describes how the findings of a limited number of studies into bat behaviour at ground-mounted solar arrays have suggested that a reduced level of activity may occur for some species, although there is no

Reference	Comments/Issue raised	Applicant's Response
		evidence that any species of bat avoids foraging over fields containing solar panels. The assessment describes how this research has been considered during the design of the Scheme, with suitably wide (15 m) undeveloped buffers to be instated from all likely key habitats for bats (namely hedgerows, tree belts and woodlands) at the Solar PV Sites, to ensure key foraging and commuting habitat will be retained as part of the Scheme. The assessment contained within **ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061]** also considers the potential for the Scheme's potential for fragmentation impacts on bats. This again describes how key habitats for bats commuting and dispersing through the Order Limits and beyond will be safeguarded. Overall the assessment concludes that impacts on bats resulting from fragmentation and avoidance of Solar PV Panels will be largely neutral; particularly when considering the likely higher value of the habitats present within the operational Scheme (predominately comprising grassland) over the baseline of largely arable land, together with the large development-free buffer zones which retain the most valuable habitat for foraging/commuting bats.

Reference	Comments/Issue raised	Applicant's Response
TW-005	In conclusion, Ms Worcester stated that the Scheme is not solely about energy generation, but about the loss of productive farmland, the destruction of communities and the long-term consequences for future generations. She urged the ExA to give serious weight to these impacts and to refuse what she described as an extremely unpopular project.	The Applicant notes this comment. The Secretary of State will balance potential impacts and changes against the urgent need and critical national priority for the Scheme as set out in Government policy.
TW-006	Following her contribution, Ms Worcester confirmed in response to a question that she would submit the studies she referred to on bat behaviour and habitat fragmentation into the examination at Deadline 1A.	The Applicant notes this comment and will await receipt of the studies referred to.

2.41 Sean Magee

Reference	Comments/Issue raised	Applicant's Response
SM-001	Sean Magee stated that he strongly objects to the Scheme and argued that it should not be approved. Mr Magee retired to a small hamlet outside Sherston and he and his wife walk almost every day, particularly along the Fosse Way. He argued that the development would prevent continued use of these walking routes and would damage the landscape, which he considers an important part of national heritage.	An assessment of landscape and visual effects is presented in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]**. This assesses effects on identified landscape and visual receptors, including residential properties and users of public rights of way, and identifies where significant effects may occur. The LVIA recognises that as a consequence of the development that there would be long term adverse effects on the Landscape Character of the area as well as long term significant adverse effects to 10 Visual Receptors (including the Fosse Way), which is directly adjacent to the proposed arrays. The Fosse Way (TR145, TP033, TP036) is a Roman road built during the first and second centuries AD between Exeter and Lincoln. It is very straight and within the Study Area is made up of sections of unsurfaced BOAT and surfaced roads passing alongside Sites B and C. The layout for the Scheme has responded to the juxtaposition of the Fosse Way by (other than for a short section to the immediate south of the railway line) avoiding panels on opposite sides of the route. Within the Scheme, within Site C, no panels are proposed in C24, C25, C26 and C27 to the

Reference	Comments/Issue raised	Applicant's Response
		east and C10 and C13 to the south. Within Site B, panels are only proposed in field B6. **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]** recognises the change to the visual amenity and associated adverse effects to users of the Fosse Way, and identifies Moderate Adverse Significant effects to users of TR145 during construction and at Year 1, reducing to Moderate / Minor Adverse, but not significant at Year 15 as a result in the mitigation planting alongside the Fosse Way predominantly screening views of array. Refer to photography for VP 15, 22-25 and photomontages for VP 14 (**ES Volume 3, Appendix 8-14: Baseline Photography and Photomontages (Part 1 to 3) [APP-103 to APP-105]**. With regards to the use of PRoW and socio-economic impacts, a detailed assessment of the likely significance of effects from the Scheme on the use and desirability of individual PRoW and recreational access to the countryside is included in **ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]** and **ES Volume 3, Appendix 16-2: Tourism and Recreation Receptor Tables [APP-241]**. This assessment considers the impact on individual recreational routes (including PRoW and

Reference	Comments/Issue raised	Applicant's Response
		long-distance recreation 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 PRoWs and unsurfaced roads in Lime Down E during construction cannot be mitigated further and as such will have to be considered in the planning balance when consent for the Scheme is being determined. No significant residual effects are anticipated during the operational phase of the Scheme. With regards to the transport and access impacts, the **Outline PRoWPPMP [APP-288]** includes measures at section 4 of the report to manage vehicle interactions with PRoW users and minimise effects on existing users.
SM-002	Mr Magee stated that, having listened to the oral submissions and reviewed written evidence, he believed sufficient information had already been presented to justify refusal of the Scheme. He focused his remarks on the identity and track record of the project's sponsor and promoter, Macquarie.	Regarding the justification for the Scheme, the Applicant maintains that the **Statement of Need [APP-266]** and the accompanying Environmental Statement **[APP-052 to APP-265]** provide a robust evidence base demonstrating that the Scheme is essential to the national interest. Large-scale solar and energy storage are classified as Critical National Priority (CNP) infrastructure and the Applicant remains confident that the Scheme's delivery of low-cost, low-carbon power is

Reference	Comments/Issue raised	Applicant's Response
		vital for achieving the UK's legally binding targets for decarbonisation and energy security. With respect to the track record of Macquarie Asset Management, the Applicant clarifies that Macquarie has a strong record of long-term UK investment, having invested more than £65 billion into UK infrastructure since 1999, supporting over 33,000 UK jobs. The Applicant is owned by three investment funds managed by Macquarie on behalf of a range of investors, which importantly includes a number of UK pension funds. This ownership structure is common in the energy sector and ensures the Scheme is privately financed, enabling the development of essential infrastructure without reliance on public funds or risk to the UK taxpayer.
SM-003	Mr Magee referred to a Channel 4 television programme, concerning Macquarie's role in Thames Water, and stated that this period was followed by a £20 million fine for improper sewage treatment. He cited judicial comments describing the situation as "shocking" and "disgraceful", involving inadequate investment, poor management and maintenance. He further stated that Macquarie financed its acquisition of Thames Water through borrowing, and transferred significant debt to Thames Water prior to exiting, which	The Applicant wishes to clarify that Macquarie's involvement in Thames Water has been repeatedly mischaracterised. Macquarie-managed funds were part owners of Thames Water for 11 years. In that time, the company invested £11 billion and Thames Water's assets almost doubled, from £6.5 billion to £12.9 billion. There were significant improvements in water quality (ranked amongst the sector's best), water leakage was cut by around 22%, the second-best improvement in

Reference	Comments/Issue raised	Applicant's Response
	he said was contrary to regulatory requirements and had a devastating effect on the company's financial position. Mr Magee questioned how Macquarie could be adequately controlled if the Scheme were to proceed. He argued that a substantial performance bond would be required, particularly in relation to end-of-project arrangements, and that Macquarie should be required to set out a clear plan for how it would deal with the site on completion, backed by a meaningful bond to ensure delivery.	the sector over this time, and pollution incidents were down by 75% compared between 2008 and 2012. This investment programme was delivered while achieving the third lowest customer bills for water and wastewater in England and Wales at the time of Macquarie's full exit, while from 2009 to 2012, the debt to assets ratio reduced by about 6%. The Applicant has repeatedly acknowledged the expression of distrust towards the Scheme's ownership and confirms it has demonstrated compliance with all statutory requirements under the Planning Act 2008 (Ref 16) and applicable legislation such as The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (Ref 17). The Applicant is subject to legally binding DCO requirements. The Planning Act 2008 also contains 1923 Reference Theme Comments/Issues Raised Applicant's Response enforcement provisions regarding compliance with the terms of a DCO. The DCO process itself incorporates enforceable mechanisms to regulate Scheme delivery. Any breach of the development consent order or failure to comply with Requirements is a criminal offence and can result in enforcement action.

Reference	Comments/Issue raised	Applicant's Response
SM-004	In conclusion, Mr Magee argued that Thames Water failed not simply because of inadequate regulation, but fundamentally because of Macquarie's actions, and he urged the ExA to refuse consent for the Scheme.	For the reasons set out in earlier response SM-003, the Applicant maintains that comments made in relation to Thames Water hold no relevance to the Scheme, due to the mischaracterisation of Macquarie's involvement and the legally binding responsibilities and regulations under which a Development Consent Order for the Scheme would be strictly governed

2.42 Sue Godwin

Reference	Comments/Issue raised	Applicant's Response
SG-001	Sue Godwin is Vice-Chair of Luckington Alderton Parish Council, and a lifelong resident of Luckington. She stated that from direct experience that the fields within the Scheme area have historically produced high-quality crops with strong yields. She emphasised the importance of food production, referring to earlier submissions highlighting the fundamental role of local food supply. She stated that landowners promoting the Scheme had previously spoken proudly about the quality and productivity of these same fields and therefore could not credibly claim otherwise.	The Applicant notes this comment. **ES Volume 3, Appendix 17-1: Agricultural Land Classification and Soil Survey Report [APP-243]** acknowledges that most of the agricultural land within the Solar PV Sites is under arable cultivation, and that approximately one-third of the land is best and most versatile quality capable of producing moderate to high yields, particularly of cereal crops.
SG-002	Ms Godwin expressed concern that in recent years the land has been deliberately left untilled and not properly nurtured for food production, contrasting this with neighbouring farmland still actively managed for agriculture, which she said continues to produce very good yields. She argued that productive agricultural land should be protected and not lost to large-scale solar development.	With regard to the potential impact of the Scheme on soil, it is noted in the established guidelines for classifying agricultural land, "The grading does not necessarily reflect the current economic value of land, land use, range of crops, suitability for specific crops or level of yield." The way in which the land has been managed in recent years has not affected the outcome of the agricultural land and soil surveys and resultant land classifications that are set out in **ES Volume 3, Appendix 17-1: Agricultural Land Classification and Soil Survey Report [APP-243]**.
SG-003	Ms Godwin also explained that she now works in the equine sector and raised concerns about safety	The use of the highway network for recreational users such as equestrians have been considered as specific

Reference	Comments/Issue raised	Applicant's Response
	impacts on horse riding. She stated that riding along roads in the Alderton area would no longer be safe due to increased lorry movements, particularly for clients with large numbers of horses. She referred to a recent fatality in the area, describing it as tragic and avoidable, and linking it to concerns about traffic risk. She further raised concerns about employment impacts, stating that businesses such as blacksmiths, veterinary practices and her own staff would be put at risk by the project.	recreational receptors in the assessment in the **ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]**. The Applicant confirms that within the Alderton area (Lime Down A, and C), no significant adverse effects are anticipated to recreational users of the highway or PRoW network at any phase of the Scheme. The Applicant has committed to ensuring the operation or recreational use of PRoW is protected as much as possible through the implementation of embedded and additional mitigation measures set out in the **Outline CTMP [APP-287]** and **Outline PRoWPPMP [APP-282]**, secured respectively by Requirements 15 and 16 in Schedule 2 to the **Draft DCO [APP-016]**. The Applicant confirms that the approach to equestrian and PRoW impacts and highway safety are under discussion with Wiltshire Council's Countryside Access Team and Highways Team (as part of discussions with Wiltshire Council in general). Additional discussions specific to PRoW are being undertaken with the British Horse Society, and the Wiltshire Bridleway Association. Progress on each of these discussions is set out in the relevant SoCG with each of these parties to be submitted at Deadline 2.

Reference	Comments/Issue raised	Applicant's Response
SG-004	Ms Godwin highlighted land classification impacts, stating that 63% of the land proposed for solar panels comprises good to moderate agricultural land, rising to 93% for the cable route within the agricultural land classifications for solar PV sites.	The areas of each ALC grade across the different components within the Order Limits are set out in **ES Volume 1, Chapter 17: Soils and Agriculture [APP-069]**. Moderate quality agricultural land refers to that of Subgrade 3b quality, which is not in the category of BMV. A total of 30% of the agricultural land in the Solar PV Sites is classified as Grade 4, as well as 9% of the land in the Cable Route Corridor
SG-005	Finally, Ms Godwin raised concerns about water resources and the aquifer. She explained that she owns woodland where the Bristol Avon originates, and stated that when water levels are low, up to two million gallons per day are pumped from the aquifer. She described how this water flows downstream to facilities supplying Bristol, and said she believed parts of Bath may also be served. She questioned the long-term legacy being left to future generations by those promoting the project and urged that these consequences be fully considered.	Risks to the Principal Aquifer and specifically to potable abstractions from the aquifer, such as Private Water Supplies, are considered in **ES Volume 1, Chapter 19 Ground Conditions [APP-071]** and mitigation is outlined. Hydrogeological risk registers which provide an initial understanding of the risk to sensitive groundwater receptors from construction activity are set out in the following documents: • **BESS and Substation - Preliminary Geotechnical Risk Register [EN010168/EXAM/9.12];** • **Cable Route Avoidance Areas - Preliminary Geotechnical Risk Register EN010168/EXAM/9.13]; and** • **Cable Route Corridor Mining Risk - Technical Memorandum [EN010168/EXAM/9.14].**

Reference	Comments/Issue raised	Applicant's Response
		Consideration of Source Protection Zones associated with major groundwater abstractions have been considered in **ES Volume 1, Chapter 19 Ground Conditions [APP-071]** and associated desk studies (**ES Volume 3, Appendix 19-1 to 19-8 [APP-247 – APP-254]**) and will be further considered in activity specific risk assessments associated with piled foundations and HDD trenchless techniques. Prior to the commencement of any construction work, a Foundation Works Risk Assessment will be undertaken for all substation and BESS locations (secured via the **Outline CEMP [APP-277])** to ensure that residual risks to groundwater will be appropriately mitigated and managed on a location-specific basis. The assessment presented in **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [APP-063]** considers the interaction between the Scheme and the water environment, including surface water and groundwater pathways. The Scheme does not include abstraction from the aquifer and does not alter the fundamental recharge processes that support groundwater levels. Solar PV Panel areas remain permeable and allow rainfall to infiltrate to ground, maintaining natural recharge processes. The Scheme does not introduce

Reference	Comments/Issue raised	Applicant's Response
		widespread impermeable cover that would prevent infiltration. Where impermeable infrastructure is required, this is limited in extent and managed through drainage design so that runoff is controlled and does not adversely affect groundwater or downstream receptors. On that basis, the Scheme does not reduce aquifer recharge or alter groundwater flow regimes in a way that would affect downstream water resources. The existing function of the aquifer, including its role in supporting baseflow to watercourses such as the Bristol Avon, would be maintained. The Applicant therefore considers that the Scheme would not give rise to adverse effects on groundwater resources or downstream water supply.

2.43 Jodie Collier

Reference	Comments/Issue raised	Applicant's Response
JC-001	Jodie Collier, a local resident and gamekeeper, objected strongly to the Scheme, explaining that both her livelihood and her family life are rooted in the land affected by the Scheme. She grew up in Grittleton, lives locally, and works in Hullavington, describing the surrounding fields, footpaths and views as integral not only to the landscape but to her identity, work and family life. She explained that she works and walks daily on the land.	The Applicant notes this comment. Responses to detailed points raised are provided in JC-002 to 006 below.
JC-002	Ms Collier explained that 25% of the farm on which she works is managed under the Countryside Stewardship Scheme, and that the land she manages is directly affected by the proposed cable route. Since 2013, she has supplementary fed wild birds and stated that this has led to a significant increase in species including yellowhammers, linnets, skylarks and grey partridges, alongside a marked increase in hare populations. She described these outcomes as central to the value and purpose of her work and expressed concern that the Scheme would undermine this stewardship and conservation effort.	The anticipated effects to the farming business affected by cable routing are likely to be temporary, and restricted to the width of the Cable Route Corridor. Where fields have been bisected, working practices around cable laying works should allow for access to be maintained to both sides of the Cable Route Corridor to allow for agricultural work, including for land managed under the Countryside Stewardship Scheme to be continued even during construction. The **Outline CEMP [APP-277]** (as secured through Requirement 13 of Schedule 2 to the **Draft DCO [APP-016]**) furthermore commits to the reinstatement of land affected by cabling works as soon as practicable to allow for agricultural work on the land to recommence

Reference	Comments/Issue raised	Applicant's Response
		as soon as construction of that section of cable route is complete. The land along the cable route will be returned to agricultural use and losses incurred during the construction period will be compensated for. The Applicant is keen to draw attention to the **Land Rights and Negotiations Tracker [PDA-004]** and the desire to enter into voluntary negotiations. The Applicant encourages all parties along the Cable Route Corridor to engage in discussions over the voluntary agreement to ensure practical concerns can be accounted for. Potential effects of cabling works within the Cable Route Corridor on ecological features are assessed in **ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061]**, which considers impacts on habitats and species during construction, operation and decommissioning and identifies measures to avoid, mitigate and compensate for potential impacts to breeding and wintering birds, and brown hare. The assessment concludes that no significant adverse effects on these species/species groups are anticipated as a result of cable installation. The anticipated impacts within the Cable Route Corridor will be temporary (for the duration of the cable route installation) and localised to a relatively narrow

Reference	Comments/Issue raised	Applicant's Response
		working width of up to 25 m. Habitats will be reinstated as soon as possible following completion of cable installation works through replanting/translocation/re-seeding. The ecological avoidance, mitigation and compensation measures determined to be necessary for cable route installation are set out within the **Outline EPMS [APP-284]** which is secured under Requirement 8 of the **Draft DCO [APP-016]**.
JC-003	Ms Collier spoke about the impact of the Scheme on her son, who is 12 years old. She challenged the characterisation of the project as "temporary", noting that her son would be approximately 75 years old by the time it is decommissioned. She argued that this represents the loss of an entire lifetime rather than a temporary effect, and questioned how severance could meaningfully account for the loss of childhood, freedom and long-term opportunity. She described the local landscape as the foundation of her son's upbringing, providing space for walking, fishing, learning patience and developing a connection with quiet, unspoilt countryside, and stated that he aspires to work on the land in the future.	The Applicant is seeking a time limited consent for up to 60 years, as secured by Requirement 20 of the **Draft DCO [APP-015],** which provides that the date of decommissioning for each part of the authorised development (i.e. the Scheme) must be no later than 60 years following the date of final commissioning. The term 'temporary' refers to the consentable finite, operational lifetime of the Scheme and is not intended to diminish the way a change may be experienced over an individual's lifetime. Effects on landscape character and communities living in proximity of the Scheme are fully assessed through **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]** and **ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]**. Any identified significant effects will be considered by the Examining Authority to determine how these influence the planning balance

Reference	Comments/Issue raised	Applicant's Response
		and ultimately whether they believe the Scheme should be given consent.
JC-004	Ms Collier raised concerns about the scale and duration of construction, describing almost three years of disruption across hundreds of acres, including extensive solar panels and a 20kV cable route cutting through the land. She explained that the primary local pastimes are cycling, horse riding and walking, and that friends regularly travel from London specifically to experience peace and countryside shaped by generations of farming. She argued that increased construction traffic, large lorries and fast-moving vehicles would fundamentally undermine safety on country lanes, which are currently used precisely because they feel safer than main roads. She stated that the anticipated increase in traffic would make these activities dangerous and effectively impossible.	As set out in **ES Volume 1, Chapter 3: The Scheme [APP-055]**, the installation of cable within the Cable Route Corridor would require up to approximately 18 months to install the Interconnecting Cables (up to 132 kV) and Grid Connection Cables (400 kV), and the construction of the Solar PV Sites would require an estimated 24 months. Potential construction durations across the different parts of the Scheme comprise a series of overlapping stages with works happening concurrently. An assessment of the likely significance of effects from the Scheme on the use and desirability of the local PRoW network and recreational use of local highways in the countryside is included in **ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]** and supported by **ES Volume 3, Appendix 16-2: Tourism and Recreation Receptor Tables [APP-241]**. This assessment considers the impact on individual PRoW and long-distance recreation routes, and on the network as a whole. The assessment finds no significant residual effects are anticipated to the overall PRoW network, nor recreational use of the local highway network at

Reference	Comments/Issue raised	Applicant's Response
		any phase of the Scheme. This is subject to implementation of traffic control and PRoW safety measures as secured through the **Outline CTMP [APP-287]** and **Outline PRoWPPMP [APP-282]** by Requirements 15 and 16 of Schedule 2 to the **Draft DCO [APP-016]**. With regards to transport and access, **ES Volume 1, Chapter 13: Transport and Access [APP-065]** assess the impact on Non-Motorised User (NMU) delay and amenity, including Fear and Intimidation. All impacts are concluded to be not significant and will be temporary. NMU delay is considered negligible given there is no existing pedestrian or cycle infrastructure on the construction routes and likely low numbers of existing NMU users. It is anticipated that PRoW which cross the Order Limits will generally remain open during the construction phase of the Scheme. There may be some slight perceptible delay to NMU movement if a construction vehicle is crossing a PRoW within the Order Limits. An **Outline PRoWPPMP [APP-282]** forms an embedded mitigation and will provide

Reference	Comments/Issue raised	Applicant's Response
		measures to ensure the effects of the construction phase on PRoW users is minimised. The **Outline PRoWPPMP [APP-282]** contain specific measures for the temporary diversion of footpath WT|GRIT|20 and bridleway WT|MALW|54, where access to Cable Route Corridor works east of Grittleton, and HGV access to Lime Down E are taken respectively. These diversions are proposed to ensure unreasonable effects to PRoW users are not experienced during construction, replacement and decommissioning. In terms of NMU amenity, pedestrian amenity is broadly defined as the relative pleasantness of a journey, and can be affected by traffic flow, traffic composition and pavement width/separation from traffic. The construction routes on the road network have little existing pedestrian infrastructure and no footways, making them already unattractive as walking routes with no pedestrian amenity so this cannot be assessed. Fear and Intimidation for other NMU's can be assessed. Highway widths of construction routes have been assessed in **ES Volume 3, Appendix 13-1: Transport Assessment [APP-233**] and provide

Reference	Comments/Issue raised	Applicant's Response
		sufficient width for HGV traffic to comfortably pass cyclists. **ES Volume 1, Chapter 13: Transport and Access [APP-065]** 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 (Ref 8). **ES Volume 1, Chapter 13: Transport and Access [APP-065]** concludes that on all links in the study area the significance of effect is Minor Adverse (temporary). In relation to mitigation, an **Outline CTMP [APP-287]** supports the DCO Application and presents outline measures which restrict construction deliveries to the proposed construction routes and times, separating the public and recreational users from hazards, including, traffic management measures such as signage and banksmen, fencing, and dust and noise control.
JC-005	Ms Collier emphasised that opposition to the Scheme is widespread and stated that local people are not opposed to renewable energy, noting the presence of many small solar installations in the area, but are opposed to large-scale industrialisation and the dismantling of rural landscapes and communities.	The Applicant disagrees that the Scheme involves the dismantling of rural landscapes. The landscape impact of the Scheme is fully assessed in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]**. Moreover, the Scheme has significantly reduced from the layout assessed at PEIR in accordance with the mitigation hierarchy to avoid, reduce and mitigate

Reference	Comments/Issue raised	Applicant's Response
		adverse effects. Specific mitigation measures and enhancement plans are included in the Landscape and Ecology Mitigation Plan (**ES Volume 2, Figure 3-4-1 to 3-4-5.2 [APP-084]**). The **Outline LEMP [APP-283]** provides details of the proposed mitigation and enhancement which are described in ES Volume 1, Chapter 8: Landscape and Visual [APP-060], **ES Volume 2, Figure 3-4-1 to 3-4-5.2 [APP-084]**, the **Outline LEMP [APP-283]**, and the **Outline EPMS [APP 284]**. The Applicant acknowledges that there will be impacts on the community as a result of the Scheme, which are a source of concern for local residents. The Secretary of State will balance those potential impacts and changes against the urgent need and critical national priority for the Scheme as set out in Government policy.
JC-006	Finally, Ms Collier explained that the proposed cable route would cut through the best drive on her farm, rendering it unusable during construction and severely impacting her ability to carry out her work. She stated that this could result in the loss of her livelihood. She urged the ExA to refuse the Scheme, calling for the protection of homes, land and way of life.	Impacts on recreation receptors are assessed in **ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]** and supported by **ES Volume 3, Appendix 16-2: Tourism and Recreation Receptor Tables [APP-241]**. Whilst the Applicant is aware of the prevalence of shooting as a recreational pastime in the countryside, the assessment has not identified or assessed specific game shooting or

Reference	Comments/Issue raised	Applicant's Response
		drives, due to them largely not being publicly available to attend, located on private land with few public records of location, and due to their transient nature. The Applicant maintains that through the use of a narrow, progressive working corridor (up to 25 m) and a commitment to full land reinstatement, the Scheme can be constructed without jeopardising the long-term viability of the respondent's livelihood. In addition to this, through ongoing negotiations with cable route corridor landowners, commercial or recreational activities are being considered as part of these negotiations for voluntary agreement, Where game drives are considered annual or intermittent, this presents an opportunity for works programmes to adapt to scheduled events and agreed notice periods to be issued for construction activities. Construction traffic will be controlled through measures set out in the **Outline CTMP [APP-287]** and **Outline PRoWPPMP [APP-282]** to ensure impacts are minimised as far as practicable.
JC-007	In response to a question, Ms Collier confirmed that land under the Countryside Stewardship Scheme would be affected by the Schemes.	The Applicant notes this comment, and has responded to the points raised in JC-002 above.

2.44 Charles Edward Buchan

Reference	Comments/Issue raised	Applicant's Response
CEB-001	Charles Edward Buchan spoke on behalf of himself and his wife, Fiona Buchan. He explained that he has lived in Sherston and now resides in Kington Langley, less than two miles from the Scheme, and has lived in the area for most of his life. While he stated that he generally supports solar energy projects, but objects to this Scheme on three principal planning concerns: traffic, hedgerows, and the overall design of the Scheme.	The Applicant notes this comment.
CEB-002	On traffic, Mr Buchan referred to the **Access Plan [APP-010]** and explained that he is a governor of Stanton St Quintin Primary School, with specific responsibility for health and safety. He stated that the road past the school is used as a cut-through between Grittleton, the A429 and Junction 17 of the M4. Despite signage indicating "no Lime Down Solar access", he expressed concern that construction traffic heading east would divert through Grittleton and Stanton St Quintin to save time, passing directly by the school gates. He noted that the school is located on a blind corner with no off-street parking, that traffic conditions are already problematic, and that increased HGV movements would present a serious risk to children and parents. He also argued that this level of traffic	HGV construction routes are shown in Figure 4.1 and Figure 4.2 of the **Outline CTMP [APP-287]**. None of the proposed HGV construction routes will route past Stanton St Quintin Primary School. As such, the Scheme is not anticipated to increase risk to children or parents and guardians accessing the school.

Reference	Comments/Issue raised	Applicant's Response
	would act as a disincentive for parents considering the school.	
CEB-003	Turning to hedgerows, Mr Buchan explained that in retirement he undertakes amateur hedge-laying and has developed a strong appreciation for the ecological value and diversity of local hedgerows. Citing the **Ecological Baseline Report [APP-198]**, he stated that approximately 84km of species-rich hedgerow are present within the site, designated as habitats of principal importance due to their biodiversity value and function as wildlife corridors for species such as hedgehogs and dormice. He argued that removal or damage to hedgerows should be avoided wherever possible. However, he stated that Schedule 12 of the **dDCO [APP-016]** identifies approximately 112km of hedgerows subject to "partial removal", which he compared to the distance from the site to Birmingham. He criticised the **Biodiversity Net Gain Assessment Report [APP-273]**, which claims a 12.31% increase in hedgerow units, arguing that it fails to account for the loss or breaching of ancient hedgerows that would be replaced with new planting needing many years to establish. He emphasised that the age of these hedgerows, some potentially dating back 200–250	The assessment of impacts on hedgerows presented in **ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061]** has been undertaken using precautionary worst-case assumptions. For example, a reasonable estimate of calculated permanent and temporary hedgerow removal requirements are set out in **ES Volume 1, Chapter 9; Ecology and Biodiversity [APP-061]** (paragraph 9.10.1380) and shown on a plan within the 'Hedgerow Removal Plan' within the **Outline EPMS [APP-284].** The Applicant acknowledges the final extent of permanent and temporary hedgerow removal cannot be determined until the detailed design stage. The estimates provided are however considered a reasonable precautionary, and likely worst-case scenario, and expected hedgerow removal estimates are considerably lower than 112 km. Any subsequent design refinement will be required to remain within the assessed parameters and will be controlled through the DCO Requirements, including the Outline EPMS, which provide further assurance that ecological mitigation and enhancement will be secured. These prescribe certain parameters that

Reference	Comments/Issue raised	Applicant's Response
	years or earlier, underpins their exceptional biodiversity.	constrain post-consent design (for example, maximum width of hedgerow breaches) and will ensure no greater ecological effects could arise than those reported. The Applicant acknowledges that any new planting of hedgerows will take time to provide equivalent value to biodiversity for any hedgerows to be removed. This is accounted for within the BNG calculations presented within the **Statutory BNG Metric [APP-274].** The metric automatically applies risk multipliers to all newly created hedgerows to account for the time taken for new hedgerows to establish. This means that a greater extent (measured by length) of new hedgerow planting is required to achieve the same value to biodiversity than an established section hedgerow proposed to be removed.
CEB-004	Finally, Mr Buchan argued that the design of the Scheme is fundamentally flawed. He described the project as fragmented across five separate sites, characterised by over-development with solar panels and extensive disruption to village communities. He stated that the scale of the Scheme is such that it would not sit within the landscape but instead become the landscape. He raised concerns about the length and complexity of the 22km grid connection and	As set out in **ES Volume 3, Appendix 4-1: Site Selection Assessment Report [APP-185]**, the Applicant undertook an initial review which did not identify a single site of the appropriate size (1,100 ha) within the area of search. Therefore, the Applicant considered both contiguous land parcels and land parcels near one another. The **Statement of Need [APP-266]** explains at Section 7.4 that NSIP proposals may comprise

Reference	Comments/Issue raised	Applicant's Response
	questioned why the BESS could not be located adjacent to the grid connection, as at Minety, rather than near the London–Swansea mainline railway and a Grade I listed 15th-century manor house. Drawing on his background in finance, he stated that the project's estimated cost of £1 billion would inevitably need to be rewarded through returns on capital, and argued that this would ultimately add further pressure to energy prices, which he said are already among the highest in Europe.	adjoining or separate parcels of land and that "*the connection of separate parcels of suitable land together into a single Scheme may, subject to analysis, enable those parcels of land to connect economically to the electricity system*" which is the case for this Scheme. Section 8.2 of the **Statement of Need [APP-266]** explains that by bringing the parcels together into a single Scheme, the Scheme is able to carry a connection to the National Electricity Transmission System (NETS), thus providing a local source of low carbon electricity and also enabling the efficient bulk transfer of energy generated at the Scheme so that any surplus can be used to cover shortfalls elsewhere. By connecting to the NETS, the Scheme will not impact the feasibility or timing of distribution network connections for either new generation or consumption connections which among other things are required to support the delivery of Wiltshire County Council's growth plans. **ES Volume 1, Chapter 4: Alternatives and Design Evolution [APP-056]** details the alternatives considered, including Minety Substation as an alternative point of connection to Melksham substation. The Applicant has undertaken extensive engagement with National Grid throughout the scoping and development of the Scheme

Reference	Comments/Issue raised	Applicant's Response
		to determine the appropriate point of connection. The Existing National Grid Melksham Substation was identified as having available capacity for a utility scale energy project such as the Scheme. Whilst Minety substation does house 400kV infrastructure, the Applicant's discussions with National Grid confirmed there was no connection available at Minety for the Scheme. On that basis, Minety Substation is not a viable alternative and the Existing National Grid Melksham Substation remains the only viable connection point for the Scheme. With regards to the landscape and visual impacts, the Scheme comprises a series of independent Sites set across an extensive agricultural landscape, with large areas of land between each of the Sites helping assist with assimilation. Each Site is set apart by their associated features such as robust hedgerows, woodland and tree cover, intervening settlements and the road and rail infrastructure and the changing topography. The discrete areas of land in the Scheme are placed so far apart that the Scheme would not be perceived in its entirety and the solar panels are distributed 'in and amongst' the landscape features to assimilate them into the landscape.

Reference	Comments/Issue raised	Applicant's Response
		An assessment of landscape and visual effects is provided in the Landscape and Visual Impact Assessment (LVIA) presented in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]**. The LVIA assesses effects on identified landscape and visual receptors, including residential properties and users of public rights of way, and identifies where significant effects may occur. The LVIA recognises that as a consequence of the development that there would be long term adverse effects on the Landscape Character of the area as well as long term significant adverse effects to 10 Visual Receptors, all of which are local PRoW which are either within or directly adjacent to the proposed arrays. As set out in the **Grid Connection Statement [APP-270]** the Applicant confirms that the Scheme has secured a Transmission entry connection to the Existing Melksham 400kV substation. Noting the suggestion that Minety substation would be more suitable, in **ES Volume 1, Chapter 4: Alternatives and Design Evolution [APP-056]**, the Applicant clarifies that it following extensive engagement with National Grid to determine an appropriate point of connection. The Existing Melksham Substation was identified as having available capacity for a utility scale energy project such as the Scheme. Whilst Minety

Reference	Comments/Issue raised	Applicant's Response
		substation 400kV infrastructure, the Applicant's discussions with National Grid confirmed there was no connection available at Minety to accommodate the Scheme. **ES Volume 1, Chapter 12: Cultural Heritage [APP-064]**, supported by **ES Volume 3, Appendix 12-1: Heritage Statement [APP-212]**, has assessed impacts to the Grade I Listed Bradfield Manor (NHLE: 1198808). The assessment identified that there would be a moderate/minor (not significant) adverse effect to the asset (less than substantial harm at the lower end in NPPF (Ref 4) terms) as a result of indirect (i.e. setting) impacts.

2.45 Isabel Ross

Reference	Comments/Issue raised	Applicant's Response
IR-001	Isabel Ross spoke as a farmer living at Park Farm near Yatton Keynell, explaining that her family farm lies directly on the proposed cabling route, which would encircle their farmhouse. She stated that the impact of the Scheme on her family and their way of life would be severe and immediate.	The Applicant has assessed Park Farm, Yatton Keynell as an equestrian facility and identifies a significant adverse effect at this location that cannot be mitigated further. This is set out in **ES Volume 1, Chapter 16: Socio-economics, Tourism and Recreation [APP-068]**. This therefore will have to be considered in the planning balance when the DCO is determined. The Applicant acknowledges that the grazing pastures south of Park Farm are directly affected by the routing of the Cable Route Corridor and there will be substantial, albeit temporary disruption to grazing on this land. This disruption to the grazing land can however be restricted to the width required for cable trenching works and any associated haul route. Where fields have been bisected, working practices around cable laying works should allow for access to be maintained to both sides of the Cable Route Corridor to allow for agricultural work to be continued even during construction. The **Outline CEMP [APP-277]** (as secured through Requirement 13 of Schedule 2 to the **Draft DCO [APP-016]**) furthermore commits to the reinstatement of land affected by cabling works as soon as practicable to allow for agricultural work on the

Reference	Comments/Issue raised	Applicant's Response
		land to recommence as soon as construction of that section of cable route is complete. The land along the cable route will be returned to agricultural use and losses incurred during the construction period will be compensated for. The Applicant is keen to draw attention to the **Land Rights and Negotiations Tracker [PDA-004]** and the desire to enter into voluntary negotiations. The Applicant encourages all parties along the Cable Route Corridor to engage in discussions over the voluntary agreement to ensure practical concerns can be accounted for.
IR-002	Ms Ross explained that a 50m wide trench and construction roadway would cut directly through the farm, passing through species-rich meadows. She stated that farm enterprises dependent on productive grassland would have to cease, resulting in a loss of farm income of at least £20,000 per year.	The Applicant confirms that it is seeking the rights to operate over a 25m working width, of which the trench width would be up to approximately 1.7m as set out in Table 3-1 of **ES Volume 1, Chapter 3: The Scheme [APP-055]**. Furthermore, The assessment of effects on agricultural land and farming operations, including temporary land take associated with the cable route, is provided in **ES Volume 1, Chapter 17: Soils and Agriculture [APP-069]** and **ES Volume 1, Chapter 16: Socio-economics, Tourism and Recreation [APP-068]**, with detailed construction methodology set out in **ES Volume 3, Appendix 3-2: Cable Route Construction Method Statement [APP-183]**.

Reference	Comments/Issue raised	Applicant's Response
		The construction methodology will seek to minimise damage to soils in accordance with **ES Volume 1, Chapter 17: Soils and Agriculture [APP-069]**. Impacts to farming enterprises can be mitigated using various measures, including the installation of crossing points. The Applicant notes the respondent's concerns and is open to discussing those mitigation measures in good time ahead of construction. Under the provisions of the Land Compensation Act 1961, the Land Compensation Act 1973 and the Compulsory Purchase Act 1965, reasonable losses incurred by the landowner or occupier as a result of the Applicant's works, are recoverable following claims to the Applicant supported by evidence In regard to the socio-economic impacts, the Applicant acknowledges that the grazing pastures south of Park Farm are directly affected by the routing of the Cable Route Corridor and there will be substantial, albeit temporary disruption to grazing on this land. This disruption to the grazing land can however be restricted to the width required for cable trenching works and any associated haul route. Where fields have been bisected, working practices around cable laying works should allow for access to be maintained to both sides of the Cable Route Corridor to allow for

Reference	Comments/Issue raised	Applicant's Response
		agricultural work to be continued even during construction. The **Outline CEMP [APP-277]** (as secured through Requirement 13 of Schedule 2 to the **Draft DCO [APP-016]**) furthermore commits to the reinstatement of land affected by cabling works as soon as practicable to allow for agricultural work on the land to recommence as soon as construction of that section of cable route is complete. The land along the cable route will be returned to agricultural use and losses incurred during the construction period will be compensated for. The Applicant is keen to draw attention to the **Land Rights and Negotiations Tracker [PDA-004]** and the desire to enter into voluntary negotiations. The Applicant encourages all parties along the Cable Route Corridor to engage in discussions over the voluntary agreement to ensure practical concerns can be accounted for.
IR-003	Ms Ross explained that the farm keeps rare-breed sheep and that the fields affected by the cabling route are the principal pastures for the flock. She stated that it would be impossible to keep sheep on a construction site, and that constant noise and the presence of large machinery would render the land unusable. As a result, she said they may be forced to reduce their flock by as	The Applicant notes the respondent's concerns in relation to loss of grazing. As mentioned in IR-002 above, there are mitigation measures that can be taken to ensure that disturbance to the farming enterprise and livestock is minimised as far as practicably possible. **ES Volume 1, Chapter 14 Noise and Vibration [APP-066]** provides detail on the anticipated noise and vibration during the construction,

Reference	Comments/Issue raised	Applicant's Response
	much as 80%, with corresponding loss of grassland use and viability of the enterprise.	operation and maintenance phases of the project. The Applicant is open to discussing those mitigation measures in good time ahead of construction. With regards to the socio-economic impacts, the Applicant acknowledges that the grazing pastures south of Park Farm are directly affected by the routing of the Cable Route Corridor and there will be substantial, albeit temporary disruption to grazing on this land. The **Outline CEMP [APP-277]** (as secured through Requirement 13 of Schedule 2 to the **Draft DCO [APP-016]**) furthermore commits to the reinstatement of land affected by cabling works as soon as practicable to allow for agricultural work on the land to recommence as soon as construction of that section of cable route is complete. The land along the cable route will be returned to agricultural use and losses incurred during the construction period will be compensated for. The Applicant is keen to draw attention to the **Land Rights and Negotiations Tracker [PDA-004]** and the desire to enter into voluntary negotiations. The Applicant encourages all parties along the Cable Route Corridor to engage in discussions over the voluntary agreement to ensure practical concerns can be accounted for.

Reference	Comments/Issue raised	Applicant's Response
IR-004	Ms Ross expressed concern about the permanent damage to the land from constructing a roadway through long-established meadows. Drawing on previous experience of a water pipe installation across one of their fields, she said that disturbed land never fully recovers, becoming characterised by poor grass and invasive weeds such as docks and thistles. She emphasised that the affected fields are species-rich grasslands that have not been ploughed since the Second World War and cannot simply be recreated once destroyed.	The Applicant acknowledges the ecological value of grassland habitats. Potential effects of cabling works within the Solar PV Sites and Cable Route Corridor are assessed in **ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061]**, which considers impacts on habitats and species during construction, operation and decommissioning and identifies measures to avoid or mitigate loss of grassland habitats. The assessment concludes that no significant adverse effects on ecology and biodiversity are anticipated as a result of cable installation. The anticipated habitat impacts within the Cable Route Corridor will be temporary (for the duration of the cable route installation) and localised to a relatively narrow working width of up to 25 m. Wherever possible, stripped grassland turf will be set aside and carefully replaced to reinstate habitat like-for-like. Where this is not viable, grassland will be re-seeded with an appropriate seed mix in keeping with the habitat type and species assemblage as the rest of the field. This is secured as part of the **Outline EPMS [APP-284].** Furthermore, standard good practice for storage and replacement of topsoil/subsoil to preserve soil structure and seedbank viability and minimise compaction will be adopted during all cabling trench works. Such measures are secured as part of the **Outline SRMP**

Reference	Comments/Issue raised	Applicant's Response
		[APP-280]. Such measures have been identified in order to ensure habitat is reinstated to pre-works condition as soon as possible on completion of temporary cable works.
IR-005	Finally, Ms Ross highlighted the wider environmental value of these grasslands, explaining that they support rich soil ecosystems, sequester significant amounts of carbon and retain large volumes of water, thereby providing important ecosystem services. She stated that the cabling works alone would cause destruction across many hectares of countryside, passing directly through land her family has farmed for generations.	The assessment of potential effects on agricultural land and soils set out in **ES Volume 1, Chapter 17: Soils and Agriculture [APP-069]** confirms that, while the primary agricultural use of the land in the Solar PV Sites would cease during the 60-year operational period, the soil resource would be retained and is expected to show improvements in soil health, quality and structure over the operation phase of the Scheme. **ES Volume 1, Chapter 3: The Scheme [APP-055]**, Section 3.3 describes how the mounting frames for solar panels are ordinarily installed by driving piles into the ground without the need for excavations. The minimal disturbance to in-situ soils associated with the Scheme will enable the soils to recover from previous intensive agricultural use, resulting in long-term benefits to soil structure and soil biology. Soil movements required for the installation of the cables along the Cable Route will be subject to best practice principles set out in the **Outline SRMP [APP-280]**, which also confirms that the soil disturbance will be temporary and short-term. The Outline SRMP is

Reference	Comments/Issue raised	Applicant's Response
		secured by Requirement 17 of Schedule 2 of the **Draft DCO [APP-016].** The Applicant acknowledges the ecological value of grassland habitats. Potential effects of cabling works within the Solar PV Sites and Cable Route Corridor are assessed in **ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061]**, which considers impacts on habitats and species during construction, operation and decommissioning and identifies measures to avoid or mitigate loss of grassland habitats. The assessment concludes that no significant adverse effects on ecology and biodiversity are anticipated as a result of cable installation. The anticipated habitat impacts within the Cable Route Corridor are temporary (for the duration of the cable route installation), and habitats will be reinstated as soon as possible through replanting/translocation/re-seeding. The ecological avoidance, mitigation and compensation measures determined to be necessary for cable route installation are set out within the **Outline EPMS [APP-284]** and will be secured via DCO Requirements.

2.46 Nicholas Clark

Reference	Comments/Issue raised	Applicant's Response
NC-001	Nicholas Clark, a professionally qualified civil engineer with over 45 years' experience in construction and highway infrastructure projects, objected to the Scheme on grounds of highway damage, congestion and safety.	The Applicant notes this comment.
NC-002	Mr Clark explained that the Scheme is located away from the primary road network, meaning construction traffic would be forced onto Class B, Class C and unclassified rural roads. He stated that within Wiltshire, around 80% of the highway network comprises minor classified and unclassified roads, which are low-standard rural routes designed for local village traffic rather than sustained industrial or construction-scale HGV movements. He explained that Class C roads are typically 4m to 5.5m wide, designed to accommodate approximately 3,000–4,000 HGVs per year, with limited passing provision often relying on verges, gateways and informal widening.	The assessment presented in the updated Annex J of **ES Volume 3, Appendix 13-1: Transport Assessment [APP-233]** submitted at Deadline 1 demonstrates adequate carriageway width or frequency of passing place opportunity to pass at least an HGV and a light vehicle as requested in comments provided by Wiltshire Council in its response (August 2025) to the Transport Assessment Scoping Note and confirmed in Paragraph 4 of 'Appendix A - Highways and Transport Document Review - Detailed Comments'. This confirms that no passing bay or widening improvements are needed to accommodate these movements on the construction route outside of the Order Limits. The distances between passing points outside of the Order Limits are all within 150 m with forward visibility extending to the next passing

Reference	Comments/Issue raised	Applicant's Response
		point and beyond. This is within the generally accepted distance of 200 metres. As set out in the **Outline CTMP [APP-287]**, a booking system will be set up to manage arrivals and departures to the Order Limits. This will be implemented in coordination with banksmen, which will be able to hold back any cross-over, should there be any delays on the roads. This will prevent HGVs generated by the Scheme passing each other in opposite directions on the local roads forming part of the construction routes and will be confirmed as part of the final CTMP. Excessive widening of existing rural routes to allow two HGVs to pass would be over engineering, because of the following reasons: • Temporary nature of the construction period; • The level of hourly HGV trips when considering a realistic construction programme; • Delivery times during the construction phase are limited to those times set out in the **Outline CTMP [APP-287]**. There will be no HGV construction trips outside of these hours; • There would be a much greater impact on hedgerow, trees and character; and

Reference	Comments/Issue raised	Applicant's Response
		• Low level of existing HGVs on the proposed HGV construction routes. Information included in **ES Volume 3, Appendix 13-1: Transport Assessment [APP-233]** submitted at Deadline 1 of Examination demonstrates that there is adequate carriageway width and/or passing place opportunity for two HGVs along the proposed construction routes. As set out in the **Outline CTMP [APP-287]**, pre-construction, interim and post-construction Road Condition Surveys will be undertaken to repair any damage caused to verges during the construction period. The details of these surveys will be confirmed as part of the Final CTMP.
NC-003	Mr Clark referred to the Applicant's estimate of 52 two-way HGV movements per day during peak construction periods and stated, based on his professional experience, that this figure represents a significant underestimate. He suggested that actual HGV movements are likely to be closer to three times this figure. He explained that even using the Applicant's figures, a two-year construction period would result in approximately 13,000 HGV movements per year — around four times the design capacity of Class C roads — rising to as much as twelve times	As set out in the **Outline CTMP [APP-287]**, pre-construction, interim and post-construction Road Condition Surveys will be undertaken to repair any damage caused to verges during the construction period. The details of these surveys will be confirmed as part of the Final CTMP. An updated breakdown of Trip Generation Calculations is provided at Annex E to **ES Vol 3, 6.3 Appendix 13-1 Transport Assessment [APP-233]** at Deadline 1. This presents specific assessed quantities of material volumes and component type/numbers for each Lime

Reference	Comments/Issue raised	Applicant's Response
	capacity if higher volumes occur. He stated that this level of use would cause structural failure across significant parts of the local road network, requiring full reconstruction rather than surface patching, which he described as inadequate. He argued that the proposed minor road upgrades are wholly insufficient and that the financial burden of repairing damaged roads should not fall on Wiltshire Council or local residents.	Down Solar PV Site. Includes fencing, aggregates for access tracks, PV modules and mounting structures substation equipment.
NC-004	Turning to congestion, Mr Clark explained that HGVs travelling from the A420 towards Sherston via Yatton Keynell would encounter up to ten sets of temporary traffic lights due to road geometry and limited passing places. He stated that this could add up to 30 minutes to each journey in each direction, significantly worsening congestion during the construction period.	The HGV construction routes are shown in Figure 4.1 and Figure 4.2 of the **Outline CTMP [APP-287]**. The HGV construction route to Lime Down A, B and C are not proposed to route from the A420 via Yatton Keynell and there are no proposals to provide up to ten sets of traffic lights.
NC-005	Finally, Mr Clark raised safety concerns, noting that roads around the site are widely used by motorists, cyclists and horse riders, particularly at weekends. He stated that narrow carriageways and sharp bends already present risks, and that the addition of large numbers of HGVs and construction vehicles would inevitably lead to both minor and major accidents. He expressed concern that there appears to be little or no	The potential effects of construction traffic on the local highway network are assessed in **ES Volume 1, Chapter 13: Transport and Access [APP-065]**, which considers construction vehicle movements, traffic volumes, road safety and effects on road users. This included the capacity of local roads and infrastructure to accommodate construction vehicles.

Reference	Comments/Issue raised	Applicant's Response
	documentation from the Applicant adequately addressing these safety risks.	The assessment concludes that the level of construction traffic associated with the Scheme is unlikely to materially affect road safety on links within the Study Area, and no significant adverse effects on accident risk are anticipated. **ES Volume 1, Chapter 13: Transport and Access [APP-065]** assess the impact on Non-Motorised User (NMU) delay and amenity, including Fear and Intimidation. All impacts are concluded to be not significant and will be temporary. NMU delay is considered negligible given there is no existing pedestrian or cycle infrastructure on the construction routes and likely low numbers of existing NMU users. It is anticipated that PRoW which cross the Order Limits will generally remain open during the construction phase of the Scheme. There may be some slight perceptible delay to NMU movement if a construction vehicle is crossing a PRoW within the Order Limits. An **Outline PRoWPPMP [APP-282]** forms an embedded mitigation and will provide measures to ensure the effects of the construction phase on PRoW users is minimised.

Reference	Comments/Issue raised	Applicant's Response
		In terms of NMU amenity, pedestrian amenity is broadly defined as the relative pleasantness of a journey, and can be affected by traffic flow, traffic composition and pavement width/separation from traffic. The construction routes on the road network have little existing pedestrian infrastructure and no footways, making them already unattractive as walking routes with no pedestrian amenity so this cannot be assessed. Fear and Intimidation for other NMU's can be assessed. Highway widths of construction routes have been assessed in **ES Volume 3, Appendix 13-1: Transport Assessment [APP-233]** and provide sufficient width for HGV traffic to comfortably pass cyclists. **ES Volume 1, Chapter 13: Transport and Access [APP-065]** 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 (Ref 8). **ES Volume 1, Chapter 13: Transport and Access [APP-065]** concludes that on all links in the study area the significance of effect is Minor Adverse (temporary).

Reference	Comments/Issue raised	Applicant's Response
		In relation to mitigation, an **Outline CTMP [APP-287]** supports the DCO Application and presents outline measures which restrict construction deliveries to the proposed construction routes and times, separating the public and recreational users from hazards, including, traffic management measures such as signage and banksmen, fencing, and dust and noise control.

2.47 Phillip Moore

Reference	Comments/Issue raised	Applicant's Response
PM-001	Phillip Moore, formerly a long-term resident of Sherston and now living in Charlton, appeared as a member of Stop Lime Down. He invited the ExA to consider the Scheme through the perspective of under-18s who had submitted relevant representations, noting that although they cannot be named, they represent the generation likely to live longest with the consequences of the project. He referred to more than 80 such representations and stated that he was struck by the breadth and depth of concerns expressed by young people.	The Applicant notes Mr Moore's comments and acknowledges the importance of young people being able to express their views on the Scheme. The Applicant confirms that all relevant representations (RRs) submitted to the Examining Authority have been considered, including those submitted by under-18s where these have been accepted and published by the Planning Inspectorate. The Applicant also notes that the pre-application consultation was designed to be accessible to a wide range of consultees, including younger people. As set out in the **Consultation Report [APP-022]**, the Applicant identified young people as an under-represented or seldom-heard group, and issued communications to gateway organisations, and to local primary and secondary schools, to notify them of the statutory consultation.
PM-002	Mr Moore explained that submissions from younger children focused largely on impacts to wildlife and the countryside, while older teenagers demonstrated a thoughtful and mature understanding of wider issues. He cited examples including a young person who had recently started a job on a farm and was concerned about losing arable land, another worried about the	The Applicant confirms that the matters raised by young people have been considered under the relevant topic areas within the Application documents and the **Applicant's Responses to Relevant Representations (RRs) (Part 2) [PDB-004]**.

Reference	Comments/Issue raised	Applicant's Response
	effect of heavy construction traffic on local roads as they prepared to learn to drive, and a young equestrian concerned about glint and glare disorientating horses. He also referred to a history and classics student distressed by potential damage to heritage assets, and a schoolchild from Alderton who had listed 28 bird species identified in their garden, many of which they believed would be threatened by the Scheme.	Relevant concerns regarding wildlife are addressed within Section 2.6: Ecology and Biodiversity. Concerns regarding the use of arable land are addressed at response reference SA-01, and concerns regarding the effects of construction traffic are addressed within Section 2.13: Transport and Access. Concerns regarding the potential effect of glint and glare on horses are addressed at response reference O-09, while concerns relating to heritage assets are addressed within Section 2.9: Cultural Heritage. Concerns relating specifically to birds are addressed at response reference EB-35. The Applicant recognises the importance of these matters to younger respondents, particularly given that they may experience the Scheme and its effects over a longer period of time. The Applicant confirms that the concerns raised have been taken into account as part of the assessment of the Scheme, and that appropriate mitigation, management and monitoring measures are secured through the Application documents where required. The overall planning balance, including the need for the Scheme and its anticipated benefits, is set out in the **Planning Statement [APP-049]** and **Statement of Need [APP-050]**. These documents explain the role of

Reference	Comments/Issue raised	Applicant's Response
		the Scheme in contributing to the urgent need for renewable energy generation and the transition to net zero, while also considering the environmental and planning matters relevant to the determination of the Application.
PM-003	Mr Moore stated that these representations revealed common themes among young people, including concerns about the economy, traffic, glint and glare, heritage and biodiversity. He observed that a recurring issue raised by both under-18s and their parents was the irreversible nature of the damage the project could cause. He described a recognition among contributors that once construction begins there would be no opportunity to reverse course or restore what is lost.	The Applicant acknowledges the concerns raised by Mr Moore regarding the matters identified by young people, including the economy, traffic, glint and glare, heritage and biodiversity. The Applicant confirms that these matters have been considered within the relevant assessments submitted as part of the Application, and in the **Applicant's Responses to Relevant Representations (Part 2) [PDB-004]**. The Application seeks consent for an operational period of up to 60 years, after which the Scheme would be required to be decommissioned. Measures to manage decommissioning and reinstatement are set out in the **Outline Decommissioning Strategy [APP-279]**, submitted as part of the Application. A detailed Decommissioning Strategy would also be required to be prepared substantially in accordance with the **Outline Decommissioning Strategy [APP-279]** and submitted to, and approved by, the relevant local planning authority prior to the commencement of decommissioning. This is secured through

Reference	Comments/Issue raised	Applicant's Response
		Requirement 20 in Schedule 2 of the **Draft DCO [APP-016]**. At the end of the Scheme's operational life, the Solar PV Sites would be decommissioned and the land restored to its original use and condition as far as practicable. The Applicant also notes that there would be opportunities for established biodiversity and landscape improvements, including habitats, hedgerows and woodland planting, to be retained beyond decommissioning, where appropriate. As these features mature over the operational life of the Scheme, they have the potential to provide long-term landscape and ecological benefits.

2.48 Paul Simmons

Reference	Comments/Issue raised	Applicant's Response
PS-001	Paul Simmons, who works professionally in the solar industry, stated that he does not support the Scheme and that he agreed with the concerns raised by local residents throughout the hearing. Drawing on his industry experience, he said he wished to highlight issues that, in his view, had not been adequately reflected in the Applicant's submissions.	The Applicant notes this comment.
PS-002	Mr Simmons explained that the Scheme is a very large solar project and compared it with other solar NSIPs, including Cleve Hill, which he stated was owned by private equity partners. He said that major issues on comparable Schemes had included workforce matters, immigration enforcement and delivery logistics. He expressed his belief that similar immigration and workforce issues would arise on the Scheme, contrary to the Applicant's claims that workers would be recruited locally through job centres and trained. He stated that, in his experience, this would not occur.	The Applicant confirms that the Scheme is consistent in scale with a number of NSIP Schemes both proposed and consented across the country. At 500MW, the Scheme has a larger export connection than that of Cleve Hill (350MW), however a number of larger Schemes ranging up to 800MW have now been consented. See section 5 of the **Outline SSCEP [APP-285]** that sets out the framework through which the Applicant will engage with local authorities and recruitment companies to maximise employment benefits for local people as part of the Scheme. The Applicant is also committed to measures to maximise benefits for local businesses as part of the supply chain for the Scheme. As this is an outline plan, the Applicant is required to

Reference	Comments/Issue raised	Applicant's Response
		prepare a detailed Skills, Supply Chain, and Employment Plan that must be approved by Wiltshire Council under Requirement 18 of the **Draft DCO [APP-016]**.
PS-003	Mr Simmons disputed the Applicant's construction figures, stating that he would expect approximately 200 workers to be on site. Based on his industry experience, he said that a solar project of around 250 MW would typically take two years to build, while a project of 500 MW would take closer to four years, with a corresponding increase in deliveries. He stated that he has personally built 50 MW and 100 MW solar sites in the UK, including in Cornwall, and described problems arising from large container trucks using small rural roads, including incidents where vehicles had struck buildings due to roads being unsuitable for such traffic.	The Applicant confirms that construction figures and timelines are not speculative and have been informed by clearly defined active Engineering, Procurement and Construction (EPC) modelling, backed by the Applicant's experienced technical consultant team. The Applicant has used a robust, reasonable worst case scenario, one that exceeds PS-003 estimate of 200 workers. As set out in **ES Volume 1, Chapter 3: The Scheme [APP-055]**, it is estimated that the Scheme would generate a peak of 692 construction workers and 268 Full Time Equivalent (FTE) jobs during the construction phase. The size of the workforce is based on the activities required and would fluctuate during the construction phase. **Chapter 3: The Scheme** also sets out that the installation of cable within the Cable Route Corridor would require up to approximately 18 months, and the construction of the Solar PV Sites would require an estimated 24 months. Potential construction durations across the different parts of the Scheme comprise a

Reference	Comments/Issue raised	Applicant's Response
		series of overlapping stages with works happening concurrently. Access to the Scheme has been assessed within **Volume 1, Chapter 13 Transport and Access [APP-065]**, which identifies how vehicles would safely access the Site, including routes for large loads (abnormal indivisible loads (AIL)). As set out in **Chapter 3**, to safely accommodate AIL vehicle movements along construction routes, Highway Improvement Areas in the wider area have been identified. These comprise minor, temporary modifications at six junctions and include the removal of street furniture, widening of junctions, and vegetation removal. This will ensure that sufficient passing room is present along the routes or traffic management is implemented to ensure the safe movement of construction vehicles. Construction vehicle movements will be managed through a Construction Traffic Management Plan. An **Outline CTMP [APP-277]** has been prepared and submitted with the Application. The CTMP sets out measures to ensure that the effect of construction traffic on the local highway network is minimised, including the safe movement of equipment, material and construction workers. The preparation, approval

Reference	Comments/Issue raised	Applicant's Response
		and implementation of the final CTMP, substantially in accordance with the **Outline CTMP [APP-277]**, are secured through Requirement 15 of Schedule 2 of the **Draft DCO [APP-016]**, ensuring construction traffic effects on the Fosse Way are appropriately managed throughout the construction phase. The Applicant is confident that the Scheme can realistically be delivered within the projected two-year construction phase.
PS-004	Mr Simmons also raised serious concerns regarding BESS. He referred to BESS fire risks and stated that he would submit reports on this issue to the ExA. He described his involvement in a BESS installation at Carnegie Road in Liverpool, working with chief fire officers, and explained that following a BESS fire at that site it took three days of continuous water application to cool the remaining containers. He said this resulted in substantial water runoff containing contaminants. He stated that although some recommendations from fire authorities had been incorporated, the majority of relevant safety measures had not been included in the Scheme, in his view.	The Applicant points out that the Carnegie Road BESS fire involved old generation legacy systems that were not compliant with NFPA 855 (pre-dated) and integrated NMC pouch cell, air-cooled battery systems that will not be considered for the Scheme. This type of system has been involved in approximately. a third of BESS failure events listed in the EPRI database (Ref 13). An **Outline BSMP [APP-286]** has been prepared for the Scheme using guidance from Dorset and Wiltshire Fire and Rescue Service (D&WFRS) and incorporating recommendations of the National Fire Chiefs Council. The **Outline BSMP [APP-286]** is fully compliant with the original NFCC Guidance and the revised guidance which was published in February 2026. The revised

Reference	Comments/Issue raised	Applicant's Response
		guidance integrates revisions and refinements to the 2024 draft which were already included in the **Outline BSMP [APP-286]**, except that the Applicant will still integrate a 10m vegetation clearance distance around BESS enclosures. Section 4.1.30 of the **Outline BSMP [APP-286]** stipulates the selected BESS design will integrate: "*Battery liquid cooling systems with automated fail-safe operation (air cooling systems will not be considered for the Scheme)*." As now mandated under NFPA 855 (2026) (Ref 14) the Applicant will only be able to select a BESS system that has undertaken Large Scale Fire Testing (LSFT). At the detailed design stage, the selected BESS LSFT data will be leveraged to fully inform inputs for risk assessment tools which will be utilised together with detailed consequence modelling to provide a comprehensive site operations and emergency response safety audit, this is stipulated in the **Outline BSMP [APP-286]** pre-construction requirements (Section 6). The objective of the test is to evaluate the thermal exposure impacts from a developed BESS enclosure, to determine propagation risk to adjacent BESS or equipment. Testing also defines the length of

Reference	Comments/Issue raised	Applicant's Response
		burn, duration of Peak Heat Release Rate, maximum burn temperatures, etc. 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 and is fully compliant with NFCC guidance (Ref 15). NFCC, NFPA, FSRI (Fire Safety Research Institute), and all BESS OEMs advise that hose streams should not be directly discharged on BESS battery systems. Claims that millions of litres of water are required to tackle a single BESS fire are incorrect, this type of assumption is based upon two ground monitor units being deployed each discharging 1900 LPM for 24 hours, i.e. 5,472,000 litres of water directly on battery systems within a BESS enclosure. This tactic is not necessary and could create environmental pollution risks and significantly prolong any BESS fire event. 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 submitted at Deadline 1, to provide further assurance that all water pollution risks from a BESS fire are fully mitigated. The

Reference	Comments/Issue raised	Applicant's Response
		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. Sections 6.1.3 and 6.1.4 of the **Outline BSMP [APP-286]** mandate the key risk analysis reports which consider how to prevent and mitigate a multi-BESS failure incident. These reports must be provided at the detailed design stage and are BESS system and site layout specific. The Applicant will also commission site specific heat flux and flame tilt consequence modelling to account for site topography and wind conditions to establish final equipment spacing distances for the Scheme. Most current BESS systems are designed to safely burn out without internal fire suppression systems (to remove the risk of stranded energy in the battery systems), Large Scale Fire Testing (LSFT) must be conducted to demonstrate that loss will be safely limited to one container without the intervention of fire fighters. Most of these BESS enclosures integrate LFP prismatic cells and have demonstrated fire propagation does not occur to other BESS enclosures at distances ranging from 15cm – 100cm to adjacent or back-to-

Reference	Comments/Issue raised	Applicant's Response
		back BESS enclosures with spacing of 3-3.5 metres across from the next row / block of BESS enclosures. These BESS designs integrate high levels of thermal insulation to prevent a fire spreading to adjacent BESS enclosures. The insulation is designed to ensure that external heat from a BESS fire does not increase internal temperatures of adjacent BESS to critical levels i.e. <100C. The **Outline BSMP [APP-286]** specifies that the indicative site design will accommodate as follows: *"The BESS Area will contain a minimum of two firefighting water storage units of no less than 228,000 litres in capacity, capable of delivering 1900 litres per minute for 4 hours (exceeding NFCC guidance)."* Section 2.4.2 of the **Outline BSMP [APP-286]** stipulates: "*Final BESS design and site layout will have been validated through mandatory Large Scale Fire Testing (LSFT) and rigorous consequence modelling to minimise the requirement for any D&WFRS intervention in a thermal runaway incident. LSFT must establish minimum equipment spacing distances that demonstrate there is no fire propagation to adjacent BESS enclosures or ESS equipment. D&WFRS intervention in worst case scenarios would typically be limited to boundary cooling of adjacent BESS and*

Reference	Comments/Issue raised	Applicant's Response
		Energy Storage System (ESS) units to prevent the fire from spreading. This strategy will be finalised with D&WFRS and be clearly communicated in the Emergency Response Plan (ERP); • *To ensure that fire, smoke, and any release of toxic gases does not significantly impact site operatives, first responders, and the local community; and* • *To ensure that firewater run-off is contained and tested before release or, if necessary, removed by tanker and treated offsite*. Sections 6.1.3 – 6.1.6 of the **Outline BSMP [APP-286]** addresses the requisite risk assessments and consequence modelling that addresses all credible BESS failure events which will be supplied at the detailed design stage. Section 5.3.2 of the **Outline BSMP [APP-286]** stipulates that: *"The firefighting water requirement will be fully assessed at the detailed design stage based upon analysis of Large Scale Fire Testing (LSFT) of the BESS design plus any additional BESS fire and explosion test data by an independent Fire Protection*

Reference	Comments/Issue raised	Applicant's Response
		Engineer and water storage volumes will be agreed with D&WFRS during detailed design; and *If an internal BESS water based fixed suppression system (automatic or dry pipe) is integrated in the BESS enclosures a separate water supply and water containment system will be integrated. Any process water from the suppression system will be contained and subjected to the same accredited testing and characterisation regime as firewater runoff before any discharge or off-site removal."* Section 5.5.2 stipulates: "*D&WFRS in foreseeable and credible emergency response scenarios would most likely adopt a defensive firefighting strategy by using water on neighbouring areas such as battery enclosures and structures to cool down and prevent further fire spread. The Scheme will select a BESS design that has undertaken full scale free burn testing to demonstrate thermal insulation protection capabilities of the BESS enclosure design, validate equipment spacing distances, and demonstrate that deflagrations do not occur and/or can be safely constrained. In accordance with NFCC guidance, the Order Limits will be maintained to prevent a fire spreading to the BESS or inadvertently fire loading, by*

Reference	Comments/Issue raised	Applicant's Response
		providing a 'bridge' or path between BESS enclosures to transmit flaming or radiant heat." Boundary cooling typically involves firefighters directing water fog or spray pattern discharge to ensure the incident does not spread to adjacent BESS enclosures. NFCC guidance states: "*If it can be confirmed that the recommended firefighting tactic for the BESS is to defensively fire fight and boundary cool whilst allowing the BESS to consume itself, this will reduce the water requirements, and thus the drainage/environmental protection requirements significantly*." If firefighters are applying water fog or spray patterns to adjacent BESS enclosures or deploying defensive spray plates that form a water curtain between the affected enclosure and adjacent BESS these "boundary cooling" tactics would likely be applied intermittently in 15-minute application periods with temperature changes measured between application periods. The peak fire load for most current BESS designs lasts for 1-3 hours and the rest of the fire, another 4-8 hours, would be at a lower intensity which reduces the impact of the fire. The maximum Peak Heat Release Rate (PHRR) occurs when propagation rate of battery

Reference	Comments/Issue raised	Applicant's Response
		cells is at peak level and decays to a smaller steady fire that is burning through fewer battery cells / modules and BESS system combustible materials. Boundary cooling would only be expected to be required during the peak fire load and is unlikely to be required if LSFT and rigorous consequence modelling has been conducted to demonstrate that loss will be safely limited to one BESS enclosure without the intervention of D&WFRS. UL 9540A heat flux test data can also establish safe distances between containers and ESS equipment but will not be conclusive if full propagation of the battery system does not occur in the test. The Applicant is in the process of agreeing a Statement of Common Ground (SOCG) with D&WFRS to provide assurance that all safety and emergency response requirements are fulfilled. The **Outline BSMP [APP-286]** is secured through Requirement 6 (Battery safety management) in Schedule 2 of the **Draft DCO [APP-016]**, which provides that Work No. 2 must not commence until a Battery Safety Management Plan has been submitted to and approved by the relevant planning authority. The approved plan must be substantially in accordance with the Outline Battery Safety

Reference	Comments/Issue raised	Applicant's Response
		Management Plan. The Draft DCO also requires the relevant planning authority to consult with Dorset and Wiltshire Fire and Rescue Service and the Environment Agency before determining the application, and that the Battery Safety Management Plan must be implemented as approved. The concerns raised in relation to firefighting water runoff and contamination are addressed in the responses to MH-001 and MH-003 above. The Scheme includes a controlled and isolatable drainage approach for the BESS, as set out in the **Outline Battery Safety Management Plan [APP-286]** and the standalone Firewater Containment and Drainage Strategy. This approach is based on containment rather than discharge. In the event of a fire, drainage within the BESS Area would be isolated so that firefighting water is retained within the site. Any stored water would then be removed and managed off-site in accordance with relevant environmental controls, rather than being allowed to enter surrounding land, watercourses or groundwater. On that basis, there is no pathway for contaminated firefighting water to be released to the environment,

Reference	Comments/Issue raised	Applicant's Response
		and the Scheme would not give rise to pollution of soils, surface waters or groundwater as a result of a BESS fire event.
PS-005	In conclusion, Mr Simmons stated that he would be submitting further information into the examination at Deadline 1A and urged the ExA to consider the project very carefully.	The Applicant notes this comment and welcomes continued engagement with Mr Simmons.

2.49 Gavin Grant

Reference	Comments/Issue raised	Applicant's Response
GG-001	Gavin Grant, Wiltshire Council Cabinet Member for Finance and Wiltshire Councillor for Malmesbury, explained that he has represented Malmesbury since 2017, has served on Malmesbury Town Council for 11 years, is a former Mayor of Malmesbury, and has lived in the town with his family for 21 years. He described his commitment to the long-term wellbeing of the community as both personal and enduring.	The Applicant notes Mr Grant's comment.
GG-002	Mr Grant also explained that he is an unpaid director of the Malmesbury Town Team, a not-for-profit community interest company established through a section 106 agreement following the arrival of Waitrose. He described the Town Team's role in promoting Malmesbury and safeguarding the economic health of the town centre, supporting local retailers, hospitality and service businesses, and key visitor attractions. From this combined perspective, he urged the ExA to give close attention to the significant negative economic impacts the Scheme would have on Malmesbury and the wider rural economy.	The Applicant notes Mr Grant's comment.
GG-003	Mr Grant described tourism as the cornerstone of the local economy and referred to Wiltshire Council's submission of evidence, approved by Cabinet, estimating a loss of £1.8 million in tourism revenue as	The potential effects of the Scheme on tourism and recreation are assessed in **ES Volume 1, Chapter 16: Socio Economics, Tourism and Recreation [APP-068]**, supported by **ES Volume 3, Appendix 16-2:**

Reference	Comments/Issue raised	Applicant's Response
	a direct impact of the Scheme. He explained that much of Malmesbury's appeal lies in its rich history, noting that it is the burial place of King Æthelstan, the first King of England, and that the town recently marked the 1,100th anniversary of Æthelstan's crowning. He also referred to Malmesbury's association with St Aldhelm, commemorated in Salisbury Cathedral, and its status as the birthplace of Thomas Hobbes, author of Leviathan.	**Tourism and Recreation Receptor Tables [APP-241]**. The assessment identifies a worst-case scenario in which a temporary loss of up to 50 tourism-related jobs and £1.76 million in annual spending could occur locally during construction, and a long-term loss of up to 11 tourism-related jobs/ £395,000 in visitor spending per annum could occur during the operational phase of the Scheme. This represents a precautionary estimate based on conservative assumptions. The assessment concludes that, while some localised effects on tourism receptors are anticipated to occur, significant adverse effects on the wider tourism economy are not anticipated. Additional mitigation measures (which were not quantified for inclusion in the assessment of potential losses to employment) secured in the **Outline SSCEP [APP-285]** seek to reduce tourism employment losses through focussing on local recruitment, promoting local suppliers where practicable, and through providing retraining opportunities for workers in tourism-dependent industries. This is secured through Requirement 18 of Schedule 2 to the **Draft DCO [APP-016]**. Furthermore, the Applicant has specifically assessed the likely impacts on Malmesbury Conservation Area as a tourism receptor in **ES Volume 3, Appendix 16-2: Tourism and Recreation Receptor Tables [APP-**

Reference	Comments/Issue raised	Applicant's Response
		241], as this covers the town centre's main tourism-dependent businesses, and key attractions e.g. Malmesbury Abbey and the Athelstan Museum. The assessment finds no greater than a negligible adverse impact to this receptor as a result of limited distant views of the Scheme, and minimal impacts from HGV movements on routes such as the A429. This is therefore not a significant effect at any phase of the Scheme.
GG-004	Mr Grant further described Malmesbury as a gateway to the edge of the CNL, surrounded by high-quality countryside, and stated that visitors are drawn by this heritage, the character of the town, and the strength and diversity of its independent businesses. He argued that the scale, nature and location of the Scheme pose a catastrophic threat to this economic base.	The Cotswolds National Landscape (CNL) is fully assessed as a standalone receptor within **ES Volume 3, Appendix 8-6: Assessment of Effects on the Cotswolds National Landscape and its Special Qualities [APP-197]**. This assessment considers the effects of the Scheme on landscape character, visual amenity and the special qualities of the CNL, including tranquillity. The Scheme was refined through an iterative design process to avoid and reduce effects on the CNL and its setting. Panels along the edge of the CNL were removed from the Order Limits in fields C2, C3 and C4 where significant visual effects on receptors within the CNL were identified. Panels were also removed from fields C1, C6, C8, the western section of C9 and the majority of C10, with this land now proposed for

Reference	Comments/Issue raised	Applicant's Response
		ecological mitigation to protect the setting of the CNL. In addition, panels within fields A11 and A12 were removed and the land repurposed for ecological mitigation to protect the setting of the CNL towards Sherston. All land parcels adjacent to the CNL are proposed to deliver habitat enhancement, informed by the CNL Management Plan and the Cotswolds National Landscape Strategy and Guidelines, to further the purposes of the designation Details of the proposed landscape and ecological mitigation and enhancement measures are provided in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060], Figure 3-4-1 to 3-4-5.2 Landscape and Ecology Mitigation Plan [APP-084]** and the **Outline LEMP [APP-283],** and the **Outline EPMS [APP-284]**. As with Malmesbury Conservation Area, the Applicant has also specifically assessed the likely impacts on the Cotswold National Landscape as a tourism receptor in **ES Volume 3, Appendix 16-2: Tourism and Recreation Receptor Tables [APP-241]**, due to its national significance as a tourism and visitor destination. The assessment finds no greater than a moderate-minor adverse impact to the CNL as a result of views of the Scheme, and some impacts from HGV

Reference	Comments/Issue raised	Applicant's Response
		movements on routes such as the A46 and local routes between villages in the CNL. This is therefore not a significant effect at any phase of the Scheme. This outcome has been determined as a result of removal of substantial areas of land from the Order Limits or Solar PV Array areas from the edge of the CNL, and the provision of a comprehensive area of landscape screening mitigation measures. These are secured through the **Outline LEMP [APP-283]** by Requirement 7 of Schedule 2 to the **Draft DCO [APP-016]**.

2.50 Helen Hood

Reference	Comments/Issue raised	Applicant's Response
HH-001	Helen Hood shared her opinion based on more than 30 years specialising in the conservation of heritage buildings. Ms Hood highlighted the historical significance of Rodbourne, stating that the Aldhelm of Malmesbury Abbey introduced farming practices such as ridge and furrow that remain visible in the landscape today, including on the Applicant's own mapping. Despite this, the Applicant's reporting describes the land as having been "recently used for arable cultivation", which appears inconsistent with 5000 years of continuous agricultural use. Ms Hood stated the reporting was lacking historical reality and local knowledge.	**ES Volume 1, Chapter 12: Cultural Heritage [APP-064]**, supported by **Volume 3 Appendix 12.7: Historic Landscape Assessment [APP-231]**, has assessed the potential impact of the Scheme on the historic landscape character. No significant effects were identified on the historic landscape character as a result of impacts caused by the Scheme. The landscape within the Order Limits of the Scheme is characterised by post-medieval or modern enclosure (including amalgamated fields, assarts, piecemeal enclosure, planned enclosure, prairie fields and reorganised fields). With the exception of a few areas where ridge and furrow earthworks have been identified, surviving remnants of agricultural activity predating the post-medieval period survive only as buried archaeological features. With consideration to Rodbourne Conservation Area, and the Listed Buildings located within it, embedded mitigation including the removal of Fields E5 and E8 from the Scheme Order Limits, removal of panels from Fields E7, E9 and E10, offsets to the PRoW and enhanced screening of existing hedgerows are considered sufficient mitigation to remove any adverse impacts to the Conservation Area. Consequently, no

Reference	Comments/Issue raised	Applicant's Response
		significant effects were identified to Rodbourne Conservation Area or the heritage assets located within the village.
HH-002	Ms Hood contended that Island Green Power's heritage assessment misrepresents impacts through omission. Ms Hood stated that the Applicant's heritage assessment excludes key designated heritage assets from the scope of assessment, including Rodbourne's tenth century Grade II* listed church, connected to its Abbey, and other listed buildings from which the proposed development would be visible, despite the Applicant's own mapping indicating that much of the development would be visible from the Abbey, nearby conservation areas and the CNL. In her view, as a scheduled monument, Malmesbury Abbey must be included within the scope of assessment, and she stated that the Applicant has ignored Government policy and Historic England guidance on the wider context and importance of historic villages such as Alderton, Rodbourne and Grittleton. She stated this require independent investigation. Ms Hood expressed concern that historic villages such as Alderton, Rodbourne and Grittleton, described as early nineteenth century model villages with strong vernacular character and group value, have not been	As to historic landscape character and heritage assets with Rodbourne please see response to HH-001. Annex 1 of **ES Volume 3, Appendix 12-1: Heritage Statement [APP-219]** details assets scoped in for assessment and was used during consultation with Historic England and Wiltshire Council. Scoped in assets are considered to be agreed with both stakeholders. While it is noted that Malmsbury Abbey and Conservation Area are located on a prominent position and are visible within the wider landscape. There is no relationship with land within the Scheme and the Assets and consequently they were scoped out of the assessment. As detailed in Section 12.3 of **ES Volume 1, Chapter 12: Cultural Heritage [APP-064]**, the cultural heritage assessment follows appropriate legislation, policy and guidance including the overarching NPS for Energy (EN-1) (Ref 1), NPS for Renewable Energy Infrastructure (EN-3) (Ref 2), the Wiltshire Core Strategy (Ref 7), as well as guidance provided by

Reference	Comments/Issue raised	Applicant's Response
	properly considered when assessing heritage effects. Ms Hood stated that the assessment fails to consider the cultural and religious significance of the landscape, including an eighth-century pilgrimage route to Malmesbury Abbey, which remains in use, and the final resting place of Aldhelm before his burial at the Abbey in 709 AD.	Historic England and the Chartered Institute for Archaeology. No significant effects have been identified as a result of the Scheme to heritage assets within Alderton, Rodbourne and Grittleton (see **ES Volume 1, Chapter 12: Cultural Heritage [APP-064],** supported by **ES Volume 3, Appendix 12.1: Heritage Statement [APP-219]).** The Athelstan Pilgrim Way forms a number of routes to the south of Malmsebury None of the routes are within the Order limits of the Scheme and there will be no direct effects on the route. The route is formed of local PRoW and minor roads. Those in close proximity to the Scheme have been fully assessed in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060].**
HH-003	Ms Hood concluded by stating that official guidance is clear that removing heritage assets from their historic context and landscape setting causes harm. Ms Hood argued that the Scheme would destroy the deep agricultural and spiritual connections of this landscape, industrialising historic communities. Ms Hood stated that local residents continue to farm the land and maintain nationally important heritage assets at their own expense, and that they depend on the unspoilt tranquillity of the countryside for their health and	**ES Volume 1, Chapter 12: Cultural Heritage [APP-064]**, supported by **Volume 3, Appendix 12.1: Heritage Statement [APP-219]**, has assessed the potential impact of the Scheme on built heritage assets including indirect (setting) impacts. Where required appropriate mitigation has been proposed (see Section 12.9 of **ES Volume 1, Chapter 12: Cultural Heritage [APP-064]** for embedded mitigation and Section 12.11 for additional mitigation).

Reference	Comments/Issue raised	Applicant's Response
	wellbeing, which she considered would be fundamentally undermined by the Scheme.	

2.51 Clare Stokes

Reference	Comments/Issue raised	Applicant's Response
CS-001	Clare Stokes stated that she lives with her family at The Plain, Easton Gray, adjacent to the Fosse Way. Ms Stokes explained that they deliberately chose the property for its peaceful rural setting within open countryside. She expressed concern about the scale of the Scheme, which would affect the field immediately opposite her home. Ms Stokes expressed her concern about the size and visual dominance of the panels and the enclosed fencing, that would exclude wildlife currently present in the area and observed from her home. Ms Stokes noted that the panels would be tracking panels and stated that they would be both visible and audible from her house and garden. Ms Stokes explained that she is particularly sensitive to noise, which was a key reason for choosing a rural rather than urban location, and described her garden as a place of sanctuary. Ms Stokes stated that the prospect of losing this tranquillity is extremely distressing.	With regards to potential Landscape impacts, a series of buffers have been embedded into the layout of the Scheme, which includes for a 50m offset from the curtilage of all residential properties. The Scheme has been designed to accommodate adjacent residential properties, and infrastructure has been set back to allow separation and space for mitigation. The Plain, Easton Grey (**ES Volume 3, Appendix 8.3.1: Visual Assessment Sheets (Not carried through to the ES Assessment) [APP-189])** receptor RI050) is located to the north of field B6. The layout of the panels within field B6 does not extend the full extent of the field with panels not on the sloping land within the northern part of the field, or to the north eastern part of the field. New hedgerow is proposed along the external edge of the north eastern fenceline to provide softening and screening of the array in this location, with proposed tussocky grassland within the areas outside of the array but still within the Order Limits. This arrangement results in panels within field B6 being located approximately 140m south of the property.

Reference	Comments/Issue raised	Applicant's Response
		Given the above juxtaposition between the Scheme and the property, combined with the layout and mitigation proposed for the Scheme at this location, the Initial Assessment **(ES Volume 3, Appendix 8.3.1: Visual Assessment Sheets (Not carried through to the ES Assessment) [APP-189])** concluded that due to surrounding woodland cover, there would be no potential views of the Scheme when looking south towards Lime Down B, and that there would be no intervisibility between residents at The Plain Farm and panels within Lime Down B and as such, Receptor RI050 (The Plain, Easton Grey) was not 'Carried Forward' into the LVIA. Potential effects of boundary treatments and fencing on ecology and wildlife movement are assessed in **ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061]**, which considers impacts on habitats and species during construction, operation and decommissioning and identifies measures to avoid or mitigate barriers to wildlife movement. The assessment concludes that no significant adverse effects on ecology and biodiversity are anticipated as a result of boundary treatments and fencing. The Scheme design incorporates fencing around the Solar PV Arrays that is permeable to wildlife, with the

Reference	Comments/Issue raised	Applicant's Response
		exception of deer. This means animals (excluding deer only) will be able to freely access habitats within the Solar PV Sites without the need for wildlife gates. In addition, wide buffers are retained around the peripheries of the Solar PV Sites to allow wildlife, including deer, to move between favoured habitats. These measures are described in **ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061]** and detailed in the **Outline EPMS [APP-284]**. Fencing will be subject to regular inspection and maintenance to ensure continued permeability to wildlife and effective functioning over the lifetime of the Scheme. Measures for ongoing ecological management and maintenance are set out in the **Outline LEMP [APP-283]**. The preparation, approval and implementation of the detailed Ecological Protection and Mitigation Strategy and Landscape and Ecological Management Plan, substantially in accordance with the **Outline EPMS [APP-284]** and **Outline LEMP [APP-283]**, are secured through Requirements 8 and 7 respectively in Schedule 2 of the **Draft DCO [APP-016]**, ensuring that fencing design and maintenance measures are delivered and maintained throughout the lifetime of the Scheme.

Reference	Comments/Issue raised	Applicant's Response
		With regards to Noise effects from the Scheme, the Plain has been assessed as receptor R37 within **ES Volume 1, Chapter 14: Noise and Vibration [APP-066]**. Construction noise levels at R37 are presented in Table 14-18 of **Chapter 14: Noise and Vibration [APP-066]** and operational noise levels are presented in Table 8 and Table 9 of **Appendix 14-4 Noise Modelling [APP-237]**, for the daytime and night-time respectively. As explained in paragraphs 14.4.16 to 14.4.18 of **Chapter 14: Noise and Vibration [APP-066]**, noise from the tracking motors of the solar panels is not expected to be audible at residential properties. The operational noise levels, which are based on a robust assessment using internationally recognised standards for sound propagation and a series of reasonable worst-case assumptions, such as wind in the direction of the receptor from all sound sources, demonstrate that levels from the Scheme would be slightly below the typical existing background sound in the area.
CS-002	Ms Stokes explained that she and her family raised concerns about the loss of views and peace during a meeting with the Applicant. She stated that representatives of the Applicant, including Will Threlfall and Chris Jackson, visited her home in February 2025 to discuss the Scheme and to observe the impacts	Landscape and Visual comments have been addressed in CS-001 above. The **Outline OEMP [APP-278]** commits to noise levels from the Scheme at residential dwellings being the same as or below those modelled in the ES. This

Reference	Comments/Issue raised	Applicant's Response
	directly. Ms Stokes explained that the field opposite her house slopes upwards, meaning that the Applicant's initial Scheme to plant trees to screen the development would not work. She added that even if screening were possible, it would take many years to establish and would still result in the permanent loss of countryside views. Ms Stokes stated that concerns about noise were dismissed with the comment that noise levels would be "about the level of rustling leaves", which she considered disingenuous. She said the meeting concluded with only a vague agreement that options would be explored to provide visual screening for the house, but not mitigation of noise effects.	provides assurance that significant effects from operational noise will be avoided, while allowing flexibility in how this is achieved. It is likely to involve substantial mitigation of plant at source as described in Section 14.9 of **ES Volume 1, Chapter 14: Noise and Vibration [APP-066]**. The preparation, approval and implementation of the detailed OEMP, substantially in accordance with the outline plan, are secured through Requirement 14 of Schedule 2 of the **Draft DCO [APP-016]**, ensuring operational noise is appropriately controlled throughout the lifetime of the Scheme.
CS-003	Ms Stokes stated that it has since become apparent that her concerns were not reflected in the application documentation, noting that her property is not listed as being affected in Appendix APP192 on the Planning Inspectorate website. She explained that approximately three weeks prior to the hearing she emailed Mr Threlfall to query why her home was not identified as affected, despite the previous meeting clearly setting out the issues, and stated that she has received no response.	Following the meeting between the Applicant's representatives and CS-003 in February 2025, a further conversation over the phone was held with Mr Stokes on 27 March, in which it was communicated that a further offsetting of panel infrastructure, as described in the above response to CS-001, was to be incorporated into the Scheme's design following consideration of the concerns raised. This change is reflected in the final application documents in Field B6. Further queries have been addressed and sign posting to the relevant documentation has been provided.

Reference	Comments/Issue raised	Applicant's Response
CS-004	In conclusion, Ms Stokes urged the Planning Inspectorate to place the wellbeing of the local community ahead of the financial interests of an overseas developer. She described the Scheme as a large-scale industrial development proposed within an area of natural beauty that would permanently alter its character, forcing local residents to live with visual intrusion and noise instead of the peace and beauty of the countryside. She requested that consent for the Scheme not be granted.	The Applicant notes Ms Stokes' comment, and as demonstrated above has undertaken the relevant assessments and provided mitigation where required to minimise effects on local residents as a result of the Scheme.

2.52 GDPR-LDSF-030

2.52.1 Given the age of GDPR-LDSF-030, the Applicant has provided a non-technical response, in addition to a technical response, to aid understanding. The Applicant appreciates the time and efforts made by GDPR-LDSF-030 to contribute to the examination of the Scheme, and as such would like to offer a visit to her school to explain the science and process behind solar developments in more detail. If GDPR-LDSF-030 is interested in such a visit, please contact the project team at info@limedownsolar.co.uk.

Applicants Non-technical Response to GDPR-LDSP-030

Reference	Comments/Issue raised	Applicant's Non-Technical Response
GDPR-LDSF-030-001	[redacted] expressed concern that the Scheme would lead to the loss of homes for animals and wildlife, and that the Roman Fosse Way would be harmed by being surrounded by the Scheme. GDPR-LDSF-030 stated the Fosse Way is ancient, and the Scheme would result in less visitors if it were bordered by large solar panels. GDPR-LDSF-030 stated the countryside, flowers, nature, fields and animals would be harmed in the interest of financial gain.	Thank you for your comments and the clear way in which you expressed them. We understand why you have some of the concerns you spoke about and would like to reassure you that the scheme will not lead to the loss of homes for wildlife. There is a lot of science to show that solar farms provide more homes for wildlife. This is because farmland is not always a good place for wildlife to live. We have done a lot of surveys to see what wildlife exists and how the land offers homes for wildlife at the moment. We have used the information from these surveys to design the scheme, and the way we will build it, so that we increase the space for wildlife to flourish. This includes creating new habitats that will support local animals.

Reference	Comments/Issue raised	Applicant's Non-Technical Response
		One way we will do this is by planting areas of flowers, trees and bushes so that there will be more of these than before. Using the surveys, we have also changed our plans to take away areas of solar panels. This means that we have less solar than we first proposed. This includes taking away panels from fields along the Fosse Way, so that the solar farm, would not be as close to it. We have used experts to look at how our plans might affect historical buildings or landscapes, including the Fosse Way, and they have told us that the effects of the scheme are not significant. We have said that we expect to have a significant adverse effect on the tourism potential of the Fosse Way. This is one of many things the Planning Examiners will consider when recommending if the scheme should be allowed or not. All of this detailed information is in the reports we have given to the Planning Inspectorate. You can see this in these documents: • **ES, Volume 1, Chapter 9: Ecology and Biodiversity [APP-061]**. This explains what our ecology surveys found.

Reference	Comments/Issue raised	Applicant's Non-Technical Response
		• **Outline Landscape and Ecological Management Plan [APP-283]**. This explains what we will do to protect the landscape and nature from construction until the scheme ends. This includes our plans for new planting. • **Outline Ecological Protection and Mitigation Strategy [APP-284]**. This explains how we will protect nature and the environment while we are building the scheme. • **Statutory Biodiversity Metric [APP-274]** and the **Biodiversity Net Gain Assessment Report [APP-273]**. These explain how we will make sure the scheme gives nature more space to thrive. • **ES, Volume 1, Chapter 12: Cultural Heritage [APP-064]**. This explains what our heritage surveys found. • **ES, Volume 3, Appendix 12.1: Heritage Statement [APP-219]**. This explains how we are protecting heritage sites, such as the Fosse Way. • **ES, Volume 3, Appendix 16-2: Tourism and Recreation Receptors [APP-241]**. This has specific information about the effect on the Fosse Way as a tourist site.
GDPR-LDSF-030-002	GDPR-LDSF-030 stated that solar panels should be located on rooftops or buildings rather than the countryside. GDPR-LDSF-030 explained that the panels would be close to trees that [redacted]	To build as much solar as the Government says Britain needs, building owners would need to put solar on rooftops six times faster than they do at the moment.

Reference	Comments/Issue raised	Applicant's Non-Technical Response
	[redacted] GDPR-LDSF-030 stated that the greyness of the Scheme would make her, and many people in North Wiltshire, feel deeply sad.	And keep doing that until 2035. We believe that this is not likely to happen and might not be possible anyway. We agree that it is important that people build small solar schemes for their home or business. We also agree with the government's National Policy Statement 1 for planning. This says that small solar schemes will not be enough to mean there is no need for large scale solar. Large scale solar schemes, like this one, produce a lot of power that is connected to the national grid. This means that it can be used by anyone who needs electricity. There is more detail in section 6.3 of the **Statement of Need [APP-266]** in the application.
GDPR-LDSF-030-003	GDPR-LDSF-030 emphasised that the Scheme would affect the countryside for 60 years, noting that she would be 69 years old by the time it ended, and she does not want to live most of her life in a "sad and grey landscape". GDPR-LDSF-030 stated that people in the area support renewable energy but referred to alternative ways of generating energy that do not harm farms, animals or the countryside, such as offshore wind turbines.	The government expects that a cheaper and cleaner energy system will mostly use wind and solar power. In our application, we show that wind and solar power work well together to provide reliable low-carbon energy. This would also help make Britain less dependent on global fossil fuel supplies, which can suddenly become expensive. But this means having both large solar and large wind farms.

Reference	Comments/Issue raised	Applicant's Non-Technical Response
		You can see more about this in Section 8.5 of the **Statement of Need [APP-266]**.
GDPR-LDSF-030-004	In conclusion, GDPR-LDSF-030 asked that the countryside is not permanently altered, stating that it is extremely important to local people and a source of happiness. GDPRLDSF03 asked that her reasons be taken seriously despite her age and urged that the Scheme not be approved.	When designing the project, we thought carefully about how it might affect the local community and how people feel. We understand that some people might worry that the countryside could feel less peaceful or different. Some people may think the project is helpful, while others may think it causes problems. Because of this, some people could feel upset, stressed, or worried. However, we believe that these effects would, overall, not be significant. To help people during the building work, there will also be a community liaison group. This group will: • Listen to local people's worries and questions, • Pass information between the builders and the community, • Help solve problems quickly, • And guide people to mental health support if they need extra help. The group is there to make sure people are heard, informed, and supported while the project is being built and operated.

Reference	Comments/Issue raised	Applicant's Non-Technical Response
		If the project goes ahead, there will be a binding legal condition that makes sure the group will exist. This is in the **Draft DCO [APP-016]**, as Requirement 4 in Schedule 2. There is more information in the **Environmental Statement Volume 1, Chapter 18: Human Health [APP-070]**.

Applicant's Technical Response to GDPR-LDSP-030

Reference	Comments/Issue raised	Applicant's Technical Response
GDPR-LDSF-030-001	GDPR-LDSF-030, lives in Lavington, near Chippenham, and wrote [redacted] She expressed concern that the Scheme would lead to the loss of homes for animals and wildlife, and that the Roman Fosse Way would be harmed by being surrounded by the Scheme. GDPR-LDSF-030 stated the Fosse Way is ancient, and the Scheme would result in less visitors if it were bordered by large solar panels. GDPR-LDSF-030 stated the countryside, flowers, nature, fields and animals would be harmed in the interest of financial gain.	Potential impacts on ecology and biodiversity are fully assessed in **ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061]**. This assessment considers baseline ecological conditions and evaluates likely significant effects arising during the construction, operation and decommissioning phases of the Scheme. It identifies avoidance, mitigation and enhancement measures to address potential impacts on habitats and protected and notable species. It also identifies opportunities for ecological enhancement, including the creation and long-term management of habitats, and delivery of biodiversity net gain. The assessment concludes that no significant unacceptable

Reference	Comments/Issue raised	Applicant's Technical Response
		adverse effects on ecology and biodiversity are anticipated during construction or operation. Measures to ensure potential impacts on habitats and protected and notable species are minimised and ecological enhancements are delivered will be secured via DCO Requirements including the **Outline LEMP [APP-283]** and the **Outline EPMS [APP-284]**. The Scheme is expected to deliver an overall net gain for biodiversity as a result of the cessation of agricultural practices combined with delivery of considerable habitat creation and enhancement measures. This is quantified through the use of the DEFRA published **Statutory Biodiversity Metric [APP-274]** with further details provided with the **Biodiversity Net Gain Assessment Report [APP-273]** which demonstrates in excess of 10% BNG will result from the Scheme. Regarding the comment on the potential Cultural Heritage impacts on 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

Reference	Comments/Issue raised	Applicant's Technical Response
		will be erected have had offsets established with their boundaries with Fosse Way, including Fields B6, C10-C12, and C22-C23. **Appendix 12.1: Heritage Statement [APP-219]** identified that the overall setting and significance of the Fosse Way will remain intact, and the asset will retain its legibility as a roadway within a largely agrarian landscape. Consequently no significant effects were identified to the asset within **ES Volume 1, Chapter 12: Cultural Heritage [APP-064]**. The assessment of impacts on long distance recreational routes in **ES Volume 3, Appendix 16-2: Tourism and Recreation Receptors [APP-241]** has included specific assessment of the Fosse Way as a nationally important recreation route due to its historical value. This is due to direct views of Lime Down B and C. Whilst mitigation measures to offset built infrastructure, and transport and PRoW mitigation is to be applied, due to its high sensitivity, it is anticipated the Scheme will have a significant adverse effect on the Fosse Way as a recreational route throughout the Scheme's construction, operation and decommissioning. This is a matter which will have to be considered in the planning balance when the DCO is determined.

Reference	Comments/Issue raised	Applicant's Technical Response
GDPR-LDSF-030-002	GDPR-LDSF-030 stated that solar panels should be located on rooftops or buildings rather than the countryside. GDPR-LDSF-030 explained that the panels would be close to trees that [redacted], and that her family regularly go on walks in the area. GDPR-LDSF-030 stated that the greyness of the Scheme would make her, and many people in North Wiltshire, feel deeply sad.	Section 6.3 of the Statement of Need [**APP-266**] describes that roll-out rates for small Schemes would immediately need to increase by a factor of 6 from recent levels and sustain those rates through to 2035 to achieve the top of the Government's clean power capacity range for solar for 2035 without the support of large-scale solar. The Applicant's view is that this is not likely nor feasible. The Applicant therefore agrees with Government's view that the continued rollout of distributed, rooftop and smaller scale solar is important to support achieving national climate goals, but that they will not "replace the need for new large-scale electricity infrastructure to meet our energy objectives" (Ref 1), Paragraph 3.3.12). This Scheme will connect to the National Electricity Transmission System so will bring forward benefits arising from the bulk transfer of power, including the pooling of generation and demand and supporting energy consumers both nationally and locally.
GDPR-LDSF-030-003	GDPR-LDSF-030 emphasised that the Scheme would affect the countryside for 60 years, noting that she would be 69 years old by the time it ended, and she does not want to live most of her life in a "sad and grey landscape". GDPR-LDSF-030 stated that people in the	With regards to potential Climate Change impacts, NPS EN-1 (Ref 1) Paragraph 3.3.20 explains that a low-cost, net zero consistent energy system in Great Britain is likely to be composed predominantly of wind and solar.

Reference	Comments/Issue raised	Applicant's Technical Response
	area support renewable energy but referred to alternative ways of generating energy that do not harm farms, animals or the countryside, such as offshore wind turbines.	Section 8.5 of the Statement of Need [**APP-266**] illustrates how wind and solar together delivers a reliable and dependable portfolio of low-carbon energy supplies which will also improve energy security by reducing Britain's vulnerability to volatile global fossil fuel markets.
GDPR-LDSF-030-004	In conclusion, GDPR-LDSF-030 asked that the countryside is not permanently altered, stating that it is extremely important to local people and a source of happiness. GDPRLDSF03 asked that her reasons be taken seriously despite her age and urged that the Scheme not be approved.	Impacts on communities have been considered as part of the assessment of "community identity, culture, influence and resilience" in **ES Volume 1, Chapter 18: Human Health [APP-070]**. The Applicant has considered how changes to perceptions of rurality, community sense of place, pride, engagement and difference in consideration of importance of different aspects of the Scheme (for example opposing views on harms versus benefits) may lead to a degree of impact to communities. The assessment has considered that this is likely to be up to a minor adverse effect on local communities and thus on residents' mental health and wellbeing. This is not considered a significant effect. Community liaison is also directly secured through Requirement 4 in Schedule 2 to the **Draft DCO [APP-016]** through the provision of a community liaison group during the Scheme's construction, operation and decommissioning. This group will act as an

Reference	Comments/Issue raised	Applicant's Technical Response
		intermediary between the public and the onsite contractors to ensure community concerns and any information they need are communicated and responded to, so as to reduce community anxiety and impacts on mental wellbeing, and to assist in directing the public to mental health support if required.

2.53 Henry Jodrell

Reference	Comments/Issue raised	Applicant's Response
HJ-001	Henry Jodrell has lived in Easton Gray for the past 30 years and during that time have witnessed increased economic activity driven by tourism, which they said has helped regenerate and revitalise towns such as Malmesbury and villages including Sherston. Mr Jodrell stated that his principal concern regarding the Scheme is negative impact on the local tourism industry and the associated economic benefits it brings to this rural area. Mr Jodrell referred to Wiltshire Council having identified a potential £1.8 million impact and argued that the location of a development of this scale at the southern gateway to the CNL would deter visitors. Mr Jodrell stated that the proposed site is too close to the boundary of the National Landscape and that its prominence would lead people to avoid the area.	With regards to the potential effects of the Scheme on tourism and recreation, these effects are assessed in **ES Volume 1, Chapter 16: Socio Economics, Tourism and Recreation [APP-068]**, supported by **ES Volume 3, Appendix 16-2: Tourism and Recreation Receptor Tables [APP-241]**. The assessment identifies a worst-case scenario in which a temporary loss of up to 50 tourism-related jobs and £1.76 million in annual spending could occur locally during construction, and a long-term loss of up to 11 tourism-related jobs/ £395,000 in visitor spending per annum could occur during the operational phase of the Scheme. This represents a precautionary estimate based on conservative assumptions. The assessment concludes that, while some localised effects on tourism receptors are anticipated to occur, significant adverse effects on the wider tourism economy are not anticipated. Additional mitigation measures (which were not quantified for inclusion in the assessment of potential losses to employment) secured in the **Outline SSCEP [APP-285]** seek to reduce tourism employment losses through focussing on local recruitment, promoting local suppliers where practicable, and through providing retraining opportunities for workers in tourism-dependent

Reference	Comments/Issue raised	Applicant's Response
		industries. Further additional mitigation measures to reduce impacts from HGV traffic and to PRoW users have been set out in the **Outline CEMP [APP-277]** and **Outline PRoWPPMP [APP 282]** to reduce impacts on individual receptors that contribute to tourism and recreation in the Study Area. These management documents are secured by Requirements 13, 16, and 18 in Schedule 2 to the **Draft DCO [APP-016]**. The Applicant has also specifically assessed the likely impacts on the Cotswold National Landscape as a tourism receptor in **ES Volume 3, Appendix 16-2: Tourism and Recreation Receptor Tables [APP-241]**, due to its national significance as a tourism and visitor destination. The assessment finds no greater than a moderate-minor adverse impact to the CNL as a result of views of the Scheme, and some impacts from HGV movements on routes such as the A46 and local routes between villages in the CNL. This is therefore not a significant effect at any phase of the Scheme. This outcome has been determined as a result of removal of substantial areas of land from the Order Limits or Solar PV Array areas from the edge of the CNL, and the provision of a comprehensive area of landscape screening mitigation measures. These are secured through the **Outline LEMP [APP-283]** by

Reference	Comments/Issue raised	Applicant's Response
		Requirement 7 of Schedule 2 to the **Draft DCO [APP-016]**. With regards to Landscape and Visual effects, Easton Grey and Sherston are located within the Cotswold National Landscape (CNL). The CNL is fully assessed as a standalone receptor within **ES Volume 3, Appendix 8-6: Assessment of Effects on the Cotswolds National Landscape and its Special Qualities [APP-197]**. This assessment considers the effects of the Scheme on landscape character, visual amenity and the special qualities of the CNL, including tranquillity. The Scheme was refined through an iterative design process to avoid and reduce effects on the CNL and its setting. Panels along the edge of the CNL were removed from the Order Limits in fields C2, C3 and C4 where significant visual effects on receptors within the CNL were identified. Panels were also removed from fields C1, C6, C8, the western section of C9 and the majority of C10, with this land now proposed for ecological mitigation to protect the setting of the CNL. In addition, panels within fields A11 and A12 were removed and the land repurposed for ecological mitigation to protect the setting of the CNL towards Sherston.

Reference	Comments/Issue raised	Applicant's Response
		All land parcels adjacent to the CNL are proposed to deliver habitat enhancement, informed by the CNL Management Plan and the Cotswolds National Landscape Strategy and Guidelines, to further the purposes of the designation. Details of the proposed landscape and ecological mitigation and enhancement measures are provided in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060], Figure 3-4-1 to 3-4-5.2 Landscape and Ecology Mitigation Plan [APP-084]** and the **Outline LEMP [APP-283],** and the **Outline EPMS [APP-284].**
HJ-002	Mr Jodrell expressed the view that the Applicant has not fully investigated or understood the long-term impacts of the Scheme on the local community, which he said would extend across the whole of North Wiltshire. He stated that tourism is generating growth and employment and is critical to the viability of many small businesses. Mr Jodrell described local cafés being busy mid-week with cyclists and walkers using the area's footpaths and country lanes. Mr Jodrell explained that visitors recommend the area to others, creating an economic benefit for local businesses.	The Applicant has aimed to provide a robust assessment of impacts to tourism and recreation in **ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]**. Therein, the Applicant has assessed that there is a likely worst case temporary loss of 50 FTE tourism industry jobs as a result of the Scheme. This is based on likely construction impacts including increased HGV use of the local highway network, visual and amenity impacts, and impacts on the use of PROWs. This estimate does not account for additional mitigation measures being applied. This effect on GVA in tourism-dependent industries is not significant, accounting for less than 0.7% of tourism-based employment within 5 km of the Scheme (BRES,

Reference	Comments/Issue raised	Applicant's Response
		2023 data), and approximately 0.17% of tourism employment across Wiltshire (29,000 estimate from Visit Wiltshire, 2021). This is also a temporary effect, anticipated to occur during construction, with recovery to tourism businesses anticipated to begin as soon as construction works are complete. During the Scheme's operational phase, the reduction in tourism compared to current conditions is anticipated to be equivalent to a loss of 11 FTE tourism-dependent jobs. Additional mitigation measures have been secured through the **Outline CTMP [APP-287]**, **Outline PRoWPPMP [APP-282]** and the **Outline SSCEP [APP-285]**. Together these seek to reduce these losses to tourism through mitigating traffic impacts, impact to PROWs, and focusing on local recruitment, promoting local suppliers where practicable, and through providing retraining opportunities for workers in tourism-dependent industries. These measures are secured by Requirements 15, 16, and 18 in Schedule 2 to the **Draft DCO [APP-016]**.
HJ-003	Mr Jodrell referenced Section 14 of the Wiltshire Cycleway, which would not continue if open countryside were fenced off for the long-term and views were obscured by 4.5m solar panels.	The assessment of impacts on long distance recreational routes in **ES Volume 3, Appendix 16-2: Tourism and Recreation Receptors [APP-241]** has identified the Wiltshire Way as a regionally important cycle route. Section 14 of the Wiltshire Cycleway is the section from Malmesbury to Yatton Keynell (via Foxley,

Reference	Comments/Issue raised	Applicant's Response
		Norton, Fosse Way, Grittleton) and therefore is the main element assessed in **ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]**. Due to its high sensitivity, it is anticipated the Scheme will have a significant adverse effect on the route throughout the Scheme's construction and decommissioning, a matter which will have to be considered in the planning balance when the DCO is determined. The Scheme is not considered to have a long-term significant adverse effect on the route during its operational phase.
HJ-004	Mr Jodrell further referred to national media recognition of Malmesbury as a popular place to visit and live. Mr Jodrell questioned why future jobs and businesses should be put at risk by turning the southern gateway to the CNL into an area people would seek to avoid due to the presence of a highly visible solar development.	The Applicant has specifically assessed the likely impacts on Malmesbury (based on the Conservation Area) as a tourism receptor in **ES Volume 3, Appendix 16-2: Tourism and Recreation Receptor Tables [APP-241]**, as this covers the town centre's main tourism-dependent businesses, and key attractions e.g. Malmesbury Abbey and the Athelstan Museum. The assessment finds no greater than a negligible adverse impact to this receptor as a result of limited distant views of the Scheme, and minimal impacts from HGV movements on routes such as the A429. This is therefore not a significant effect at any phase of the Scheme.

Reference	Comments/Issue raised	Applicant's Response
HJ-005	In conclusion, Mr Jodrell requested that a detailed and robust assessment of the long-term economic impacts of the Scheme on local tourism be undertaken over a number of years. He stated that the assessment work carried out by the Applicant to date is not satisfactory and urged caution before permanently altering the character of the southern gateway to the CNL. He emphasised the importance of tourism to the local economy and asked that this impact be fully examined before any decision is made.	The Applicant is confident that the assessment methodology in **ES Volume 1, Chapter 16: Socio Economics, Tourism and Recreation [APP-068]** and supporting **ES Volume 3, Appendix 16-2: Tourism and Recreation Receptor Tables [APP-241]** are robust, and that the assessment outcomes demonstrate the likely significant effects from the Scheme based on a reasonable and precautionary worst-case scenario.

2.54 Sara Sorby (on behalf of St Paul Malmesbury Without Parish Council)

Reference	Comments/Issue raised	Applicant's Response
SS-001	Ms Sara Sorby, on behalf of St Paul Malmesbury Without Parish Council, stated that the Council opposes the Scheme due to grounds of flooding, contamination, visual impact, noise and highways impacts. Ms Sorby described the Scheme as inappropriate given the distance of the site from the grid connection at Melksham and irresponsible in its use of natural countryside for industrial purposes.	See response to SS-002 below. The Applicant notes MS Sorby's comments on behalf of St Paul Malmesbury Without Parish Council. The Applicant's response to comments on flooding are included at row SS-002 below. With regard to the comments made on visual impact, an assessment of landscape and visual effects is provided in the Landscape and Visual Impact Assessment (LVIA) presented in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]**. The LVIA assesses effects on identified landscape and visual receptors, including residential properties and users of public rights of way, and identifies where significant effects may occur. The LVIA recognises that as a consequence of the development that there would be long term adverse effects on the Landscape Character of the area as well as long term significant adverse effects to 10 Visual Receptors, all of which are local PRoW which are either within or directly adjacent to the proposed arrays. Mitigation measures to address landscape and visual effects are set out in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]**, **Figure 3-4-1 to 3-**

Reference	Comments/Issue raised	Applicant's Response
		4-5.2 Landscape and Ecology Mitigation Plan [APP-084] and detailed within the **Outline LEMP [APP-283]** and the **Outline EPMS [APP-284]**. These documents include proposals for new and enhanced planting, retention of existing hedgerows and woodland, and landscape integration measures to reduce visual effects over time. In addition, the Scheme design incorporates minimum offsets from existing landscape features, including residential properties, ancient woodland, woodland, hedgerows, public rights of way and watercourses, to further limit visual impacts. The preparation, approval and implementation of detailed landscape and ecological management plans, substantially in accordance with the **Outline LEMP [APP-283]** and **Outline EPMS [APP-284]**, are secured through Requirements 7 and 8 in Schedule 2 of the **Draft DCO [APP-016]**, ensuring that the identified mitigation measures are delivered and maintained throughout the lifetime of the Scheme. In terms of the noise and vibration impacts arising from the Scheme, these are assessed in Section 14.10 of **ES Volume 1, Chapter 14: Noise and Vibration [APP-066]**. No significant effects from construction

Reference	Comments/Issue raised	Applicant's Response
		noise or vibration or operational noise are expected, with mitigation measures in place. Mitigation measures are committed to in the **Outline CEMP [APP-277]** and **Outline OEMP [APP-278]**. The preparation, approval and implementation of the Environment Management Plans is secured through Requirement 13 and 14 in Schedule 2 of the **Draft DCO [APP-016]**, ensuring that construction and operational noise are appropriately controlled. With regards to comments made on transport, **ES Volume 1, Chapter 13: Transport and Access [APP-065]** concludes that the impacts of construction traffic would be temporary and would not result in any significant transport effects. Construction traffic will be controlled through measures set out in the **Outline CTMP [APP-287]** and **Outline PRoWPPMP [APP-282]** to ensure impacts to NMUs along highways and PRoW are minimised as far as practicable. Final CTMPs and a PRoWPPMP would be prepared post consent and must be substantially in accordance with the **Outline CTMP [APP-287]** and **Outline PRoWPPMP [APP-282]**, respectively, and approved by the relevant local planning authorities (in consultation with the relevant highway authorities), as

Reference	Comments/Issue raised	Applicant's Response
		secured by Requirement 15 and Requirement 16 in Schedule 2 of the **Draft DCO [APP-016]**.
SS-002	Ms Sorby stated that the Parish Council's concerns focus particularly on the impacts on Corston and Rodbourne. In relation to flooding, she explained that several properties in Corston already experience flooding from the Gauze Brook, which has been re-engineered and is currently unable to manage water volumes during prolonged periods of rainfall. She stated that the Parish Council has early-stage plans to restore the Gauze Brook to its original course to allow greater water capacity. She argued that the installation of large areas of solar panels within the floodplain would prevent these plans from being implemented and that increased runoff from the panels would significantly increase both the frequency and severity of flooding in Corston.	The Applicant acknowledges the concerns raised in relation to existing flooding at Corston and the capacity of Gauze Brook during prolonged rainfall. The Applicant acknowledges the flooding experienced at the A429 bridge over Gauze Brook in Corston, including the mechanism described whereby flood levels increase once the capacity of the bridge is exceeded. The Applicant does not agree that the Scheme would exacerbate flood risk at this location or that additional attenuation is required to offset Scheme effects. Fluvial flood risk associated with Gauze Brook, including the influence of structures such as the A429 bridge, has been assessed through site-specific hydraulic modelling for Lime Down D, as presented in **ES Volume 3, Appendix 11-6: Flood Risk Assessment and Drainage Strategy: Lime Down D / BESS [APP-215]**. This assessment has informed the layout of the Scheme to ensure that the function of the floodplain and conveyance along Gauze Brook is maintained.

Reference	Comments/Issue raised	Applicant's Response
		The Scheme does not introduce built development within the floodplain that would materially displace floodwater or alter channel conveyance. Solar PV Panels are mounted above ground on piles, and floodplain storage calculations confirm that any displacement associated with panel supports is negligible. The Scheme therefore does not affect the operation of the bridge or the controls on flood levels at this location. In terms of surface water runoff, the Scheme does not generate a material increase in runoff to the Gauze Brook catchment. Solar PV Panel areas remain permeable and drain to ground, rather than discharging as a concentrated flow to the watercourse. Where impermeable infrastructure is introduced within Lime Down D, including the BESS Area and substations, runoff is attenuated and discharged at a controlled rate so that greenfield runoff rates are not exceeded, as set out in **ES Volume 3, Appendices 11-1 to 11-9: Flood Risk Assessment and Drainage Strategy [APP-210 to APP-218]**. The Scheme therefore does not increase peak flows within Gauze Brook or place additional pressure on the A429 bridge during flood events. Flooding associated with exceedance of the bridge capacity would continue

Reference	Comments/Issue raised	Applicant's Response
		to be governed by wider catchment conditions rather than the presence of the Scheme. On that basis, the Applicant considers that the Scheme would not exacerbate flooding at Corston or at Mr Rawlings' property, and that the proposed approach to runoff management and floodplain design is appropriate. In relation to the concern that Solar PV Panels would increase runoff and worsen flooding, it is recognised that Solar PV Panels redistribute rainfall locally, with some concentration at panel drip-lines. This is a well understood physical process. The key consideration is whether that local redistribution translates into a meaningful increase in runoff at field or catchment scale. The evidence base and policy position confirm that it does not, provided ground conditions are appropriately managed. The controlling factors for runoff response are: • Ground cover condition, including the presence of permanent vegetation; • Soil structure and compaction; • Surface roughness and infiltration capacity; and • Flow connectivity across the site.

Reference	Comments/Issue raised	Applicant's Response
		Solar PV Panels are mounted above ground and are not connected to a drainage network. They do not behave as impermeable hardstanding and do not generate a new, connected discharge leaving the site. The redistributed rainfall drains to permeable, vegetated ground beneath and between panel rows, where it is dissipated and infiltrated. The Applicant's approach is consistent with national policy. NPS EN-3 (Ref 2) confirms that solar PV panels drain to the existing ground and that the impact on drainage will not, in general, be significant. The assessment at Lime Down applies this position through a risk-led framework, whereby: • Panel areas are treated as permeable and managed through secured soil and vegetation controls; and • Genuinely impermeable infrastructure is subject to quantitative drainage design, including attenuation and controlled discharge, as set out in the **ES Volume 3, Appendices 11-1 to 11-9 [APP-210 to APP-218]**. The assessment is not based on a single study. It is supported by a wider peer-reviewed evidence base, which shows that where vegetation is maintained and soil condition is managed, changes in runoff volume

Reference	Comments/Issue raised	Applicant's Response
		and peak flow are negligible. Where increases have been observed, these are associated with degraded ground conditions such as bare or compacted soils, which are addressed through embedded mitigation secured through the **Outline CEMP [APP-277]** and **Outline SRMP [APP-280]**, and through operational land management. On that basis, while localised drip-line effects are acknowledged, they do not translate into increased runoff at a site or catchment scale. The Scheme therefore does not increase runoff or flood risk off-site. Solar PV Panel areas remain permeable and do not generate a new, connected discharge. While rainfall may be redistributed locally beneath panels, this does not translate into increased runoff at a catchment scale. Runoff behaviour is governed by ground condition and flow pathways, which are maintained and controlled through embedded mitigation. On that basis, the Scheme would not increase the volume or rate of water entering Gauze Brook and would not increase the frequency or severity of flooding at Corston. In relation to the Parish Council's aspiration to restore Gauze Brook, the Scheme does not include in-channel works or permanent structures that would prevent

Reference	Comments/Issue raised	Applicant's Response
		future interventions. The layout maintains floodplain function and does not preclude future restoration works, which would be subject to separate design and consenting processes.
SS-003	In relation to contamination and the proposed BESS, Ms Sorby stated that residents are extremely alarmed by the proximity of the BESS to homes and to the railway line, given the risk of fire. Ms Sorby expressed concern that any chemical leaks associated with a solar farm of this scale could contaminate aquifers supplying water to residents across a wide area of North Wiltshire. She also raised concerns about contamination resulting from firefighting water and from the use of herbicides at substations, stating that once contamination has occurred it would be very difficult, if not impossible, to reverse.	In relation to risks to the Principal Aquifer and specifically to potable abstractions from the aquifer, such as Private Water Supplies, these are considered in **ES Volume 1, Chapter 19 Ground Conditions [APP-071]** and mitigation is outlined. Hydrogeological risk registers which provide an initial understanding of the risk to sensitive groundwater receptors from construction activity are set out in the following documents: • **BESS and Substation - Preliminary Geotechnical Risk Register [EN010168/EXAM/9.12];** • **Cable Route Avoidance Areas - Preliminary Geotechnical Risk Register [EN010168/EXAM/9.13]; and** • **Cable Route Corridor Mining Risk - Technical Memorandum [EN010168/EXAM/9.14].** Further to this, prior to the commencement of any construction work, a Foundation Works Risk Assessment will be undertaken for all substation and BESS locations (secured via the **Outline CEMP [APP-277])** to ensure that residual risks to groundwater will

Reference	Comments/Issue raised	Applicant's Response
		be appropriately mitigated and managed on a location-specific basis. With regards to the BESS fire emissions assessment (as detailed in **ES Volume 3, Appendix 15-2: BESS Fire Emissions Modelling [APP-239]**), this has been undertaken using professional judgement in the absence of specific regulatory guidance, and adopts a conservative, worst case approach throughout. The assessment demonstrates that, even under worst case assumptions, a BESS fire would not result in significant effects on human health or safety. The modelling set out in **Appendix 15-2: BESS Fire Emissions Modelling [APP-239]** assumes: • Worst case BESS fire locations within the BESS area closest to sensitive receptors; • Worst case release height, temperature and plume parameters; and • Use of five years of hourly meteorological data, with the maximum predicted concentration extracted at each receptor, assuming the fire coincides with the poorest dispersion conditions. Given the inherent uncertainty in available BESS fire emissions data, a sensitivity test was also undertaken whereby emission rates were doubled, as set out in Section 1.6 of **ES Volume 3, Appendix 15-2: BESS**

Reference	Comments/Issue raised	Applicant's Response
		Fire Emissions Modelling [APP-239]. Even under this highly conservative sensitivity test, predicted concentrations remained well below the relevant health-based thresholds. Six worst case BESS fire locations (i.e. locations within the BESS Area closest to sensitive receptors) have been modelled as depicted in **ES Volume 2, Figure 15-5: Battery Energy Storage System Fire Emissions Study Area [APP-166]**. The Concentrations of carbon monoxide (CO), formaldehyde, hydrogen chloride (HCl), hydrogen cyanide (HCN), hydrogen fluoride (HF), ammonia (NH_3), nitrogen dioxide (NO2) and particulates from a potential BESS fire have been modelled using an air quality dispersion model to determine the likely effects on human health. A high-level visibility assessment has also been undertaken using the modelled particulates results to determine the effect of BESS fire emissions on visibility on the local road and rail network to inform the **Outline BSMP [APP-286]**. **ES Volume 3, Appendix 15-2: BESS Fire Emissions Modelling [APP-239]** concludes that there would be no significant air quality effects as a result of a BESS fire incident and visibility issues were not predicted.

Reference	Comments/Issue raised	Applicant's Response
		The Applicant has followed National Fire Chiefs Council (NFCC) guidance (Ref 15) and undertaken BESS Fire Emissions Modelling (see **ES Volume 3, Appendix 15-2: BESS Fire Emissions Modelling [APP-239])** to model toxic gas emissions and visibility impacts from a BESS fire on sensitive receptors within a 1km radius of the BESS area. The fire emissions modelled in the report were based upon recent UK Health Security Agency (UKHSA) requests for DCO BESS projects which explore both immediate air quality impacts together with annual UK air quality requirements. The UKHSA stated in their relevant representation **[RR-4798]** that "*Following our review of the submitted documentation the UKSHA are satisfied that the proposed development should not result in any significant adverse impact on public health".* An **Outline 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 safety objectives for the design of the BESS site are listed in Section 2.4 of the **Outline BSMP [APP-286]**. The **Outline BSMP [APP-286]** was amended at Deadline 1 to fully accommodate the latest BESS safety requirements contained in National Fire Protection Association (NPFA) 855 (2026) ensuring

Reference	Comments/Issue raised	Applicant's Response
		that any credible risks associated with battery storage are either prevented or fully mitigated if a BESS failure occurs. As now mandated under NFPA 855 (2026) (Ref 14) the Applicant will only be able to select a BESS system that has undertaken Large Scale Fire Testing (LSFT). At the detailed design stage, the selected BESS LSFT data will be leveraged to fully inform inputs for risk assessment tools which will be utilised together with detailed consequence modelling to provide a comprehensive site operations and emergency response safety audit, this is stipulated in the **Outline BSMP [APP-286]** pre-construction requirements (Section 6). The Applicant has also committed to commissioning an additional Plume Analysis Study at the detailed design stage as the **Outline BSMP [APP-286]** and secured under Requirement 6 of the **Draft DCO [APP-016]**. Section 5.5.9 of the **Outline BSMP [APP-286]** states that: *"...at the detailed design stage a BESS system and site specific Plume Analysis study will be conducted to assess the environmental impact of a site incident to sensitive receptors within a 1 km radius. Toxic gas emissions to sensitive receptors must be below relevant public health exposure limit guidelines*

Reference	Comments/Issue raised	Applicant's Response
		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 Emergency Response Plan 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." Section 2.4.2 of the **Outline BSMP [APP-286]** stipulates that: *"Final BESS design and site layout will have been validated through mandatory Large Scale Fire Testing (LSFT) and rigorous consequence modelling to minimise the requirement for any D&WFRS intervention in a thermal runaway incident. LSFT must establish minimum equipment spacing distances that demonstrate there is no fire propagation to adjacent BESS enclosures or ESS equipment. D&WFRS intervention in worst case scenarios would typically be limited to boundary cooling of adjacent BESS and Energy Storage System (ESS) units to prevent the fire from spreading. This strategy will be finalised with D&WFRS and be clearly communicated in the Emergency Response Plan (ERP);*

Reference	Comments/Issue raised	Applicant's Response
		• *To ensure that fire, smoke, and any release of toxic gases does not significantly impact site operatives, first responders, and the local community; and* • *To ensure that firewater run-off is contained and tested before release or, if necessary, removed by tanker and treated offsite."* Section 5 of the **Outline BSMP [APP-286]** covers all requisite firefighting requirements for the Scheme including fire service access, firefighting water supply, and emergency planning requirements. The Applicant is currently preparing a Statement of Common Ground with the Environment Agency on Scheme environmental protection issues including the BESS area drainage strategy. The agreed strategy document, the **Firewater Containment and Drainage Strategy – Lime Down D Battery Energy Storage System [EN010168/EXAM/9.8]** was submitted 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.

Reference	Comments/Issue raised	Applicant's Response
		The **Outline BSMP [APP-286]** is secured through Requirement 6 (Battery safety management) in Schedule 2 of the **Draft DCO [APP-016]**, which provides that Work No. 2 must not commence until a Battery Safety Management Plan has been submitted to and approved by the relevant planning authority. The approved plan must be substantially in accordance with the **Outline 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. The concerns raised in relation to contamination from BESS, including from firewater and potential chemical releases, are addressed in the responses to MH-001 and MH-003 above. The Scheme includes a controlled and isolatable drainage approach for the BESS and substations, as set out in the **Firewater Containment and Drainage Strategy – Lime Down D Battery Energy Storage System [EN010168/EXAM/9.8]** and **Firewater Containment and Drainage Strategy - Lime Down Substation [EN010168/EXAM/9.9]**. This ensures that,

Reference	Comments/Issue raised	Applicant's Response
		in the event of a fire or spill, any contaminated water or materials are contained within the site and are not discharged to surrounding land, watercourses or groundwater. Drainage systems will be sealed and capable of isolation, with any retained water removed and managed off-site in accordance with relevant environmental controls. In addition, routine operational controls will be in place to prevent contamination, including the management of any chemicals used on site. These measures are secured through the **Outline CEMP [APP-277]** and operational management plans. On that basis, there is no pathway for contaminants to enter the aquifer as a result of the Scheme, and no mechanism by which groundwater supplying local receptors would be affected.
SS-004	In terms of visual impact, Ms Sorby stated that given the scale of the panels proposed, effective screening is unlikely to be achieved within a reasonable timeframe, if at all. She argued that the character of the landscape would be significantly harmed, leading to a reduction in visitors and consequent impacts on small businesses providing accommodation in Corston and Rodbourne. She described the landscape as becoming dominated	With regard to the comment on visual impact, mitigation measures to address landscape and visual effects are set out in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060], Figure 3-4-1 to 3-4-5.2 Landscape and Ecology Mitigation Plan [APP-084]** and detailed within the **Outline LEMP [APP-283]** and the **Outline EPMS [APP-284].** These documents include proposals for new and enhanced planting, retention of existing hedgerows and woodland, and

Reference	Comments/Issue raised	Applicant's Response
	by panels, with a major adverse effect on residents and on users of public footpaths and bridleways.	landscape integration measures to reduce visual effects over time. A uniform rate of growth is allowed for trees, shelterbelts, and woodland mitigation planting of 0.4m every 1 year. At Year 15 this will result in new trees, shelterbelts, and woodland plantings having reached a minimum height of 7.5m. A uniform growth rate is allowed for new hedgerows of 0.4m every 1 year. This would result in hedgerows being able to be maintained at a height of between 3 - 5m by Year 15. The preparation, approval and implementation of detailed landscape and ecological management plans, substantially in accordance with the **Outline LEMP [APP-283] and Outline EPMS [APP-284**], are secured through Requirements 7 and 8 in Schedule 2 of the **Draft DCO [APP-016]**, ensuring that the identified mitigation measures are delivered and maintained throughout the lifetime of the Scheme. In relation to impacts on business, the potential effects of the Scheme on tourism and recreation are assessed in **ES Volume 1, Chapter 16: Socio Economics, Tourism and Recreation [APP-068]**, supported by **ES Volume 3, Appendix 16-2: Tourism and Recreation Receptor Tables [APP-241]**. The assessment identifies a worst-case scenario in which a temporary

Reference	Comments/Issue raised	Applicant's Response
		loss of up to 50 tourism-related jobs and £1.76 million in annual spending could occur locally during construction, and a long-term loss of up to 11 tourism-related jobs/ £395,000 in visitor spending per annum could occur during the operational phase of the Scheme. This represents a precautionary estimate based on conservative assumptions. The assessment concludes that, while some localised effects on tourism receptors are anticipated to occur, significant adverse effects on the wider tourism economy are not anticipated. Additional mitigation measures (which were not quantified for inclusion in the assessment of potential losses to employment) secured in the **Outline SSCEP [APP-285]** seek to reduce tourism employment losses through focussing on local recruitment, promoting local suppliers where practicable, and through providing retraining opportunities for workers in tourism-dependent industries. Further additional mitigation measures to reduce impacts from HGV traffic and to PRoW users have been set out in the **Outline CEMP [APP-277]** and **Outline PRoWPPMP [APP 282]** to reduce impacts on individual receptors that contribute to tourism and recreation in the Study Area. These management documents are secured by Requirements

Reference	Comments/Issue raised	Applicant's Response
		13, 16, and 18 in Schedule 2 to the **Draft DCO [APP-016]**. A detailed assessment of the likely significance of effects from the Scheme on the use and desirability of individual PRoW and recreational access to the countryside is included in **ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]** and **ES Volume 3, Appendix 16-2: Tourism and Recreation Receptor Tables [APP-241]**. This assessment considers the impact on individual recreational routes, including their practical use, enjoyment and desirability. The Applicant confirms that the majority of significant adverse effects can be mitigated. However, some significant adverse effects to users of PRoW and unsurfaced roads in Lime Down E during construction cannot be mitigated further, a matter which will have to be considered in the planning balance when the DCO is determined. No significant residual effects are anticipated during the operational phase of the Scheme.
SS-004	Ms Sorby stated that noise and light reflection from tracking solar panels would adversely affect several high-value equine businesses in Corston and Rodbourne, due to the sensitivity of horses under	With regards to equestrian facilities, including private stables and paddocks, studs, riding schools, and public rights of way such as bridleways and byways, these have been considered as specific recreational receptors in the assessment in the **ES Volume 1,**

Reference	Comments/Issue raised	Applicant's Response
	training. She referred specifically to thoroughbreds, eventers, dressage horses and show jumpers.	**Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]**. The likely effects on these locations and receptors are specifically and individually assessed in **ES Volume 3, Appendix 16-2: Tourism and Recreation Receptor Tables [APP-241]**. The Applicant confirms that the majority of significant adverse effects can be mitigated, however understands that some significant adverse effects to users of routes in Lime Down E cannot be mitigated further during construction and will therefore be considered in the planning balance when the DCO is determined. No significant residual effects are anticipated during the operational phase of the Scheme. The Applicant has committed to ensuring the operation or recreational use of equestrian facilities and PRoWs is protected as much as possible through the implementation of embedded and additional mitigation measures set out in the **Outline CTMP [APP-287]** and **Outline PRoWPPMP [APP-282]**, secured respectively by Requirements 15 and 16 in Schedule 2 to the **Draft DCO [APP-016]**. Glint and glare effects upon bridleway users have been assessed in Section 8 of **ES Volume 3, Appendix 20-4: Solar Photovoltaic Glint and Glare Study [APP-261]**. No significant effects are predicted as the sensitivity of receptors is considered to be low. There

Reference	Comments/Issue raised	Applicant's Response
		is no evidence that horses are significantly affected by solar reflections, and there are many potential natural and man-made sources of glare in a typical rural environment including water bodies and agricultural buildings.
SS-005	Ms Sorby stated that more than 20,000 HGV movements during the construction phase would damage narrow local roads and verges and significantly increase risks to pedestrians, cyclists and horse riders. She highlighted particular concern for Rodbourne, which is designated as a conservation area and should be preserved for future generations. She stated that the volume of construction traffic passing through the centre of the settlement, combined with daily movements of construction workers' vehicles, would create unacceptable levels of harm and danger.	HGV construction routes are shown in **Figure 4.1** and **Figure 4.2** of the **Outline CTMP [APP-287]**. The proposed construction routes will not pass though the centre of Rodbourne. An updated breakdown of Trip Generation Calculations is provided at Annex E to **ES Volume 3, Appendix 13-1 Transport Assessment [APP-233]** at Deadline 1. This presents specific assessed quantities of material volumes and component type/numbers for each Lime Down Solar PV Site. Includes fencing, aggregates for access tracks, PV modules and mounting structures substation equipment. As set out in the **Outline CTMP [APP-287]**, pre-construction, interim and post-construction Road Condition Surveys will be undertaken to repair any damage caused to verges during the construction period. The details of these surveys will be confirmed as part of the Final CTMP, which is secured under Requirement 15 of the **Draft DCO [APP-016]**.

Reference	Comments/Issue raised	Applicant's Response
		The potential effects of construction traffic on the local highway network are assessed in **ES Volume 1, Chapter 13: Transport and Access [APP-065]**, which considers construction vehicle movements, traffic volumes, road safety and effects on road users. This included the capacity of local roads and infrastructure to accommodate construction vehicles. The assessment concludes that the level of construction traffic associated with the Scheme is unlikely to materially affect road safety on links within the Study Area, and no significant adverse effects on accident risk are anticipated. In terms of the use of the highway network for recreational users, such as equestrians, they have been considered as specific recreational receptors in the assessment in the **ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]**. The Applicant confirms that within the Corston and Rodbourne area (Lime Down E), significant adverse effects are anticipated solely to recreational users of bridleway MALW54 and the unsurfaced roads parallel to, and crossing the railway (Cabbage Lane) in Lime Down E, as a result of the construction of the Scheme. Therefore, this will be considered in the planning balance when the DCO is determined. The Applicant has committed to ensuring the operation or

Reference	Comments/Issue raised	Applicant's Response
		recreational use of PRoWs is protected as much as possible through the implementation of embedded and additional mitigation measures set out in the **Outline CTMP [APP-287]** and **Outline PRoWPPMP [APP-282]**, secured respectively by Requirements 15 and 16 in Schedule 2 to the **Draft DCO [APP-016]**. The Applicant confirms that the approach to equestrian and PRoW impacts and highway safety are under discussion with Wiltshire Council's Countryside Access Team and Highways Team (as part of discussions with Wiltshire Council in general). Additional discussions specific to PRoWs are being undertaken with the British Horse Society, and the Wiltshire Bridleway Association. Progress on each of these discussions is set out in the relevant Statements of Common Ground with each of these parties, to be submitted at Deadline 2. In relation to the heritage matters, **ES Volume 1, Chapter 12: Cultural Heritage [APP-064]**, supported by **ES Volume 3, Appendix 12.1: Heritage Statement [APP-219]**, has assessed the potential impact of the Scheme on built heritage assets, and where required appropriate mitigation has been proposed (see Section 12.9 of **ES Volume 1, Chapter 12: Cultural Heritage**

Reference	Comments/Issue raised	Applicant's Response
		[APP-064] for embedded mitigation and Section 12.11 for additional mitigation). With consideration to Rodbourne Conservation Area, embedded mitigation including the removal of Fields E5 and E8 from the Scheme Order Limits, removal of panels from Fields E7, E9 and E10, offsets to the PRoW and enhanced screening of existing hedgerows are considered sufficient mitigation to remove any adverse impacts to the Conservation Area.
SS-006	Ms Sorby further stated that, in the Parish Council's view, the proposed highway routes are unenforceable and likely to be ignored. She expressed concern that the proposed new access road from the busy A429 to serve Site E and onward to Site D would cause congestion on that route. She also raised concerns about the proposed route for abnormal indivisible loads via Cirencester and around the Malmesbury bypass, together with the road alterations required, which she stated would cause significant disruption to residents' journeys.	Regarding the access point from the A429, this will be subject to the measures within the **Outline CTMP [APP-287]** which include delivery booking and a requirement to undertake HGV deliveries outside of highway peak hours. Highway network peak hours are when the highway would be at its busiest, so avoiding this period would limit the potential for any delays. Peak hour capacity assessment cannot be undertaken as there will be no construction deliveries during the peak hour. However, daily impact has been assessed in **ES Volume 1, Chapter 13-1: Transport and Access [APP-065]** combined with the temporary and low number of predicted delivery trips, the impact on the A429 link will be negligible as shown in Table 13-24 of **ES Volume 1, Chapter 13-1: Transport and Access [APP-065].**

Reference	Comments/Issue raised	Applicant's Response
		The AILs are one-off movements that typically have a police escort and will not require significant or permanent highway works. They will result in a one-off temporary disruption at the time of the AIL delivery. Residents will be notified prior to these movements, as per normal AIL procedure. Further detail regarding these procedures is set out in the **Outline CTMP [APP-287]**.

2.55 Lesley Palmer (on behalf of Grittleton Parish Council)

Reference	Comments/Issue raised	Applicant's Response
LP-001	Lesley Palmer, speaking on behalf of Grittleton Parish Council, stated that the parish has a population of approximately 500 and comprises the villages of Grittleton and Littleton Drew, together with the hamlets of Sevington, Leigh Delamere and The Gibb. In October 2025 the Parish Council surveyed residents, with the aim of understanding local needs and concerns. The responses showed that parishioners most valued the surrounding countryside, along with heritage and conservation, followed by the network of public footpaths and bridleways that provide access to the landscapes enjoyed locally. Ms Palmer argued that these valued features would be destroyed by extensive areas of solar panels, fencing and equipment. Ms Palmer states that residents cited specific concerns with the Scheme, with the most frequently cited issue being road safety.	In relation to the points raised regarding heritage assets in Grittleton, **ES Volume 1, Chapter 12: Cultural Heritage [APP-064]**, supported by **ES Volume 3, Appendix 12.1: Heritage Statement [APP-219]**, has assessed the potential impact of the Scheme on built heritage assets. No significant effects have been identified to heritage assets located within Grittleton. In terms of the potential effects of construction traffic on the local highway network, **ES Volume 1, Chapter 13: Transport and Access [APP-065]**, provides an assessment which considers construction vehicle movements, traffic volumes, road safety and effects on road users. This included the capacity of local roads and infrastructure to accommodate construction vehicles. The assessment concludes that the level of construction traffic associated with the Scheme is unlikely to materially affect road safety on links within the Study Area, and no significant adverse effects on accident risk are anticipated. The assessment set out in **Chapter 13: Transport and Access [APP-065]** additionally concludes that with appropriate mitigation such as the CTMP in place, there would be no significant adverse impacts on the

Reference	Comments/Issue raised	Applicant's Response
		local highway network during the construction, operation and maintenance, and decommissioning phases of the Scheme. With regard to the points raised about public footpaths and bridleways, the assessment of tourism and recreation impacts in **ES Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]** and the supporting **ES Volume 3 Appendix 16-2 Tourism and Recreation Receptor Tables [APP-241]** has assessed the likely impacts of the Scheme at construction, operation, peak replacement, and decommissioning on all identified tourism and recreation assets in the Grittleton area, including individual PRoWs connecting to Grittleton village that are affected by the Scheme, and the effect on the Cotswold National Landscape. The assessment finds no residual significant adverse effects to PRoWs or the CNL at any phase of the Scheme. The assessment does however identify a significant adverse effect to the Wiltshire Cycleway and Fosse Way, a matter which will have to be considered in the planning balance when the DCO is determined.
LP-002	Ms Palmer stated that part of Grittleton Parish lies within the CNL, an area designated as sensitive and afforded the highest level of protection for landscape	In relation to the Cotswolds National Landscape (CNL), the Scheme is located adjacent to the CNL and Sites A, B and C are within its setting. The cable route

Reference	Comments/Issue raised	Applicant's Response
	and natural beauty. Ms Palmer argued that construction of the Scheme would destroy cherished views, walking, cycling and riding routes, causing psychological distress and real harm to residents, visitors and tourists. She stated that the aspects of living in the parish that residents value most, and the issues of greatest concern to them, are directly linked to the Applicant's Scheme to industrialise the rural landscape of North Wiltshire.	corridor crosses The Street which provides access to the village from the east. The landscape effects of the Cable Rote Corridor (CRC) are assessed in the LVIA, refer to **ES Volume 3, Appendix 8-3 Landscape and Visual Assessment Sheets [APP-193**] for the full assessment of the proposals within the CRC Study Area. The summary of landscape effects within the CRC Study recorded Minor / Negligible Adverse effects during construction and Year 1 and Negligible Neutral at Year 15 and Decommissioning. The CNL is fully assessed as a standalone receptor within **ES Volume 3, Appendix 8-6: Assessment of Effects on the Cotswolds National Landscape and its Special Qualities [APP-197]**. This assessment considers the effects of the Scheme on landscape character, visual amenity and the special qualities of the CNL, including tranquillity. The Scheme was refined through an iterative design process to avoid and reduce effects on the CNL and its setting. Panels along the edge of the CNL were removed from the Order Limits in fields C2, C3 and C4 where significant visual effects on receptors within the CNL were identified. Panels were also removed from fields C1, C6, C8, the western section of C9 and the majority of C10, with this land now proposed for

Reference	Comments/Issue raised	Applicant's Response
		ecological mitigation to protect the setting of the CNL. In addition, panels within fields A11 and A12 were removed and the land repurposed for ecological mitigation to protect the setting of the CNL towards Sherston. All land parcels adjacent to the CNL are proposed to deliver habitat enhancement, informed by the CNL Management Plan and the Cotswolds National Landscape Strategy and Guidelines, to further the purposes of the designation. Details of the proposed landscape and ecological mitigation and enhancement measures are provided in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060], Figure 3-4-1 to 3-4-5.2 Landscape and Ecology Mitigation Plan [APP-084]** and the **Outline LEMP [APP-283],** and the **Outline EPMS [APP-284].** In terms of residents, visitors and tourists, the assessment of tourism and recreation impacts in **ES Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]** and the supporting **ES Volume 3 Appendix 16-2 Tourism and Recreation Receptor Tables [APP-241]** has assessed the likely impacts of the Scheme at construction, operation, peak replacement, and decommissioning on all identified tourism and recreation assets in the Grittleton area,

Reference	Comments/Issue raised	Applicant's Response
		including individual PRoWs connecting to Grittleton village that are affected by the Scheme, and the effect on the Cotswold National Landscape. The assessment finds no residual significant adverse effects to PRoWs or the CNL at any phase of the Scheme. The assessment does however identify a significant adverse effect to the Wiltshire Cycleway and Fosse Way, a matter which will have to be considered in the planning balance when the DCO is determined. Regarding health matters, the assessment in **ES Volume 1, Chapter 18: Human Health [APP-070]** considers the physical and mental health impacts of changes to recreation and access to the countryside under the assessment topic 'open space, leisure and play'. The assessment concludes that no significant adverse effects to mental health and wellbeing are anticipated at any phase of the Scheme. Mitigation measures to reduce construction impacts to PRoW users are secured through the **Outline PRoWPPMP [APP-282]** by Requirement 16 in Schedule 2 to the **Draft DCO [APP-016]**. Impacts on communities have been considered as part of the assessment of "community identity, culture, influence and resilience" in **ES Volume 1, Chapter 18: Human Health [APP-070]**. The Applicant has

Reference	Comments/Issue raised	Applicant's Response
		considered how changes to perceptions of rurality, community sense of place, pride, engagement and difference in consideration of importance of different aspects of the Scheme (for example opposing views on harms versus benefits) may lead to a degree of impact to communities. The assessment has considered that this is likely to be up to a minor adverse effect on local communities and thus on residents' mental health and wellbeing. This is not considered a significant effect. Community liaison is also directly secured through Requirement 4 in Schedule 2 to the **Draft DCO [APP-016]** through the provision of a community liaison group during the Scheme's construction, operation and decommissioning. This group will act as an intermediary between the public and the onsite contractors to ensure community concerns and any information they need are communicated and responded to, so as to reduce community anxiety and impacts on mental wellbeing, and to assist in directing the public to mental health support if required.
LP-003	Turning to transport impacts, Ms Palmer stated that the proposed construction routes would affect all major roads within the parish, and several minor roads. She said that around two-thirds of homes and businesses	As concluded in **ES Volume 1, Chapter 13: Transport and Access [APP-065]** the impacts of construction traffic would be temporary and would not result in any significant transport effects. Construction traffic will be

Reference	Comments/Issue raised	Applicant's Response
	would be directly affected, including properties in The Gibb and along Alton Road in Grittleton, which connects to the historic Fosse Way. She noted that section 14 of the Wiltshire Cycleway passes through the village, is highly popular, and would be subject to a significant and unacceptable increase in HGV traffic. She stated that rural roads in the parish are not designed to accommodate the size, weight or volume of construction traffic proposed, creating serious safety risks for all users.	controlled through measures set out in the **Outline CTMP [APP-287]** and **Outline PRoWPPMP [APP-282]** to ensure impacts to Non Motorised Users along highways and PRoW are minimised as far as practicable. The assessment presented in the updated Annex J of **ES Volume 3, Appendix 13-1: Transport Assessment [APP-233]** submitted at Deadline 1 demonstrates adequate carriageway width or frequency of passing place opportunity to pass at least an HGV and a light vehicle as requested in comments provided by Wiltshire Council in its response (August 2025) to the Transport Assessment Scoping Note and confirmed in Paragraph 4 of 'Appendix A - Highways and Transport Document Review - Detailed Comments'. This confirms that no passing bay or widening improvements are needed to accommodate these movements on the construction route outside of the Order Limits. The distances between passing points outside of the Order Limits are all within 150 m with forward visibility extending to the next passing point and beyond. This is within the generally accepted distance of 200 metres. As set out in the **Outline CTMP [APP-287]**, a booking system will be set up to manage arrivals and

Reference	Comments/Issue raised	Applicant's Response
		departures to the Order Limits. This will be implemented in coordination with banksmen, which will be able to hold back any cross-over, should there be any delays on the roads. This will prevent HGVs generated by the Scheme passing each other in opposite directions on the local roads forming part of the construction routes and will be confirmed as part of the final CTMP. Excessive widening of existing rural routes to allow two HGVs to pass would be over engineering, because of the following reasons: • Temporary nature of the construction period; • The level of hourly HGV trips when considering a realistic construction programme; • Delivery times during the construction phase are limited to those times set out in the Outline **CTMP [APP-287]**. There will be no HGV construction trips outside of these hours; • There would be a much greater impact on hedgerow, trees and character; and • Low level of existing HGVs on the proposed HGV construction routes. Information included in **ES Volume 3, Appendix 13-1: Transport Assessment [APP-233]** submitted at Deadline 1 of Examination demonstrates that there is

Reference	Comments/Issue raised	Applicant's Response
		adequate carriageway width and/or passing place opportunity for two HGVs along the proposed construction routes. **ES Volume 1, Chapter 13: Transport and Access [APP-065]** assess the impact on Non-Motorised User (NMU) delay and amenity, including Fear and Intimidation. All impacts are concluded to be not significant and will be temporary. NMU delay is considered negligible given there is no existing pedestrian or cycle infrastructure on the construction routes and likely low numbers of existing NMU users. It is anticipated that PRoW which cross the Order Limits will generally remain open during the construction phase of the Scheme. There may be some slight perceptible delay to NMU movement if a construction vehicle is crossing a PRoW within the Order Limits. An **Outline PRoWPPMP [APP-282]** forms an embedded mitigation and will provide measures to ensure the effects of the construction phase on PRoW users is minimised. The **Outline PRoWPPMP [APP-282]** contain specific measures for the temporary diversion of footpath WT|GRIT|20 and bridleway WT|MALW|54, where

Reference	Comments/Issue raised	Applicant's Response
		access to Cable Route Corridor works east of Grittleton, and HGV access to Lime Down E are taken respectively. These diversions are proposed to ensure unreasonable effects to PRoW users are not experienced during construction, replacement and decommissioning. In relation to NMU amenity, pedestrian amenity is broadly defined as the relative pleasantness of a journey, and can be affected by traffic flow, traffic composition and pavement width/separation from traffic. The construction routes on the road network have little existing pedestrian infrastructure and no footways, making them already unattractive as walking routes with no pedestrian amenity so this cannot be assessed. Fear and Intimidation for other NMU's can be assessed. Highway widths of construction routes have been assessed in **ES Volume 3, Appendix 13-1: Transport Assessment [APP-233**] and provide sufficient width for HGV traffic to comfortably pass cyclists. **ES Volume 1, Chapter 13: Transport and Access [APP-065]** concludes that the level of flow change will not result in a step change in fear and intimidation as

Reference	Comments/Issue raised	Applicant's Response
		defined in the ISEP guidance at Tables 3.1, 3.2 and 3.3 (Ref 8). **ES Volume 1, Chapter 13: Transport and Access [APP-065]** concludes that on all links in the study area the significance of effect is Minor Adverse (temporary). The potential effects of construction traffic on the local highway network are assessed in **ES Volume 1, Chapter 13: Transport and Access [APP-065],** which considers construction vehicle movements, traffic volumes, road safety and effects on road users. This included the capacity of local roads and infrastructure to accommodate construction vehicles. The assessment concludes that the level of construction traffic associated with the Scheme is unlikely to materially affect road safety on links within the Study Area, and no significant adverse effects on accident risk are anticipated. The assessment also concludes that with appropriate mitigation such as the CTMP in place, there would be no significant adverse impacts on the local highway network during the construction, operation and maintenance, and decommissioning phases of the Scheme. As a result, the Applicant is confident that there will not be significant adverse effects to residential access or the operation of businesses in Grittleton as a result of the Scheme.

Reference	Comments/Issue raised	Applicant's Response
		While impacts to individual residents and business have not been undertaken, the assessment results presented in respect of economic impacts in **ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]**, do not identify any significant adverse effects to any economic industry in the Study Area. In relation to the assessment of impacts on long distance recreational routes in **ES Volume 3, Appendix 16-2: Tourism and Recreation Receptors [APP-241]**, the Wiltshire Way (including Section 14 through Grittleton and on the Fosse Way) has been identified as a regionally important cycle route, while the Fosse Way has also been identified as a long-distance recreational route of historic quality. Due to the high sensitivity of both receptors, it is anticipated the Scheme will, even with the implementation of mitigation measures, have a significant adverse effect on the Wiltshire Way and Fosse Way throughout the Scheme's construction, operation (Fosse Way only) and decommissioning as a result of visual impacts and HGV movements associated with the Scheme, a matter which will have to be considered in the planning balance when the DCO is determined.

Reference	Comments/Issue raised	Applicant's Response
LP-004	Ms Palmer further stated that heavy construction traffic would use The Street within the Grittleton Conservation Area to access the proposed compound, which would be located close to Grittleton Village Hall and Recreation Ground. She explained that these facilities are well used by the community and include a cricket pitch, multi-use games area and children's playground. She referred to Historic England records identifying three Grade II* listed buildings and 47 Grade II listed buildings within the parish, 28 of which are located on the street itself, including seventeenth-century houses, a K6 telephone box and a historic Baptist chapel. She stated that the volume of traffic using this narrow street, combined with on-street parking, could damage these listed buildings and compromise their structural integrity.	In related to construction traffic, as presented in **ES Volume 3, Chapter 13-1: Transport and Access [APP-233]** each of the two cable route corridor accesses to the east of Grittleton are expected to be in use for approximately 90 non-consecutive days over the construction phase, each generating approximately 8 HGV movements a day and 32 total movements per day of use. The existing road through Grittleton is already used by HGVs and as concluded in **ES Volume 3, Chapter 13-1: Transport and Access [APP-233]** will not result in any significant transport impacts. In relation to heritage assets, **ES Volume 1, Chapter 12: Cultural Heritage [APP-064]**, supported by **ES Volume 3, Appendix 12.1: Heritage Statement [APP-219]** (which sets out further information on Grittleton in Section 5.9 including details of listed buildings scoped in for assessment that are located in Grittleton, or formerly belonged to the Grittleton Estate, in Table 12), has assessed the potential impact of the Scheme on built heritage assets, and where required appropriate mitigation has been proposed (see Section 12.9 of **ES Volume 1, Chapter 12: Cultural Heritage [APP-064]** for embedded mitigation and Section 12.11 for additional mitigation). No significant effects have been identified to heritage assets located within Grittleton.

Reference	Comments/Issue raised	Applicant's Response
		Annex 1 of **ES Volume 3, Appendix 12-1: Heritage Statement [APP-219]** details assets scoped in for assessment and was used for consultation with Historic England and Wiltshire Council. The majority of Listed Buildings within Grittleton were scoped of assessment as there was no potential for impact. In terms of Grittleton Village Hall specifically, this has been assessed as a specific recreational receptor in **ES Volume 3, Appendix 16-2: Tourism and Recreation Receptor Tables [APP-241]** due to its use for recreational events, and for the inclusion of sports and play facilities. This identifies that during construction, a residual medium-term temporary moderate-minor adverse effect is anticipated to users of these facilities. Whilst this indicates there is some level of disruption to access anticipated to the village hall in Grittleton, this is not a significant effect, subject to the implementation of additional mitigation measures to control HGV movements to and from the construction compound. These measures are set out in the **Outline CTMP [APP-287]**, secured by Requirement 15 in Schedule 2 to the **Draft DCO [APP-016]**.
LP-005	Ms Palmer stated that Grittleton Parish Council recognises the need for planning policies to protect	The Scheme is considered to comply with planning policies relating to the historic environment and

Reference	Comments/Issue raised	Applicant's Response
	conservation areas, listed buildings and national landscapes, and is pragmatic about the role of such policies in safeguarding heritage and rural communities. She argued that the Applicant's Schemes demonstrate a disregard for these protections.	national landscape, as set out in further detail in the **Planning Statement [APP-267].** Through sensitive design, the Applicant has taken care to avoid, reduce and mitigate impacts on heritage assets and their setting, in accordance with the mitigation hierarchy. Mitigation for each heritage asset is set out in **ES Volume 3, Appendix 12-8: Cultural Heritage Impact Assessment Tables [APP-X]** and includes: • The removal or solar panels from fields close to heritage assets (such as close to conservation areas and various listed buildings); • The inclusion of offsets as buffers between infrastructure and heritage assets; • Enhanced screening of existing hedgerows between the Scheme and heritage assets; • Creation of new tree belts; • Routing of construction traffic to minimise impacts on conservation areas; and • Measures for in-situ preservation of archaeological assets. Impacts on heritage assets have been assessed, and no residual significant effects are anticipated.

Reference	Comments/Issue raised	Applicant's Response
		With regard to the Cotswolds National Landscape (CNL), the Applicant has assessed the Scheme against the relevant planning policies regarding national landscapes as set out in the **Planning Statement [APP-267]** (see from paragraph 8.3.139 onwards). **ES Volume 3, Appendix 8-6: Assessment of the Effects on the Cotswolds National Landscape and its Special Qualities [APP-197**] and the **Tranquillity Technical Note [PDA-010]** provide specific assessments of the effects of the Scheme on the CNL. These documents confirm that no significant effects are anticipated on receptors within or directly adjacent to the CNL in relation to landscape, cultural heritage, transport and access and noise and vibration. Significant effects are anticipated in relation to some limited tourism and recreation receptors within or directly adjacent to the CNL. Proposed mitigation measures to mitigate the socio-economic, tourism and recreation effects of the Scheme on the CNL during the construction, operation and maintenance, and decommissioning phases are detailed in the **Outline CEMP [APP-277], Outline OEMP [APP-278], Outline Decommissioning Strategy [APP-279], Outline PRoW and Permissive Paths Management Plan [APP-282]** and the **Outline SSCEP [APP-285]**. These significant effects have been considered by the

Reference	Comments/Issue raised	Applicant's Response
		Applicant in the application of the planning balance, with tourism and recreation having been afforded limited negative weight. More generally, it is considered that these effects are far outweighed by the benefits of the Scheme, including proposed enhancements to PRoW, and the provision of 12.8 km of new permissive paths as set out in the **Outline PRoW and Permissive Paths Management Plan [APP-282]**, which will enhance connectivity in the local area and will help to improve recreation in the immediate vicinity, and also benefitting local population health and wellbeing in the long term.
LP-006	Ms Palmer stated that the parish supports a range of local businesses, including farms, pubs, bed and breakfasts, and Grittleton House, a Grade II* listed, family-owned events venue. She explained that these businesses provide employment and attract visitors, with activities such as weddings, filming and domestic and international school holiday programmes making an important contribution to the local economy. She stated that the Scheme would seriously harm these businesses, potentially rendering them unviable and leading to closures, with consequences for both owners and the wider area.	While direct impacts on specific business in Grittleton, such as at Grittleton House, have not been assessed individually, the assessment of tourism and recreation impacts in **ES Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]** and the supporting **ES Volume 3 Appendix 16-2 Tourism and Recreation Receptor Tables [APP-241]** have assessed the likely impacts of the Scheme at construction, operation, peak replacement, and decommissioning on Grittleton Conservation Area as a tourism and visitor destination, and on individual PRoWs connecting to Grittleton village that are affected by the Scheme. The assessment therein identifies up to a medium-term temporary moderate-

Reference	Comments/Issue raised	Applicant's Response
		minor adverse effect due to views of cable construction works, the construction compound, and HGV traffic within the conservation area. The Applicant has committed to the mitigation measures set out in the **Outline CEMP [APP-277]**, **Outline OEMP [APP-278]**, **Outline CTMP [APP-287]**, and **Outline PRoWPPMP [APP-282]** (secured by Requirements 13-16 inclusive in Schedule 2 to the **Draft DCO [APP-016]**) to ensure these impacts are minimised as much as practicable. The Applicant has assessed that there is a likely worst-case temporary loss of 50 FTE tourism industry jobs as a result of the Scheme, as set out in **ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]**. Where losses to tourism have been identified, these are worst-case estimates based on likely significant effects from the Scheme and do not include for additional mitigation measures being applied. This is also a temporary effect, anticipated to occur during construction, with recovery to tourism businesses anticipated to begin as soon as construction works are complete. During the Scheme's operational phase, the reduction in tourism compared to current conditions is anticipated to be equivalent to a loss of 11 FTE tourism-dependent jobs.

Reference	Comments/Issue raised	Applicant's Response
		Additional mitigation measures through the **Outline SSCEP [APP-285]** seek to reduce these losses through focusing on local recruitment, promoting local suppliers where practicable, and through providing retraining opportunities for workers in tourism-dependent industries. It is considered that these measures would help to reduce local losses in the local economy, and help to generate additional GVA in the local economy in alternative industries. The **Outline SSCEP [APP-285]** is secured by Requirement 18 in Schedule 2 to the **Draft DCO [APP-016]**.
LP-007	Ms Palmer acknowledged the need for energy self-sufficiency and noted that Wiltshire already hosts numerous solar developments but stated that food self-sufficiency is equally important and requires access to productive agricultural land. She argued that the location and fragmented layout of the Scheme would require extensive excavation for cabling and infrastructure, resulting in unjustified disruption and loss of agricultural land.	In relation to food security and self-sufficiency, the energy NPSs do not contain specific policies, although there is policy regarding the use of best and most versatile land more generally (see for instance NPS EN-1 (Ref 1) paragraph 5.11.34). Food security is also referenced in Policy 4: Addressing Climate Change of Wiltshire's Draft Local Plan (Ref 6), which provides that development proposals must support a move to a carbon neutrality and adaption to climate change by, amongst other things, protecting high grade agricultural land for future use and to help support food security. Analysis in the government's Land Use Framework (Ref 11) confirms that there is enough land to deliver

Reference	Comments/Issue raised	Applicant's Response
		the government's objectives for nature restoration and development without reducing domestic food production or compromising on these objectives. In relation to renewable energy infrastructure, the Land Use Framework (Ref 11) estimates that the amount of land in England required to meet renewable energy objectives in 2050 would be around 1% of England's total land and around 2% of the Utilised Agricultural Area. With regard to the protection of best and most versatile agricultural land more generally, the Scheme is compliant with NPS EN-1 (Ref 1) paragraph 5.11.34. As set out in **ES Volume 3 Appendix 4-1: Site Selection Assessment Report [APP-185]**, the Applicant has taken a sequential approach to including best and most versatile land in its search for suitable sites. In the initial stages of site selection, the Applicant identified and assessed potential development areas (PDAs) on grade 4, 5 and non-agricultural land. The Applicant also considered brownfield sites within the 20 km search area. None of the initial PDAs or brownfield sites were considered suitable for the Scheme due to constraints unrelated to agricultural land classification (such as site size and existing development uses), therefore it was necessary to reintroduce BMV land into the search criteria The

Reference	Comments/Issue raised	Applicant's Response
		search was therefore expanded to include Grade 3 and some Grade 2 agricultural land. In relation to excavation for cabling, soil movements required for the installation of the cables along the Cable Route and other fixed infrastructure will be subject to best practice principles set out in the **Outline SRMP [APP-280]**, which also confirms that the soil disturbance will be temporary and short-term in the Cable Route Corridor. The Outline SRMP **[APP-280]** is secured by Requirement 17 of Schedule 2 of the **Draft DCO [APP-016].** Section 1.8 of the **Outline SRMP [APP-280]** notes that the timing and management of works along the Cable Route Corridor will be agreed with the affected landowner to minimise disruption. **ES Volume 1, Chapter 3 The Scheme [APP-055]**, Section 3.6 notes that 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 subject to landowner requirements and preferences at the time. Although the primary agricultural use will cease for the duration of the Scheme, there is not anticipated to be any permanent loss of agricultural land.

Reference	Comments/Issue raised	Applicant's Response
		With regards to the anticipated effects to the farming business affected by cable routing, they are likely to be temporary, and restricted to the width of the Cable Route Corridor. Where fields have been bisected, working practices around cable laying works should allow for access to be maintained to both sides of the Cable Route Corridor to allow for agricultural work to be continued even during construction. The **Outline CEMP [APP-277]** (as secured through Requirement 13 of Schedule 2 to the **Draft DCO [APP-016]**) furthermore commits to the reinstatement of land affected by cabling works as soon as practicable to allow for agricultural work on the land to recommence as soon as construction of that section of cable route is complete. The land along the cable route will be returned to agricultural use and losses incurred during the construction period will be compensated for. The Applicant is keen to draw attention to the **Land Rights and Negotiations Tracker [PDA-004]** and the desire to enter into voluntary negotiations. The Applicant encourages all parties along the Cable Route Corridor to engage in discussions over the voluntary agreement to ensure practical concerns can be accounted for.

Reference	Comments/Issue raised	Applicant's Response
LP-008	In conclusion, Ms Palmer stated that Grittleton Parish Council considers the Scheme would have a significant and detrimental effect on the daily lives and wellbeing of parishioners and therefore maintains its objection.	The Applicant is confident that the methodology used within the assessment in **ES Volume 1, Chapter 18: Human Health [APP-070]** is robust, and that the assessment outcomes identify that there is no significant adverse effect to health and wellbeing to the affected population in the 2 km Study Area (which includes Grittleton) at any phase of the Scheme. Furthermore, the UK Health Security Agency, in their Relevant Representation **[RR-4798]** *"Following our review of the submitted documentation we are satisfied that the proposed development should not result in any significant adverse impact on public health"***.**

2.56 Nick Haire (on behalf of Sopworth Parish Meeting / Sopworth village)

Reference	Comments/Issue raised	Applicant's Response
NH-001	Nick Haire, speaking on behalf of Sopworth Parish Meeting and the village of Sopworth, stated that he lives in Sopworth, approximately two miles north-west of Sherston, and is Chairman of the Parish Meeting. Mr Haire explained that he was speaking on behalf of the village, which objects to the Schemes in their entirety.	The Applicant notes Mr Haire's comments on behalf of Sopworth Parish Meeting.
NH-002	Mr Haire stated that Sopworth lies within the CNL, formerly known as the Cotswolds AONB. He referred to the wide-ranging views across the surrounding landscape, including views towards the proposed site. He argued the Scheme will create a hard boundary between an industrial development and the protected landscape would exaggerate the negative characteristics of the Scheme while irreversibly harming the defining and positive qualities of the National Landscape.	The Scheme is located adjacent to the Cotswolds National Landscape (CNL) and Sites A, B and C are within its setting. The CNL is fully assessed as a standalone receptor within **ES Volume 3, Appendix 8-6: Assessment of Effects on the Cotswolds National Landscape and its Special Qualities [APP-197]**. This assessment considers the effects of the Scheme on landscape character, visual amenity and the special qualities of the CNL, including tranquillity. 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 have been avoided in fields C2, C3 and C4 where significant visual effects on receptors within the CNL were identified. Panels have also been avoided from fields C1, C6, C8, the western section of C9 and the majority of C10, with this land now proposed for ecological

Reference	Comments/Issue raised	Applicant's Response
		mitigation to protect the setting of the CNL. In addition, panels within fields A11 and A12 have been avoided and the land repurposed for ecological mitigation to protect the setting of the CNL towards Sherston. All land parcels adjacent to the CNL are proposed to deliver habitat enhancement, informed by the CNL Management Plan and the Cotswolds National Landscape Strategy and Guidelines, to further the purposes of the designation. Details of the proposed landscape and ecological mitigation and enhancement measures are provided in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060], Figure 3-4-1 to 3-4-5.2 Landscape and Ecology Mitigation Plan [APP-084] and the Outline LEMP [APP-283],** and the **Outline EPMS [APP-284].**
NH-003	Mr Haire referred to the statutory duty of the CNL Board to conserve and enhance the natural beauty of the designated area and stated that it is difficult to see how that duty could be fulfilled if the Scheme were to proceed.	The Applicant has consulted with the CNL Board throughout the iterative design process which has sought to conserve and enhance the natural beauty of the designated area. Significant design changes as noted above and all land parcels adjacent to the CNL are proposed to deliver habitat enhancement, informed by the CNL Management Plan and the Cotswolds National Landscape Strategy and Guidelines, to further the purposes of the designation.

Reference	Comments/Issue raised	Applicant's Response
		The Scheme is located adjacent to the CNL and Sites A, B and C are within its setting. The CNL is fully assessed as a standalone receptor within **ES Volume 3, Appendix 8-6: Assessment of Effects on the Cotswolds National Landscape and its Special Qualities [APP-197]**. This assessment considers the effects of the Scheme on landscape character, visual amenity and the special qualities of the CNL, including tranquillity.
NH-004	He went on to identify five fundamental considerations which, in his view, should be applied at the earliest stage when assessing the viability of Schemes of this nature. These were: good access close to a main road; a single consolidated site to minimise unnecessary wider impacts; close proximity to the grid; adequate separation from residential areas; and avoidance of flood risk. Mr Haire stated that the Scheme fails each of these tests and argued that these failures alone provide clear and sufficient grounds for refusal.	With regard to site selection, the Applicant has assessed a total of 12 potential development areas (PDAs) (including the proposed Solar PV Sites for the Scheme), against standardised assessment criteria as set out in Annex D of the **Site Selection Assessment Report [APP-185]**. Various constraints were also excluded from the search area when the PDAs were identified for assessment. In relation to the specific considerations raised by NH-004: Good access close to a main road: access was considered in the site selection assessment at Annex D of the **Site Selection Assessment Report [APP-185]** and balanced against other factors that were considered when assessing the overall suitability of a PDA.

Reference	Comments/Issue raised	Applicant's Response
		A single consolidated site: paragraph 2.2.6 of the **Site Selection Assessment Report [APP-185]** explains that the Applicant's initial review of the search area did not reveal a single site of adequate size and therefore the Applicant considered both contiguous land parcels and land parcels near one another. Close proximity to the grid: grid connection was considered in the site selection assessment at Annex D of the **Site Selection Assessment Report [APP-185]** and balanced against other factors that were considered when assessing the overall suitability of a PDA. Adequate separation from residential areas: As set out in section 2.3 of the **Site Selection Assessment Report [APP-185]**, the applicant considered proximity to sensitive human receptors in its site selection methodology and excluded larger urban areas such as Melksham and Chippenham from the search area at Stage 2 of the assessment. Avoidance of flood risk: Annex D of the **Site Selection Assessment Report [APP-185]** includes an assessment of how each PDA performs in terms of flood risk. Each PDA has been assessed further against all sources of flooding in the Sequential and

Reference	Comments/Issue raised	Applicant's Response
		Exception Test Report which can be found at Annex C of the **Planning Statement [APP-267].** All assessment indicators have been considered and balanced to determine the overall suitability of the PDAs as alternatives to the proposed Solar PV Sites. With the exception of PDA 10 (forming the Solar PV Sites for the Scheme), all the PDAs considered revealed major constraints. The details of the constraints are set out in further detail in Annex D of the **Site Selection Assessment Report [APP-185]** but include factors such as site size, heritage constraints, flood risk, landscape effects, existing land uses and land availability. PDA 10 (which forms the Solar PV Sites for the Scheme), did not reveal any major constraints and is considered suitable for solar development at the scale proposed and is deliverable within the required timescales. In terms of flood risk specifically, the Applicant does not agree that the Scheme fails to avoid flood risk. Flood risk has been a key consideration in both site selection and Scheme design. As set out in the **ES Voume 3, Appendix 4-1 Site Selection Assessment Report [APP-185]** and the Sequential and Exception Test within Annex C of the Planning Statement **[APP-267]**, flood risk has been assessed across all potential

Reference	Comments/Issue raised	Applicant's Response
		development areas and balanced alongside other constraints. The majority of the Order limits are located in areas of low flood risk, with more limited areas of higher risk identified and taken into account through the design. More vulnerable infrastructure, including substations and BESS, is located outside areas of higher flood risk, and Solar PV Panels within the flood extent are limited and designed so that floodplain function is maintained. **ES Volume 3, Appendices 11-1 to 11-9: Flood Risk Assessment and Drainage Strategy [APP-210 to APP-218]** demonstrates that the Scheme does not increase flood risk elsewhere. Solar PV Panels are mounted above ground and allow floodwater to pass beneath them, with negligible displacement of floodplain storage. Surface water runoff is managed so that there is no increase in peak flows leaving the site. On that basis, flood risk has been appropriately considered and addressed through both site selection and design, and the Scheme does not give rise to increased flood risk.
NH-005	Finally, Mr Haire addressed the human impacts of the application, stating that it has been deeply divisive within the community, causing distress, anxiety and	Impacts on communities within the 2 km Study Area have been considered as part of the assessment of "community identity, culture, influence and resilience"

Reference	Comments/Issue raised	Applicant's Response
	upset. He described the Scheme as a fundamentally flawed design covering too extensive an area, affecting too many people in their daily lives and impacting an excessive amount of countryside. On behalf of Sopworth village, Mr Haire respectfully requested that the application should not be supported and that consent should not be granted.	in **ES Volume 1, Chapter 18: Human Health [APP-070]**. The Applicant has considered how changes to perceptions of rurality, community sense of place, pride, engagement and difference in consideration of importance of different aspects of the Scheme (for example opposing views on harms versus benefits) may lead to a degree of impact to communities. The assessment has considered that this is likely to be up to a minor adverse effect on local communities and thus on residents' mental health and wellbeing. This is not considered a significant effect. Community liaison is also directly secured through Requirement 4 in Schedule 2 to the **Draft DCO [APP-016]** through the provision of a community liaison group during the Scheme's construction, operation and decommissioning. This group will act as an intermediary between the public and the onsite contractors to ensure community concerns and any information they need are communicated and responded to, so as to reduce community anxiety and impacts on mental wellbeing, and to assist in directing the public to mental health support if required. With regard to the scale and location of the Scheme, the **Statement of Need [APP-266]** provides further details of why utility scale solar schemes are needed in

Reference	Comments/Issue raised	Applicant's Response
		order to meet the county's demand for electricity. As set out in paragraph 6.4.10 of the Statement of Need, large-scale solar schemes, because of their scale and the area of land required for their development, are more likely to be sited in more rural areas of the county. NPS EN-3 (Ref 2) paragraph 2.10.31 recognises that *"at this scale, it is likely that the applicants' developments will use some agricultural land. Applicants should explain their choice of site, noting a preference for development to be on suitable brownfield, industrial and low to medium grade agricultural land."* The Applicant has considered alternative sites, including the use of brownfield land, as set out in the **Site Selection Assessment Report [APP-185]** (see table 2-2 for a list of brownfield sites considered). However, all of the brownfield sites considered were significantly smaller than the 40 ha minimum threshold for inclusion in the Scheme, and all of the sites are unavailable due to existing allocations or planning permissions in relation to them.

2.57 George Clarke (on behalf of Easton Grey Parish)

Reference	Comments/Issue raised	Applicant's Response
GC-001	George Clarke, speaking on behalf of Easton Grey Parish Meeting, stated that he is Chairman of the Parish Meeting and has lived in Easton Grey for 24 years. Mr Clarke described a stark disparity in resources between the parish and the Applicant, noting that the Parish Meeting has an annual precept of £825 compared with the Applicant's spending power of around £1 billion. He stated that the parish relies on a single volunteer chairman, whereas the Applicant has access to numerous employees and professional consultants. He emphasised, however, that the parish brings detailed local knowledge of the community, landscape, environment and flood risk, supported by what he described as common sense. On that basis, he requested that the ExA put the parish's written questions directly to the Applicant, expressing confidence that the parish's concerns would be supported by scientific evidence.	The Applicant notes Mr Clarke's comments on behalf of Easton Grey Parish Meeting. Whilst the Applicant acknowledges it has access to the required expertise, this is necessary in order to deliver a Scheme that is well designed, is compliant with national and local planning policy and minimises impacts to local residents and nearby communities. 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. The current cost estimate to deliver the Scheme in its entirety is approximately £900m to £950m.
GC-002	Mr Clarke stated that sightlines within parts of the parish would be adversely affected. He described Easton Grey as a conservation area located entirely within the CNL and argued that its setting would be harmed by the presence of solar panels of approximately two-storey height. He stated that	In relation to the Landscape and Visual Impact Assessment, the village of Easton Grey was scoped out of the assessment (refer to **ES Volume 3, Appendix 8-2: Scoping LVIA Receptor Sheets [APP-188]** as it is 1,470m from Lime Down Site B. The village is located on the river Avon with no visual

Reference	Comments/Issue raised	Applicant's Response
	residents and visitors, including those visiting scheduled monuments, would have to pass alongside the panels. Mr Clarke questioned the justification for covering high-quality, versatile agricultural land and stated that valued public rights of way used by walkers, cyclists and horse riders would be blighted, including by what he described as a tunnel effect and associated noise. He argued that the benefits these routes provide for mental and physical health and for tourism would be severely disrupted or lost altogether.	relationship with the scheme due to the intervening topography. From within the parish and nearer to the Scheme there is some intervisibility which gives rise to Minor Adverse effects to visual amenity which are considered non significant.In terms of the size of panels, as set out within **ES Volume 1, Chapter 3: The Scheme [APP-055]**, the maximum hight of the panels would be 4.5 m above ground level. In terms of the Easton Grey Conservation Area, **ES Volume 1, Chapter 12: Cultural Heritage [APP-064]**, supported by **ES Volume 3, Appendix 12.1: Heritage Statement [APP-219]**, has assessed the potential impact of the Scheme on built heritage assets. The assessment has concluded that no significant effects have been identified to heritage assets located within Easton Grey. In relation to agricultural land, **ES Volume 1, Chapter 17: Soils and Agriculture [APP-069]** notes that, within the Solar PV Sites (which would be subject to long-term effects), 32% of the agricultural land is best and most versatile (BMV) quality, primarily in Subgrade 3a, which is the lowest of the BMV grades. As set out in **ES Volume 3, Appendix 4-1: Site Selection Assessment Report [APP-185]**, the Applicant has taken a sequential approach to including

Reference	Comments/Issue raised	Applicant's Response
		best and most versatile land in its search for suitable sites. In the initial stages of site selection, the Applicant identified and assessed potential development areas (PDAs) on grade 4, 5 and non-agricultural land. The Applicant also considered brownfield sites within the 20 km search area. None of the initial PDAs or brownfield sites were considered suitable for the Scheme due to constraints unrelated to agricultural land classification (such as site size and existing development uses), therefore it was necessary to reintroduce BMV land into the search criteria. The search was therefore expanded to include Grade 3 and some Grade 2 agricultural land. With regard to tourism and PRoWs, a detailed assessment of the likely significance of effects from the Scheme on the use and desirability of key tourism destinations, individual PRoW and recreational access to the countryside is included in **ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]** and **ES Volume 3, Appendix 16-2: Tourism and Recreation Receptor Tables [APP-241]**. Whilst this assessment has scoped out assessment of Easton Grey Conservation Area due to its physical separation from the Scheme, the assessment has considered the impact on the

Reference	Comments/Issue raised	Applicant's Response
		Cotswold National Landscape and PRoWs that interact with the Scheme at Lime Down B. No significant residual effects are anticipated to these receptors at any phase of the Scheme. The assessment of impacts on long-distance recreational routes in **ES Volume 3, Appendix 16-2: Tourism and Recreation Receptor Tables [APP-241]** has identified the Wiltshire Way as a regionally important cycle route, and the Fosse Way as a nationally important historic route. Due to their high sensitivity, it is anticipated the Scheme will have a significant adverse effect on these routes throughout the Scheme's construction and decommissioning (and for the Fosse Way during operation), a matter which will have to be considered in the planning balance when the DCO is determined. The Applicant has committed to the mitigation measures set out in the **Outline CEMP [APP-277]**, **Outline OEMP [APP-278]**, **Outline CTMP [APP-287]**, and **Outline PRoWPPMP [APP-282]** (secured by Requirements 13-16 inclusive in Schedule 2 to the **Draft DCO [APP-016]**) to ensure impacts to these receptors are minimised as much as practicable 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

Reference	Comments/Issue raised	Applicant's Response
		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. In terms of noise, and with reference to **ES Volume 2, Figure 14-2 Daytime Operational Noise Contours [APP-160]**, noise from the Scheme within the Easton Grey Conservation Area is expected to be below 30 dB LpA and therefore the Scheme will not adversely impact the use of the land.
GC-003	Mr Clarke stated that falling property values, or difficulties in selling homes, are already causing mental and financial distress within the community.	Impacts of the Scheme on property prices and the saleability of properties have not been assessed as these have been agreed by the Planning Inspectorate to be scoped out of assessment in the ES, as set out in **ES Volume 3, Appendix 1-2: Scoping Opinion Response Table [APP-181]**. In terms of health, the Applicant has sought to undertake pre-application consultation in as robust a form as practicable, to allow interested parties to have access to as much information as available at the time of consulting as possible, to help alleviate concerns about the potential future impacts of the Scheme on people's lives. The **Consultation Report [APP-022]** sets out the Applicant's approach to pre-application consultation and demonstrates how consultation was

Reference	Comments/Issue raised	Applicant's Response
		undertaken with a wide range of stakeholders, including local communities, community organisations, statutory consultees and those with an interest in land. This has included in-person events and online communications, with consultation materials provided both digitally and in hard-form, and free-to-use communication channels to respond back to the Applicant team. The Applicant will seek to engage with communities during the construction stage through the implementation of a Community Liaison Group, as secured through Requirement 4 in Schedule 2 to the **Draft DCO [APP-016]**. Whilst this group is set up for the construction phase of the Scheme, the Applicant has committed to providing a designated community contact within the Scheme's operation and maintenance team during the operational lifetime of the Scheme, with a dedicated Community Liaison Manager committed to during peak replacement events and decommissioning. This is secured through the **Outline OEMP [APP-278]** and **Outline Decommissioning Strategy [APP 279]** by Requirements 14 and 20 in Schedule 2 to the **Draft DCO [APP-016]**.

Reference	Comments/Issue raised	Applicant's Response
GC-004	He went on to address heritage, tourism, noise and transport. Mr Clarke stated that, in his view, the Applicant relies on bold but highly questionable assertions and assessments. He argued that claims relating to tourism and employment do not reflect the scale of the Scheme or the number of communities and businesses affected. He stated that a country hotel, a local public house and a number of equine-related businesses would suffer adverse and potentially existential impacts.	In terms of the heritage points raised, **ES Volume 1, Chapter 12: Cultural Heritage [APP-064]**, supported by **ES Volume 3, Appendix 12.1: Heritage Statement [APP-219]**, has assessed the potential impact of the Scheme on built heritage assets, and where required appropriate mitigation has been proposed (see Section 12.9 of **ES Volume 1, Chapter 12: Cultural Heritage [APP-064]** for embedded mitigation and Section 12.11 for additional mitigation). In relation to tourism and employment, the Applicant is confident that the assessment methodology in **ES Volume 1, Chapter 16: Socio Economics, Tourism and Recreation [APP-068]** and supporting **ES Volume 3, Appendix 16-2: Tourism and Recreation Receptor Tables [APP-241]** are robust, and that the assessment outcomes demonstrate the likely significant effects from the Scheme based on a reasonable and precautionary worst-case scenario. Furthermore, the noise assessment presented in **ES Volume 1, Chapter 14: Noise and Vibration [APP-066]** is the result of a robust assessment using internationally recognised standards for sound propagation and are based on a series of reasonable worst-case assumptions, such as wind in the direction of the receptor, as well as a range of mitigation

Reference	Comments/Issue raised	Applicant's Response
		measures as described in Section 14.9. No significant effects on local noise sensitive receptors are expected. The **Outline OEMP [APP-278]** commits to noise levels from the Scheme at residential dwellings being the same as or below those modelled in the ES. The preparation, approval and implementation of the detailed OEMP, substantially in accordance with the outline plan, are secured through Requirement 14 of Schedule 2 of the **Draft DCO [APP-016]**, ensuring operational noise is appropriately controlled throughout the lifetime of the Scheme.
GC-005	Mr Clarke stated that traffic displaced from routes to and from Malmesbury and Sherston would be diverted onto the single-track road between Norton and Easton Grey. He stated that this road is incapable of accommodating additional traffic and already experiences near-fatal accidents.	The HGV construction routes are shown in **Figure 4.1** and **Figure 4.2** of the **Outline CTMP [APP-287]**. None of the proposed HGV construction routes will route via Easton Grey. The assessment presented in the updated Annex J of **ES Volume 3, Appendix 13-1: Transport Assessment [APP-233]** submitted at Deadline 1 demonstrates adequate carriageway width or frequency of passing place opportunity to pass at least an HGV and a light vehicle on the proposed construction routes. An **Outline CTMP [APP-287]** supports the DCO Application and presents outline measures which restrict construction deliveries to the proposed construction routes and times outside of

Reference	Comments/Issue raised	Applicant's Response
		highway network peak hours. A final Construction Workers Travel Plan will also be submitted as part of the Final CTMP, setting out the preferred routes to the site. Further to the above there is no reason to suggest that a material volume of traffic would be displaced onto the route between Norton and Easton Grey.
GC-006	Mr Clarke also raised concerns regarding decommissioning, stating that arrangements are inadequate in the absence of bonded guarantees, effective sanctions or realistic enforcement mechanisms. He argued that assurances offered are ineffective and prohibitively expensive to pursue. He expressed concern about the bank backing the Applicant and stated that the Applicant is a special purpose vehicle with no substantive assets and offshore ownership.	In terms of decommissioning, a requirement to decommission the Scheme is set out in Requirement 20 of the **Draft DCO [APP-016]**; failing to comply with that requirement would be a criminal offence. The requirement to decommission the Scheme would sit with the owner at the time of decommissioning. Decommissioning is also covered in agreements with landowners, which includes decommissioning securities to cover the cost of decommissioning in the event of any breach by the Applicant or in the event of the insolvency of the Applicant. The amount of such decommissioning security is regularly re valued throughout the lifecycle of the Scheme and topped up if necessary. Decommissioning is secured through Requirement 20 in Schedule 2 of the **Draft DCO [APP-016]**. The Applicant has produced an **Outline**

Reference	Comments/Issue raised	Applicant's Response
		Decommissioning Strategy [APP-279] as part of the EIA submitted with the DCO Application. A final decommissioning strategy will be prepared and agreed with the relevant authorities at that time of decommissioning and will include detailed measures and timescales.
GC-007	On flood risk, Mr Clarke stated that the Applicant's responses demonstrate either a misunderstanding or ignorance of the affected land. He argued that the proposed 1.8 million square metres of panels would concentrate runoff toward areas that already flood or are at risk of flooding. He stated that all examples cited in the parish's written evidence lie within Flood Zone 3. He referred to a critical rail route to Wales running through a cutting within the site, which he stated is already recognised as being at high risk due to climate change. He added that Easton Grey already experiences property flooding and that existing sewage infrastructure is also at risk. He argued that the Applicant appears focused on protecting its own assets, with little regard to flood risk imposed on surrounding communities that derive no benefit from the Scheme.	The Applicant does not agree with the characterisation of the flood risk assessment. Regarding the impacts of the panels on flooding, it is recognised that Solar PV Panels redistribute rainfall locally, with some concentration at panel drip-lines. This is a well understood physical process. The key consideration is whether that local redistribution translates into a meaningful increase in runoff at field or catchment scale. The evidence base and policy position confirm that it does not, provided ground conditions are appropriately managed. The controlling factors for runoff response are: • Ground cover condition, including the presence of permanent vegetation; • Soil structure and compaction; • Surface roughness and infiltration capacity; and • Flow connectivity across the site.

Reference	Comments/Issue raised	Applicant's Response
		Solar PV Panels are mounted above ground and are not connected to a drainage network. They do not behave as impermeable hardstanding and do not generate a new, connected discharge leaving the site. The redistributed rainfall drains to permeable, vegetated ground beneath and between panel rows, where it is dissipated and infiltrated. The Applicant's approach is consistent with national policy. NPS EN-3 (Ref 2) confirms that solar PV panels drain to the existing ground and that the impact on drainage will not, in general, be significant. The assessment at Lime Down applies this position through a risk-led framework, whereby: • Panel areas are treated as permeable and managed through secured soil and vegetation controls; and • Genuinely impermeable infrastructure is subject to quantitative drainage design, including attenuation and controlled discharge, as set out in the **ES Volume 3, Appendices 11-1 to 11-9 [APP-210 to APP-218]**. The assessment is not based on a single study. It is supported by a wider peer-reviewed evidence base, which shows that where vegetation is maintained and soil condition is managed, changes in runoff volume

Reference	Comments/Issue raised	Applicant's Response
		and peak flow are negligible. Where increases have been observed, these are associated with degraded ground conditions such as bare or compacted soils, which are addressed through embedded mitigation secured through the **Outline CEMP [APP-277]** and **Outline SRMP [APP-280]**, and through operational land management. On that basis, while localised drip-line effects are acknowledged, they do not translate into increased runoff at a site or catchment scale. The Scheme therefore does not increase runoff or flood risk off-site. Further, the Scheme has been assessed against all sources of flood risk, using Environment Agency data, site-specific appraisal and hydraulic modelling where appropriate, including for Gauze Brook, as set out in **ES Volume 3, Appendices 11-1 to 11-9: Flood Risk Assessment and Drainage Strategy [APP-210 to APP-218]**. This demonstrates that the Scheme does not increase flood risk elsewhere or alter flood behaviour at Easton Grey. The assessment considers catchment response, existing flood mechanisms and downstream receptors, and confirms that the Scheme does not increase runoff rates or volumes leaving the Order Limits.

Reference	Comments/Issue raised	Applicant's Response
		Existing flooding at locations cited within the parish's written representation **[EGPM-003 in PDA-009],** including Easton Grey, the railway corridor, local drainage channels and wastewater infrastructure within the village, is recognised as part of the baseline. The assessment also acknowledges that some of these receptors are already located within areas at risk of flooding, including Flood Zone 3. Flood risk across the Scheme has been assessed using Environment Agency datasets and, where appropriate, site-specific hydraulic modelling, including for Gauze Brook. The assessment does not assume that existing flooding issues are resolved. Rather, it assesses whether the Scheme would materially alter existing runoff pathways, floodplain storage or downstream flood behaviour. The assessment demonstrates that the Scheme would not materially increase runoff rates or volumes leaving the Order Limits and would not increase flood risk to existing receptors, including Easton Grey and the railway corridor. Existing drainage pathways and floodplain function are maintained, and where Solar PV Panels interact with mapped flood extents the assessment demonstrates that floodplain storage is preserved.

Reference	Comments/Issue raised	Applicant's Response
		Construction phase risks associated with soil compaction, sediment transport and pollution are also specifically considered within the assessment. These risks are controlled through measures secured within the **Outline CEMP [APP-277]** and **Outline Soil Resources Management Plan [APP-280].** **ES Volume 3, Appendices 11-1 to 11-9: Flood Risk Assessment and Drainage Strategy [APP-210 to APP-218]** considers flood risk both to and from the Scheme, including potential effects on surrounding communities and infrastructure. It is not limited to the protection of Scheme assets. The design approach ensures that runoff from the Scheme is controlled and that there is no increase in peak flows leaving the site. On that basis, the Applicant considers that the assessment is robust and that the Scheme would not increase flood risk to surrounding communities or infrastructure.
GC-008	In conclusion, Mr Clarke stated that the Scheme is the wrong development at the wrong scale in the wrong location, and that the harm it would cause would be substantial and permanent.	The **Planning Statement [APP-267]** considers the planning balance including consideration of the benefits it would deliver and the harm it may cause. As set out in the **Planning Statement [APP-267]** the benefits of the Scheme include the contribution the Scheme makes to achieve decarbonisation, the demand for electricity and the security of the supply of

Reference	Comments/Issue raised	Applicant's Response
		energy, ecological and landscape enhancements including substantial new hedgerow and tree planting, reinforcement planting and grassland habitat creation, biodiversity net gain in excess of 10%, the provision of 12.8km of permissive paths, employment generation and skills training. It is these benefits that are considered in the relevant policy tests that apply to the Scheme including: • In the case of designated heritage assets, where less than substantial harm is anticipated to seven designated assets. • The application of the exception test as set out in **Annex C: Sequential Test and Exception Test of the Planning Statement [APP-267]**. • The use of best and most versatile agricultural land. • Development in a National Landscape. As demonstrated in the **Planning Statement [APP-267]**, overall, the Scheme accords with the relevant energy National Policy Statements and, where required, it has been demonstrated that any harm caused by the Scheme is outweighed by the substantial benefits that are delivered.

2.58 Adrian Temple-Brown (on behalf of North Wiltshire Friends of the Earth)

Reference	Comments/Issue raised	Applicant's Response
ATB-001	Mr Adrian Temple-Brown, on behalf of North Wiltshire Friends of the Earth, stated that the organisation accepts that the application is likely to be approved due to the need for electricity delivery, proximity to significant computing power linked to national defence, current Government policy on renewables, climate and the environment, and national legal obligations relating to climate change.	The Applicant notes this comment and further details on the need for the Scheme can be found in the **Statement of Need [APP-266]**.
ATB-002	Mr Temple-Brown stated, however, that the Scheme represents a missed opportunity to deliver substantially greater benefits for both the climate and the environment. He argued that it has significant unrealised potential for carbon sequestration and for generating far more energy than could be achieved through solar panels alone. Mr Temple-Brown stated that the project would effectively convert the UK's sovereign solar resource into profit for Macquarie Bank, much of which would flow offshore and be untaxed. In return, he said, the UK would receive some jobs, some tax revenue, some environmental benefit and some energy, but many opportunities to maximise carbon sequestration and energy generation throughout the project lifecycle have not been taken.	Section 6.7 of the **Statement of Need** [**APP-266**] provides a comparative analysis of annual energy yields for solar and other generation technologies at the Site. It concludes that large-scale ground-mount solar schemes are likely to produce similar or greater quantities of low carbon electricity per acre than other types of low-carbon generation, contributing in a meaningful way to reduce carbon emissions and enhancing energy security and affordability. Far from missing sequestration opportunities, the cessation of intensive arable farming and the creation of 269.5 hectares of managed habitat, including native grasslands, species-rich buffers, and restored historic ponds, will enhance soil health and carbon accumulation while delivering in excess of 10% Biodiversity Net Gain. Further benefits of the Scheme

Reference	Comments/Issue raised	Applicant's Response
		are set out in Section 5.3 of the **Planning Statement [APP-267]** and include the delivery of large amounts of affordable, secure, and low carbon electricity which will help the UK to achieve net zero by 2050, ecological and landscape enhancements, biodiversity net gain, permissive paths, employment generation, economic benefits and skills training. Regarding the financial and investment structure, the Applicant clarifies that Lime Down Solar Park Limited and its parent company are registered in England and Wales and are subject to all applicable UK tax laws and regulations. Private financing through experienced infrastructure investors like Macquarie, who have invested over £65 billion in UK energy and infrastructure since 1999, is a common and robust structure used to deliver essential national projects faster and more efficiently while easing pressure on public finances. The Scheme will deliver significant domestic value, including providing clean electricity for 115,000 homes, generating business rates for the local authority, and supporting local recruitment and skills uplifting through the **Outline SSCEP [APP-285].**
ATB-003	Mr Temple-Brown provided specific examples of these shortcomings. He stated that no carbon costing has been provided for the construction and operation of the	The industry standard guidance adopted for the Climate Change assessment is that prepared by the Institute of Sustainability and Environmental

Reference	Comments/Issue raised	Applicant's Response
	Scheme. He argued that if no suitable planning tool currently exists, the Applicant should be required to create a comprehensive carbon costing model covering the entire lifecycle of the development, which could serve as a benchmark for future solar Schemes. He also stated that requiring all plant machinery, deliveries and maintenance vehicles to be electric would demonstrate a genuine commitment to the energy transition.	Professionals (ISEP) (Ref 9). This guidance does not include any requirement for carbon costing. The applicant notes the comment in relation to the provision of electric plant and vehicles, but it would not be feasible to restrict contractors to ensure that all plant machinery, deliveries and maintenance vehicles to be electric.
ATB-004	Mr Temple-Brown further suggested that low-rate electric vehicle chargers could be installed from the outset to serve delivery vehicles, maintenance fleets and on-site plant, and then retained permanently for community use. He stated that, if powered by the solar array and batteries, this infrastructure would provide a lasting benefit for communities affected by the Scheme.	The applicant notes the comment in relation to the installation of electric vehicle chargers, but it would not be feasible to restrict contractors to ensure that all plant machinery, deliveries and maintenance vehicles to be electric.
ATB-005	Mr Temple-Brown stated that, within a small number of El Niño cycles, it is likely that greater urgency in addressing the climate crisis will become apparent. He criticised the absence of any infrastructure provision to support the future installation of large wind turbines on the site and stated that there is no consideration of deep geothermal energy, for which he considered the 2,000-acre site to be well suited.	The Applicant has considered alternative technologies in a proportionate way as set out in section 4.10 of **ES Volume 1, Chapter 4: Alternatives and Design Evolution [APP-056],** including consideration of wind. Onshore wind in the proposed location is likely to give rise to greater visual effects due to the height of the wind turbines and the proximity to residential dwellings may give rise to adverse effects associated with

Reference	Comments/Issue raised	Applicant's Response
		shadow flicker and turbine noise. It is also considered that onshore wind would have a greater impact on the setting of the CNL than solar panels. Deep geothermal energy has not been considered. To give the wider context, it is the Government's view that new schemes across a wide range of technologies will be needed to deliver a secure, low-carbon electricity system. Therefore the Applicant does not consider that a different scheme in a different location, with a different technology, could be considered to be an alternative to this Scheme, because all schemes coming forward may be needed. Ultimately, the Applicant is a solar developer and considers that this site is suitable for solar development.
ATB-006	Mr Temple-Brown also argued that the Scheme lacks any meaningful strategy for carbon sequestration. He stated that the site could support the creation of living soil through the use of organic waste, increasing soil depth and volume and substantially enhancing carbon sequestration. Mr Temple-Brown noted that naturally generated soils such as vermicast or frass contain approximately 30 per cent carbon by volume, yet there is no commitment to increasing soil organic carbon levels across the site, even incrementally. He	In terms of carbon sequestration, while some Carbon sequestration could be lost in comparison to arable land, every effort would be made to maintain suitable vegetation and landscaping through native species. Ground beneath the panels can support native grasses, wildflowers and some managed vegetation. Furthermore, reducing soil disturbance (i.e. no tilling of fields) can lead to increased soil carbon accumulation.

Reference	Comments/Issue raised	Applicant's Response
	suggested that such measures could create significant employment opportunities in carbon sequestration for those currently working the land who may otherwise be displaced.	Natural England's Report 'Carbon Storage and Sequestration by Habitat 2021' states that arable land sequesters less carbon (around 27-25-88.2 tonnes/hectare) compared to semi natural grasslands (72-204 tonnes/hectare). Notwithstanding the above, solar schemes play an important role in combatting Climate Change through clean energy transition and reducing the reliance on fossil fuels. In relation to the points raised about soils, the assessment of potential effects on agricultural land and soils set out in **ES Volume 1, Chapter 17: Soils and Agriculture [APP-069]** confirms that, while the primary agricultural use of the land in the Solar PV Sites would cease during the 60-year operational period, the soil resource is expected to show improvements in soil health, quality and structure over the operational phase of the Scheme. Leaving the soil undisturbed under long-term grassland will naturally result in an accumulation of organic matter and carbon in the topsoil, for example by allowing continuous earthworm activity and sustained populations that annual ploughing would interrupt.

Reference	Comments/Issue raised	Applicant's Response
		Further ecological benefits of reversion of arable land to long-term grassland are detailed in section 1.3 of the **Outline LEMP [APP-283]**. In relation to employment opportunities, during operation, economic benefits from the Scheme are recognised to be relatively modest and limited in scope. The Applicant is cognisant of the impact the Scheme could have on existing agricultural employment associated with tenancies and contracts and so therefore seeks to source ways of retaining agricultural workers, providing reskilling opportunities, or providing re-employment (such as for land management where practicable) as supported by the measures secured in the **Outline SSCEP [APP-285]** by Requirement 18 of Schedule 2 to the **Draft DCO [APP-016]**.
ATB-007	Mr Temple-Brown highlighted the absence of Schemes for agrivoltaics, which could allow food production or livestock grazing beneath solar panels. He concluded that the Scheme fails to deliver a range of potential stacked benefits and that far greater contributions to energy security, food security, carbon sequestration and environmental restoration could be achieved. He stated that such outcomes could align more closely with Wiltshire's local plan, which he noted anticipates	**ES Volume 1, Chapter 17 Soils and Agriculture [APP-069]** identifies that there is potential for some agricultural use to resume during operation if land beneath the panels is grazed by livestock, including sheep. Specifically, the ES notes that during the operational lifetime of the Scheme *"some agricultural use may resume within the Solar PV Sites if the area beneath the panels is grazed by livestock".* Accordingly, sheep grazing is a potential future land

Reference	Comments/Issue raised	Applicant's Response
	significant carbon emissions over the coming years without a corresponding sequestration strategy.	management option rather than a guaranteed or required component of the Scheme. Agrivoltaic approaches have not been relied upon, as they can materially reduce generation efficiency compared with the optimised and selected use of bi-facial solar modules for the Scheme. The Applicant has therefore not relied on sheep grazing or agrivoltaics in the Environmental Impact Assessment, and the Scheme remains acceptable on the basis of mechanical grassland management alone. Any future decision to introduce grazing would be at the discretion of the landowners and farm operators, subject to appropriate management controls, and would not alter the conclusions of the Environmental Impact Assessment. The Applicant has responded on the topic of the carbon emissions reductions, energy security and affordability benefits of large-scale solar in relation to other technologies in Representation ATB-002 above.
ATB-008	In conclusion, Mr Temple-Brown requested that, if a DCO is granted, it should be subject to a robust set of conditions addressing the issues he raised. He stated that North Wiltshire Friends of the Earth would wish to	The responses to Mr Temple-Brown outlined identify where a matter raised has already been secured through the **Draft DCO [APP-016]**. In summary, these are:

Reference	Comments/Issue raised	Applicant's Response
	bring forward further Schemes in later stages of the examination.	• **Outline SSCEP [APP-285]**, secured through Requirement 18 of the Draft DCO. • **Outline LEMP [APP-283]**, secured through Requirement 7 of the Draft DCO. As noted in paragraph 7.9.1 of **ES Volume 1, Chapter 7: Climate Change** of the ES **[APP-059]**, the measures that form the GHG Reduction Strategy for the Scheme are included within the **Outline CEMP [APP-277]** and **Outline OEMP [APP-278]** (see section 3.2 of both management plans that sets out the traffic and waste management measures for reducing GHG) which are secured through Requirements 13 and 14 respectively.

2.59 Dan Pike (on behalf of Community Action: Whitley and Shaw and Melksham Without Parish Council)

Reference	Comments/Issue raised	Applicant's Response
DP-001	Dan Pike, speaking on behalf of Community Action Whitley and Shaw and Norton Without Parish Council, stated that the villages of Whitley and Shaw are already affected by close to eighty energy-related Schemes at various stages of planning and construction, including solar farms, BESS facilities, substations and cable corridors. He explained that the majority of these Schemes converge on Melksham substation at Beanacre, which lies on the edge of the parish, and invited the ExA to consider this cumulative context when assessing the application.	The Applicant recognises the importance of grid substations, including the existing Melksham Substation, as a strategic connection point for energy developments. However, cumulative effects have been carefully considered in accordance with Planning Inspectorate Advice Note 17 (Ref 10) and the relevant NPS EN-1 (Ref 1), NPS EN-3 (Ref 2) and NPS EN-5 (Ref 3) requirements as set out in **ES Volume 1, Chapter 21 Cumulative and In-Combination Effects [APP-073].** **ES Volume 1, Chapter 21 Cumulative and In-Combination Effects [APP-073]** and **ES Volume 3, Appendix 21-1 Long List of In Combination Effects and Cumulative Developments [APP-264]** set out the approach and conclusions of the technical chapters of the **ES [APP-052 to APP-074]** cumulative assessments. The long list of developments, set out at Section 1.2 of **ES Volume 3, Appendix 21-1 Long List of In** Combination Effects and Cumulative Developments **[APP-264]** includes the relevant developments located at Melksham. Taking a conservative worse case approach, significant cumulative effects are identified at a limited and

Reference	Comments/Issue raised	Applicant's Response
		discrete number of receptors comprising tourism and recreation impacts during the construction phase on Corsham Park, PRoW WT|CORM|122, PRoW WT|HULL|29, and Sustrans Cycle Route 403, and on skylark at a District level. None of the significant cumulative effects identified are located within the villages of Whitley or Shaw.
DP-002	Mr Pike stated that his principal concern is procedural, asking whether the Applicant should be required to properly assess and document cumulative impacts before consent is granted. He stated that while the Applicant asserts that cumulative impacts have been assessed, the information provided is inadequate. Mr Pike argued that the Environmental Statement assesses effects as if the Scheme were the only project in the area, when in reality risks are cumulative and capacity-limited.	Please see the response above which details how the cumulative effects assessment has been undertaken. The Applicant respectively disagrees that any aspect as the cumulative assessment is inadequate. It should also be noted that existing schemes are considered within each of the technical assessments of the **ES [APP-052 to APP-072]** and form part of the baseline environment. Cumulative schemes are considered in addition to the reported baseline environment. Cumulative effects (baseline plus the additional short-listed proposed schemes) are therefore then reported separately within each of the technical assessments of the **ES** [**APP-052 to APP-072**].
DP-003	He stated that Whitley and Shaw are located at the foot of a headwater catchment and explained that when multiple headwaters are disturbed during construction, sediments and contaminants are carried	The Applicant acknowledges the local experience of flooding described in Whitley and Shaw.

Reference	Comments/Issue raised	Applicant's Response
	downstream through interconnected drainage systems into the wider basin. He argued that these cumulative catchment-scale effects have not been assessed.	Flooding within the wider area, including Whitley, is recognised as part of the baseline and has informed the assessment. The purpose of the FRA is not to eliminate existing flooding, but to ensure that the Scheme does not increase flood risk. As set out in **ES Volume 3, Appendices 11-1 to 11-9: Flood Risk Assessment and Drainage Strategy [APP-210 to APP-218]**, the Scheme has been designed so that it does not increase runoff or peak flows leaving the site. Solar PV Panel areas remain permeable and do not generate a new, connected discharge, and runoff from impermeable infrastructure is attenuated and controlled. On that basis, while existing flooding may continue to occur under certain conditions, the Scheme would not increase the volume or rate of water reaching downstream receptors, including Whitley, and would not exacerbate existing flooding. Further, the Applicant does not agree that the Scheme fails to consider cumulative runoff effects or that it would increase flood risk to downstream receptors. The assessment has been undertaken across the Scheme as a whole and within the context of the contributing catchments. As already mentioned above,

Reference	Comments/Issue raised	Applicant's Response
		all elements of the Scheme are required to demonstrate that there is no increase in flood risk off-site. Any neighbouring or local developments would be subject to the same planning and policy requirements to manage runoff and demonstrate no increase in flood risk, and therefore would not give rise to uncontrolled cumulative effects.
DP-004	Mr Pike stated that he is an engineer, which informs his understanding of how large infrastructure projects can affect their surroundings in ways that are not always immediately apparent. He explained that he has lived in Whitley for 16 years and has personally experienced several flooding events, including flooding to his own home.	The Applicant acknowledges the local experience of flooding described at Whitley. Flooding within the wider area is recognised as part of the baseline and has informed the assessment presented in **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [APP-063]** and the **ES Volume 3, Appendices 11-1 to 11-9: Flood Risk Assessment and Drainage Strategy [APP-210 to APP-218]**. The purpose of the assessment is to ensure that the Scheme does not increase flood risk. The Scheme has been designed so that it does not increase runoff or peak flows leaving the site. Solar PV Panel areas remain permeable and do not generate a new, connected discharge, and runoff from impermeable infrastructure is attenuated and controlled to greenfield rates, with allowance for climate change.

Reference	Comments/Issue raised	Applicant's Response
		On that basis, while existing flooding may continue to occur under certain conditions, the Scheme would not increase the volume or rate of water reaching downstream receptors, including Whitley, and would not exacerbate existing flooding.
DP-005	Mr Pike raised particular concern about the proposed cable route, which he described as requiring a wide construction corridor extending from north of the M4, across fields, roads and a railway line, to Melksham substation. He stated that the Applicant seeks reliance on assurances that impacts will be appropriately managed, yet construction methods are not defined in sufficient detail. He argued that key elements are deferred to later stages, meaning that the consequences cannot be properly predicted at this point, and that deferral does not remove risk but instead displaces responsibility.	In relation to the width of the Cable Route Corridor, it is considered standard for a solar development, generally spanning 50 m but extending to 665 m in some isolated locations where utilities are located or where there are road and rail crossings. The technical chapter of the **ES** [**APP-052 to APP-072**] are informed using the "Rochdale Envelope", which is an industry standard approach for Nationally Significant Infrastructure Projects, and defines the maximum envelope of the Scheme's parameters and design optionality. This ensures that the worst-case scenario is always considered when undertaking environmental assessment (even where aspects of the Scheme require flexibility). All mitigation measures proposed in the ES are secured through the suite of management plans documents secured by the Requirements in Schedule 2 to the **Draft DCO [APP-016].** If consented, the DCO becomes a statutory instrument, and thus failure to

Reference	Comments/Issue raised	Applicant's Response
		comply with, or breach of, any of the Requirements is a criminal offence.
DP-006	Mr Pike further stated that BESS facilities appear repeatedly across the numerous schemes in the area. While each is assessed individually, he argued that the associated risks are not site-specific and depend on shared emergency response capacity. He stated that there has been no cumulative major accident assessment across all projects and no clear evidence that Wiltshire Fire and Rescue Service has been asked to consider a cumulative fire or accident scenario.	Cumulative effects associated with the Building Failure, Fire and Associated Explosions (including any risk posed by the BESS) are assessed in **ES Volume 1, Chapter 20: Other Environmental Matters, Section 20.7: Major Accidents and Disasters [APP-072].** This assessment considers credible worst-case accident scenarios and concludes that, with embedded mitigation and appropriate management measures, no significant adverse effects are anticipated as a result of interaction with other shortlisted projects.
DP-007	Mr Pike emphasised that neither he nor the organisations he represents are opposed to renewable energy. He explained that the objection is on the basis of incomplete information. He stated that he is not questioning the Applicant's ability to deliver the Scheme, but rather the quality, completeness and reliability of the information presented, particularly in relation to environmental risk management.	The applicant respectively disagrees that any aspect as the DCO Application assessment is inadequate. Please see the responses provided above in DP-001 to 006 which set out the reasons for this.
DP-008	In conclusion, Mr Pike stated that key elements of the application are missing, others are fragmented, and critical matters are deferred. He questioned whether a	The Applicant respectfully disagrees that any key elements of the application are missing or fragmented. Please see the responses provided above in DP-001 to 006 which set out the reasons for this.

Reference	Comments/Issue raised	Applicant's Response
	robust and lawful decision can be made on this basis and left that judgment to the ExA.	The overall planning balance, including the need for the Scheme and its anticipated benefits, is set out in the **Planning Statement [APP-267]** and **Statement of Need [APP-266]**. These documents explain the role of the Scheme in contributing to the urgent need for renewable energy generation and the transition to net zero, while also considering the environmental and planning matters relevant to the determination of the Application.

2.60 John Buckley (on behalf of Luckington & Alderton Parish Council)

Reference	Comments/Issue raised	Applicant's Response
JBu-001	Mr John Buckley, on behalf of Luckington and Alderton Parish Council, stated the Council's strong opposition to the Scheme. He highlighted his master's in environmental sciences and served for 30 years as a senior police officer, specialising in multi-agency responses to major incidents, particularly flooding and other adverse weather events, supported by specialist training at the National Police Staff College and the Emergency Planning College.	The Applicant notes Mr Buckley's experience outlined.
JBu-002	Mr Buckley described the expansive rural area around Luckington and Alderton and stated that the scale and nature of the proposed motorised solar panels, BESS facilities and substations would make them impossible to conceal within this landscape. He rejected suggestions that, after 60 years, the land could be restored to the existing Cotswold landscape, stating that such claims lack credibility.	The villages of Luckington and Alderton are located within the Cotswold National Landscape (CNL). The Scheme is located adjacent to the CNL and Sites A, B and C are within its setting. The CNL is fully assessed as a standalone receptor within **ES Volume 3, Appendix 8-6: Assessment of Effects on the Cotswolds National Landscape and its Special Qualities [APP-197]**. This assessment considers the effects of the Scheme on landscape character, visual amenity and the special qualities of the CNL, including tranquillity. 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 have been avoided from the Order Limits in fields C2, C3 and C4

Reference	Comments/Issue raised	Applicant's Response
		where significant visual effects on receptors within the CNL were identified. Panels have also been avoided 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 have been avoided and the land repurposed for ecological mitigation to protect the setting of the CNL towards Sherston. All land parcels adjacent to the CNL are proposed to deliver habitat enhancement, informed by the CNL Management Plan and the Cotswolds National Landscape Strategy and Guidelines, to further the purposes of the designation. Details of the proposed landscape and ecological mitigation and enhancement measures are provided in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]**, **ES Volume 2, Figure 3-4-1 to 3-4-5.2 Landscape and Ecology Mitigation Plan [APP-084]**, the **Outline LEMP [APP-283]** and the **Outline EPMS [APP-284]**. Mitigation measures to address landscape and visual effects are set out in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]**, **ES Volume 2, Figure 3-4-1 to 3-4-5.2 Landscape and Ecology**

Reference	Comments/Issue raised	Applicant's Response
		Mitigation Plan [APP-084] and detailed within the **Outline LEMP [APP-283]** and the **Outline EPMS [APP-284]**. These documents include proposals for new and enhanced planting, retention of existing hedgerows and woodland, and landscape integration measures to reduce visual effects over time. In addition, the Scheme design incorporates minimum offsets from existing landscape features, including residential properties, ancient woodland, woodland, hedgerows, public rights of way and watercourses, to further limit visual impacts. The preparation, approval and implementation of detailed landscape and ecological management plans, substantially in accordance with the **Outline LEMP [APP-283]** and **Outline EPMS [APP-284]**, are secured through requirements in Schedule 2 of the **Draft DCO [APP-016]**, ensuring that the identified mitigation measures are delivered and maintained throughout the lifetime of the Scheme. It is the position of the Applicant that, following decommissioning of the Scheme, the landscape would be left in a better condition than the current day. This betterment is established as a consequence of the landscape proposals resulting in greater species variety, greater age depth, enhanced structure,

Reference	Comments/Issue raised	Applicant's Response
		resilience to pest and disease and reinforcement of local landscape character across the Sites. At decommissioning, as infrastructure is removed, there would be an overall benefit to the character of the area with landscape mitigation retained providing long term benefit towards legacy landscape. Following decommissioning, the site would benefit from the significantly enhanced tree and hedgerow planting that has been carried out and has matured to create a much stronger and robust landscape, retaining, and enhancing the overall character and providing considerable biodiversity benefits over the years. Due to the development, the landscape would be left in a better condition than current day. This betterment is established as a consequence of the landscape proposals resulting in greater species variety, greater age depth, enhanced structure, resilience to pest and disease and reinforcement of local landscape character across the Sites. The defining legacy of the landscape would be the robust framework of features that have improved through the mitigation and landscape enhancements. This mitigation in turn would give rise to long-term wider benefits, including maintaining and enhancing

Reference	Comments/Issue raised	Applicant's Response
		biodiversity and in promoting the resilience of ecosystems.
JBu-003	Mr Buckley acknowledged that climate change and its impacts are real and increasingly evident, citing warmer and drier summers, wetter and stormier winters, and consistently high groundwater levels extending through autumn and winter. He stated that these conditions are already resulting in increased river and surface water flooding, flooded roads, damaged carriageways, travel disruption, waterlogged farmland, property damage and frequent discharges from overwhelmed treatment works, all ultimately affecting the Bristol Avon.	The Applicant acknowledges the observations made regarding the effects of climate change on flooding and the wider water environment. Climate change has been explicitly considered within the assessment, as set out in **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [APP-063]** and **ES Volume 3, Appendices 11-1 to 11-9: Flood Risk Assessment and Drainage Strategy [APP-210 to APP-218]**. Environment Agency climate change allowances have been applied to both hydrological estimation and drainage design to account for increased rainfall intensity and future flood risk. The assessment recognises that baseline conditions are expected to change over time, including increased frequency and severity of flooding. The assessment considers downstream catchment response and receiving water environments, including pathways ultimately contributing to the Bristol Avon catchment, and demonstrates that the Scheme would not adversely impact runoff rates or volumes leaving the Order Limits under current or future climate scenarios. Surface water runoff from impermeable infrastructure is attenuated and controlled with climate change

Reference	Comments/Issue raised	Applicant's Response
		allowances applied, and Solar PV Panel areas remain permeable and continue to drain to ground. On that basis, while the impacts of climate change on flooding are acknowledged, the Scheme would not exacerbate these effects and would not increase flood risk within the catchment. In relation to climate change, the **ES Volume 1, Chapter 7 Climate Change [APP-059]** considers the Scheme's resilience to the effects of Climate Change. This is achieved through a review of projected future weather changes and sets out means to mitigate the Scheme from these impacts. The Applicant notes the observations on climate made as part of this representation. The **Statement of Need [APP-266]** describes that the Government's approach to tackle climate change is to achieve a clean power system by 2030 and to keep it clean thereafter as electricity demand increases due to wider decarbonisation (Section 2.9). NPS EN-3 (Ref 3) Paragraphs 2.10.9 and 2.10.10 explain that solar is a key part of the government's strategy for low-cost decarbonisation of the energy sector and that solar also has an important role in delivering the government's goals for greater energy independence.

Reference	Comments/Issue raised	Applicant's Response
JBu-004	Mr Buckley explained that the Scheme area has particular sensitivities relating to contamination risk, sub-soil disturbance and flooding. He stated that the entire northern part of the Scheme lies above a deep limestone aquifer network that stores and transmits water across a wide area and supplies drinking water to large parts of the West Country. He emphasised that these aquifers are particularly vulnerable to contamination due to micro-fissures that accelerate groundwater movement, and that the Scheme therefore poses a direct risk to public water supplies.	In terms of sub soil disturbance, **ES Volume 1, Chapter 3 The Scheme [APP 055],** Section 3.3 describes how the mounting frames for solar panels are ordinarily installed by driving piles into the ground without the need for excavations. There will therefore be minimal disturbance to the in-situ subsoils within the Solar PV Sites. Subsoils that would be disturbed, for example within the Cable Route Corridor excavations, primarily fall into two types, one being brashy limestone which **ES Volume 1, Chapter 17 Soils and Agriculture [APP-069]** identifies as a low sensitivity soil. All soil access and movements will be subject to best practice principles set out in the **Outline SRMP [APP-280]**, which also confirms that the soil disturbance in the Cable Route Corridor will be temporary and short-term. The **Outline SRMP [APP-280]** is secured by Requirement 17 of Schedule 2 of the **Draft DCO [APP-016].** In relation to risks to the Principal Aquifer and specifically to potable abstractions from the aquifer, such as Private Water Supplies or more significant mains water abstractions, these are considered in **ES Volume 1, Chapter 19 Ground Conditions [APP-071]** and mitigation is outlined. Hydrogeological risk

Reference	Comments/Issue raised	Applicant's Response
		registers which provide an initial understanding of the risk to sensitive groundwater receptors from construction activity are set out in the following documents: • **BESS and Substation - Preliminary Geotechnical Risk Register [EN010168/EXAM/9.12];** • **Cable Route Avoidance Areas - Preliminary Geotechnical Risk Register [EN010168/EXAM/9.13];** and • **Cable Route Corridor Mining Risk - Technical Memorandum [EN010168/EXAM/9.14].** Further to this, prior to the commencement of any construction work, a Foundation Works Risk Assessment will be undertaken for all substation and BESS locations (secured via the **Outline CEMP [APP-277])** to ensure that residual risks to groundwater will be appropriately mitigated and managed on a location-specific basis. Emphasis will be placed on mitigation which prevents the introduction of contaminants to underlying water-bearing strata, minimising any risks associated with the presence of fissures and rapid migration of contaminants within the aquifer.

Reference	Comments/Issue raised	Applicant's Response
JBu-005	Mr Buckley described a network of permanent streams, seasonal surface flows, subterranean watercourses and springs that convey water into the Bristol Avon both within and beyond the Scheme area. He stated that the site already experiences significant standing and surface water issues and that surrounding and downstream communities are subject to high flood risk. Mr Buckley stated any change to the rate or volume of runoff across the site would exacerbate flooding off-site and downstream, and that the risk of such effects has not been properly assessed.	The Applicant acknowledges the description of the local drainage network and existing flooding conditions. The assessment presented in **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [APP-063]** and **ES Volume 3, Appendices 11-1 to 11-9: Flood Risk Assessment and Drainage Strategies [APP-210 to APP-218]** considers how water moves through the catchment, including headwaters, existing overland flow routes, receiving watercourses and areas of existing standing water and seasonal flooding. The assessment distinguishes between Solar PV Panel areas and impermeable infrastructure. Solar PV Panels are mounted above ground and drain directly to the existing ground beneath and between panel rows. These areas remain permeable and are not connected to a positive drainage system that would collect and discharge runoff beyond the Order limits. As such, the Scheme does not introduce new off-site discharge points or alter the fundamental routing of surface water from the wider Solar PV areas. By contrast, impermeable infrastructure, including substations, the BESS Area and associated

Reference	Comments/Issue raised	Applicant's Response
		hardstanding, is subject to quantitative drainage design. Runoff from these areas has been calculated and would be attenuated and discharged at restricted greenfield runoff rates, including an allowance for climate change. Exceedance flows from these areas would be retained and managed within the site drainage systems as part of the embedded drainage design. The assessment therefore concludes that the Scheme would not increase runoff rates or peak flows leaving the site and would not exacerbate downstream flooding. Existing flooding may continue to occur as a result of wider catchment conditions, however the Scheme would not materially alter those conditions or increase flood risk elsewhere. Flood risk from watercourses has been assessed using established UK methodologies, including FEH-based hydrological estimation and hydraulic modelling where appropriate, in accordance with Environment Agency guidance and standard industry practice. Environment Agency datasets have informed the baseline assessment and site-specific hydraulic modelling has also been undertaken for Gauze Brook to provide a

Reference	Comments/Issue raised	Applicant's Response
		more detailed understanding of flood levels, depths and flow behaviour within that catchment. Local observations of flooding and flow behaviour are recognised and have informed understanding of catchment response during specific events. However, individual observations cannot define the full range of flood risk required for assessment. FEH-based methods provide a consistent and robust basis for estimating flows and testing flood behaviour across a range of return periods and future climate scenarios, enabling the assessment to demonstrate that the Scheme would not increase flood risk.
JBu-006	Mr Buckley stated that the Parish Council considers the Applicant to have consistently underestimated risks to local communities and to the public water supply, offering insufficient mitigation while disregarding foreseeable impacts. He explained that the Bristol Avon passes through the parish and already floods regularly, alongside widespread surface water flooding from runoff and springs, which blocks roads, damages land and property, and isolates communities. He stated that the Scheme would undoubtedly worsen these conditions.	The Applicant does not agree that risks have been underestimated or that the Scheme would worsen existing flooding. Flood risk has been assessed in accordance with national and local planning policy and relevant guidance, using Environment Agency data, site-specific appraisal and consultation with statutory bodies. This framework is applied to the specific characteristics of the local catchment, including known flooding, groundwater conditions and drainage pathways.

Reference	Comments/Issue raised	Applicant's Response
		Existing flooding within the parish, including along the Bristol Avon and from surface water and springs, is recognised and forms part of the baseline. The assessment has been undertaken to ensure that the Scheme does not increase that risk. The Scheme does not increase runoff or peak flows leaving the site. Solar PV Panel areas remain permeable and do not create a new, connected discharge, and runoff from impermeable infrastructure is attenuated and controlled to greenfield rates, with climate change allowance, as set out in **ES Volume 3, Appendices 11-1 to 11-9: Flood Risk Assessment and Drainage Strategy [APP-210 to APP-218]**. There is therefore no mechanism by which the Scheme would increase the volume or rate of water reaching the Bristol Avon, local roads or surrounding communities. On that basis, while existing flooding may continue, the Scheme would not exacerbate those conditions.
JBu-007	Regarding highways, Mr Buckley stated that the area is served primarily by narrow, single-carriageway rural roads that are incapable of accommodating the level of construction, operational, replacement and decommissioning traffic proposed. He stated that the	In terms of the points raised on highways, an updated breakdown of Trip Generation Calculations was provided at Annex E of **ES Volume 3, Appendix 13-1 Transport Assessment [APP-233]** at Deadline 1. This presents specific assessed quantities of material

Reference	Comments/Issue raised	Applicant's Response
	risks and disruption to pedestrians, cyclists and horse riders would inevitably increase, that passing places are inadequate for the anticipated volume of HGVs and abnormal loads, and that those volumes have been significantly underestimated. He considered the proposed mitigation measures to be inadequate, with no viable alternative routes available.	volumes and component type/numbers for each Lime Down Solar PV Site including fencing, aggregates for access tracks, PV modules and mounting structures substation equipment. The assessment presented in the updated Annex J of **ES Volume 3, Appendix 13-1: Transport Assessment [APP-233REP-]** submitted at Deadline 1 demonstrates adequate carriageway width or frequency of passing place opportunity to pass at least an HGV and a light vehicle as requested in comments provided by Wiltshire Council in its response (August 2025) to the Transport Assessment Scoping Note and confirmed in Paragraph 4 of 'Appendix A - Highways and Transport Document Review - Detailed Comments'. This confirms that no passing bay or widening improvements are needed to accommodate these movements on the construction route outside of the Order Limits. The distances between passing points outside of the Order Limits are all within 150m with forward visibility extending to the next passing point and beyond. This is within the generally accepted distance of 200 m. As set out in the **Outline CTMP [APP-287]**, a booking system will be set up to manage arrivals and departures to the site. This will be implemented in

Reference	Comments/Issue raised	Applicant's Response
		coordination with banksmen, which will be able to hold back any cross-over, should there be any delays on the roads. This will prevent HGVs generated by the Scheme passing each other in opposite directions on the local roads forming part of the construction routes and will be confirmed as part of the final CTMP. Excessive widening of existing rural routes to allow two HGVs to pass would be over engineering, because of the following reasons: • The temporary nature of the construction period; • The level of hourly HGV trips when considering a realistic construction programme; • Delivery times during the construction phase are limited to those times set out in the **Outline CTMP [APP-287]**. There will be no HGV construction trips outside of these hours; • There would be a much greater impact on hedgerow, trees and character; and • The low level of existing HGVs on the proposed HGV construction routes. Information included in **ES Volume 3, Appendix 13-1: Transport Assessment [APP-233]** submitted at Deadline 1 of Examination demonstrates that there is adequate carriageway width and/or passing place

Reference	Comments/Issue raised	Applicant's Response
		opportunity for two HGVs along the proposed construction routes. **ES Volume 1, Appendix 13-1: Transport Assessment [APP-233]** assess the impact on Non-Motorised User (NMU) delay and amenity, including Fear and Intimidation. All impacts are concluded to be not significant and will be temporary. NMU delay is considered negligible given there is no existing pedestrian or cycle infrastructure on the construction routes and likely low numbers of existing NMU users. It is anticipated that PRoW which cross the Order Limits will generally remain open during the construction phase of the Scheme. There may be some slight perceptible delay to NMU movement if a construction vehicle is crossing a PRoW within the Order Limits. An **Outline PRoWPPMP [APP-282]** forms an embedded mitigation and will provide measures to ensure the effects of the construction phase on PRoW users is minimised. The **Outline PRoWPPMP [APP-282]** contain specific measures for the temporary diversion of footpath WT|GRIT|20 and bridleway WT|MALW|54, where access to Cable Route Corridor works east of

Reference	Comments/Issue raised	Applicant's Response
		Grittleton, and HGV access to Lime Down E are taken respectively. These diversions are proposed to ensure unreasonable effects to PRoW users are not experienced during construction, replacement and decommissioning. In terms of NMU amenity, pedestrian amenity is broadly defined as the relative pleasantness of a journey, and can be affected by traffic flow, traffic composition and pavement width/separation from traffic. The construction routes on the road network have little existing pedestrian infrastructure and no footways, making them already unattractive as walking routes with no pedestrian amenity so this cannot be assessed. Fear and Intimidation for other NMU's can be assessed. Highway widths of construction routes have been assessed in **ES Volume 3, Appendix 13-1: Transport Assessment [APP-233**] and provide sufficient width for HGV traffic to comfortably pass cyclists. **ES Volume 1, Chapter 13: Transport and Access [APP-065]** concludes that the level of flow change will not result in a step change in fear and intimidation as

Reference	Comments/Issue raised	Applicant's Response
		defined in the ISEP guidance at Tables 3.1, 3.2 and 3.3 (Ref 8). **ES Volume 1, Chapter 13: Transport and Access [APP-065]** concludes that on all links in the study area the significance of effect is Minor Adverse (temporary). In terms of mitigation, an **Outline CTMP [APP-287]** supports the DCO Application and presents outline measures which restrict construction deliveries to the proposed construction routes and times, separating the public and recreational users from hazards, including, traffic management measures such as signage and banksmen, fencing, and dust and noise control. In relation to the use of the highway network for recreational users such as walkers, cyclists, and equestrians, these have been considered as a recreational receptor in the assessment in the **ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]**. The Applicant confirms that within the Luckington and Alderton area (Lime Down A and C), no significant adverse effects are anticipated to users of PRoWs or to the local highway network. This is based on the assessment of likely affects to highway users as set out in **ES Volume 1, Chapter 13: Transport and**

Reference	Comments/Issue raised	Applicant's Response
		Access [APP-065] finding no significant effects to non-motorised users. The Applicant has committed to ensuring the operation or recreational use of PRoWs and the local highway network is protected as much as possible through the implementation of embedded and additional mitigation measures set out in the **Outline CTMP [APP-287]** and **Outline PRoWPPMP [APP-282]**, secured respectively by Requirements 15 and 16 in Schedule 2 to the **Draft DCO [APP-016]**. The Applicant confirms that the approach to PRoW impacts and highway safety are under discussion with Wiltshire Council's Countryside Access Team and Highways Team (as part of discussions with Wiltshire Council in general). Additional discussions specific to PRoWs are being undertaken with the British Horse Society, and the Wiltshire Bridleway Association. Progress on each of these discussions is set out in the relevant Statements of Common Ground with each of these parties, to be submitted at Deadline 2.
JBu-008	Mr Buckley stated the Applicant appears to treat the Scheme as something to be imposed on the area rather than developed in partnership with local communities. He stated that no meaningful mitigation has been offered in a parish characterised by	In relation to flood risk and water environment matters, the Applicant does not agree that the Scheme has been developed without regard to local concerns. Engagement with Mr Buckley during public consultation events and separate one-to-one discussions informed the Applicant's understanding of

Reference	Comments/Issue raised	Applicant's Response
	residents, visitors and a range of businesses reliant on tourism.	local flooding conditions, groundwater sensitivities and the behaviour of the underlying oolitic limestone aquifer. These discussions informed the scope and focus of the assessment work undertaken for the Scheme. In particular, concerns regarding groundwater vulnerability and potential contaminant pathways informed further consideration of sensitive groundwater receptors and the development of additional groundwater risk assessment work, including hydrogeological risk registers for piled foundations and HDD works, together with commitments for location-specific Foundation Works Risk Assessments secured through the **Outline CEMP [APP-277]**. The Applicant has also considered local concerns regarding existing flooding, runoff pathways and downstream receptors as part of the assessment presented in **ES Volume 3, Appendices 11-1 to 11-9: Flood Risk Assessment and Drainage Strategy [APP-210 to APP-218]**. On that basis, the Applicant considers that local engagement has informed both the assessment and mitigation approach for the Scheme.

Reference	Comments/Issue raised	Applicant's Response
		Contrary to the comments made in regard to the Scheme being imposed on the area, the Applicant wishes to confirm that the Scheme has been developed through an iterative design process undertaken in response to consultation and in accordance with the mitigation hierarchy to avoid, reduce and mitigate adverse effects on the environment. The process of consultation has involved Mr Buckley directly, and members of Luckington and Alderton Parish Council. The Applicant wishes to point out the value which Mr Buckley has provided in regard to further informing the Applicant team of current flood risk matters and shared his concerns that could occur from the Scheme. The assessments set out in the **ES [APP-052 to APP-265]** detail what impacts are expected as a result of the Scheme based on the minimum and maximum parameters of the Scheme, and the mitigation and enhancement measures that are proposed to reduce these impacts. The Applicant has sought to ensure mitigation has been targeted to minimise impacts to residents and visitors, particularly in locations on the edge of the Cotswolds National Landscape (as Luckington and Aderton are). This has included removing significant areas of Solar PV Array infrastructure from the Scheme in Lime Down C, providing landscape

Reference	Comments/Issue raised	Applicant's Response
		screening, providing mitigation for construction impacts, controls on HGV movements to protect highway users, and protection for PRoW users. Furthermore, tourism-dependent businesses affected by the Scheme may be eligible for support through local skills and retraining opportunities. These measures are secured through the **Works Plan [APP-007]**, **Outline LEMP [APP-283]**, **Outline CEMP [APP-277]**, **Outline CTMP [APP-287]**, **Outline PRoWPPMP [APP-282]**, and **Outline SSCEP [APP-285]** by Requirements 5, 7, 13, 15, 16 and 18 respectively in Schedule 2 to the **Draft DCO [APP-016]**. This is not an exhaustive list of the mitigation measures and management plans the Applicant has committed too. A more comprehensive list can be found in the **Commitments Register [APP-291]**. The Applicant also seeks to reiterate that the approach to mitigation for the Scheme is under discussion with Wiltshire Council's relevant technical teams. The extent and progress of these discussions is set out in the Statement of Common Ground, to be submitted at Deadline 2.
JBu-009	In conclusion, Mr Buckley stated that the experience of moving through the landscape would fundamentally change, contrasting open views with what he	An assessment of landscape and visual effects is provided in the Landscape and Visual Impact Assessment (LVIA) presented in **ES Volume 1,**

Reference	Comments/Issue raised	Applicant's Response
	described as confined corridors formed by 4.5m high panels. He urged the ExA to support local opposition and refuse the DCO.	**Chapter 8: Landscape and Visual [APP-060]**. The LVIA assesses effects on identified landscape and visual receptors, including residential properties and users of PRoWs, and identifies where significant effects may occur. The LVIA recognises that as a consequence of the development that there would be long term adverse effects on the Landscape Character of the area as well as long term significant adverse effects to 10 Visual Receptors, all of which are local PRoW which are either within or directly adjacent to the proposed arrays.

2.61 Jon Atkey (Councillor representing By Brook Ward)

Reference	Comments/Issue raised	Applicant's Response
JA-001	Jon Atkey, speaking in his capacity as Wiltshire Councillor for the By Brook Division and on behalf of residents in Hullavington, Grittleton and other By Brook communities, stated that these communities would be severely affected if the Scheme were to proceed. He referred to his written representation and the Applicant's response to it, and explained that, in the limited time available, and stated the full scale of harm outweighs what the Scheme actually delivers and therefore is not justifiable in this location. Mr Atkey stated that his original representation identified a wide and interconnected range of impacts, including landscape harm, the industrialisation of a deeply rural area, adverse effects on amenity and wellbeing, safety concerns and issues of long-term resilience. He stated that the Applicant does not deny these impacts, but instead acknowledges them and seeks to justify them.	The Applicant has, as identified, responded to Mr. Atkey's Relevant Representations **[RR-0914]** in section 4.34 of the **Applicant' Response to Relevant Representations (Part 1) [PDA-009].** The Applicant has sought to robustly and comprehensively assess the potential impacts of the Scheme in the **ES [APP-052** to **APP-265]**, and mitigate them as required through the management pans secured through the Requirements in Schedule 2 of the **Draft DCO [APP-016]**. This has been done to fully demonstrate the potential impacts of the Scheme against its benefits (including but not limited to energy production, economic, employment and skills, local ecology and biodiversity benefits) so that these matters can be considered in the planning balance when the DCO is determined.
JA-002	Mr Atkey highlighted the proposed BESS as a clear illustration of the wider problem and stated that, in responding to his representation, the Applicant accepts that a BESS carries real risks, including the risk of fire, implications for emergency response and potential environmental consequences. He noted that these	An **Outline 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 safety objectives for the design of the BESS site are listed in Section 2.4 of the **Outline BSMP [APP-**

Reference	Comments/Issue raised	Applicant's Response
	risks are proposed to be addressed through outline management plans and future approvals, and argued that this does not remove the concern but instead confirms that local communities are being asked to accept a substantial industrial hazard in a rural setting for decades, with the consequences of any failure borne locally. He stated that this is in addition to a range of other harms which the Applicant has already identified and accepted as significant.	**286]**. The **Outline BSMP [APP-286]** has been amended at Deadline 1 to fully accommodate the latest BESS safety requirements contained in NFPA 855 (2026) (Ref 14) ensuring that any credible risks associated with battery storage are either prevented or fully mitigated if a BESS failure occurs. As now mandated under NFPA 855 (2026) (Ref 14) the Applicant will only be able to select a BESS system that has undertaken Large Scale Fire Testing (LSFT). At the detailed design stage, the selected BESS LSFT data will be leveraged to fully inform inputs for risk assessment tools which will be utilised together with detailed consequence modelling to provide a comprehensive site operations and emergency response safety audit, this is stipulated in the **Outline BSMP [APP-286]** pre-construction requirements (Section 6). Section 2.4.2 of the **Outline BSMP [APP-286]** stipulates that: *"Final BESS design and site layout will have been validated through mandatory Large Scale Fire Testing (LSFT) and rigorous consequence modelling to minimise the requirement for any D&WFRS intervention in a thermal runaway incident. LSFT must establish minimum equipment spacing distances that demonstrate there is no fire propagation*

Reference	Comments/Issue raised	Applicant's Response
		to adjacent BESS enclosures or ESS equipment. D&WFRS intervention in worst case scenarios would typically be limited to boundary cooling of adjacent BESS and Energy Storage System (ESS) units to prevent the fire from spreading. This strategy will be finalised with D&WFRS and be clearly communicated in the Emergency Response Plan (ERP); • *To ensure that fire, smoke, and any release of toxic gases does not significantly impact site operatives, first responders, and the local community; and* • *To ensure that firewater run-off is contained and tested before release or, if necessary, removed by tanker and treated offsite."* Section 5 of the **Outline BSMP [APP-286]** covers all requisite firefighting requirements for the Scheme including fire service access, firefighting water supply, and emergency planning requirements. The Applicant is currently drafting a Statement of Common Ground with the Environment Agency on Scheme environmental protection issues including the BESS area drainage strategy. The agreed strategy document (**Firewater Containment and Drainage Strategy – Lime Down D Battery Energy Storage System [EN010168/EXAM/9.8]**) has been submitted

Reference	Comments/Issue raised	Applicant's Response
		at Deadline 1, to provide further assurance that all water pollution risks from a BESS fire are fully mitigated. The Environment Agency 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. The **Outline BSMP [APP-286]** is secured through Requirement 6 (Battery safety management) in Schedule 2 of the **Draft DCO [APP-016]**, which provides that Work No. 2 must not commence until a Battery Safety Management Plan has been submitted to and approved by the relevant planning authority. The approved plan must be substantially in accordance with the **Outline 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. The BESS fire emissions assessment (as detailed in **ES Volume 3, Appendix 15-2: BESS Fire Emissions Modelling [APP-239]**) has been undertaken using

Reference	Comments/Issue raised	Applicant's Response
		professional judgement in the absence of specific regulatory guidance, and adopts a conservative, worst case approach throughout. The assessment demonstrates that, even under worst case assumptions, a BESS fire would not result in significant effects on human health or safety. The modelling assumes: • Worst case BESS fire locations within the BESS area closest to sensitive receptors; • Worst case release height, temperature and plume parameters; and • Use of five years of hourly meteorological data, with the maximum predicted concentration extracted at each receptor, assuming the fire coincides with the poorest dispersion conditions. Given the inherent uncertainty in available BESS fire emissions data, a sensitivity test was also undertaken whereby emission rates were doubled. Even under this highly conservative sensitivity test, predicted concentrations remained well below the relevant health-based thresholds. 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**

Reference	Comments/Issue raised	Applicant's Response
		15-5: Battery Energy Storage System Fire Emissions Study Area [APP-166]. The Concentrations of carbon monoxide (CO), formaldehyde, hydrogen chloride (HCl), hydrogen cyanide (HCN), hydrogen fluoride (HF), ammonia (NH_3), nitrogen dioxide (NO2) and particulates from a potential BESS fire have been modelled using an air quality dispersion model to determine the likely effects on human health. A high-level visibility assessment has also been undertaken using the modelled particulates results to determine the effect of BESS fire emissions on visibility on the local road and rail network to inform the **Outline BSMP [APP-286]**. **ES Volume 3, Appendix 15-2: BESS Fire Emissions Modelling [APP-239]** concludes that there would be no significant air quality effects as a result of a BESS fire incident and visibility issues were not predicted. The Applicant has followed National Fire Chiefs Council (NFCC) guidance (Ref 15) and undertaken BESS Fire Emissions Modelling (see **ES Volume 3, Appendix 15-2: BESS Fire Emissions Modelling [APP-239])** to model toxic gas emissions and visibility impacts from a BESS fire on sensitive receptors within a 1km radius of the BESS area. The fire emissions

Reference	Comments/Issue raised	Applicant's Response
		modelled in the report were based upon recent UK Health Security Agency (UKHSA) requests for DCO BESS projects which explore both immediate air quality impacts together with annual UK air quality requirements. The UKHSA stated in their relevant representation **[RR-4798]** that "*Following our review of the submitted documentation the UKSHA are satisfied that the proposed development should not result in any significant adverse impact on public health".*
JA-003	Mr Atkey stated the Applicant' justifies the harm with the Scheme's climate benefit. Drawing on his professional background as an accountant, he explained that he approached this issue through a break-even analysis using only the Applicant's own figures from the Environmental Statement. On that basis, he stated that carbon break-even would not be reached until 2058, more than 30 years into the future and beyond the UK's legally binding net-zero target of 2050. Until that point, he argued, the Scheme would be a net contributor to atmospheric carbon due to the substantial emissions generated in its early years. Mr Atkey referred to the Applicant's response to Wiltshire Council, in which it was suggested that the concept of break-even is not helpful. He disagreed, stating that timing is critical, and that emissions	Section 2.9 of the **Statement of Need [APP-266]** describes the Governments Clean Power Mission (Ref 5). Government aims to achieve its Clean Power target (Paragraph 2.9.7) by 2030 while establishing a robust pipeline of projects to prepare for the rapid growth in power demand expected over the 2030s and 40s while maintaining a clean power system. The government has established challenging capacity ranges for low-carbon technologies, including large-scale solar, by 2030 and 2035, to support the Clean Power Mission. Regarding a 'payback' year, and as set out in the EN-1 (Ref 1) paragraph 5.3.1, "*in light of the vital role energy infrastructure plays in the process of economy-wide decarbonization, the Secretary of State must accept that there are likely to be some residual emissions*

Reference	Comments/Issue raised	Applicant's Response
	released in the 2020s and 2030s cannot reasonably be justified by potential carbon savings arising decades later, after the point at which national policy requires emissions to have fallen to zero.	*from the construction and decommissioning of energy infrastructure."* **ES Volume 1, Chapter 7 Climate Change [APP-059]** compares the energy generated by the Scheme with the projected DESNZ grid carbon intensity which only includes national emissions (for example, it does not include GHG emissions from imported materials as part of the UK's national inventory). In contrast, the Scheme's assessment accounts for global carbon emissions, including the embodied carbon of materials and components such as BESS (Battery Energy Storage Systems), PV arrays, transformers, and others. The global emissions of the Scheme represent more than 80% of the total Scheme emissions. While it is important to show the total global emissions from the Scheme, this discrepancy results in an asymmetrical comparison that underestimates the Scheme's GHG savings and provides a conservative assessment of the Scheme's overall emissions savings. The projected DESNZ grid carbon intensity numbers rely on solar Schemes, like Lime Down, being developed. The GHG emissions methodology used in the assessment is limited in that it only compares electricity generated by the Scheme to the equivalent electricity available via the national grid. This approach

Reference	Comments/Issue raised	Applicant's Response
		does not fully account for the broader carbon benefits that accrue from the provision of renewable energy as part of an extensive electricity supply system. Renewable energy contributes to a decarbonized grid and supports the electrification of activities that currently rely on fossil fuels, such as heating homes and fuelling cars. Similarly, the BESS grid-balancing function contributes to the decarbonization of the grid and further reduces dependence on fossil fuels. These savings are presented within **ES Volume 1, Chapter 7 Climate Change [APP-059]** but not accounted for the net Scheme carbon savings as a conservative approach. The limited comparison of generated electricity against equivalent grid intensity ignores the broader benefits of displacing fossil fuel use in transport, heating, and industrial processes. In practice, the energy use from these sectors that the Scheme displaces may be significantly more carbon-intensive than the national grid at any given time. GHG emission numbers only also ignore the difference between long-lived emissions, as those arising from fossil fuels, which transfer carbon from geological storage into the active atmosphere, and short-lived emissions. Schemes like Lime Down aim to reduce the fossil fuel reliance in the wider sense, displacing mostly long-lived emissions.

Reference	Comments/Issue raised	Applicant's Response
		For the reasons presented, the carbon savings of the Scheme presented in the **ES Volume 1, Chapter 7 Climate Change [APP-059]** could be much greater than estimated and calculating a specific 'payback' year is not recommended.
JA-004	Mr Atkey concluded that the real, immediate and enduring harms to landscape, communities and amenity, together with risks requiring active management for generations outweigh a theoretical climate benefit which, on the Applicant's own evidence, would not materialise until well after the net-zero deadline. He stated the harms are certain and long-lasting while the claimed benefits are delayed to the point of being effectively meaningless. He emphasised that this is not a minor Scheme affecting a marginal location, but one that would fundamentally alter the communities he represents. He concluded that, on the evidence, the Scheme is not worth these risks.	An assessment of landscape and visual effects is provided in the Landscape and Visual Impact Assessment (LVIA) presented in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]**. The LVIA assesses effects on identified landscape and visual receptors, including residential properties and users of public rights of way, and identifies where significant effects may occur. The LVIA recognises that as a consequence of the development that there would be long term adverse effects on the Landscape Character of the area as well as long term significant adverse effects to 10 Visual Receptors, all of which are local PRoW which are either within or directly adjacent to the proposed arrays. Mitigation measures to address landscape and visual effects are set out in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]**, **ES Volume 2, Figure 3-4-1 to 3-4-5.2 Landscape and Ecology Mitigation Plan [APP-084]** and detailed within the **Outline LEMP [APP-283]** and the **Outline EPMS**

Reference	Comments/Issue raised	Applicant's Response
		[APP-284]. These documents include proposals for new and enhanced planting, retention of existing hedgerows and woodland, and landscape integration measures to reduce visual effects over time. In addition, the Scheme design incorporates minimum offsets from existing landscape features, including residential properties, ancient woodland, woodland, hedgerows, public rights of way and watercourses, to further limit visual impacts. The preparation, approval and implementation of detailed landscape and ecological management plans, substantially in accordance with the **Outline LEMP [APP-283]** and **Outline EPMS [APP-284]**, are secured through Requirements 7and 8 in Schedule 2 of the **Draft DCO [APP-016]**, ensuring that the identified mitigation measures are delivered and maintained throughout the lifetime of the Scheme. Impacts on communities within the 2 km Study Area (including those within the By Brook ward) have been considered as part of the assessment of "community identity, culture, influence and resilience" in **ES Volume 1, Chapter 18: Human Health [APP-070]**. The Applicant has considered how changes to perceptions of rurality, community sense of place, pride, engagement and difference in consideration of

Reference	Comments/Issue raised	Applicant's Response
		importance of different aspects of the Scheme (for example opposing views on harms versus benefits) may lead to a degree of impact to communities. The assessment has considered that this is likely to be up to a minor adverse effect on local communities and thus on residents' mental health and wellbeing. This is not considered a significant effect. Regarding climate benefits, see above JA-003 response to what is considered a misinterpretation of the findings of **ES Volume 1, Chapter 7 Climate Change [APP-059]** with regards to a 'payback' year. With regard to the planning balance, it is considered that the overall planning balance is overwhelmingly in favour of the grant of development consent for the Scheme. Further details can be found in section 9 of the **Planning Statement [APP-267].** The substantial benefits of the Scheme include greenhouse gas emissions savings (which far outweigh the impacts on climate change anticipated during the construction, operation and decommissioning of the Scheme), but also include: • Biodiversity net gain, with a minimum of 10% BNG secured by Requirement 9 of the **Draft DCO [APP-016]** with larger percentages anticipated in the **Biodiversity Net Gain**

Reference	Comments/Issue raised	Applicant's Response
		Assessment Report [APP-273] (total net gain for the whole Scheme is 34.75% for area habitat units, 12.31% for hedgerow units and 20.08% for watercourse units); • The creation of 12.8 km of new permissive paths; • Job creation together with measures to enhance local education through promoting apprenticeship and training Schemes, to promote local recruitment and procurement, and to support agricultural workers in moving to diversified farming practises; and • Economic benefits, with the Scheme anticipated to generate a total uplift in excess of £161 million GVA (chained to 2023 value) over its lifetime within 20 km of the Scheme alone (with further benefits nationally). In addition, whilst not relevant to Secretary of State decision making and therefore not considered in the planning balance, the Applicant has committed to a Community Benefit Fund which will be available to fund local projects.

2.62 Anne Henshaw (on behalf of CPRE Wiltshire – Campaign to Protect Rural England)

Reference	Comments/Issue raised	Applicant's Response
AHe-001	Anne Henshaw, speaking on behalf of CPRE Wiltshire (Campaign to Protect Rural England), stated that CPRE supports the transition to cleaner energy, but only where it is delivered with integrity, strategic foresight and genuine respect for communities and landscapes. She explained that CPRE advocates a balanced approach that protects food security, rural livelihoods and the character of Wiltshire's countryside while still enabling innovation in energy generation.	An assessment of landscape and visual effects is provided in the Landscape and Visual Impact Assessment (LVIA) presented in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]**. The LVIA assesses effects on identified landscape and visual receptors, including residential properties and users of public rights of way, and identifies where significant effects may occur. The LVIA recognises that as a consequence of the development that there would be long term adverse effects on the Landscape Character of the area as well as long term significant adverse effects to 10 Visual Receptors, all of which are local PRoW which are either within or directly adjacent to the proposed arrays. Impacts on communities within the 2 km Study Area have been considered as part of the assessment of "community identity, culture, influence and resilience" in **ES Volume 1, Chapter 18: Human Health [APP-070]**. The Applicant has considered how changes to perceptions of rurality, community sense of place, pride, engagement and difference in consideration of importance of different aspects of the Scheme (for example opposing views on harms versus benefits) may lead to a degree of impact to communities. The

Reference	Comments/Issue raised	Applicant's Response
		assessment has considered that this is likely to be up to a minor adverse effect on local communities and thus on residents' mental health and wellbeing. This is not considered a significant effect.
AHe-002	Ms Henshaw stated that what is currently occurring across Wiltshire is not balanced, describing a growing patchwork of industrialisation spreading through the countryside. She argued that while individual Schemes are presented as isolated and capable of mitigation, their cumulative effect is a gradual and damaging transformation of the rural landscape. She stated that the Scheme is a clear example, leading to substantial, widespread and long-term harm to a highly sensitive area. In her view, a 60-year consent represents a permanent loss of countryside rather than a temporary impact.	The Applicant acknowledges that there will be impacts on the community as a result of the Scheme which may be a source of concern for local residents. The Secretary of State will balance those potential impacts and changes against the urgent need and critical national priority for the Scheme as set out in Government policy. The Applicant has assessed adverse impacts arising from the Scheme and has also set out within the **ES [APP-052 – APP-065]** the steps taken to avoid, mitigate and minimise these impacts as far as possible, and has prepared a number of management plans that will ensure that impacts are kept to a minimum. These management plans are secured in the **Draft DCO [APP-016].** Cumulative effects have been carefully considered in accordance with Planning Inspectorate Advice Note 17 (Ref 10) and the relevant NPS EN-1 (Ref 1), NPS EN-3 (Ref 2) and NPS EN-5 (Ref 3) requirements as set out in **ES Volume 1 Chapter 21 Cumulative and In-Combination Effects [APP-074]** and **ES Volume 3, Appendix 21-1 Long List of In-Combination Effects**

Reference	Comments/Issue raised	Applicant's Response
		and Cumulative Developments [APP-264] set out the approach and conclusions of the technical chapters of the **ES** [**APP-052 to APP-074**] cumulative assessments. Taking a conservative worse case approach, significant cumulative effects are identified at a limited and discrete number of receptors comprising tourism and recreation impacts during the construction phase on Corsham Park, PRoW WT|CORM|122, PRoW WT|HULL|29, and Sustrans Cycle Route 403, and on skylark at a District level. The Applicant is seeking a time limited consent for 60 years, as secured by Requirement 20 of the **Draft DCO [APP-016]**, which provides that the date of decommissioning for each part of the authorised development (i.e. the Scheme) must be no later than 60 years following the date of final commissioning. Therefore, the Scheme is temporary in nature.
AHe-003	Ms Henshaw identified a fundamental inconsistency in how landscape sensitivity and significance, particularly in combination with heritage assets, has been assessed. She stated that this is most evident in the heavy reliance on mitigation through screening. She explained that the Applicant's iterative design process, while framed as following the mitigation hierarchy,	**ES Volume 1, Chapter 8 Landscape and Visual [APP-060]** has undertaken a robust assessment of the sensitivity (nature of the receptor) of landscape receptors. The judgement on landscape sensitivity is based on consideration of both the landscape receptor's value and its susceptibility to change arising from the Scheme. For details on how landscape value

Reference	Comments/Issue raised	Applicant's Response
	ultimately depends on existing and proposed vegetation to screen views. She argued that landscape buffers are not neutral, as they alter the landscape themselves, and that this harm is significantly understated. She noted that screening can take up to 15 years to establish and may never be fully effective, and that if planting fails or underperforms the actual level of harm could be greater than predicted, meaning adverse effects have been underestimated.	and susceptibility is assessed please refer to Section 1.6 of **ES Volume 3, Appendix 8-1 Landscape and Visual Impact Assessment Methodology [APP-187]**. For landscape receptors, value concerns the importance of the landscape resource as evidenced by the presence of landscape designations and professional judgement. Susceptibility is concerned with the landscape's ability to absorb change brought about by the Scheme. Tables 8-1-1-2 and Table 8-1-1-3 of **ES Volume 3, Appendix 8-1 Landscape and Visual Impact Assessment Methodology [APP-187]** provide criteria for determining landscape value for both designated and undesignated landscapes. Landscape value is based on factors such as natural and cultural heritage, its condition, associations, distinctiveness, and recreational opportunities and how it is perceived. Value assessments are included for all landscape receptors and are set out within **ES Volume 3, Appendix 8-3-2-2 Landscape and Visual Assessment Sheets (Significant) [APP-191]**. Embedded mitigation (hedgerows, buffers etc.) has been informed by the **Volume 3, Appendix 8-4 Landscape Character Area Descriptions [APP-195]**

Reference	Comments/Issue raised	Applicant's Response
		and Wiltshire's Nature Recovery Strategy to protect and enhance the landscape through the landscape- led design. Whilst it is recognised that there would be an appreciation of an overall increase in solar infrastructure, the discrete areas of land in the Scheme and the rolling topography of the landscape, the Scheme would not be perceived in its entirety and the solar panels are distributed 'in and amongst' the landscape features helping to assimilate them into the landscape. A uniform rate of growth is allowed for trees, shelterbelts, and woodland mitigation planting of 0.4m every 1 year. At Year 15 this will result in new trees, shelterbelts, and woodland plantings having reached a minimum height of 7.5m. A uniform growth rate is allowed for new hedgerows of 0.4m every 1 year. This would result in hedgerows being able to be maintained at a height of between 3 - 5m by Year 15. The preparation, approval and implementation of detailed landscape and ecological management plans, substantially in accordance with the **Outline LEMP [APP-283]** and **EPMS [APP-284**], are secured through Requirements 7 and 8 in Schedule 2 of the **Draft DCO [APP-016]**, ensuring that the identified mitigation

Reference	Comments/Issue raised	Applicant's Response
		measures are delivered and maintained throughout the lifetime of the Scheme.
AHe-004	Ms Henshaw went on to state that there is a deeper issue concerning the historic environment, which she described as inseparable from its surrounding landscape. She argued that historic assets and landscape context are historically and culturally intertwined, and that the suggestion this relationship can be broken for 60 years and later restored is not credible. She stated that there is no evidence anywhere in the country of landscape character and heritage context being successfully restored after development on this scale.	**ES Volume 1, Chapter 12: Cultural Heritage [APP-064]**, supported by **ES Volume 3 Appendix 12.7: Historic Landscape Character Assessment [APP-231]**, has assessed the potential impact of the Scheme on the historic landscape character. No significant effects were identified on the historic landscape character as a result of impacts caused by the Scheme. The landscape within the Order Limits of the Scheme is characterised by post-medieval or modern enclosure (including amalgamated fields, assarts, piecemeal enclosure, planned enclosure, prairie fields and reorganised fields). With the exception of a few areas where ridge and furrow earthworks have been identified, surviving remnants of agricultural activity predating the post-medieval period survive only as buried archaeological features.
AHe-005	Turning to policy, Ms Henshaw referred to the recently published Land Use Framework, which states that by 2030 communities will have a greater role in stewarding valued landscapes. She noted that this date is only four-years away and argued that if this principle is to apply across all land uses, it must include large-scale solar developments.	The Scheme has been developed in accordance with the relevant National Policy Statements (Ref 1; Ref 2; Ref 3), which the Secretary of State must have regard to when deciding the application (see section 104(2) of the Planning Act 2008) (Ref 16). The Land Use Framework (Ref 11) may still be considered by the

Reference	Comments/Issue raised	Applicant's Response
		Secretary of State to the extent that it considers it important and relevant to the decision. The Land Use Framework (Ref 11) describes the government's long-term version for land use in 2030 and 2050, which will evolve over time through future Land Use Frameworks. This includes that by 2030, communities will have a greater say in the stewardship of the landscapes they love, and will be able to access better mapping of their areas showing what land use changes are being delivered by local land managers and how they might benefit from them. Examples are given of what this might achieve, for instance local input into plans and strategies will ensure that heritage infrastructure and the history of places are reflected in future land use plans. However, the mechanics of how this change might be achieved is not set out in detail and this will be the subject of further government policy. Some of the initial commitments under the Land Use Framework (Ref 11) to empower local communities include guidance clarification on awarding management of land to communities for food growing and nature recovery. In consideration of the desire for communities to have greater involvement in how their local landscapes are used, the Land Use Framework (Ref 11) commits to supporting *"the development of new capabilities in Defra and other departments to*

Reference	Comments/Issue raised	Applicant's Response
		gather further insights to inform ongoing analysis published on GOV.UK. This will not be for resolving individual cases or projects, but will enable faster adaptation of policy to support delivery of the change we need". There are also plans to improve publicly accessible mapping to better understand land uses in each community's local area. Therefore, much of the detail of how the vision set out in the Land Use Framework (Ref 11) is to be achieved, is yet to be provided. In the meantime, the 2024 versions of the National Policy Statements (which are the relevant versions under which the Scheme will be decided), remain unchanged.
AHe-006	Ms Henshaw also referred to the framework's emphasis on meaningful community input into local plans and strategies, ensuring that heritage, infrastructure and the history of places are properly reflected. She stated that representations made at the examination demonstrate that rural communities do not feel their voices are currently reflected in decision-making and questioned why confidence should be placed in future plan-led policies when existing community-focused policies are being overridden.	The Scheme has been prepared in accordance with the requirements of the Planning Act 2008 (Ref 16) including the provisions regarding consultation as set out in s42, s44, s47, s48 and s49 of Planning Act 2008 and associated legislation and guidance. The Applicant undertook pre-application consultation with the relevant statutory consultees and multi-phased community consultation to enable the iterative development of proposals in response to the ongoing consideration of feedback received. Further details of the consultation carried out can be found in the **Consultation Report [APP-022].**

Reference	Comments/Issue raised	Applicant's Response
AHe-007	Regarding energy need, Ms Henshaw referred to research carried out by University College London for CPRE in 2023, which indicates that the UK's 70 GW solar target could ultimately be met through urban and brownfield deployment alone, allowing for a gradual phasing out of greenfield solar after 2030. She stated that land availability is not the main barrier, but policy, and that this could be addressed through stronger planning measures, fiscal incentives, accelerated rooftop solar deployment and reductions in overall energy demand.	To build as much solar as the Government says Britain needs, building owners would need to put solar on rooftops six times faster than they do at the moment. And keep doing that until 2035. We believe that this is not likely to happen and might not be possible anyway. We agree that it is important that people build small solar schemes for their home or business. We also agree with the government's National Policy Statement 1 for planning. This says that small solar schemes will not be enough to mean there is no need for large scale solar. Large scale solar schemes, like this one, produce a lot of power that is connected to the national grid. This means that it can be used by anyone who needs electricity. There is more detail in section 6.3 of the **Statement of Need [APP-266]** in the application.
AHe-008	Ms Henshaw further referred to data from the National Energy System Operator showing that renewable energy projects totalling approximately 760 GW are currently awaiting grid connection, far in excess of the Government's 2030 target of 150–225 GW. She argued that this demonstrates the Scheme is unnecessary and contributes to an already unsustainable development	Section 5.3 of the **Statement of Need [APP-266]** describes Connections Reform: re-prioritisation of the connections queue to deter speculative connection applications and remove stalled Schemes from the connections queue. The Applicant was informed by the National Energy System Operator (NESO) in December 2025 that the

Reference	Comments/Issue raised	Applicant's Response
	pipeline. She stated that while some ground-mounted solar may be required in the short term, there is substantial untapped potential elsewhere, noting that installing solar on new buildings, warehouses and car parks could deliver 40–50 GW of low-carbon electricity, more than half of the UK's 2035 solar target.	solar component of the Scheme had been re-prioritised as a 'Gate 2 Phase 1' connection meaning that it has been included within the first phase of NESO's re-prioritised list. As part of its consultation response to the new National Policy Statements, designated in January 2026, the Government confirmed that "Clean Power 2030 is a milestone that reflects the scale of ambition required to meet our Net Zero 2050 target; it is not a fixed ceiling on technology deployment or project approvals". Further, Paragraph 3.2.6 of the newly designated NPS EN-1 (Ref 1) provides additional guidance and states that "It is not the government's intention in presenting any of the figures or targets in this NPS to propose limits on any new infrastructure that can be consented in accordance with the energy NPSs" Therefore, the current policy position is that the need established by NPS EN-1 (Ref 1) applies to any Scheme or component of a Scheme which comes forwards, because of the urgent need for an unprecedented scale of development of new low-carbon capacity to meet and sustain the Government's Clean Power Target (as described in Section 2.9 of the **Statement of Need [APP-266]**).

Reference	Comments/Issue raised	Applicant's Response
		In terms of smaller scale, distributed and rooftop solar, Section 6.3 of the Statement of Need [**APP-266**] describes that roll-out rates for small Schemes would immediately need to increase by a factor of 6 from recent levels and sustain those rates through to 2035 to achieve the top of the Government's clean power capacity range for solar for 2035 without the support of large-scale solar. The Applicant's view is that this is not likely nor feasible. The Applicant therefore agrees with Government's view that the continued rollout of distributed, rooftop and smaller scale solar is important to support achieving national climate goals, but that they will not "replace the need for new large-scale electricity infrastructure to meet our energy objectives" (Ref 1), Paragraph 3.3.12). This Scheme will connect to the National Electricity Transmission System so will bring forward benefits arising from the bulk transfer of power, including the pooling of generation and demand and supporting energy consumers both nationally and locally.
AHe-009	Finally, Ms Henshaw stated that CPRE views developments of this scale as part of market-driven and fuelled by international investors, offering no meaningful local energy benefit to Wiltshire	The Applicant wishes to clarify that the Scheme is not merely a commercial venture, but a response to an urgent national need for low-carbon generation to meet legally binding net-zero targets and energy security

Reference	Comments/Issue raised	Applicant's Response
	communities. She described the Scheme as a commercial venture rather than a public utility, arguing that it would exploit the countryside, diminish the local environment and primarily benefit overseas investors. She concluded that the Scheme would cause lasting harm to landscape, heritage and community confidence, and for all these reasons CPRE Wiltshire strongly objects to the Scheme.	objectives. Government policy, specifically National Policy Statement (NPS) EN-1 (Ref 1), establishes that substantial weight should be given to the need for such projects, which are considered a "critical national priority". Private investment is required to bring forward such Schemes, without burdening the UK taxpayer. Section 7.6 of the **Statement of Need [APP-266]** specifically concludes that the development of a large-scale solar development connecting at Melksham 400kv Substation, provides the potential to help decarbonise local electricity demand to the benefit of consumers both locally and nationally, and that the Scheme will also not impact the local electricity distribution networks by either causing any connection delays for smaller Schemes or consumer loads. Furthermore, Section 7.4 of the **Statement of Need [APP-266]** explains that the inclusion of BESS as part of the Scheme will provide the National Energy System Operator with a cost-effective tool to help manage power flows on the grid in the vicinity of the Scheme over its operational life. The Scheme would deliver long term environmental benefit alongside a secure energy supply, which benefits all consumers, including those in Wiltshire and Nationally. The Scheme also aims to deliver wider

Reference	Comments/Issue raised	Applicant's Response
		benefits, including biodiversity enhancements, opportunities for local supply chain involvement, and onsite and offsite community benefit initiatives, which will be developed in consultation with local representatives.

2.63 John Eavis

Reference	Comments/Issue raised	Applicant's Response
JE-001	John Eavis farms with his wife at Manor Farm, Corston, and has done so for 63 years. He explained that the Scheme would have a significant impact on both the farm business and his family. He stated that the land affected by the Applicant's compulsory purchase Schemes amounts to almost 90 acres of their best farmland, including rights for construction compounds, car parks, offices and welfare facilities, as well as cabling, haul routes and associated infrastructure. Mr Eavis argued that these rights are disproportionate for a Scheme of this nature and stated that neither the Applicant nor its agents have adequately engaged with or consulted him regarding these requirements, which he said should be clearly defined and substantially reduced from what is currently proposed.	The Applicant acknowledges that the Cable Route Corridor between Lime Down D and E, and both main construction access route for Lime Down D and E from the A429 pass through Mr. Eavis' land. The Applicant therefore acknowledges there will be substantial, albeit temporary disruption to agricultural work on this land. The anticipated effects to the farming business affected by cable routing are likely to be temporary, and restricted to the width of the Cable Route Corridor and access routes, rather than the entirety of the land sought within the Order Limits, to allow for flexibility and micro siting for the route of these features. Where fields have been bisected, working practices around cable and track laying works should allow for access to be maintained to both sides of the Cable Route Corridor to allow for agricultural work to be continued even during construction, with disruption restricted to the width required for cable trenching works and any associated haul routes wherever practicable. The **Outline CEMP [APP-277]** (as secured through Requirement 13 of Schedule 2 to the **Draft DCO [APP-016]**) furthermore commits to the reinstatement of land affected by cabling works as soon as practicable to allow for agricultural work on the land to recommence

Reference	Comments/Issue raised	Applicant's Response
		as soon as construction of that section of cable route is complete. The land along the cable route will be returned to agricultural use and losses incurred during the construction period will be compensated for. The Applicant is keen to draw attention to the **Land Rights and Negotiations Tracker [PDA-004]** and the desire to enter into voluntary negotiations. The Applicant encourages all parties along the Cable Route Corridor to engage in discussions over the voluntary agreement to ensure practical concerns can be accounted for. The **Statement of Reasons [APP-018]** sets out the justification for the compulsory acquisition powers required for the Scheme at section 7, including alternatives considered and how lesser powers of temporary possession are proposed to be used where permanent acquisition of rights and interests are not necessary. This has enabled a proportionate approach to the use of compulsory acquisition powers for the Scheme. For example, if a voluntary agreement is not entered into, the Applicant is able to use temporary possession powers during construction of the cable route over the working width and then only exercise compulsory acquisition powers to acquire permanent

Reference	Comments/Issue raised	Applicant's Response
		rights over the narrower area of land where the cable has been laid. Further, the Applicant has been and continues to engage with the respondent's agents as set out in the **Land and Rights Negotiations Tracker [PDA-004].** The Applicant acknowledges the comments made by the respondent and is only seeking voluntary rights for the purposes of the project that are being sought within the DCO order limits. The land would then be handed back and returned to agricultural use post construction. The Applicant will continue to engage with the respondent and their professional representatives, with updates provided within the **Land and Rights Negotiations Tracker [PDA-004].**
JE-002	Mr Eavis stated that the impact on drainage and flood risk would be severe. He referred to recent flooding in Corsham as evidence that such risks are real and serious. He explained that no water management plans have been provided to date, despite the presence of a significant stream and roadside ditches running through Corston. He stated that the proposed access road would inevitably affect runoff and water flows from the farm's fields.	The Applicant does not agree that the Scheme would have a severe impact on drainage or flood risk. A drainage strategy has been provided as part of the application within **ES Volume 3, Appendices 11-1 to 11-9: Flood Risk Assessment and Drainage Strategy [APP-210 to APP-218]**, which sets out how surface water is managed across the Scheme. Further, the assessment presented in **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [APP-063]** and **ES Volume 3, Appendices 11-1 to 11-**

Reference	Comments/Issue raised	Applicant's Response
		9: Flood Risk Assessment and Drainage Strategies [APP-210 to APP-218] considers how water moves through the catchment, including headwaters, existing overland flow routes, receiving watercourses and areas of existing standing water and seasonal flooding. The assessment distinguishes between Solar PV Panel areas and impermeable infrastructure. Solar PV Panels are mounted above ground and drain directly to the existing ground beneath and between panel rows. These areas remain permeable and are not connected to a positive drainage system that would collect and discharge runoff beyond the Order limits. As such, the Scheme does not introduce new off-site discharge points or alter the fundamental routing of surface water from the wider Solar PV areas. By contrast, impermeable infrastructure, including substations, the BESS Area and associated hardstanding, is subject to quantitative drainage design. Runoff from these areas has been calculated and would be attenuated and discharged at restricted greenfield runoff rates, including an allowance for climate change. Exceedance flows from these areas would be retained and managed within the site

Reference	Comments/Issue raised	Applicant's Response
		drainage systems as part of the embedded drainage design. The assessment therefore concludes that the Scheme would not increase runoff rates or peak flows leaving the site and would not exacerbate downstream flooding. Existing flooding may continue to occur as a result of wider catchment conditions, however the Scheme would not materially alter those conditions or increase flood risk elsewhere. Flood risk from watercourses has been assessed using established UK methodologies, including FEH-based hydrological estimation and hydraulic modelling where appropriate, in accordance with Environment Agency guidance and standard industry practice. Environment Agency datasets have informed the baseline assessment and site-specific hydraulic modelling has also been undertaken for Gauze Brook to provide a more detailed understanding of flood levels, depths and flow behaviour within that catchment. Local observations of flooding and flow behaviour are recognised and have informed understanding of catchment response during specific events. However, individual observations cannot define the full range of

Reference	Comments/Issue raised	Applicant's Response
		flood risk required for assessment. FEH-based methods provide a consistent and robust basis for estimating flows and testing flood behaviour across a range of return periods and future climate scenarios, enabling the assessment to demonstrate that the Scheme would not increase flood risk.
JE-003	Mr Eavis further stated that the Scheme includes taking a legal charge over approximately 90 acres of his land. He explained that this would negatively affect the future value of the farm and would be wholly incompatible with their operational, nature-based approach to farming. He also stated that the proposed routes for roads and cabling would adversely affect a number of public rights of way across the land.	The land along the cable route will be returned to agricultural use and losses incurred during the construction period will be compensated for. The Applicant is keen to draw attention to the **Land Rights and Negotiations Tracker [PDA-004]** and the desire to enter into voluntary negotiations. The Applicant encourages all parties along the Cable Route Corridor to engage in discussions over the voluntary agreement to ensure practical concerns can be accounted for. The **Statement of Reasons [APP-018]** sets out the justification for the compulsory acquisition powers required for the Scheme at section 7, including alternatives considered and how lesser powers of temporary possession are proposed to be used where permanent acquisition of rights and interests are not necessary. This has enabled a proportionate approach to the use of compulsory acquisition powers for the Scheme. For example, if a voluntary agreement is not entered into, the Applicant is able to use temporary

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		possession powers during construction of the cable route over the working width and then only exercise compulsory acquisition powers to acquire permanent rights over the narrower area of land where the cable has been laid. The **Statement of Reasons [APP-018]** explains the basis for the compulsory acquisition powers required for the Scheme, and the circumstances where compensation is available for affected land and business owners. The Applicant has demonstrated that it has the funds available for such compensation as set out in the **Funding Statement [APP-019]**. As set out at section 12.2 of the Statement of Reasons, a guide on compensation for agricultural owners and occupiers for compulsory acquisition of rights is available free of charge on the Government's website. The Applicant confirms a detailed assessment of the likely significance of effects from the Scheme on the use and desirability of individual PRoWs on Mr Eavis' land is included in **ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]** and **ES Volume 3, Appendix 16-2: Tourism and Recreation Receptor Tables [APP-241]**. The assessment identifies that MALW54 is anticipated to

Reference	Comments/Issue raised	Applicant's Response
		experience a medium-term temporary moderate adverse effect during construction. This is a significant adverse effect and therefore will be considered in the planning balance when the DCO is determined. No other affected public rights of way are anticipated to experience significant effects at any phase of the Scheme. Bridleway MALW54 is subject to diversion measures during construction to facilitate access to Lime Down E for HGVs. As part of this, the diversion route will be fully waymarked and segregated from HGV traffic. Following construction, bridleway MALW54 will be restored to its original route and all waymarking will be restored. These measures are secured through the **Outline CTMP [APP-287]** and **Outline PRoWPPMP [APP-282]**, secured respectively by Requirements 15 and 16 in Schedule 2 to the **Draft DCO [APP-016]**.
JE-004	Mr Eavis stated that the family's sustainable farming Scheme would be destroyed by the Scheme, describing it as fundamentally incompatible with the UK Government environmental Scheme in which they currently participate.	The Applicant acknowledges that the Cable Route Corridor between Lime Down D and E, and both main construction access route for Lime Down D and E from the A429 pass through Mr. Eavis' land. The Applicant therefore acknowledges there will be substantial, albeit temporary disruption to agricultural work on this land. The **Outline CEMP [APP-277]** (as secured through Requirement 13 of Schedule 2 to the **Draft DCO [APP-**

Reference	Comments/Issue raised	Applicant's Response
		016]) furthermore commits to the reinstatement of land affected by cabling works as soon as practicable to allow for agricultural work on the land to recommence as soon as construction of that section of cable route is complete. Losses incurred during the construction period will be compensated for. The Applicant is keen to draw attention to the **Land Rights and Negotiations Tracker [PDA-004]** and the desire to enter into voluntary negotiations. The Applicant encourages all parties along the Cable Route Corridor to engage in discussions over the voluntary agreement to ensure practical concerns can be accounted for.
JE-005	Mr Eavis addressed highways impacts, stating that the A429 is now regarded nationally as a main arterial route from the Midlands to the south coast and as a gateway to the Cotswolds. He explained that it is a single-carriageway road and is wholly inadequate to accommodate the volume of infrastructure delivery required, including daily construction traffic and ongoing access to the Rodbourne site. He expressed doubt that large loads would be able to pass beneath railway bridges and stated that as a result such traffic is likely to be routed across his land.	As concluded in **ES Volume 1, Chapter 13: Transport and Access [APP-065]** the impacts of construction traffic would be temporary and would not result in any significant transport effects on the A429. Construction traffic will be controlled through measures set out in the **Outline CTMP [APP-287]** and **Outline PRoWPPMP [APP-282]** to ensure impacts to NMUs along highways and PRoW are minimised as far as practicable. The Final CTMP will make note of any height restrictions on routes and ensure that all deliveries are

Reference	Comments/Issue raised	Applicant's Response
		notified and of an appropriate height to prevent rerouting. Final CTMPs and a PRoWPPMP would be prepared post consent and must be substantially in accordance with the **Outline CTMP [APP-287]** and **Outline PRoWPPMP [APP-282]**, respectively, and approved by the relevant local planning authorities (in consultation with the relevant highway authorities), as secured by Requirement 15 and Requirement 16 in Schedule 2 of the **Draft DCO [APP-016]**.
JE-006	Mr Eavis stated that the stress caused by the proposed Scheme has had a clear impact on his and his wife's health. He described this impact as incalculable, arising from a lack of accurate information, absence of clarity and uncertainty about what their business would look like before and after construction if the Scheme were allowed. He described this situation as unfair and unreasonable.	The Applicant has sought to undertake pre-application consultation in as robust a form as practicable, to allow interested parties to have access to as much information as available at the time of consulting as possible, to help alleviate concerns about the potential future impacts of the Scheme on people's lives and livelihoods. The **Consultation Report [APP-022]** sets out the Applicant's approach to pre-application consultation and demonstrates how consultation was undertaken with a wide range of stakeholders, including local communities, community organisations, statutory consultees and those with an interest in land. This has included in-person events and online communications, with consultation materials provided both digitally and in hard-form, and free-to-use

Reference	Comments/Issue raised	Applicant's Response
		communication channels to respond back to the Applicant team. The Applicant has sought to engage with communities ahead of construction through the implementation of a Community Liaison Group, as secured through Requirement 4 in Schedule 2 to the **Draft DCO [APP-016]**. Whilst this group is set up for the construction phase of the Scheme, the Applicant has committed to providing a designated community contact within the Scheme's operation and maintenance team during the operational lifetime of the Scheme, with a dedicated Community Liaison Manager committed to during peak replacement events and decommissioning. This is secured through the **Outline OEMP [APP-279]** and **Outline DS [APP-279]** by Requirements 14 and 20 in Schedule 2 to the **Draft DCO [APP-016]**.
JE-007	In conclusion, Mr Eavis urged the ExA to consider the human impact of what he described as an ill-thought-out Scheme being imposed on a long-established family farm.	Losses incurred due to temporary works on agricultural land during the construction period will be compensated for. The Applicant is keen to draw attention to the **Land Rights and Negotiations Tracker [PDA-004]** and the desire to enter into voluntary negotiations. The Applicant encourages all parties along the Cable Route Corridor to engage in discussions over the voluntary agreement to ensure practical concerns can be accounted for.

Reference	Comments/Issue raised	Applicant's Response
		Further, the Applicant recognises the importance of assessing physical and mental health and wellbeing impacts, and has sought to address these in a proportionate and comprehensive manner through the assessment criteria used in **ES Volume 1, Chapter 18: Human Health [APP-070]**. The Applicant is confident that the methodology used within the assessment of human health is robust, and that the assessment outcomes identify that there is no significant adverse effect to health and wellbeing to the affected population in the 2 km Study Area at any phase of the Scheme.

2.64 Roddy Seymour-Williams

Reference	Comments/Issue raised	Applicant's Response
RSW-001	Roddy Seymour-Williams lives at Farleaze Farm, located at the centre of Site C. He stated that he has already observed negative impacts arising from the Scheme on close friends, family members and others who have spoken. Mr Seymour-Williams stated that his objection is grounded in many years of living and spending time outdoors in the local area, including walking, cycling and horse riding around Norton, Sherston and Hullavington.	The Applicant has sought to undertake pre-application consultation in as robust a form as practicable, to allow interested parties to have access to as much information as available at the time of consulting as possible, to help alleviate concerns about the potential future impacts of the Scheme on people's lives and livelihoods. The **Consultation Report [APP-022]** sets out the Applicant's approach to pre-application consultation and demonstrates how consultation was undertaken with a wide range of stakeholders, including local communities, community organisations, statutory consultees and those with an interest in land. This has included in-person events and online communications, with consultation materials provided both digitally and in hard-form, and free-to-use communication channels to respond back to the Applicant team. The Applicant has sought to engage with communities ahead of construction through the implementation of a Community Liaison Group, as secured through Requirement 4 in Schedule 2 to the **Draft DCO [APP-016]**. Whilst this group is set up for the construction phase of the Scheme, the Applicant has committed to providing a designated community contact within the

Reference	Comments/Issue raised	Applicant's Response
		Scheme's operation and maintenance team during the operational lifetime of the Scheme, with a dedicated Community Liaison Manager committed to during peak replacement events and decommissioning. This is secured through the **Outline OEMP [APP-278]** and **Outline DS [APP- 279]** by Requirements 14 and 20 in Schedule 2 to the **Draft DCO [APP-016]**. An assessment of the likely significance of effects from the Scheme on the use and desirability of the local PRoW network and recreational use of local highways in the countryside is included in **ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]** and supported by **ES Volume 3, Appendix 16-2: Tourism and Recreation Receptor Tables [APP-241]**. This assessment considers the impact on individual PRoWs and long-distance recreation routes, and on the network as a whole. The assessment finds no significant residual effects are anticipated to individual PRoWs (other than at Lime Down E), the overall PRoW network, nor recreational use of the local highway network at any phase of the Scheme. This is subject to implementation of traffic control and PRoW safety measures as secured through the **Outline CTMP [APP-287]** and **Outline PRoWPPMP [APP-282]** by

Reference	Comments/Issue raised	Applicant's Response
		Requirements 15 and 16 of Schedule 2 to the **Draft DCO [APP-016]**.
RSW-002	Mr Seymour-Williams stated that the combined effects of visual intrusion, noise from the associated security infrastructure would fundamentally alter these areas. He emphasised that this is not an isolated site, but a shared rural environment used by the community for recreation, business and social interaction.	The combined or in combination cumulative effects of the Scheme (including the solar infrastructure and associated security infrastructure as described in **ES Volume 1, Chapter 3 The Scheme [APP-055]**) on Landscape and Visual Impact, Noise, as well as other environmental effects have been fully assessed in **ES Volume 1, Chapter 21 Cumulative and In Combination Effects [APP-073]**. The noise impacts from the operation of the Scheme and its components are assessed in Section 14.10 of **ES Volume 1, Chapter 14: Noise and Vibration [APP-066]**. A penalty has been applied to predicted noise levels from the Solar PV Sites to account for the distinctive nature of the sound when compared to the existing environment. As shown in Table 8 of **ES Volume 3, Appendix 14-4: Noise Modelling [APP-237]**, levels would typically be below or slightly above the existing background sound in the area. The **Outline OEMP [APP-278]** commits to noise levels from the Scheme at residential dwellings being the same as or below those modelled in the ES. The preparation, approval and implementation of the detailed OEMP, substantially in accordance with the

Reference	Comments/Issue raised	Applicant's Response
		outline plan, are secured through Requirement 14 of Schedule 2 of the **Draft DCO [APP-016]**, ensuring operational noise is appropriately controlled throughout the lifetime of the Scheme. The assessment in **ES Volume 1, Chapter 18: Human Health [APP-070]** considers the physical and mental health impacts of changes to recreation and access to the countryside, including along PRoWs and other recreational routes, under the assessment topic 'open space, leisure and play', from 'noise and vibration', and the wider personal and social wellbeing impacts on community cohesion and identity and culture as a result of the Scheme. The assessment concludes that no significant adverse effects to mental health and wellbeing are anticipated at any phase of the Scheme. Mitigation measures to reduce construction noise, to minimise impacts to PRoW users, and to provide community support are secured through the **Outline CEMP [APP-277]** and **Outline PRoWPPMP [APP-282]** by Requirements 13 and 16, and the provision of a community liaison group secured by Requirement 4, in Schedule 2 to the **Draft DCO [APP-016]**.
RSW-003	Mr Seymour-Williams has spent many years walking and cycling along the Fosse Way and valuing its historic significance. He stated that this experience	The assessment of impacts on long distance recreational routes in **ES Volume 3, Appendix 16-2: Tourism and Recreation Receptors [APP-241]** has

Reference	Comments/Issue raised	Applicant's Response
	would be fundamentally changed if large-scale industrial development were constructed alongside it, such that it would no longer reflect its Roman heritage.	included specific assessment of the Fosse Way as a nationally important recreation route due to its historical value. This is due to direct views of Lime Down B and C. Whilst mitigation measures to offset built infrastructure, and transport and PRoW mitigation is to be applied, due to its high sensitivity, it is anticipated the Scheme will have a significant adverse effect on the Fosse Way as a recreational route throughout the Scheme's construction, operation and decommissioning. This is a matter which will have to be considered in the planning balance when the DCO is determined. Regarding potential heritage impacts, since the design presented at PEIR stage, Field C26, the westernmost part of Field C25, and the majority of Field C13 have been entirely removed from the Order Limits. Solar PV Panels have also been removed entirely from within Fields B1-B5, C24-C25, and C13. A number of fields abutting the Fosse Way within which Solar PV Panels will be erected have had offsets established with their boundaries with Fosse Way, including Fields B6, C10-C12, and C22-C23. **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.

Reference	Comments/Issue raised	Applicant's Response
		Consequently, no significant effects were identified to the asset within **ES Volume 1, Chapter 12: Cultural Heritage [APP-064]**.
RSW-004	Mr Seymour-Williams also stated that local pubs, cafés and other businesses would be adversely affected, noting that these venues act as natural destinations for visitors enjoying the landscape. He stated that visual harm to an area of natural beauty and disruption to footpaths would lead to significant financial impacts on these businesses and the wider local economy.	The potential effects of the Scheme on tourism and recreation are assessed in **ES Volume 1, Chapter 16: Socio Economics, Tourism and Recreation [APP-068]**, supported by **ES Volume 3, Appendix 16-2: Tourism and Recreation Receptor Tables [APP-241]**. The assessment identifies a worst-case scenario in which a temporary loss of up to 50 tourism-related jobs and £1.76 million in annual spending could occur locally during construction, and a long-term loss of up to 11 tourism-related jobs/ £395,000 in visitor spending per annum could occur during the operational phase of the Scheme. This represents a precautionary estimate based on conservative assumptions. The assessment concludes that, while some localised effects on tourism receptors are anticipated to occur, significant adverse effects on the wider tourism economy are not anticipated. Additional mitigation measures (which were not quantified for inclusion in the assessment of potential losses to employment) secured in the **Outline SSCEP [APP-285]** seek to reduce tourism employment losses through focussing on local recruitment, promoting local suppliers where practicable, and through providing retraining

Reference	Comments/Issue raised	Applicant's Response
		opportunities for workers in tourism-dependent industries. Further additional mitigation measures to reduce impacts from HGV traffic and to PRoW users have been set out in the **Outline CEMP [APP-277]** and **Outline PRoWPPMP [APP 282]** to reduce impacts on individual receptors that contribute to tourism and recreation in the Study Area. These management documents are secured by Requirements 13, 16, and 18 in Schedule 2 to the **Draft DCO [APP-016]**. An assessment of landscape and visual effects is provided in the Landscape and Visual Impact Assessment (LVIA) presented in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]**. The LVIA assesses effects on identified landscape and visual receptors, including residential properties and users of public rights of way, and identifies where significant effects may occur. The LVIA recognises that as a consequence of the development that there would be long term adverse effects on the Landscape Character of the area as well as long term significant adverse effects to 10 Visual Receptors, all of which are local PRoW which are either within or directly adjacent to the proposed arrays.

Reference	Comments/Issue raised	Applicant's Response
RSW-005	Mr Seymour-Williams stated that the setting of places within the Scheme area is critical, and depends on countryside that feels open, protected and largely unchanged. He argued that replacing this with large-scale infrastructure for intermittent electricity generation would fundamentally alter that character, while the costs and impacts would be borne primarily by local people. He challenged the description of solar developments as temporary, stating that in practice this still entails multiple decades of change, alongside ongoing risks to land quality and wildlife, for a technology which he stated typically operates at around ten per cent of its potential capacity given the UK's climate and daylight conditions.	An assessment of landscape and visual effects is provided in the Landscape and Visual Impact Assessment (LVIA) presented in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]**. The LVIA assesses effects on identified landscape and visual receptors, including residential properties and users of public rights of way, and identifies where significant effects may occur. The LVIA recognises that as a consequence of the development that there would be long term adverse effects on the Landscape Character of the area as well as long term significant adverse effects to 10 Visual Receptors, all of which are local PRoW which are either within or directly adjacent to the proposed arrays. Mitigation measures to address landscape and visual effects are set out in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]**, **ES Volume 2, Figure 3-4-1 to 3-4-5.2 Landscape and Ecology Mitigation Plan [APP-084]** and detailed within the **Outline LEMP [APP-283]** and the **Outline EPMS [APP-284]**. These documents include proposals for new and enhanced planting, retention of existing hedgerows and woodland, and landscape integration measures to reduce visual effects over time.

Reference	Comments/Issue raised	Applicant's Response
		In addition, the Scheme design incorporates minimum offsets from existing landscape features, including residential properties, ancient woodland, woodland, hedgerows, public rights of way and watercourses, to further limit visual impacts. The preparation, approval and implementation of detailed landscape and ecological management plans, substantially in accordance with the **Outline LEMP [APP-283]** and **Outline EPMS [APP-284]**, are secured through Requirements 7 and 8 in Schedule 2 of the **Draft DCO [APP-016]**, ensuring that the identified mitigation measures are delivered and maintained throughout the lifetime of the Scheme. Potential impacts on ecology and biodiversity are fully assessed in **ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061].** This assessment considers baseline ecological conditions and evaluates likely significant effects arising during the construction, operation and decommissioning phases of the Scheme. It identifies avoidance, mitigation and enhancement measures to address potential impacts on habitats and protected and notable species. It also identifies opportunities for ecological enhancement, including the creation and long-term management of habitats, and delivery of biodiversity net gain. The

Reference	Comments/Issue raised	Applicant's Response
		assessment concludes that no significant adverse effects are anticipated on ecological features with the exception of skylark and hedgerows. Residual significant adverse effects on these receptors are anticipated at a local-level of geographical importance only. The Applicant has responded on the benefits of and need for solar as part of the UK's future energy system in Representation GDPR-LDSF-030-003 above.
RSW-006	Mr Seymour-Williams expressed particular concern about decommissioning at the end of the Scheme. He stated that it is unlikely the land could be restored to its previous quality and that it would likely become classed as brownfield, making it vulnerable to further industrial development. He questioned the robustness of disposal and recycling processes for solar panels at the scale proposed, stating that while such processes are said to exist, they are relatively untested at this level and their effectiveness, consistency and long-term waste implications remain unclear.	The Applicant notes the concern regarding decommissioning at the end of the Scheme. **ES Volume 1, Chapter 3: The Scheme [APP-055]** states that post-decommissioning the landowners would choose how the land is to be used and managed. The effects of decommissioning on soils and agricultural land are assessed in **ES Volume 1, Chapter 17 Soils and Agriculture [APP-069]**. As stated in this chapter, all land will be returned to its original use and condition as far as practicable and returned to the landowner. The effect on agricultural land quality at decommissioning would be influenced by the extent of disturbance caused by the removal of the Solar PV Panels, for example the presence and dimensions of leftover voids or the depth of the remaining underground cables. Currently, the most

Reference	Comments/Issue raised	Applicant's Response
		environmentally acceptable option is to leave the cables in-situ, although the cables could be removed by excavating at regular intervals and pulling the cable through to the extraction point, thus avoiding the need to excavate the entire cable trench. In either case, the effects would be less than those likely to occur during the construction phase. Built aspects of the Scheme such as the BESS Area and substations are also subject to the proposal to return the land to its original use and condition, which is primarily agricultural land of Subgrade 3b quality, with some Subgrade 3a at the BESS Area. A detailed Decommissioning Strategy would be prepared in accordance with the **Outline Decommissioning Strategy [APP-279]** and would ensure that decommissioning is undertaken safely and with regard to the environmental legislation at the time of decommissioning, including relevant waste legislation. It is likely that the solar PV panels and battery waste generated by the Scheme, during operation and maintenance and decommissioning phases, would be managed by specialist regional or national facilities; these facilities would be developed over the operation and maintenance phase of the Scheme in response to

Reference	Comments/Issue raised	Applicant's Response
		demand generated by the UK-wide solar energy industry. The Waste Electrical and Electronic Equipment (WEEE) Regulations place obligations on companies who place solar PV panels on the market to finance the costs of collection, treatment, recovery and environmentally sound disposal; and the landfill tax strongly incentivise reuse, recycling and recovery (Ref 18).
RSW-007	Mr Seymour-Williams stated that without clear and enforceable arrangements, there is a real risk that long-term environmental and social costs would not fall on the Applicant, but instead be borne by local people, particularly younger generations. Mr Seymour-Williams expressed concern about how the area will look over the coming decades, expressing a desire for future generations to experience the same landscape he grew up in.	The **Draft DCO [APP-016]** provides a suite of legally enforceable commitments requiring the Applicant to implement the mitigation measures embedded within the Scheme design and suite of management plans that are included with the DCO application. Under section 161 of the Planning Act 2008, it is a criminal offence for the Applicant to breach the terms of the DCO or any of the management plans approved under the DCO (Ref 16). In respect of younger generations, the Applicant is proposing a number of measures including apprenticeships and training Schemes and local employment, procurement, and supply opportunities in the **Outline SSCEP [APP-285]**, as secured by Requirement 18 of Schedule 2 in the **Draft DCO [APP-016]**. These measures will collectively help to enhance

Reference	Comments/Issue raised	Applicant's Response
		the economic activity and employment in the local area during the construction, operation and decommissioning of the Scheme. With regards potential landscape effects associated with the Scheme, an assessment of landscape and visual effects is provided in the Landscape and Visual Impact Assessment (LVIA) presented in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]**. The LVIA assesses effects on identified landscape and visual receptors, including residential properties and users of public rights of way, and identifies where significant effects may occur. The LVIA recognises that as a consequence of the development that there would be long term adverse effects on the Landscape Character of the area as well as long term significant adverse effects to 10 Visual Receptors, all of which are local PRoW which are either within or directly adjacent to the proposed arrays.
RSW-008	In conclusion, Mr Seymour-Williams stated that the local community would be poorer as a result of the Scheme, with permanent harm to heritage, landscape and community life, while others benefit financially. He urged that consent for the Scheme be refused.	The **Planning Statement [APP-267]** considers the planning balance including consideration of the benefits it would deliver and the harm it may cause. As set out in the **Planning Statement [APP-267]** the benefits of the Scheme include the contribution the Scheme makes to achieve decarbonisation, the demand for electricity and the security of the supply of

Reference	Comments/Issue raised	Applicant's Response
		energy, ecological and landscape enhancements including substantial new hedgerow and tree planting, reinforcement planting and grassland habitat creation, biodiversity net gain in excess of 10%, the provision of 12.8km of permissive paths, employment generation and skills training. It is these benefits that are considered in the relevant policy tests that apply to the Scheme including: • In the case of designated heritage assets, where less than substantial harm is anticipated to seven designated assets. • The application of the exception test as set out in Annex C: Sequential Test and Exception Test of the Planning Statement [APP-267]. • The use of best and most versatile agricultural land. • Development in a National Landscape. As demonstrated in this Planning Statement, overall, the Scheme accords with the relevant energy National Policy Statements and, where required, it has been demonstrated that any harm caused by the Scheme is outweighed by the substantial benefits that are delivered.

Reference	Comments/Issue raised	Applicant's Response
		Regarding heritage effects specifically, **ES Volume 1, Chapter 12: Cultural Heritage [APP-064]**, supported by **ES Volume 3, Appendix 12.1: Heritage Statement [APP-219]**, has assessed the potential impact of the Scheme on built heritage assets, and where required appropriate mitigation has been proposed (see Section 12.9 of **ES Volume 1, Chapter 12: Cultural Heritage [APP-064]** for embedded mitigation and Section 12.11 for additional mitigation). No significant effects have been identified to built heritage assets. An assessment of the likely economic effects of the Scheme has been set out in **ES Volume 1, Chapter 16: Socio-Economic, Tourism and Recreation [APP-068]**. This identified a beneficial effect at all phases of the Scheme to economic prosperity in the local area (20 km Study Area) as a result of employment and skills uplifting opportunities, and the transition to employment anticipated to have a greater gross value added to the local economy than those being displaced by the Scheme. The Applicant is committed to ensuring these benefits are felt in the local economy as much as practicable through the enhancement measures (local skills uplifting and training, local employment, procurement, and supply opportunities) in the **Outline SSCEP [APP-285]**, as

Reference	Comments/Issue raised	Applicant's Response
		secured by Requirement 18 of Schedule 2 in the **Draft DCO [APP-016]**. Impacts on communities within the 2 km Study Area have been considered as part of the assessment of "community identity, culture, influence and resilience" in **ES Volume 1, Chapter 18: Human Health [APP-070]**. The Applicant has considered how changes to perceptions of rurality, community sense of place, pride, engagement and difference in consideration of importance of different aspects of the Scheme (for example opposing views on harms versus benefits) may lead to a degree of impact to communities. The assessment has considered that this is likely to be up to a minor adverse effect on local communities and thus on residents' mental health and wellbeing. This is not considered a significant effect.

2.65 Peter Phillips

Reference	Comments/Issue raised	Applicant's Response
PP-001	Peter Phillips owns a small parcel of land at Whitley House, Corsham Road, Whitley, which is required for the proposed cable route connecting the generating site near the motorway to the substation at Beanacre. Mr Phillips he has had numerous meetings with representatives of the Applicant over the last two or three years, both formal and informal, which were amicable but unproductive. Mr Phillips stated that throughout this period he consistently and clearly informed the Applicant of his intention to develop the land at Whitley House. He explained that he notified the Applicant when planning applications were to be submitted, when they were approved, and that at a meeting towards the end of 2025 he provided copies of the granted consents. He stated that the Applicant's representatives appeared surprised by this. He explained that the approved works have since been completed and have resulted in significant changes to the site, including substantial and clearly visible alterations to the highway. Mr Phillips stated that despite his openness and transparency, the plans of his land submitted as part of the application are incorrect and do not reflect the current situation on the ground. He explained that	The Applicant acknowledges the comments made by the respondent and is actively negotiating with the respondent's agent, negotiations of which can be found in the **Land and Rights Negotiations Tracker [PDA-004]**. The Applicant is aware of the respondent's planning consent and the subsequent development works carried out and confirms that the planning application and subsequent works have been understood, and have not altered the ability to deliver the Scheme, nor give rise to any impacts to Mr Phillips. The planning application details the approval of works for a new access point, and the subsequent works reflect this. (Wiltshire Council Planning application reference: PL/2024/09556). The Applicant will issue an updated plan to the respondent and their land agent to accurately represent the current state of the land. For the avoidance of doubt, there is no error in the Applicant's DCO application which has arisen from Mr Phillips planning application and associated works.

Reference	Comments/Issue raised	Applicant's Response
	there are clear discrepancies between the drawings before the ExA and the site as it now exists, which would be immediately apparent to anyone travelling along Corsham Road outside Melksham. Mr Phillips stated that he assumed the ExA must be satisfied that the information on which it relies is accurate. He argued that, in relation to this specific part of the Scheme, the drawings relating to Whitley House are wrong and are likely to require amendment. He requested that the ExA examine carefully all drawings and information submitted with the application, particularly as much of that material relates to land more significant than his own. In conclusion, Mr Phillips stated that the ExA would need to determine whether the errors identified in relation to Whitley House represent a genuine isolated mistake or indicate a wider issue of inadequate or careless preparation by the Applicant and its advisers. He explained that his purpose in speaking was solely to draw attention to what has occurred in this specific instance, to assist the ExA in critically assessing the reliability of the information submitted with the application. Mr Phillips will share the planning and construction information for his property at Deadline 1A.	

2.66 Willa Gibb

Reference	Comments/Issue raised	Applicant's Response
WG-001	Willa Gibb is a 22-year-old resident of Sherston and a Great Britain athlete, and that her objection to the Scheme is based on her direct and daily use of the landscape. Ms Gibb explained that she was speaking specifically about the network of footpaths, public rights of way and bridleways that cross the proposed site.	A detailed assessment of the likely significance of effects from the Scheme on the use and desirability of individual PRoW and recreational access to the countryside is included in **ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]** and **ES Volume 3, Appendix 16-2: Tourism and Recreation Receptor Tables [APP-241]**. This assessment considers the impact on individual recreational routes, including their practical use, enjoyment and desirability. The Applicant confirms that the majority of significant adverse effects can be mitigated. However, some significant adverse effects to users of PRoW and unsurfaced roads in Lime Down E during construction cannot be mitigated further, a matter which will have to be considered in the planning balance when the DCO is determined. No significant residual effects are anticipated during the operational phase of the Scheme. With respect to PRoWs near to Sherston, the Applicant confirms no significant effects are anticipated to PRoWs that interact with the Order Limits at Lime Down A, B or C.
WG-002	Ms Gibb stated that she understands the need for renewable energy, but argued that the Scheme has treated public access to the countryside as an	The Applicant is cognisant of the importance of access to the countryside, both for recreation, and for physical and mental health and wellbeing. As such, impacts on

Reference	Comments/Issue raised	Applicant's Response
	afterthought. She emphasised that, for her, these routes are not used for occasional recreation but form her training environment and therefore her place of work. While she expressed concern about disruption during the construction phase, she stated that her primary concern relates to the long-term situation once construction is complete. She explained that although the Applicant proposes land restoration and reinstatement, these are not equivalent, as while hedgerows may be planted and grass re-sown, the character and sense of solitude of the footpaths cannot be restored.	PRoWs have been assessed as recreational features in **ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]**, and under the category "open space, leisure and play" in **ES Volume 1, Chapter 18: Human Health [APP-070]**. These assessments together conclude no significant effects to PRoWs as recreational features, nor any significant effect on health and wellbeing during the operational lifetime of the Scheme. The Applicant confirms that some significant adverse effects to recreational users of PRoW and unsurfaced roads in Lime Down E during construction cannot be mitigated further, a matter which will have to be considered in the planning balance when the DCO is determined, however this is not anticipated to have a significant effect on health and wellbeing. With regards reinstatement post-construction, a comprehensive package of habitat creation and enhancement measures are shown in **ES Volume 2, Figure 3-4: Landscape and Ecological Mitigation Plan [APP-084]** and detailed in the **Outline LEMP [APP-283].** These measures have been carefully designed based on the extensive knowledge of ecological conditions at the Order Limits collected through comprehensive desk studies and field surveys, as well as extensive professional experience of

Reference	Comments/Issue raised	Applicant's Response
		ecological enhancement measures which are both feasible and appropriate for the Scheme and its locality. The preparation, approval and implementation of the detailed Landscape and Ecological Management Plan, substantially in accordance with the **Outline LEMP [APP-283]**, is secured through Requirement 7 in Schedule 2 of the **Draft DCO [APP-016]**, ensuring appropriate management of retained and newly created habitat across the Solar PV Sites for the lifetime of the Scheme.
WG-003	Ms Gibb described the rural landscape as open views across fields to the horizon and stated that if the Scheme proceeds, those views would be dominated by metal frames and solar panels, at waist height or higher, extending over a large area. She argued that while the footpaths may continue to exist legally, the experience of using them would be lost permanently.	An assessment of landscape and visual effects is provided in the Landscape and Visual Impact Assessment (LVIA) presented in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]**. The LVIA assesses effects on identified landscape and visual receptors, including residential properties and users of public rights of way, and identifies where significant effects may occur. The LVIA recognises that as a consequence of the development that there would be long term adverse effects on the Landscape Character of the area as well as long term significant adverse effects to 10 Visual Receptors, all of which are local PRoW which are either within or directly adjacent to the proposed arrays.

Reference	Comments/Issue raised	Applicant's Response
		Mitigation measures to address landscape and visual effects are set out in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]**, **ES Volume 2, Figure 3-4-1 to 3-4-5.2 Landscape and Ecology Mitigation Plan [APP-084]** and detailed within the **Outline LEMP [APP-283]** and the **Outline EPMS [APP-284]**. These documents include proposals for new and enhanced planting, retention of existing hedgerows and woodland, and landscape integration measures to reduce visual effects over time. In addition, the Scheme design incorporates minimum offsets from existing landscape features, including residential properties, ancient woodland, woodland, hedgerows, public rights of way and watercourses, to further limit visual impacts. The LVIA recognises the change to the visual amenity and associated adverse effects to users of those PRoW that are located within the array itself or directly adjacent. The design of the Scheme has embedded buffers into the proposed layout, specifically a 15m offset to any proposed infrastructure on either side of any PRoW. Where PRoW directly cross the array, this creates a corridor with a minimum width of 30m wide between proposed fencelines through the array. There would then be a gap of 4m between the fence line and

Reference	Comments/Issue raised	Applicant's Response
		the proposed panels resulting in a minimum total width of 38m between the panels where PRoW cross the arrays. The preparation, approval and implementation of detailed landscape and ecological management plans, substantially in accordance with the **Outline LEMP [APP-283]** and **Outline EPMS [APP-284]**, are secured through Requirements 7and 8 in Schedule 2 of the **Draft DCO [APP-016]**, ensuring that the identified mitigation measures are delivered and maintained throughout the lifetime of the Scheme. The Applicant furthermore is committed to the provision of additional permissive paths (including close to Sherston on Lime Down A, B, and C) that are intended to enhance connectivity on the PRoW network. These are illustrated on **ES Volume 2, Figure 3-4: Landscape and Ecology Mitigation Plan [APP-084]** and are secured through the **Outline PRoWPPMP [APP-282]** by Requirement 16 of Schedule 2 of the **Draft DCO [APP-016]**.
	Ms Gibb addressed the proposed 60-year lifespan of the development, stating that for footpath users this duration is effectively permanent. She explained that for a young athlete starting out now, an entire sporting career, from junior level to potential retirement, would	The Applicant understands the importance of character of PRoWs and has sought to ensure adverse impacts to the character of PRoWs are mitigated or compensated through additional enhancement measures. The treatment of PRoWs through the

Reference	Comments/Issue raised	Applicant's Response
	be spent training within an industrialised environment rather than open countryside. She stated that this represents a generation of users losing their connection to the landscape. She clarified that her concern is not about the loss of rights of way as mapped routes, but the loss of the open rural character that defines them as public rights of way rather than merely public rights of passage.	operational lifetime of the Scheme is to offset onsite infrastructure from PRoWs by a minimum of 15 m on either side, provide enhancements to existing hedgerows and boundary treatments, plant biodiverse groundcover on field margins where PRoWs run, and improve the PRoW network connectivity through permissive paths. These measures are put in place to ensure adverse effects on PRoWs and their users are not significant. These measures are secured through the **Outline LEMP [APP-283]** and **Outline PRoWPPMP [APP-282]** Requirements 7 and 16 of Schedule 2 to the **Draft DCO [APP-016]**. The DCO is applying for a 60 Year consent. Whilst it is recognised that the Scheme, if consented, would be in place for a long period of time, it is temporary and would require decommissioning after the 60 year period and the land returned back to the control of land owners. It is the position of the Applicant that, following decommissioning of the Scheme, the landscape would be left in a better condition than current day. This betterment is established as a consequence of the landscape proposals resulting in greater species variety, greater age depth, enhanced structure,

Reference	Comments/Issue raised	Applicant's Response
		resilience to pest and disease and reinforcement of local landscape character across the Sites. At decommissioning, as infrastructure is removed, there would be an overall benefit to the character of the area with landscape mitigation retained providing long term benefit towards legacy landscape. Following decommissioning, the site would benefit from the significantly enhanced tree and hedgerow planting that has been carried out and has matured to create a much stronger and robust landscape, retaining, and enhancing the overall character and providing considerable biodiversity benefits over the years. Due to the development, the landscape would be left in a better condition than current day. This betterment is established as a consequence of the landscape proposals resulting in greater species variety, greater age depth, enhanced structure, resilience to pest and disease and reinforcement of local landscape character across the Sites. The defining legacy of the landscape would be the robust framework of features that have improved through the mitigation and landscape enhancements. This mitigation in turn would give rise to long-term wider benefits, including maintaining and enhancing

Reference	Comments/Issue raised	Applicant's Response
		biodiversity and in promoting the resilience of ecosystems.
WG-004	Finally, Ms Gibb asked the panel to consider the hierarchy of land use. She stated that the area is designated as having high landscape sensitivity, and that at the same time the country faces significant physical and mental health challenges, with people encouraged to exercise outdoors and use green spaces. She described landscapes such as this as public health assets and argued that covering them with solar arrays represents a choice to prioritise industrial energy generation over public recreation, sacrificing access to nature and wellbeing. In conclusion, Ms Gibb stated that her objection is not opposition to renewable energy, but to the permanent industrialisation of public recreational space, and urged that the importance of the character of rights of way be recognised, as once lost it cannot be recovered.	The assessment in **ES Volume 1, Chapter 18: Human Health [APP-070]** 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. Measures to mitigate adverse effects to PRoW users and to enhance user experience wherever practicable are secured through the **Outline LEMP [APP-283]** and **Outline PRoWPPMP [APP-282]** Requirements 7 and 16 of Schedule 2 to the **Draft DCO [APP-016]**. With regards potential effects on landscape character, **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]** has undertaken a robust assessment of the sensitivity (nature of the receptor) of landscape receptors. The judgement on landscape sensitivity is based on consideration of both the landscape receptor's value and its susceptibility to change arising from the Scheme. For details on how landscape value and susceptibility is assessed please refer to Section 1.6 of **ES Volume 3, Appendix 8-1 Landscape and Visual Impact Assessment Methodology [APP-187]**.

Reference	Comments/Issue raised	Applicant's Response
		For landscape receptors, value concerns the importance of the landscape resource as evidenced by the presence of landscape designations and professional judgement. Susceptibility is concerned with the landscape's ability to absorb change brought about by the Scheme. Tables 8-1-1-2 and Table 8-1-1-3 of **ES Volume 3, Appendix 8-1 Landscape and Visual Impact Assessment Methodology [APP-187]** provide criteria for determining landscape value for both designated and undesignated landscapes. Landscape value is based on factors such as natural and cultural heritage, its condition, associations, distinctiveness, and recreational opportunities and how it is perceived. Value assessments are included for all landscape receptors and are set out within **ES Volume 3, Appendix 8-3-2-2 Landscape and Visual Assessment Sheets (Significant) [APP-191].**

2.67 John Baillie

Reference	Comments/Issue raised	Applicant's Response
JBa-001	John Baillie owns and farms land at Corston his land is required for an underground cable route between Lime Down E and the transformer substation at Lime Down D. Mr Baillie explained that he has completed all mapping and surveys requested by the Applicant and has allowed unrestricted access to his land for geophysical, wildlife and environmental surveys.	The Applicant acknowledges the positive manner in which Mr Baillee has engaged with the Applicant's representatives and confirms that survey access agreements were signed and access granted voluntarily.
JBa-002	Mr Baillie stated, however, that despite repeated requests he has been unable to obtain the results of the wildlife surveys carried out on his land, leaving him unable to confirm that habitats have been correctly identified. He further stated that the Applicant has still not produced heads of terms acceptable to his land agent and that fundamental commercial terms remain unresolved. He said that, to his knowledge, no landowner has signed cable access heads of terms, notwithstanding assertions that agreements are close to completion.	The Applicant would draw attention to the **Land Rights and Negotiations Tracker [PDA-004]**, which details the progress that has been made with Mr Baillie's agent in reaching voluntary agreement over the Heads of Terms. It is acknowledged that negotiation of those terms remains ongoing. Results of all ecological surveys undertaken across the Scheme are presented within the **ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061]** and supporting appendices **ES Volume 3 (9-1 to 9-7) [APP-198 to APP-204]**. Habitat survey results are detailed within **ES Volume 3, Appendix 9.1: Ecological Baseline Report [APP-198]**, and presented in **ES Volume 2, Figure 9-1-8 to 9-1-12 Baseline Habitats Map – Lime Down A to Lime Down E [APP-113]** for the Solar PV Sites, and **ES Volume 2, Figure 9-1-13 to 9-1-23 Baseline Habitats**

Reference	Comments/Issue raised	Applicant's Response
		Map – Cable Route Corridor [APP-114] for land within the Cable Route Corridor.
JBa-003	Mr Baillie explained that the proposed heads of terms affecting his land would grant the Applicant access to more than 65 per cent of his holding for a period of five years, despite the cable route being fixed and requiring only a strip of approximately 30m during construction, reducing to 15m for compensation purposes. He stated that drainage infrastructure on his land passes through a field within a proposed solar area to reach a ditch outlet, yet no written assurance has been provided to confirm that his drainage rights would be protected when construction disrupts those drains.	The Order Limits includes an area wider than the final width of the cable because the precise cable route is yet to be confirmed. This is why a larger area of land has been identified than the cable width, to facilitate both the area within which the cable could be laid, but also to provide space for the construction activities for the installation of the cable (for example access, laydown areas etc). The Applicant acknowledges the comments made by the respondent and is seeking voluntary rights for the purposes of the Scheme that are being sought within the DCO order limits. **ES Volume 1, Chapter 11, Hydrology, Flood Risk and Drainage [APP-063]** provides detail on The Applicants responsibilities in relation to drainage and there will be an independent land drainage consultant to assist with any potential damages and repairs to drainage as a result of the works. Where existing field drainage systems are encountered during construction, these would be identified, appropriately managed and reinstated to maintain their functionality. The Applicant would continue to engage

Reference	Comments/Issue raised	Applicant's Response
		with affected landowners, including Mr Baillie, as the detailed design progresses in order to understand the location and operation of existing private drainage infrastructure and to ensure appropriate protection and reinstatement measures are implemented where required. Under the provisions of the Land and Compensation Act 1961 and the Land Compensation Act 1973, reasonable losses incurred by the landowner or occupier as a result of the Applicant's works are recoverable following demonstrable claims to The Applicant upon a loss being incurred supported with evidence.
JBa-004	Mr Baillie stated that he has acted in good faith throughout the process but does not feel this has been reciprocated. He expressed concern that compulsory purchase powers could be used to avoid proper negotiation and fair compensation. He stated that this would destroy his small farm unit and leave several parcels of land landlocked without access. He also stated that the Applicant has refused to consider minor amendments to the cable route which, in his view, would significantly reduce impacts on his land.	The Applicant remains committed to reaching voluntary negotiation with all parties, this is evidenced in the **Land Rights and Negotiations Tracker [PDA-004]**, where details can be seen in relation to the engagement and negotiations that have been ongoing. The Applicant is actively engaging with the respondent's professional representative to reach an amicable solution It is the preference of The Applicant to reach a voluntary agreement with the respondent. Under the provisions of the Land Compensation Act 1961, the Land Compensation Act 1973 and the Compulsory Purchase Act 1965, reasonable losses

Reference	Comments/Issue raised	Applicant's Response
		incurred by the landowner or occupier as a result of the Applicant's works are recoverable following claims to the Applicant supported by evidence.
JBa-005	Mr Baillie stated that he is 72 years old and may wish to reduce his farming activities, but that with the majority of his land subject to the proposed heads of terms and construction anticipated over the next five years, he is unable to plan for his future. He stated that he does not expect to profit from the Scheme, but that his farming business would be adversely affected, his land devalued, and that the compensation proposed does not reflect the losses he would incur.	The Applicant has committed to ensuring that losses are compensated for, in addition to a generous commercial offering to reflect any potential land de-valuation. The Applicant continues to engage with the respondent and their professional representative about any potential impacts of the Applicant's development, to reach a mutual agreement and to provide clarity on how and when the respondent's land will be affected, to enable future planning for the respondent. Under the provisions of the Land Compensation Act 1961, the Land Compensation Act 1973 and the Compulsory Purchase Act 1965, reasonable losses incurred by the landowner or occupier as a result of the Applicant's works are recoverable following claims to the Applicant with reasonable and appropriate evidence.
JBa-006	Mr Baillie stated that farms subject to compulsory cable routes are essential to delivery of the Scheme yet derive no benefit while their farming assets are significantly devalued. He explained that the stress and uncertainty caused by the situation are already	The Applicant is cognisant of the stress that large-scale infrastructure proposals can cause to individuals and as such, continues to provide all relevant and applicable information in order to assist with negotiations for voluntary land rights. The Applicant

Reference	Comments/Issue raised	Applicant's Response
	affecting his health, stating that preparation for the hearing has disrupted his sleep and raised his blood pressure, and that he is deeply concerned about the impact that construction and the loss of his small farm unit would have on his wellbeing.	has actively encouraged all parties to obtain legal and professional agent advice, with fees made available at no cost to the individual, ensuring landowners are properly advised throughout the process. The Applicant remains committed to a transparent approach to negotiations with Mr Baillie, and all parties involved. Under the provisions of the Land Compensation Act 1961, the Land Compensation Act 1973 and the Compulsory Purchase Act 1965, reasonable losses incurred by the landowner or occupier as a result of the Applicant's works are recoverable following claims to the Applicant upon a loss being incurred supported with reasonable and appropriate evidence. However, it is the Applicant's goal to reach a voluntary agreement with any party. The Applicant has sought to undertake pre-application consultation in as robust a form as practicable, to allow interested parties to have access to as much information as available at the time of consulting as possible, to help alleviate concerns about the potential future impacts of the Scheme on people's lives. The **Consultation Report [APP-022]** sets out the Applicant's approach to pre-application consultation and demonstrates how consultation was undertaken

Reference	Comments/Issue raised	Applicant's Response
		with a wide range of stakeholders, including local communities, community organisations, statutory consultees and those with an interest in land. This has included in-person events and online communications, with consultation materials provided both digitally and in hard-form, and free-to-use communication channels to respond back to the Applicant team. The Applicant has sought to engage with communities ahead of construction through the implementation of a Community Liaison Group, as secured through Requirement 4 in Schedule 2 to the **Draft DCO [APP-016]**. Whilst this group is set up for the construction phase of the Scheme, the Applicant has committed to providing a designated community contact within the Scheme's operation and maintenance team during the operational lifetime of the Scheme, with a dedicated Community Liaison Manager committed to during peak replacement events and decommissioning. This is secured through the **Outline OEMP [APP-279]** and **Outline DS [APP-279]** by Requirements 14 and 20 in Schedule 2 to the **Draft DCO [APP-016]**.

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