

Lime Down Solar Park

**Planning Inspectorate Reference:
EN010168**

**Wiltshire Council Comments on Submissions
Received at Deadlines 1 and 1A**

Deadline 2 (22 May 2026)

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1. 2.2 Land Plan (Rev 2) [\[REP1-004\]](#)

- 1.1. Wiltshire Council’s previous highways and transport comments on the 2.2 Land Plan, as made in its Relevant Representation [\[RR-4934\]](#), remain. As stated then: *“The 23 number land plans indicate areas in blue and yellow shading which encroach over the existing public highway limits in several locations, notably Farhill Lane, Fosse Way, Alderton Road, the A429, A420 Bristol Road and the A4 Bath Road. In the case of the ‘blue’ land identified the KEY cites that “New rights (including restrictions) to be compulsorily acquired and temporary use of land and in relation which it is proposed to suspend or extinguish easements, servitudes and other private rights”. In the case of the ‘yellow’ land identified it is stated “Temporary use of land and in relation to which it is proposed to temporarily suspend easements, servitudes and other private rights”. It is assumed in both cases that, where this is also public highway, that normal rights of passage will not be affected by these designations on the Land Plans. Furthermore, where it is stated that new rights are to be compulsory purchased, it is unclear what rights will be sought and how this will impact public highway land within the areas of blue shade”.*
- 1.2. There are ongoing discussions with the Applicant over highway ‘Protective Provisions’ to be written in the draft DCO to protect Wiltshire Council highway interests. It is anticipated this will follow a similar vein to the Protective Provisions wording set out in Appendix 1 of the National Highways Relevant Representation [\[RR-3426\]](#).

2. 2.3 Works Plan (Rev 2) [\[REP1-005\]](#)

- 2.1. The 23 number Works Plan drawings identify works proposed within public highway as Works Numbers 8A or 8B. As noted in past highway comments [\[RR-4934\]](#), it is therefore inferred that where lengths of public highway are excluded from these designations on the Works Plan, no mitigation or improvements are deemed necessary by the Applicant to accommodate the increased HGV trafficking expected during construction. The exclusion of the following minor road lengths on the planned construction routes remains a concern:

Lime Down Areas A-C

- The length of Farhill Lane between the junction with Fosse Way and the planned access points to Lime Down area A (circa 1.1km) - **Sheet 1**
- Significant lengths of the Fosse Way, with the only 8B works areas identified linked to the Lime Down Area C access junction works - **Sheets 1, 3 and 4**. Whilst highway works within these areas 'could' additionally include the provision of temporary passing places to allow two HGVs to pass during the construction phase, it is unclear if this is the intent. However, there is still a significant length of Fosse Way (870m) between the junction at Fosse Lodge at the southern corner of the Lime Down C site and Alderton Road, which is deemed as needing no passing mitigation to accommodate HGVs. Whilst the horizontal road alignment here is straight, it is unclear whether this long distance and forward visibility available would allow two opposing HGV drivers to be fully aware of each other easily, with one thus able to wait at a suitable passing point before entering this length of Fosse Way, this assuming one exists which is not clear.

Lime Down Area D

- Unnamed road between the roundabout junction with Wellington Place Road and Bradfield Cottages (circa 1.7km) - **Sheet 5 (Part)**. 8B work area extents on this route are limited to a length north of Bradfield Cottages, where the access points to Lime Down Area D are proposed. This is a significant concern given the volume of HGV construction traffic expected on this route to / from the A429, its carriageway width and alignment to the northwest of the junction with The Street.
- 2.2. The council considers it would be helpful if the drawing key described what each of the keyed shadings apply to rather than just listing works reference numbers. The council can see no reason why the full information should not be provided as keyed information on the plans, as this would better assist understanding and review of the planned works within the DCO limits.

3. 3.1 Draft Development Consent Order (Rev 2) [[REP1-007](#)]

- 3.1. The council has made previous comments on the Draft DCO as contained within its Relevant Representation [[RR-4934](#)], Written Representation [[REP1-138](#)] and Local Impact Report [[REP1-137](#)]. The council maintains its position as contained within those documents.
- 3.2. It is noted that Schedule 12, Part 2 and 3 headings within the **Contents** section have been corrected (with the previous Part 3 having now been removed). However, these amendments are only shown as tracked within the Contents and not within the document itself.

Article 10 – Power to alter layout, etc., of streets

- 3.3. There are no changes to this Article in Revision 2, so past comments remain applicable [[RR-4934](#) and [REP1-138](#)]. Council officers have expressed past concern over the ability of the council to control works being undertaken within the public highway, and from the highway development management perspective, the ability to ensure that the proposed site access and other works meet the adoptable standard. The Applicant has alluded to the fact that: “A separate agreement will not be necessary as the undertaker’s powers relating to the alteration of streets are conveyed by Article 10 of the DCO as opposed to the Highways Act 1980 (“HA 1980”). However, this is a little vague. The DCO needs ‘Protective Provisions’ for Wiltshire Council (Highways) to be included in Schedule 15, with appropriate reference made to this in this Article as may be required. Article 10(4) states that: “*The powers conferred by paragraph (2) may not be exercised without the consent of the street authority, such consent to be in a form reasonably required by the street authority*”. This might usefully cross-reference the said Protective Provisions in due course.

Article 14 – Access to works

- 3.4. There is again no drafting change made to this Article in this revision to the DCO, so previous comments remain valid. To reiterate, there is concern about the precise wording of Article 14, as it implies that approval by the highway authority is only required for new access locations proposed beyond those set out in Schedule 7, Parts 1 and 2. In short, all the accesses in Schedule 7, whether permanent or temporary, are seemingly deemed approved in at least principle under powers conferred in Article 14. The Applicant has previously advised in response that: “*Access works however would be secured through the discharge of the Construction Traffic Management Plan (“CTMP”) via Requirement 15 which requires approval from the Council prior to the commencement of the Scheme*”. However, the council does not consider that the detailed design and technical approval of permanent highway works is a part of the CTMP process. It is noted the National Highways Protective Provisions in Schedule 15 include for technical approval of all works drawings and associated Road Safety Audits as part of these provisions. That should be

case with Wiltshire Council Protective Provisions, which need adding to this Schedule.

Article 15 – Agreements with street authorities

- 3.5. Article 15 is also unchanged in this revision to the DCO. The council's Relevant Representation [RR-4934] states that "review of DCO Article 15 states in (1) that "A street authority and the undertaker **may** enter into agreements". The concern is the use of the word 'may' (highlighted in bold), which suggests that the undertaker is not bound or required to do so". However, as noted earlier, the inclusion of bespoke Wiltshire Council 'Protective Provisions' may negate the need for a formal and separate agreement in all cases. Given the powers conveyed under DCO Article 10, and assuming this is backed with Protective Provisions for Wiltshire Council to be added in Schedule 15, it remains unclear as to when the provisions in Article 15 would then be needed. If the DCO articles in themselves give no power to dedicate new land as public highway then this may be one instance, but confirmation is sought.

Article 40 – Felling or lopping of trees and removal of hedgerows

- 3.6. Paragraph (4) of Part 6, Article 40 has been amended to cite the Ecological Protection and Mitigation Strategy (EPMS) instead of the LEMP. The previous omission of the reference to the EPMS has been highlighted in the Ecology and Biodiversity Considerations section of Wiltshire Council's Written Representation [REP1-138] given that the Hedgerow Removal Plan(s) is embedded within the submitted Outline EPMS instead of having been submitted as a standalone plan(s).
- 3.7. The Written Representation stated: "*The council's Ecology Officer queries why paragraph (4) of Article 40 [APP-016] refers to only the LEMP and not also to the 7.19 Outline Ecological Protection and Mitigation Strategy (EPMS) [APP-284] and the Hedgerow Removal Plan(s) embedded within the EPMS and / or 6.2 Environmental Statement Volume 2, Figure 3-4-1 to 3-4-5.2 Landscape and Ecology Mitigation Plan [APP-084] and 6.3 Appendix 9-8 Schedule of Protective Ecological Buffers [APP-205]. It is deemed that citing other pertinent documents and plans in Article 40, paragraph (4) would serve to ensure that approved hedgerow removal is suitably prescriptive and that there is consistency across the documents and plans for the avoidance of doubt.*"
- 3.8. The revised Draft DCO was submitted for Deadline 1 and so was the council's Written Representation, nonetheless, the council seeks to highlight that given that paragraph (4) of Article 40 has been amended to cite only the EPMS, the issues raised by the council in its Written Representation have not been wholly addressed in respect of the wording of the article.

Article 41 – Trees subject to tree preservation orders

- 3.9. Clarity is sought as to why the duty to replace protected trees does not apply as per Article 41 2(b).

Schedule 2 - Requirements

- 3.10. The council considers that numerous additional Requirements are required, as contained within its Local Impact Report [\[REP1-137\]](#). However, it is acknowledged that this report was submitted at the same time that the Rev 2 version of the Draft DCO was submitted by the Applicant. Therefore, the council will not repeat its requirements here in order to allow the Applicant an opportunity to respond.
- 3.11. The council welcomes the inclusion of a phasing and timetable Requirement within Requirement 2. However, the current drafting does not require the phasing scheme or timetable to be approved by the relevant planning authority, only submitted to it. This does not reflect the drafting that the council requested the Applicant include, nor does it reflect similar Requirements on other DCO solar schemes, for example the Mallard Pass Solar Farm DCO. Furthermore, in light of information disclosed by the Applicant at Issue Specific Hearing 1, and in the absence of sufficient assurance or certainty provided within the Applicant's Post Hearing Submission [\[REP1A-012\]](#), the council considers that the Requirements should be as contained within its Written Representation [\[REP1-138\]](#).
- 3.12. Furthermore, as highlighted in its Relevant Representation [\[RR-4934\]](#), the council considers that the Community Liaison Forum should be in place for a period of six years post construction and during decommissioning. The council welcomes the commitment to resume the Community Liaison Forum in the Outline Decommissioning Strategy [\[REP1-100\]](#) during the decommissioning phase and considers that Requirement 4 should be amended to reflect that the Forum will be resumed and in place in advance of all decommissioning activity. The council does also not agree with the limit to the Forum's operational life for a period of 1-year post final commissioning.
- 3.13. The council maintains that Detailed design approval should not be restricted to work Nos. 1, 2 and 3 in Requirement 5. All work packages should be included.
- 3.14. The council notes the amendments to Requirement 20 Decommissioning and restoration. However, the council considers that its drafting as contained within Wiltshire Council's Written Representation [\[REP1-138\]](#) should be utilised.
- 3.15. As noted within its Statement of Common Ground, the council considers that it is important that a Detailed Arboricultural Impact Assessment and Arboricultural Method Statement should be submitted to and approved by the local planning authority as a stand-alone document as part of the DCO. A separate Requirement is therefore required to secure this. The methods of decommissioning should be specified within these documents to ensure minimal impact on underground soil structures and tree root systems manifested over the term of the solar park. Preventing damage to soil particles during pile removal (de-piling or extraction) is important to maintain ground stability, avoid settlement, and preserve soil structure, therefore all piles should be left in situ during and after decommissioning.

Schedule 12 – Hedgerows to be Removed

- 3.16. In terms of the content of Schedule 12, aside from the correction to the title of Part 2, there appears to have been no revisions to the contents of Part 1 and 2. Critically, there has been no reduction in the number of hedgerows listed and no refinements in terms of the extents of hedgerow specified for removal in either Part 1 or 2 as has been requested by the council. As such, although Article 40 paragraph (4) has been amended to stipulate that hedgerow can be removed to the extent set out in the EPMS (which contains the Hedgerow Removal Plan), rather than the LEMP, the council remains concerned regarding the scope of Part 1 and 2 of Schedule 12 given that it effectively lists every hedgerow, and the associated entire approximate lengths, within the Order Limits.
- 3.17. The council's Ecology Officer has previously raised concern with Part 2, Article 6, paragraph (3) which provides for the disapplication of the Hedgerows Regulations 1997, particularly given that Part 1 and Part 2 of Schedule 12 appears to list all hedgerows within the Order Limits. Although the 3.2 Explanatory Memorandum (Rev 2) [[REP1-009](#)] specifies that this approach has precedent in other DCOs and lists three examples, the council remains concerned and the revisions undertaken to the Draft DCO have not suitably addressed or overcome these concerns.

Schedule 15 – Protective Provisions

- 3.18. Schedule 15 'Protective Provisions' will need a 'Part' added to provide protective measures for Wiltshire Council as the Local Highway Authority, which is currently absent. It is accepted that this is a matter under discussion with the Applicant which is not yet part of the draft DCO. It is envisaged this will be of similar form to the Protective Provisions already included for National Highways, with the existing Wiltshire Council s278 Agreement template used in part to formulate clause wording. It is noted the proposed National Highways Protective Provisions in place cover the following in part:

Prior Approvals

- The need to obtain detailed design technical approval of the highway works prior to commencement, including Stage 1-2 Road Safety Audits. It also requires the proposed 'Scheme of Traffic Management' to undertake the highway work to be submitted and approved.

Construction of the Cable Works and Highway Works

- Need for compliance with National Highways' road space booking procedures when booking road space on the strategic road network prior to and during the carrying out the road works or cable works.
- Requirement for inspections of the ongoing and completed highway works.

Payments

- Provision for design checking and supervision fee payments.

Certification of Works

- Provision for the issue of a Provisional Certificate of Completion and a Final Certificate, with an intervening 'Defects' period.
- 3.19. The Protective Provision requirements included for National Highways include the need for a Bond or Surety based on the estimated full cost of the highway costs and a contingency allowance. Furthermore, an 'Indemnity' clause is also included whereby the undertaker fully indemnifies National Highways from and against all costs, claims, expenses, damages, losses and liabilities suffered by National Highways arising from, or in connection to the construction, maintenance or use of the road works. In short most, if not all, of these provisions are typically included within the standard Wiltshire Council s278 template, although this goes further in discussing road space booking requirements and matters linked to 'Permits' which are not. It would thus seem entirely reasonable for Protection Provisions covering Wiltshire Councils' highway interests to be added to Schedule 15.
- 3.20. The council is in discussions with the Applicant with the intention for the Protective Provisions for the benefit of the Local Highway Authority to be included within the draft DCO to be submitted at Deadline 3.

Schedule 16 – Procedure for the Discharge of Requirements

- 3.21. The council welcomes the extension to the period for the discharge of applications from eight to ten weeks in 2.(2). However, this does not reflect the time period that the council requested the Applicant to include (as contained within correspondence dated 15 April 2026), nor does it reflect the discharge period in other made solar DCO's. The council considers that the period for discharge should be twelve weeks, noting that the determination period in the Cottom Solar Project DCO was 13 weeks.
- 3.22. Additionally, as previously advised to the Applicant (as contained within correspondence dated 15 April 2026), the council considers that the period for requesting further information should be extended to 20 working days in 3.(2), which would be in line with the Mallard Pass Solar Farm DCO.
- 3.23. As per the council's original comments on the draft DCO, as contained within the council's Relevant Representation [[RR-4934](#)], the council requires the following additional wording to be included against each numerical charge within Clause 5 to state "or the fees applicable at the time of application by the Applicant". This is due to the extended time period in which applications for discharge will be made given the scheme's stated operational life of 60 years.
- 3.24. Furthermore, the council maintains, as per its Relevant Representation, that the Applicant should be required to undertake pre-submission consultation with the local planning authority and all required consultees on all proposed documents for discharge. The Applicant should also maintain a Register of Requirements to alert the public, community and / or other stakeholders of the status of the documents to allow visibility of the approved documents. The council considers

that this should be included, and a separate Requirement incorporated into the DCO within Schedule 2.

4. 4.3 Book of Reference (Rev 2) [\[REP1-011\]](#)

- 4.1. It is acknowledged that the Rev 2 Book of Reference was submitted by the Applicant at the same time as the council’s comments on it as contained within its Written Representation [\[REP1-138\]](#). Therefore, the council does not seek to repeat the comments made in that response in order to allow the Applicant an opportunity to respond.
- 4.2. However, in reviewing the Rev 2 version of the Book of Reference, the council has noted that parcel **14-006a** was added to the Book of Reference. As part of this review, the council has also reconsidered parcels **14-009** and **14-010** and therefore the narrative in relation to these 2 parcels has been amended.
- 4.3. As a consequence, the council has provided its response in the same format as that within its Written Representation to aid review.

Plan Reference	Rights Claimed	Temporary or Permanent Rights Claimed	Owner or Occupier (as local highway authority)
14-006a	Acquire right to use / carry out works	Permanent	Maintainable highway (see Figure 8 Thingley Overbridge within Written Representation) and partially within legal title
14-009	Acquire right to use / carry out works	Possibly both	Maintainable highway (see Figure 8 Thingley Overbridge within Written Representation) and partially within legal title
14-010	Acquire right to use / carry out works	Possibly both	Maintainable highway (see Figure 8 Thingley Overbridge within Written Representation) and partially within legal title

5. 6.1 ES Volume 1 Chapter 9 Ecology (Rev 2) [\[REP1-015\]](#)

Other Neutral Grassland

- 5.1. In respect of other neutral grassland (ONG), it is noted that revisions to **Table 9-8** and **Paragraph 9.10.100** indicate a reduction in the estimated area of ONG present within the cable route corridor from 15.44 ha as detailed in the last iteration of ES Chapter 9, to 3.06 ha in the Rev 2 iteration submitted at Deadline 1.

Ditches and Watercourses – Construction Phase Impacts

5.2. In terms of construction phase impacts on ditches and watercourses, it is noted that the revised iteration of ES Chapter 9 details in **Paragraph 9.10.145** that two additional new permanent culverts for access across ‘wet’ ditches are proposed in the Solar PV Sites compared to the previous iteration of ES Chapter 9. As such, five new permanent culverts across ‘wet’ ditches, each approximately 6m wide, are now proposed in the Solar PV Sites and should be given due consideration in terms of the impact assessment. Three are proposed at locations within Lime Down D, one at a location in Lime Down B, and one in Lime Down C. **Paragraph 9.10.145** specifies that the culverts will be designed so that the flow of water through the channel is not impeded with the base of the culvert being set beneath the existing channel bed and it sets out that less than 0.2% of the overall wet ditch / watercourse network will be impacted by the construction of new accesses, however it completely omits any discussion regarding the potential for adverse effects on this ecologically important habitat. Nonetheless, the same paragraph goes on to discuss how several other new culverts for access proposed at dry or seasonally inundated ditches within the Solar PV Sites are not expected to have an impact on the quality of the ditch network or its value to wildlife and how three new proposed non-vehicular crossings for permissive paths are not expected to result in adverse impacts on the ditch network or wildlife present. It is unclear why there has been no meaningful discussion regarding the potential for adverse impacts arising from the five new permanent culverts for access, and yet there is some, albeit limited, discussion of the potential for impacts on wildlife and the quality of the ditch network in relation to the new culverts at dry ditches and for permissive paths. This is considered to be an omission, particularly as **Paragraph 9.10.145** concludes there will be no significant effects on the extent and quality of the ditch network within the Solar PV Sites through the creation of new crossings. As such, it is considered that the potential for effects hasn’t been fully assessed and that the conclusion has not been adequately evidenced or substantiated.

Aquatic Macrophytes

5.3. It is noted that the Rev 2 ES Chapter 9 now includes discussion regarding aquatic macrophytes and that the Schedule of Changes states that **Table 9-9** was updated “*in relation to including aquatic macrophytes as a protected species.*” It is unclear why it references ‘a protected species’ – presumably this is an error. It is also noted that the Schedule of Changes indicates that the updates relating to aquatic macrophytes are in response to Wiltshire Council’s Relevant Representation [[RR-4934](#)]. Whilst the inclusion of this new section pertaining to aquatic macrophytes is welcomed, in the interests of accuracy and clarity, it should be noted that contrary to the suggestions in the Schedule of Changes, these revisions were not recommended or discussed in the Council’s Relevant Representation.

Aquatic Invertebrates

- 5.4. The addition of new discussion regarding aquatic invertebrates, in addition to white-clawed crayfish, is noted.

White-Clawed Crayfish – Construction Phase Impacts

- 5.5. **Paragraphs 9.10.304 – 9.10.309** discuss potential construction phase impacts on white-clawed crayfish (WCC). Given that Paragraph 3.3.100 of Appendix 9-1 Ecological Baseline Report (Rev 2) [[REP1-083](#)] states suitable habitat for white-clawed crayfish is present at the Gauze Brook and Gabriel's Well watercourses in Lime Down D and E as well as a small number of wet ditches directly connected to these watercourses, and assumes presence in the absence of survey, together with the fact that three new circa 6m wide permanent accesses for culverts are proposed across 'wet' ditches at Lime Down D, the council considers that the potential for adverse effects on WCC during construction may have been underestimated.
- 5.6. Furthermore, the lack of dedicated WCC survey at locations with suitable habitat means that it is not known whether WCC are in fact present or likely absent and has resulted in an incomplete baseline. In turn, this seems to have precluded any consideration in ES Chapter 9 regarding whether any further mitigation or compensation may be required over and above that proposed, or even whether a mitigation licence may be needed to facilitate any of the works at specific locations. Please refer to Natural England's standing advice on WCC.

6. 6.1 ES Volume 1 Chapter 11 Hydrology, Flood Risk and Drainage (Rev 2) [[REP1-017](#)]

Surface Water Drainage Strategy

- 6.1. In **Paragraphs 11.1.7 to 11.1.9**, the inclusion of standalone drainage strategies for the BESS and substations provides improved clarity compared to previous iterations. However, the strategies remain high-level and do not clearly demonstrate integration with the wider drainage network. There is insufficient information on cumulative discharge rates, connectivity between systems and interaction with downstream receptors. Consequently, the revised information does not fully demonstrate that the overall drainage system will operate effectively without increasing flood risk.

Surface Water Runoff Rates

- 6.2. The reduction of runoff to 70% of greenfield rates is supported and aligns with Lead Local Flood Authority (LLFA) policy expectations. However, this commitment is not supported by sufficient technical evidence. There is no information provided on the basis of calculation, storm durations, or sensitivity

to climate change scenarios. This limits confidence in the robustness of the proposed runoff control.

Attenuation Design

- 6.3. The use of attenuation features is appropriate; however, the design remains conceptual. There is no clear evidence of storage volumes, hydraulic controls, or exceedance routing. Without this information, it is not possible to determine whether the system is resilient to design events or extreme rainfall conditions.

Downstream Impact Assessment

- 6.4. The assessment does not demonstrate that receiving watercourses have sufficient capacity to accommodate controlled discharge rates. There is an absence of hydraulic modelling or evidence of downstream constraints. As such, it has not been demonstrated that the scheme will not increase flood risk beyond the site boundary.

Watercourse Buffers

- 6.5. The introduction of a 10m buffer to watercourses is supported and aligns with best practice. This provides benefits in protecting channel morphology, maintaining conveyance capacity, and reducing pollution risks during construction and operation.

Construction Pollution Control

- 6.6. The identification of washdown and refuelling areas on impermeable surfaces away from watercourses is welcomed. These measures follow good practice and are considered effective in minimising pollution risks, subject to appropriate implementation via the Construction Environmental Management Plan (CEMP).

Foul Water Management

- 6.7. The use of sealed systems is supported as it removes direct pathways to receptors. However, the long-term performance of such systems is dependent on management and maintenance procedures, which introduces a degree of uncertainty that must be controlled through enforceable measures.

Flood Risk Baseline (SFRA Reference)

- 6.8. Reference to the Wiltshire Strategic Flood Risk Assessment is appropriate and ensures that the assessment reflects local flood risk context. This strengthens the baseline understanding.

SuDS Strategy

- 6.9. The application of SuDS principles is supported; however, details on treatment stages, flow paths, and integration across the site are limited. It is not clear

how the hierarchy of SuDS components will function collectively to manage runoff effectively.

Exceedance Flow Management

- 6.10. There is limited reference to exceedance flow routing across the site. Without clearly defined exceedance pathways, it is not possible to confirm that flows during events exceeding design capacity will be safely managed without causing flooding on or off site.

Cumulative Impact

- 6.11. The assessment does not clearly address cumulative impacts of the development, particularly in relation to multiple drainage catchments and phased implementation. Without this, there is uncertainty regarding the overall impact on the receiving environment.

Construction Phase Drainage

- 6.12. The identification of temporary drainage measures is welcomed; however, the level of detail is limited. There is insufficient information on how runoff will be managed across construction phases, particularly in areas of disturbed ground.

Overall Drainage Strategy Conclusion

- 6.13. Whilst the Chapter provides improvements and a clearer narrative compared to earlier submissions, the proposals remain largely outline. The absence of detailed hydraulic evidence, integration of components, and downstream capacity assessment limits confidence that the Scheme will not increase flood risk.

7. 6.1 ES Volume 1 Chapter 13 Transport and Access (Rev 2) [REP1-019]

- 7.1. There have been no revisions made to **Table 13-4**, which sets out the assessed 'Sensitivity' classification of roads forming the construction routes to the solar PV sites. As such, previous comments [RR-4934] remain concerning the minor route to Lime Down area D from the A429. This still doesn't seem to be broken down into sufficient separate links in assessing receptor sensitivity. For example, whilst the part of the route between the A429 and the crossroads junction to the northeast of Hullavington might be agreed as 'Low' sensitivity, the onward route past Bradfield Cottages to Lime Down D access points 8, 9 and 20 is clearly more sensitive. Representations made by others have indicated that this part of the route is more widely used by pedestrian users routing between Hullavington and public rights of way (PRoW) to the northeast, where no footways exist. As such and based on the criteria set out in **Table 13-3**, it might be expected that sensitivity here would be at least Medium / High, given daily HGV construction trafficking is expected to be high.

- 7.2. It is noted that 'Impacts' considered and how these are assessed / graded under criteria set out in **Table 13-6** to the Environmental Statement still exclude 'Highway Safety' per-se. However, minor roads subject to increases in HGV trafficking, and where two-way passage for two HGVs is limited to only specific passing places, is going to lead to increased safety risk if such opportunities for passage are infrequent with large distances and no inter-visibility between them. It is accepted this could be covered and encompassed under 'Road User and Pedestrian Safety' where, as noted, ISEP Guidance isn't being applied but 'professional judgement' based on analysis in the Transport Assessment. As such, this is commented on in reviewing this latest document separately. It is noted that the 'Severance' criterion (ISEP) and impact rating is based on very district percentage range changes in HGVs, not just the change in overall traffic. Given the expected level of daily HGV construction trafficking on the route between Dyson RBT and Bradfield Cottages, how can it thus be the case that this route is classed as 'low' sensitivity throughout given that the existing 2-way average daily HGV volume at Bradfield Cottages (Table 13-17) is only 48. Similarly, the daily existing volume of 2-way HGV traffic on Alderton Road and Fosse Way is only 20. With regards to the latter, the HGV delivery predictions in Table 13.20 show an 'Average Day' number of expected 2-way HGV movements linked to Lime Down areas A-C of 32, so a 160% change.
- 7.3. **Table 13-20** shows the predicted number of HGV movements associated with the construction of the Lime Down solar PV sites, including the 400KV substation and the BESS on Area D. This overall number of HGV deliveries and movements appears to be unchanged from the previous version, so a total of 13,043 deliveries and so 26,086 2-way movements over the entirety of the 2-year construction period over all areas. Differences include a dis-aggregation of the substation / BESS figures and critically the expected vehicle types, with the predominant vehicle type now expected to be 10m tippers delivering aggregate (2,865) and only 445 16.5m articulated HGV deliveries linked with substation units / cabling. These vehicles were all previously advised as being articulated HGVs (3,310). The other key change is division of the Lime Down D areas to 'West' and 'East', so some routing now assumed to take place via the direct A429 access (Access Ref 10). However, the 2-way 'peak' HGV trafficking to Lime Down D (West), so the Bradfield Cottages route is still expected to be 56. As now noted in the Wiltshire Council Written Representation [[REP1-138](#)] and indeed the first draft of the Statement of Common Ground (SoCG), the council does require more clarification and verification surrounding these HGV movement estimates linked to the solar PV sites and substation / BESS installation. Comments made in the Written Representation are re-iterated below for completeness:

"The predicted volumes of HGVs expected during the construction phases for each of the Lime Down SF sites (A-E) is still a point of discussion, with some clarification sought on these estimates following DCO application document review. The supporting calculations undertaken for Modules and Mounting Structures for each Lime Down site have not been fully provided or verified by evidence from existing solar farm sites. For example, whilst the total number of assumed PV Modules for each of the Lime Down sites (A-E) has been provided,

it is unclear how these quantities have been derived. The area occupied by panels on each site will be known (Works Area 1), but the density / ha assumed and how this compares with the assumptions adopted for other consented solar farm sites or those in operation is unknown. The same query applies to module mounting structures, as assumptions made regarding the type of mounting structures or foundations / supports are also absent. Similarly, aggregate volumes are not determined on a Lime Down site-by-site basis, or on what basis, so the total access track lengths and their width / depth of construction. It is further noted the 'waste' calculations account for only removal of packaging, so seemingly exclude any allowance for removal of excavated 'spoil' material associated with the construction of the access trackways, the construction compounds and the foundation bases for the BESS and 440kV and 132KV substations".

- 7.4. Any under-estimates in components or the need for the export of even some of the considerable spoil needed to construct the access tracks / compounds / bases could significantly increase the volume of predicted HGV movements needed over the construction period, so adding to the highway safety and indeed damage concerns. As such, Table 13-20 to the Environmental Statement Volume 1, Chapter 13 [REP1-019] is still not accepted by the council, until such time as these HGV estimates are duly considered to be sufficiently robust. The council's Highways Development Management Officer thus offers no comment on the flows on specific routes and expressly the expected average percentage changes in HGVs shown in Table 13.25. However, this table still shows HGV increases of 238-250% on Alderton Road / Fosse Way (Lime Down A-C), and 117% between 'The Street' at Hullavington and Bradfield Cottages (Lime Down D). In paragraph 13.10.33, it is stated that "*high percentage changes in HGVs typically reflect a low baseline number of HGVs. Real term numbers of HGVs are relatively low. For example, on Link 6, Alderton Road, the number of HGVs in the 2028 baseline is 20 per day. This increases to 70 during peak construction phases. Whilst an increase of 250% appears high, the actual increase of HGVs is 50. Where baseline flows are low, any change in traffic flow will result in a large percentage change, but this will not necessarily lead to a likely significant effect*". However, with planned deliveries taking place as advised between 9:30 and 16:30 to avoid the weekday peak periods, this level of increase would relate to a frequency of circa 7-8 HGVs per hour during the working day, or a movement every 7-8 minutes. This does not appear to be an insignificant effect or impact when the level of movement frequency is considered. If estimates are duly found to be low, this frequency could be even higher.
- 7.5. **Table 13-35**, which also remains unchanged, shows the projected increases in overall flows and HGV volumes along the cable route corridor. As stated before, overall increases on certain minor roads are quite significant, with changes in HGV flows of >30% affecting a much greater proportion of minor roads where the cable route crosses. It is advised that HGV access will largely consist of 10m tipper trucks to construct the haul road and laydown areas, but ALL movements associated with cable drum deliveries will be needed over the length of the Grid Connection Cable works. Whilst more a matter to be agreed / approved as part of the temporary access works, it will need to be

demonstrated to the Wiltshire Council Network Management team that passage for 10m tipper trucks can be safely accommodated along all the minor roads intended for access and, where AIL access is needed, that this is physically possible.

- 7.6. In paragraph 13.11.1, it is now stated in part that the Applicant will be committed to: “*Conduct a Stage 1 and Stage 2 Road Safety Audit at all access junctions to recommend additional safety measures at the access points*”. The council would seek more than that, so the submission for Wiltshire Council’s Highways approval of all detailed layout and construction drawings together with a supporting Stage 2 Road Safety Audit is needed as part of required ‘Protective Provisions’ in Schedule 15 to the DCO.

8. 6.1 ES Volume 1 Chapter 14 Noise and Vibration (Rev 2) [REP1-021]

- 8.1. Although the noise calculations indicate that predicted sound levels at sensitive receptors remain unchanged, Tables 8 and 9 of ES Volume 3, Appendix 14-4: Noise Modelling [REP1-061] show that the modelled baseline monitoring data has been revised. In particular, the thresholds for LOAEL and SOAEL have been increased for the operational and maintenance phases at 16 sensitive receptors, purportedly “*to accurately relate to the typical background sound levels.*”
- 8.2. **Table 14-23** of Chapter 14: Noise and Vibration [REP1-021] further confirms that, as a consequence of these increased thresholds, the number of daytime sensitive receptors falling between LOAEL and SOAEL has decreased from 37 to 28.
- 8.3. However, the meaning of “*accurately relate*” in this context is unclear. Furthermore, the justification for amending the modelled baseline monitoring data at this stage of the application process is not explained and warrants clarification.

9. 6.1 ES Volume 1 Chapter 17 Soils and Agriculture (Rev 2) [REP1-025]

- 9.1. With respect to ID 3.15.2 in Table 17-1, the Applicant is asked to confirm that option agreements have been agreed with all landowners within the option area for the scheme’s lifetime.
- 9.2. It is noted that reference is made to the Wiltshire Draft Local Plan in **Paragraph 17.3.15**. The Applicant is advised that following the Inspectors providing the council with two choices as advised within its Written Representation [REP1-138], Wiltshire Council members voted on 19 May at the Full Council meeting to withdraw the Draft Local Plan from examination.

9.3. Wiltshire Council is pleased to see the updates to receptor sensitivity in **Table 17-3**.

10. 6.2 ES Volume 2 Figure 8-14 Baseline Photography and Photomontages – VP1-22 (Part 1) [[REP1-033](#)], VP23-24 (Part 2) [[REP1-034](#)] and VP45-CNL G (Part 3) [[REP1-035](#)]

10.1. Whilst the panoramas are a useful tool in assessing the potential effects, it is not clear from the information provided in which fields the developments are proposed, although it is a relatively simple procedure to indicate this on photographs. The council does not consider that it is their responsibility to explain how to represent development areas / features on viewpoint photographs, but needless to say, although the additional information is useful, the quality and ease of interpretation of the information provided remains lacking and is not overly helpful in interpreting visual effects.

11. 6.2 ES Volume 2 Figure 9-1-13 to 9-1-24 Baseline Habitats Map – Cable Route Corridor [[REP1-036](#)]

11.1. The Baseline Habitat Maps for the CRC have been resubmitted on account of the additional habitat survey data collated for the CRC. It is noted however, that the figures submitted at Deadline 1 have not been given updated drawing or revision numbers or dated so that it can readily be seen at a glance, that these figures comprise the latest iterations.

11.2. Wiltshire Council's Written Representation [[REP1-138](#)], should be referred to for discussion on the absence of habitat reference numbers on baseline habitats maps and the associated implications as these comments still stand and are pertinent to these submitted figures.

12. 6.3 ES Volume 3 Appendix 13-1 Transport Assessment (Rev 2) [[REP1-057](#) and [REP1-059](#)]

12.1. As noted in previous comments [[RR-4934](#)], many parts of the supporting Transport Assessment simply mimic the content taken from it into Chapter 13 of the Environmental Statement [[REP1-019](#)]. As such, commentary is not replicated on points already raised above but focuses on supporting information solely in the Transport Assessment.

12.2. With respect to **Table 13-12** 'Lime Down – Anticipated Construction Deliveries (HGV)', please see comments on Table 13-20 of the ES Chapter 13 Transport and Access (Rev 2) above.

12.3. Previous Wiltshire Council Highways Development Management comments [[RR-4934](#)] on **Annex C** remain valid, so the 'Solar PV Sites Access Drawings

(Ref: 1-20 inclusive)'. As stated then, these only show the swept paths for 16.5m articulated HGVs and 'indicative' black lines showing the necessary extent of the access width and bell-mouth, so assumed to be the position of new intended kerbing. These are not considered sufficient in themselves for highway works approval, as there are no details of the new 'apron' construction, kerbing, 'tie-in' joints to the existing carriageway and, where drainage ditches are present, any new culverts or changes to existing. Visibility splays will need to be DMRB or MfS compliant as the road type and speed limit dictates, and 85th percentile speed surveys undertaken as required to evidence any reduction to 'Y' values below the required standard dictated by the posted speed limit. With Wiltshire Council Protective Provisions included in Schedule 15 to the DCO, it is accepted that detailed design approval could be included in a way that would be acceptable to the council, with this requirement extending to these access points listed in Schedule 7, Parts 1 and 2. In short, these drawings can only be regarded as 'preliminary' or no more than 'approval in principle'.

- 12.4. The council's Arboricultural Officers note that the existing track will be used for articulated HGV vehicles for Solar PV Sites: Accesses 13, 14 and 15 which are immediately adjacent to North Bincombe Wood. It is considered that use of this access track will have a long-term negative impact on this Protected Ancient Woodland. Therefore, to prevent any impact, the access track and access points should be located outside the 15 metre buffer.
- 12.5. Previous Wiltshire Council Highways Development Management comments [\[RR-4934\]](#) on **Annex D** also remain applicable. These show the 'Cable Route Corridor Access Drawings' and, whilst most of these are temporary accesses for construction purposes only, the comments made in respect of the Solar PV site accesses are equally applicable. The drawings for each access show the swept paths associated with a 10.2m tipper and very indicative proposed kerb-lines to accommodate these. In short, there is an absence of construction detail whilst, in many cases, the Ordnance Survey background is very sketchy or almost non-existent. The lack of background makes it unclear whether drainage ditches are affected, and so any works associated with temporary piping necessary. It would be normal practice for a temporary construction access submission under s184 of the Highway Act to include detail drawings of the intended works, this on a topographical survey base as required. The council would see no reason to deviate from such requirements for the temporary access junctions needed along the cable route corridor. It would again be possible to write in the specific drawing requirements for temporary works into Wiltshire Council Protective Provisions; which is a requested addition to Schedule 15 of the DCO.
- 12.6. **Annex E** shows the 'Solar PV Sites Trip Generation Calculations' for the construction phase. As noted in the Wiltshire Council Written Representation [\[REP1-138\]](#), the council still has key queries with some of the data presented and calculations as follows:
 - Whilst the total number of assumed PV Modules for each of the Lime Down sites (A-E) has been provided, it is unclear how these quantities have been derived. The area occupied by panels on each site will be

known (Works Area 1), but the density / ha assumed and how this compares with the assumptions adopted for other consented solar farm sites or those in operation is unknown. A degree of validation or 'proving' is needed to confirm this quantity is robust and not being underestimated.

- The same query applies to module mounting structures, as assumptions made regarding the type of mounting structures or foundations / supports are also absent.

12.7. In short, the number of PV Modules set out in the 'Components' sheet is not validated or verified by any evidence based on the coverage area of each the Lime Down PV sites. As the number of HGV deliveries is then based on what can be carried in a regular 40ft container, this quantum estimate of the PV Modules and how it has been derived is very important to know. It is a little unclear why the module mounting structures, which are presumably component items and needed for each PV Module, are expressed in tonnage and not unit numbers in the same way.

12.8. Other concerns that could collectively add to the numbers of predicted HGVs are as follows:

- 'Waste' calculation still allows for only removal of PV Module and Module Mounting Structure packaging, so excludes any removal of excavated material associated with the construction of the access trackways, compound and the foundation bases for the BESS and 440KV and 132KV substations. This could be a significant amount of off-site disposal of spoil, unless it is being assumed that all excavated material is reused on site / or transported offsite as required in the same tippers used for the incoming supply of aggregate. Paragraph 1.5.7 now states that "*The anticipated trips for general construction activities include fencing and landscaping activities. While it is anticipated that most of the spoil from construction of access tracks etc. will remain on site, the calculations allow a comfortable buffer for general construction activities, including the removal of spoil, other construction waste and the installation and removal of construction compounds*". However, it does remain very unclear how the predicted 2,700 HGV deliveries linked to fencing and general landscaping have been derived from the Excel spreadsheet figures, and how much allowance is made within this for possible off-site disposal of spoil and so the percentage of the total volume of topsoil / subsoil excavation needed to construct the access trackways and bases.
- The volume of aggregate needed to construct the BESS and substation bases is very significant and is shown to generate large numbers of HGV deliveries (2,865). It will thus be sensitive to any variation in the assumed construction depth, which is assumed to be 0.5m in the calculations. However, scheme description elsewhere identifies the conversion units sitting on a 0.8m layer of aggregate. Clarity is required as to which is correct.

- Similarly, the volume of aggregate needed to construct the access trackways is also very significant and is shown to generate very large numbers of HGV deliveries (4,940). It will thus also be sensitive to any small variations in the stated construction depths, which are assumed to be only 0.3m for general access tracks and 0.5m for BESS access tracks in the calculations. However, Appendix 3-3 shows a typical depth of up to 0.65 for the BESS trackways. Clarity is required as to which is correct.

12.9. **Annex F** now shows the ‘Solar PV Sites Trip Generation Link Flows’ during the construction phase. Mindful of the ongoing queries concerning the predicted number of HGV deliveries, the council’s Highways Development Management Officer does not comment unduly on the HGV link flow diagrams in reviewing now. However, it is noted two ‘sets’ of flows have been produced based on the 50% Uplift daily HGV flows and ‘Average’ daily HGV flows (so figures shown collectively for the Lime Down PV sites in Table 13-12). However, each set of flows then comprises 8 number plans representing the ‘Hour ending 10:00’ to ‘Hour ending 17:00’, so in effect the advised weekday 9:30-16:30 period intended for construction deliveries. This seems to be an unnecessarily disaggregated approach to presenting the HGV link flows and assumes that the execution of the works on a typical day (or peak day) will achieve a perfectly smooth distribution of delivery arrivals and departures throughout the day, which seems unrealistic despite best endeavours. There will inevitably be variations in arrivals on any given day, and so departures, so a likelihood of some ‘spiking’ in the daily HGV profiles. It would seem better to just present the daily total HGV figures, whereupon knowledge of the planned period for deliveries makes it easy enough to calculate a typical hourly average. So, for example, the average and 50% uplift figures for Alderton Road obtained from Table 13-12 are 32 and 50 HGV movements respectively per day. This taken across the 7-hour delivery period would give hourly 2-way HGV increases of 4-5 on average or 7 as a maximum. The purpose of the exercise would appear to be to show link diagrams with extremely low hourly numbers although, as previously noted, peak 2-way increases of 7-8 HGVs per hour on Alderton Road in Grittleton would still equate to one HGV every 7-8 minutes.

12.10. **Annex I** and expressly Drawing SP53 now shows the planned ‘Highway Improvement Area’ works along Alderton Road to allow the passage of two 16.5 articulated HGVs. These works are shown to be areas of proposed carriageway widening at 8 number locations to allow some opportunities for HGV passage. However, what is shown is very indicative and, as with the access junction works, it is considered detailed drawings based on a topographical survey base would need to be submitted to Wiltshire Council for full technical approval as part of DCO provisions. It is also unclear whether these passing bay works are intended to be permanent, or just temporary and removed at the end of the construction period. The council’s Highways Development Management Officer would suggest it would be advantageous to retain as permanent areas of carriageway widening given the routine need for HGV access to maintain the solar farm infrastructure during its planned 60-year operational life cycle. Details which the council would expect to see submitted for approval prior to construction include the following:

- General Arrangement (GA) drawings showing the length of each treatment area and resultant carriageway width dimensions. A separate swept path overlay should be provided confirming the achievable passage of two 16.5m articulated HGVs without conflict.
- Details of the proposed widening construction including any proposed kerbing to retain the new road edge and proposed ‘tie in’ to the existing carriageway construction. If kerbs with an upstand are proposed, the means of maintaining edge drainage would need to be indicated, such as the use of grips.
- Any changes to roadside ditches if affected by proposed widening works.
- Any impact on hedgerow or roadside trees. The aim should be to avoid carriageway widening and associated excavation to formation within the root zone of any significant trees along Alderton Road.

12.11. There are no carriageway widening works proposed within the length of Alderton Road through Grittleton, which could be a safety concern if there is no opportunity for 2-way HGV passage between the junction with The Street and the first proposed area of works to the north of the village. It seems unlikely that there would be inter-visibility between these two locations for two HGV drivers, plus any incoming HGV turning left into Alderton Road would not be able to see clearly until already executing this movement. A similar concern exists with the distance between the northernmost area of proposed widening and the junction with Fosse Way, although no intervisibility distance is indicated or whether it would be possible for a southbound HGV to wait at the Fosse Way junction to allow a northbound HGV to pass without conflict. It appears that the eight passing locations proposed would have appropriate intervisibility between them, but it would again be helpful to have these spacing distances indicated on the drawing for clarity.

12.12. **Annex J** (which was previously Annex H) shows the Construction Route Swept Path Analysis’ for a 16.5m articulated HGV and an estate car along all the minor roads being proposed for construction access, so:

- Drawings SP34 Rev B and SP36 Rev B: Dyson RBT to Bradfield Cottages
- Drawings SP38 and SP39 A: Farhill Lane: Fosse Way junction to Lime Down A
- Drawings SP42 Rev A and SP47 Rev A: Alderton Road
- Drawings SP43, SP44, SP45 and SP46: Fosse Way

12.13. In previous Wiltshire Council comments on the Transport Assessment [[RR-4934](#)], the council’s Highways Development Management Officer referred specifically to the content of what was then Annex H. It is not intended to reiterate all that dialogue here, but would re-make the following comments:

- Between Dyson Roundabout and Bradfield Cottages (Drawings SP34 and SP36) the analysis indicates that the existing carriageway width is, for the most part, only able to pass an HGV and a car. Furthermore, parts of the route do not even accommodate passage for a car / HGV, requiring one driver to wait in a suitable location to allow passage of the other through the 'narrowed' sections. Some of these restricted passage sections appear quite long, as indicated by the intervisibility distances shown between passing points. At that time no part of the route had been assessed for passing opportunity for two opposing HGVs. This is now included as Annex K which is commented on below.
- Drawings SP42 and SP47 showed the HGV / Car swept path passage analysis for a length of Fosse Way and Alderton Road. It was noted from the Works Plans [APP-007] that a significant part of this was indicated as a Highway Improvement Area on Sheet 18 (Works Ref 8A). However, it remained unclear from Drawing SP47 what improvement works, if any, were proposed based on this analysis. There was a concern that no assessment had been done to consider passage opportunities for two opposing HGVs. Annex I now contains a plan showing indicative widening improvements to achieve passing opportunities for two 16.5m HGVs, whilst Annex K now shows the swept path analyses for two HGVs. See comments on those respective Annexes separately as contained above and below.
- Drawings SP43-SP46, which do not appear to have been revised or altered, provide the swept path analysis for the remaining part of Fosse Way proposed for construction access. These suggest that there are significant lengths where the existing carriageway width is insufficient to pass a car / HGV without verge over-run or one driver waiting at a suitable passing point. Some of the inter-visibility distances measured between possible passing points are quite long and, in some cases, up to 215m, which is a concern even though the alignment is relatively straight for the most part. It was previously unknown as to whether two HGVs could pass anywhere along the length of Fosse Way without over-riding / damaging the grass verges. However, this analysis has now been provided in Annex K which is commented on below.

12.14. **Annex K** now, as requested, shows the shows the Construction Route Swept Path Analysis' for two 16.5m articulated HGVs along all the minor roads being proposed for construction access. Content includes the following drawings:

- Drawing SP50 Rev A: Farhill Lane: Fosse Way junction to Lime Down A
- Drawing SP51: Dyson RBT to Bradfield Cottages
- Drawing SP52: Alderton Road
- Drawings SP54 and SP55: Fosse Way

Drawing SP50 Rev A – Farhill Lane

12.15. The new analysis now suggests that there are numerous sections where two 16.5m articulated HGVs could currently pass on this length of road. Furthermore, where this is not possible, the driver inter-visibility between passing points is generally shown to be under 100m. This suggests that the existing carriageway width where passage is possible is at least 5.5m, so the minimum necessary to pass two large vehicles (MfS). This would ideally be 6.0m to provide some passage tolerance and to avoid HGV wheel-running along the carriageway outer edge, which is unlikely to have a physical kerb restraint. It would be helpful to see some dimensions added to the plan to show the 'actual' carriageway widths through some of the passing sections. The 'base' used for tracking should also be a topographical survey due to the inherent inaccuracies with OS-Landline data, noting that even small width errors could be significant. The only minor concern is the possible conflict between an HGV turning left into this lane from Fosse Way, and one proceeding southbound from Lime Down A towards this junction. Whilst the intervisibility of 125m between the junction and the first passing point to the north is not excessive, the analysis indicates that the left turn would require an 'overturn' taking up most of the width at the junction. Furthermore, the inbound HGV drivers would not be able to see ahead until completing this left turn manoeuvre. However, this might be capable of management with a banksman in this location.

Drawing SP51 – Dyson RBT to Bradfield Cottages

12.16. The analysis suggests that 2-way passage for HGVs is generally achievable over long lengths of the route section between Dyson RBT and the junction with The Street (Insert 1). Where the carriageway width is deemed insufficient, the inter-visibility between available passing points is generally 100m or less, which is considered acceptable. However, it would again be useful to see some measured carriageway widths on the passing sections added as dimensions to the drawing to confirm these are a minimum of 5.5m, or preferably greater.

12.17. Insert 2 shows a very critical section of the Lime Down D access route between The Street junction and the access to the Flying Monk Café / Taproom. The swept path analysis indicates that 2-way HGV passage is possible around the 60-70 degree bend some 150m northwest of the junction with The Street, with width also sufficient to accommodate this on the immediate approaches. There is a narrow section indicated between this bend and the junction with The Street where two HGVs would be unable to pass. However, the inter-visibility between possible passing positions in both locations is shown to be 130m, which is considered acceptable if this is a clear line of sight unaffected by the vertical alignment. Between the bend and the access to Brookside, so where the route also passes under the railway, the analysis suggests the carriageway width to be quite variable, so providing a series of short sections potentially suitable for passing HGVs with similarly short narrow sections between them. This at face value suggests no mitigation may be needed to further improve passing provision for HGVs through this length. However, it would be helpful to see some carriageway width dimensions additionally provided at intervals on this

drawing, or a supporting drawing, to confirm widths in the passing zones indicated are a minimum of 5.5m and ideally greater, certainly around the bend where greater road width would be needed for passing two large articulated HGVs. It appears that the base is a topographical survey, so it should be readily possible to provide this carriageway width data for a defined series of chainage intervals between The Street and the Flying Monk Café access. It is accepted that the opportunities for widening the carriageway between The Street junction and the bend are limited, but between the bend and Brookside there are areas of verge which could facilitate carriageway widening if required. To the north of Brookside, the swept analysis indicates that there is no passing opportunity for two HGVs between this junction and the access to the Flying Monk Café. Whilst a 132m inter-visibility line is indicated, examination of Google Earth footage suggests it may be quite difficult for two opposing HGV drivers to see one another clearly, as the road line bends slightly between the two points and the hedge line on the western line could screen this view. There is, however, a large access on the west side with the concrete apron within this length which might be improved to provide an interim passing point. On balance, it is not accepted that no mitigation works to improve HGV passage under the DCO are needed through this section.

- 12.18. Insert 3 shows the final part of the route from the Flying Monk Café access to the proposed Lime Down D access points (Refs 7, 8 and 20). Whilst some possible passing positions for two HGVs are indicated, most of the road length is too narrow, which is a concern as some of the inter-visibility sightlines indicated are quite long, with a 167m spacing in one case. It is accepted that, as this length is close to the Lime Down D access points, it may be easier to manage and prevent any HGV departure if an incoming HGV is observed within this section. Even so, it would be preferable to see some mitigation works considered and included to improve passing opportunity provision.

Holding Areas for Incoming HGVS

- 12.19. The OCTMP advises that a booking system would be employed for HGV deliveries to each Lime Down site to co-ordinate arrival slots, this would then be used to time departures to avoid opposing HGV conflicts within the narrow roads proposed for construction access as far as possible. However, some HGVs making deliveries will inevitably arrive earlier than their allocated 'slot' time, or possibly later due to travel delays. In either scenario, a 'holding' location will be needed for these HGVs to wait as may be required after contacting the site manager. It is still unclear where this is intended to be on the planned construction route to Lime Down Areas A-C, although a location towards the southern end of Fosse Way would seemingly be logical. Similarly, it is still unclear where this intended holding area would be on the route to Lime Down Area D.

Drawing SP52: Alderton Road

- 12.20. Alderton Road is proposed to have HIA widening improvements, so refer separately to comments on Annex I. This drawing provides the driver inter-visibility distances between the eight locations proposed for carriageway

widening, and these all look acceptable. The analysis also suggests that, for the most part, 2-way HGV passage is considered possible on the length of Alderton Road through Grittleton. However, it is necessary to see actual carriageway width measurements with dimensions shown on the drawing, noting the need for a 5.5m minimum width and ideally a 6.0m width for comfort. It is noted that temporary traffic signals are proposed to control traffic at the Alderton Road / The Street junction. The HGV left turn swept path into Alderton Road is not indicated but is likely to require most of the available bell-mouth width. As such, the stop position on Alderton Road will need to be well set-back as part of the planned temporary traffic management. At the northern end of Alderton Road, the council's Highways Development Management Officer is concerned at the lack of inter-visibility through the bend at the junction with Fosse Way. Whilst there is a potential passing point indicated on Fosse Way some 57m to the northeast of this bend, an HGV driver approaching on Fosse Way would not be able to see an opposing HGV on Alderton Road until passing this point and reaching the corner. However, it is accepted that 2-way passage is deemed possible in the part of Alderton Road just south of this bend.

Drawings SP54 and SP55: Fosse Way

- 12.21. Drawing SP54 shows the southern length of Fosse Way extending to the railway bridge. Whilst there are some possible passing points indicated for two 16.5m articulated HGVs, it is also the case that the inter-visibility between some of these is very long. For example, there is length of over 200m just south of the junction by Frome Lodge, and a length of 424m where passage for two HGVs is not possible to the north of this junction. In short, it is considered that mitigation will be needed in the form of additional passing bay works which aren't currently proposed. It is noted that two-way HGV passage is not possible over the railway bridge, although passing points exist either side with a 193m inter-visibility as indicated. This is acceptable but assurance is sought that this sightline is still achievable when considering the vertical alignment over the structure. It is noted that tracking checks are not included for the length north of the railway bridge on Inset 3, so this needs to be.
- 12.22. Drawing SP55 shows the northern length of Fosse Way. It is again noted that HGV tracking checks are incomplete on Inset 1. This is also the case on Inset 2, so a long length south of the junction with Farhill Lane. This needs to be completed to allow a complete review of the HGV passing opportunities on this length of Fosse Way.

13. 6.3 ES Volume 3 Appendix 14-4 Noise Modelling (Rev 2) **[\[REP1-061\]](#)**

- 13.1. Although the noise calculations indicate that predicted sound levels at sensitive receptors remain unchanged, **Tables 8 and 9** of ES Volume 3, Appendix 14-4: Noise Modelling [\[REP1-061\]](#) show that the modelled baseline monitoring data has been revised. In particular, the thresholds for LOAEL and SOAEL have been increased for the operational and maintenance phases at 16 sensitive

receptors, purportedly “to accurately relate to the typical background sound levels.”

- 13.2. Table 14-23 of Chapter 14: Noise and Vibration [[REP1-021](#)] further confirms that, as a consequence of these increased thresholds, the number of daytime sensitive receptors falling between LOAEL and SOAEL has decreased from 37 to 28.
- 13.3. However, the meaning of “*accurately relate*” in this context is unclear. Furthermore, the justification for amending the modelled baseline monitoring data at this stage of the application process is not explained and warrants clarification.

14. 6.3 ES Volume 3 Appendix 9-1 Ecological Baseline Report (Rev 2) [[REP1-083](#)]

Habitat Surveys

- 14.1. Under the heading ‘Habitat Surveys’, **Paragraph 2.6.5** stipulates that condition assessments were undertaken for the Solar PV Sites and the cable route corridor. However, as has been raised as an issue by Wiltshire Council, most recently in paragraph 6.62 – 6.64 of the council’s Written Representation [[REP1-138](#)], complete condition assessment sheets have not in fact been provided for the habitats assigned a condition in the submitted Biodiversity Net Gain (BNG) Metric. This issue is discussed in detail in the council’s Written Representation, however, the omission of condition assessment sheets alongside the metric constitutes a deviation from The Statutory Biodiversity Metric User Guide (Last updated: 3 July 2025). Furthermore, the absence of condition assessment sheets has meant that the council’s Ecology Officer has not been able to wholly verify the condition of the habitats.

Previously Un-surveyed Area in the Cable Route Corridor

- 14.2. It is recognised that the updated report details that approximately 10.57 ha of land within the CRC has not been subject to habitat survey due to access constraints on account of it comprising wooded railway embankments. The report specifies that the precautionary principle has therefore been applied and that on the basis of a desk study and from visual observations from adjacent and nearby land during the field survey, the approximate 10.57 ha of land not surveyed has been assigned as ‘Lowland Mixed Deciduous Woodland’ and has been evaluated as being of District Importance. This approach is supported by the council.

Other Neutral Grassland

- 14.3. In respect of the Solar PV Sites, it is recognised that **Paragraph 3.2.30** has been updated and clarity is now provided in respect of an issue previously raised by the council as it now states: “*None of the other neutral grassland*”

habitat present within the Solar PV Sites was evaluated as being representative of any Priority Habitat grassland types.”

- 14.4. **Paragraph 3.2.45** has been updated to specify that one field (CRF114) and a small number of field margins and road verges comprising other neutral grassland (ONG) were recorded in the CRC. It has also been updated to state that ONG has been recorded over 3.06 ha of land, whereas the previous iteration of the report stated that ONG was recorded over 15.44 ha of land. In addition, clarity is now provided in respect of an issue previously raised by the council as **Paragraph 3.2.48** now states: “*None of the other neutral grassland habitat present within the Cable Route Corridor was evaluated as being representative of any Priority Habitat grassland types.*”

Ponds

- 14.5. It is noted that new text has been added to **Paragraph 3.2.81**. However, it is unclear why it has omitted reference to the presence of great crested newt (GCN), a European Protected Species (EPS) as well as toads, rather than just toads, given that the evaluation pertains to the Solar PV Sites and the CRC and GCN presence has been identified in some of the ponds surveyed within the Solar PV Sites. In addition, the equivalent discussion in the updated ES Chapter 9 [REP1-015], such as in Table 9-7, does mention GCN as well as toads and so it is not apparent why there is an inconsistency across the two documents and why Appendix 9-1 [REP1-083] only mentions the presence of toad, which is not afforded as great a level of protection as GCN. Omitting reference to GCN in the context of ponds is a notable omission, and potentially inaccurately conveys the impression that the ponds are of lower ecological value to fauna than they actually are, especially as GCN has in fact been identified within the Solar PV Sites.

White-Clawed Crayfish

- 14.6. It is noted that **Paragraph 3.3.100** now puts forward a rationale setting out why specific survey for white-clawed crayfish (WCC) has not been undertaken which states: “*These features are anticipated to be retained and protected as part of the Scheme.*”
- 14.7. As detailed in **Paragraph 3.3.100** of Appendix 9-1 Ecological Baseline Report [REP1-083], suitable habitat for WCC exists at the Gauze Brook and Gabriel’s Well watercourses in Lime Down D and E, as well as a small number of wet ditches directly connected to these watercourses, and therefore presence has been assumed in Appendix 9-1 and ES Chapter 9. The assumption of presence shouldn’t preclude proper consideration of the requirements set out in Natural England’s standing advice relating to WCC, and whether the proposed avoidance and mitigation is sufficient, as well as whether a mitigation licence could even be required to permit some works, especially in light of the three new circa 6m wide permanent accesses for culverts proposed across ‘wet’ ditches at Lime Down D.

- 14.8. Given the scope of proposed works, especially at Lime Down D where suitable habitat for WCC exists, it is considered that the rationale for the lack of any dedicated survey is somewhat weak as there could still be adverse impacts on the species, if present, despite the mitigation put forward. Also, it is possible that undertaking targeted survey may have led to the conclusion that further mitigation and compensation over and above that proposed, and possibly even a mitigation licence may be necessary to permit some of the work depending on survey results, however this is not known as a survey has not been conducted and has not been discussed in the DCO application documents.

15. **7.8 Biodiversity Net Gain Assessment Report (Rev 2)** **[REP1-089]**

- 15.1. The issues raised in Wiltshire Council's Written Representation [\[REP1-138\]](#) regarding the BNG submissions should be read alongside this response as a number of the issues raised in the former still stand and have not been addressed as a result of the submission of 7.8 Biodiversity Net Gain Assessment Report (Rev 2) [\[REP1-089\]](#) and Biodiversity Net Gain Assessment Appendix Statutory Biodiversity Metric Calculation (Rev 2) [\[REP1-091\]](#) and [\[REP1-093\]](#).

Baseline Habitats

- 15.2. The BNG Assessment Report and Statutory BNG Metric have been revised to account for the inclusion of information collated through habitat survey for the area of the CRC that had previously not been subject to survey. It is acknowledged that it hasn't been possible to survey the entire 17 ha that had previously not been surveyed, because part of this area comprises railway embankments and therefore not accessible for reasons of health and safety. It is not clearly stipulated or quantified in the BNG Assessment Report, however, the size of the remaining area within the CRC that has not been surveyed for the aforementioned reason. This is despite it being clearly set out in **Paragraph 2.6.7** of Appendix 9-1 Ecological Baseline Report (Rev 2) [\[REP1-083\]](#) which stipulates: "*Approximately 10.57 ha of land within the Cable Route Corridor has not been subject to ecological survey. All un-surveyed land comprises wooded railway embankments which have not been surveyed due to access constraints.*"
- 15.3. The reason for this omission within the BNG Assessment Report is unclear given that the report should contain all relevant information for completeness and transparency and should also be consistent with other submitted documents.
- 15.4. In respect of the approach taken in the BNG Assessment Report and BNG Metric to the un-surveyed areas, this is set out in **Paragraph 1.2.18** and Wiltshire Council is supportive of the approach taken. Paragraph 1.2.18 states: "*Areas such as railway corridors (including tracks, embankments and woodland strips along their boundaries) were not possible to access due to health and*

safety concerns / access consents. The habitats in these areas have therefore been assumed based on a combination of aerial imagery, visual observations from adjacent land, and professional judgement using the precautionary principle. These habitats will be retained with no change. In all such cases the baseline habitat has been assigned as the high distinctiveness habitat type 'Woodland – lowland mixed deciduous woodland' in 'Good' condition."

Other Neutral Grassland

- 15.5. In respect of the other neutral grassland (ONG) within the CRC, previously, the BNG Assessment Report stipulated that 81.37% was of Good condition (including all assumed habitat). In **Paragraph 1.3.29** of the Rev 2 BNG Assessment Report [[REP1-089](#)], the reference to ONG in Good condition in the CRC has been deleted and the percentage of ONG in Moderate condition has been amended from 17.84% to 92.73%. **Table 4** of the report indicates that the area of ONG within the CRC was specified as 11.42 ha (9.29 ha assumed) in the last iteration of the report and has been amended to 3.06 ha.
- 15.6. It is assumed that the 81.37% of ONG which had previously been assessed as being in Good condition, included areas that had been subject to field survey and wasn't entirely comprised of areas of assumed habitat that hadn't been surveyed. If this is the case, it is unclear why the revisions to the BNG Assessment Report and metric following the habitat survey of previously un-surveyed areas has resulted in what appears to be a recategorisation of ONG previously recorded as Good condition to Moderate condition. This issue is a concern to the council and clarification and further information on this matter is sought.

Modified Grassland

- 15.7. In terms of the modified grassland baseline habitat, it is noted that the respective areas in hectares and percentages have been revised to incorporate the data collated for the areas subject to survey in the CRC which had previously not been surveyed, and to reflect the habitat and habitat condition assigned to the 10.57 ha of railway embankment within the CRC that cannot be accessed. For the reasons already detailed in the council's Written Representation [[REP1-138](#)], however, it has not been possible for the council's Ecology Officer to comprehensively check and verify either the baseline information or the projected post-development habitat calculations at this stage.

BNG Metric Results

- 15.8. It is noted that there is an estimated slight increase in the projected area habitat units and hedgerow units and a slight decrease in projected watercourse units compared to the calculations in the last iteration of the BNG Assessment Report and Statutory BNG Metric submitted, but that ultimately it has still been calculated that there will be an overall BNG increase of more than 10% in terms of area habitats, hedgerows and watercourses. Nonetheless, due to the reasons and limitations already discussed in the council's Written

Representation [[REP1-138](#)], the council cannot verify or corroborate these calculations at the current time.

Botanical Quadrat Data

15.9. **Annex A** comprises botanical quadrat data. Although habitat survey has now been conducted for a proportion of the 17 ha of the CRC that had not been surveyed previously, it is noted that there are no tracked changes in **Table A5: Botanical Quadrat Data for 'Medium, High and Very High Distinctiveness' Grassland Types – Cable Route Corridor** or in **Table A15: Botanical Quadrat Data for 'Low Distinctiveness' Grassland Types – Cable Route Corridor** in Annex A. It is therefore assumed that the use of botanical quadrats was not employed during the habitat survey of the previously un-surveyed areas of the CRC.

16. 7.9 Biodiversity Net Gain Assessment Appendix Statutory Biodiversity Metric Calculation (Rev 2) [[REP1-091](#) and [REP1-093](#)]

16.1. The revised Statutory Biodiversity Metric has been reviewed alongside the Biodiversity Net Gain Assessment Report (Rev 2) [[REP1-089](#)]. Therefore, combined comments have been provided under the heading of the BNG Assessment Report above.

17. 7.12 Outline Construction Environmental Management Plan (Rev 2) [[REP1-096](#)]

17.1. **Paragraph 2.1.1** indicates that a Community Liaison Group will be established, as part of the roles and responsibilities for the Community Liaison Officer. The council considers that the group should continue throughout construction and for the first six years of scheme operation and also be resumed for the decommissioning phase [[RR-4934](#)]. Therefore, the council does not agree with the insertion of "*the first anniversary of the date of*". The council also considers that reference to the Community Liaison Group should be included within **Section 2.14**.

17.2. **Table 6: Cultural Heritage** has been updated in relation to landscape mitigation. The additional text relating to monitoring and replanting simply requires compliance with the requirements for replanting etc. in the Landscape and Ecological Management Plan (LEMP) to ensure that the already proposed landscape mitigation is effectively implemented. It does not allow for any review of the performance of the mitigation and whether it is achieving the required benefits or provision for amendment or adaptive management should this be found to be required.

- 17.3. Furthermore, whilst the guidance to the contractor to undertake works as far away from the assets as reasonably practicable is welcomed, the update is advisory in nature and does not secure any certainty in respect of the impacts from construction compound areas. It cannot therefore be considered as providing any additional mitigation of the potential harm.
- 17.4. It is noted that the number of assets which have potential to be affected by the passage of traffic is relatively limited and that the management plans also allow for making good of any physical damage caused. On this basis, it is agreed that there is no requirement for an overall before and after condition survey for heritage assets.
- 17.5. The final update to this section of **Table 6**, refers back to the update made to the OCTMP [[REP1-112](#)] and, whilst welcomed, it is unclear that it will secure mitigation of the potential impact to the character and appearance of the Conservation Area.
- 17.6. The 7.25 Outline Water Resources Strategy [[APP-290](#)] submitted with the DCO application states that there is a viable water supply for the Scheme to meet its water demands. Notwithstanding this, carbon emissions and water resources reduction is an impact of the project that is possible to mitigate and will become more important as climate change has an impact on availability of water. Therefore, from a climate resilience perspective (e.g. drought), the Applicant should explore opportunities for rainwater harvesting for non-potable uses on site (such as vehicle and solar panel washdown), where feasible. This should be considered alongside the overall drainage and SuDS strategy, with particular focus on buildings and site infrastructure, and subject to agreement with the Environment Agency in relation to water quality and pollution control. The council considers that any such measures should be secured through the CEMP/OEMP as appropriate.

18. 7.13 Outline Operational Environmental Management Plan (Rev 2) [[REP1-098](#)]

- 18.1. Paragraph 2.11.2 states that “*any waste components (e.g. faulty or damaged Solar PV Panels, batteries, cables, connectors and mounting structures) would also be removed and recycled as far as practical and in accordance with legislation and guidance applicable at the time*”. It is suggested that recycling is a topic that an Innovation Forum could cover, taking advantage of developments in good practice and technology, and working with others in the sector to develop regional or national solutions.
- 18.2. Furthermore, the Monitoring Requirements in **Table 1: Climate Change** in relation to the 'Greenhouse Gas emissions from the operational maintenance activities required during operation of the Scheme' and in **Table 15: Materials and Waste** do not include anything about monitoring recycling, reducing pollution, minimising waste, using lower carbon forms of transport and other measures listed in the Mitigation sections. It is suggested that the Monitoring

Requirements of the Operational Environmental Management Plan relate to the mitigation measures.

- 18.3. From a landscape and visual perspective, the council considers that this is a high-level document, which provides limited detailed information and has not addressed the more detailed issues by the council.
- 18.4. It is noted that **Table 6: Cultural Heritage** has been updated in relation to landscape mitigation. The additional text relating to monitoring and replanting simply requires compliance with the requirements for replanting etc. in the Landscape and Ecological Management Plan (LEMP) to ensure that the already proposed landscape mitigation is effectively implemented. It does not allow for any review of the performance of the mitigation and whether it is achieving the required benefits or provision for amendment or adaptive management should this be found to be required.
- 18.5. The other update to this section of Table 6, refers back to the update made to the OCTMP [[REP1-112](#)] and, whilst welcomed, it is unclear that it will secure mitigation of the potential impact to the character and appearance of the Conservation Area.
- 18.6. The council notes the proposed amendments to **Table 8**, which provide additional detail on:
 - The locations where monitoring will be undertaken
 - The timescales relating to the location and frequency of monitoring
 - The frequency with which monitoring data will be submitted to the local authority, and
 - The timescales within which the developer will undertake further maintenance or mitigation where review indicates that plant noise levels have exceeded acceptable levels as identified in the ES.
- 18.7. However, the Outline Environmental Management Plan should also include a map or plan clearly identifying the precise locations of the proposed monitoring points in proximity to the BESS units. In addition, each monitoring location should be assigned a defined maximum noise threshold, aligned with the noise levels predicted by the modelling presented in the ES. Exceedance of these thresholds should trigger specific and enforceable corrective actions to address any identified issues. In the absence of such provisions, there is no clear mechanism to ensure that the noise levels committed to within the ES will be achieved in practice.
- 18.8. The 7.25 Outline Water Resources Strategy [[APP-290](#)] submitted with the DCO application states that there is a viable water supply for the Scheme to meet its water demands. Notwithstanding this, carbon emissions and water resources reduction is an impact of the project that is possible to mitigate and will become more important as climate change has an impact on availability of water.

Therefore, from a climate resilience perspective (e.g. drought), the Applicant should explore opportunities for rainwater harvesting for non-potable uses on site (such as vehicle and solar panel washdown), where feasible. This should be considered alongside the overall drainage and SuDS strategy, with particular focus on buildings and site infrastructure, and subject to agreement with the Environment Agency in relation to water quality and pollution control. The council considers that any such measures should be secured through the CEMP/OEMP as appropriate.

- 18.9. Furthermore, the 7.3 Design Approach Document [[APP-268](#)] mentions the Applicant's design principles that "*Projects are functional and fit for purpose, adaptable and able to respond to innovative new technologies, with built-in resilience to climate change*" and the 'scheme specific design principles' number 4 states "*The Scheme design will retain a degree of flexibility to enable it to adapt over time, be functional and fit for purpose, and respond to innovative and new technologies as well as building resilience to climate change.*" In order to adhere to good practice and guidance throughout the time of operation, it is suggested that an Innovation Forum is set up, with an opportunity to enable flexibility over the scheme's lifetime and the ability to evolve with new innovations and best practice. It is also suggested that recycling is a topic that an Innovation Forum could cover, as per comment above.
- 18.10. In the council's Relevant Representation [[RR-4934](#)], the council indicated that it considered that the Community Liaison Forum should continue during the first six years of scheme operation. It is noted that this has not been reflected in this document. There is also no mention either that the Forum would operate during the first year of operation, as currently specified within the draft DCO [[REP1-007](#)] and Outline Construction Environmental Management Plan [[REP1-096](#)].

19. 7.14 Outline Decommissioning Strategy (Rev 2) [[REP1-100](#)]

- 19.1. **Paragraph 2.1.3** states "*All Solar PV Panels, mounting structures, cabling, inverters, transformers, switchgear, BESS Area, substations and access tracks would be removed from within the Solar PV Sites and recycled or disposed of in accordance with good practice and market conditions at that time*" and **Table 1: Climate Change** places an emphasis on recycling in order to address greenhouse gas emissions. However, the Monitoring Requirements in relation to the 'Greenhouse Gas emissions from decommissioning traffic and equipment' do not include anything about monitoring recycling, reducing pollution, minimising waste, using lower carbon forms of transport and other measures listed in the Mitigation section. It is suggested that the Monitoring Requirements of the Decommissioning Strategy relate to the mitigation measures.
- 19.2. **Paragraph 2.10.3** indicates that the Community Liaison Group will be re-established for the decommissioning phase. Wiltshire Council welcomes this

commitment as it was previously requested by the council in its Relevant Representation [RR-4934]. However, clarity is required as to when the “decommissioning phase” commences. The council considers that the Applicant should take steps to establish the forum from the point that it notifies the planning authority that it intends to decommission any part of the authorised development (i.e. no later than 12 months prior), and the group must be established at least 6-months prior to any decommissioning activity commencing. The council also notes that Requirement 4 in the draft DCO [REP1-007] should be updated to reflect that the group will operate during the decommissioning phase.

- 19.3. With respect to landscape and visual matters, very little information is given regarding the landscape and visual effects of decommissioning. There is no detail on how this will be undertaken without incurring further adverse landscape and visual effects. Additionally, there is a concern as to what happens to the embedded landscaping and mitigation undertaken and which, as has been highlighted in Relevant Representation responses, may not be appropriate to the area to reinstate the rural agricultural landscape to its current baseline state.

20. 7.16 Outline Site Waste Management Plan (Rev 2) [REP1-102]

- 20.1. It is noted in **paragraph 1.1.3** that a waste component is “*Other waste from construction of fencing, internal tracks, substations and field stations, construction compounds and other supporting infrastructure*”. In short, not just PV Module and Module Support packaging waste allowed for in the HGV generation figures.
- 20.2. **Table 3** estimates that the volume of excavated soil that is likely to be deemed unsuitable for refill and compaction is circa **139,666** cubic metres. As this is defined as a Waste Type, then it would not be unreasonable to assume that the entirety of this volume, or at least a proportion, would need to be exported off-site by HGVs (10m tippers). However, no bespoke allowance is made in the HGV traffic estimates. See also separate comment on Annex E to the Transport Assessment [REP1-057 and REP1-059]. Waste quantities stated for plastic, paper and cardboard packaging are very small in comparison to the stated excavated spoil waste.
- 20.3. **Paragraph 1.4.4** further states “*Excavated material reuse of suitable excavated materials on-site would be via a Materials Management Plan (MMP), developed post-consent in accordance with the Contaminated Land: Applications in Real Environments Definition of Waste: Development Industry Code of Practice (CL:AIRE DoW CoP) (Ref 14), exemption, or environmental permit*”. However, the quantum of spoil set out in Table 3 is stated as being unsuitable for reuse, so presumably this will fall outside of the MMP and require export by HGVs from site.

21. 7.19 Outline Ecological Protection and Mitigation Strategy (Rev 2) [[REP1-106](#)]

- 21.1. **Paragraph 2.3.3** indicates that Tree Protection Fencing will be installed in accordance with British Standard 5837:2012. The council considers that this should also indicate that it should be in accordance with an approved Tree Protection Plan.
- 21.2. It is noted that **Paragraph 2.3.8** states that Biodiversity Protection Fencing (BPF) will be installed a minimum of 15m from all woodland, hedgerows, lines of trees and designated sites. Further details need to be provided regarding the relocation of the access track and access points to the north of North Bincombe Wood, which is located within the 15m buffer in Lime Down Site E.

22. 7.22 Outline Construction Traffic Management Plan (Rev 2) [[REP1-112](#)]

- 22.1. In previous Wiltshire Council comments [[RR-4934](#)], it was noted that “The future need for a ‘detailed’ CTMP is accepted, but what may be preferably needed is separate CTMPs for the different Lime Down areas, although it may be possible to combine these plans where works / signage needs are concurrent and use the same proposed construction access route”. **Paragraph 1.3.2** has now been reworded as follows: “*Final CTMPs and Final Operational Environmental Management Plan (OEMP) including traffic measures needed for scheduled replacements in substantial accord with this Outline CTMP, will be approved by Wiltshire Council and South Gloucestershire Council, as the local planning and highway authorities, prior to construction commencing. This will include for an option for separate Final CTMPs to be prepared for each Solar PV Site and the Cable Route Corridor*”. This would seem to cover off the point raised and provides this flexibility.
- 22.2. **Paragraph 2.1.5** states that “*During the construction phase, banksmen will be deployed at each access whenever construction vehicles are accessing or egressing the Order Limits. This will ensure the safe movement of construction vehicles in and out of the Solar PV Sites and will overcome any instances where the achievable visibility is below guidance, which is a factor at a small number of access locations*”. For the avoidance of doubt, the use of bankmen will not be accepted as a substitute for providing the requisite visibility splays at the proposed access junctions where the Applicant has land control under the DCO to do so. It may be necessary to employ temporary traffic control in other situations during the construction phase where visibility standards cannot be met. Safe egress should not rely on an operative stepping into the carriageway to establish whether opposing vehicles are present.
- 22.3. **Sub-Section 2.3 Detailed Design** still states in part that “*Prior to carrying out any work to the public highway, the detailed design of such works must be submitted to the highway authority for technical approval*”. This goes on to say

that this will include in part a construction programme for the works, detailed technical drawings, CDM documentation, Stage 1-2 RSA and details of the proposed contractor. However, as previously noted, the council does not consider that the OCTMP or a final CTMP to be the appropriate mechanism for the technical approval of permanent highway works. This is not considered a substitute for 'requiring' bespoke highway agreements where necessary under Article 15 of the DCO for all works undertaken within the public highway, where such agreements would normally subsume the technical approval requirement of all drawings and allied documentation. However, the preferred approach to this, which is a matter under discussion with the Applicant, is to include all these technical approval requirements within bespoke Wiltshire Council Protective Provisions in Schedule 15 to the DCO. Once these Protective Provisions are agreed and written in, then it would simply be necessary to additionally reference these in the OCTMP in revising paragraph 2.3.1, for example as follows:

“Prior to carrying out any work to the public highway, the detailed design of such works and all necessary supporting documentation must be submitted to the highway authority for technical approval in full accordance with the Wiltshire Council ‘Protective Provisions’ set out in Schedule 15 to the DCO”.

- 22.4. **Paragraph 2.3.2** has been added to respond to concerns regarding the potential for impact on the Rodbourne Conservation Area: *“Design of works to the track to the south-west of Rodbourne Road (Works Number 8b) needed to facilitate permanent access to Lime Down E (Work No. 1 to 6 and 9 to 10) will be undertaken in consultation with the Wiltshire Council Conservation Officer and Highway Officer.”* It is unclear what the mechanisms would be for ensuring this occurs, how much ability the Conservation Officer would have to influence the design and / or what would happen if there was any conflict of opinion. Whilst the provision is welcomed and has potential to allow some influence over the nature of the works, it clearly cannot necessarily reduce the potential impact to the character and appearance of the Conservation Area. In addition, it does not provide any commitment to the reinstatement of the rural character of the track and junction following construction or, at worst, at decommissioning.
- 22.5. **Section 3: Construction Vehicle Trip Generation** is drawn from the Transport Assessment (TA) [[REP1-057](#) and [REP1-059](#)]. The council’s Highways Development Management Officer has commented in depth on this in reviewing Annex E of the TA. Suffice to say, any revisions to predicted HGV volumes made necessary by changes needed to component or materials quantity assumptions would need to be amended in this part of the OCTMP.
- 22.6. **Paragraph 3.2.9** states that a shuttle bus will be used for workers to travel to and from the site. It is suggested that the shuttle buses should be Ultra Low Emission Vehicles. This is not mentioned in the draft plan, but the council’s Climate Officer considers this should be an option that is considered and can be flexible over time to adjust to the latest low emission option according to developments in technology, feasibility of charging and cost.

- 22.7. **Sub-Section 4.6: Highway Improvement Areas** remains unchanged from the first iteration. As such, previous council comments [[RR-4934](#)] remain applicable. As noted previously and now based on the review of swept path drawings in Annexes J and K to the Transport Assessment [[REP1-057](#) and [REP1-059](#)], the council's Highways Development Management Officer has concerns that the identified extent of HIAs is still insufficient and may lead to passage issues for HGVs along some of the minor roads excluded. This could lead to verge damage or potentially highway safety issues if conflicts result in a need for lengthy vehicle reversing movements to a suitable passing point.
- 22.8. **Section 5: Abnormal Loads** considers ALL deliveries and proposed routes, with a more detailed ALL assessment provided in Appendix D. **Table 6** Abnormal Load Movements states vehicle movements of 120 tonnes would be required for the delivery of transformers. The council's Arboricultural Officers consider that this will have a long-term negative impact on this Protected Ancient Woodland, should the access track adjacent to North Bincombe Wood, located within the 15m buffer in Lime Down Site E be used. Therefore, to prevent any impact, the council considers that the access track and access points should be located outside the 15m buffer.
- 22.9. **Sub-Section 6.6 Vehicle Movement** has now been revised and additionally includes the following statements *"Drivers will receive training and be made aware of the routes to each access in advance of driving to the Site. Delivery drivers will therefore be required to follow the routes and will not be permitted to use any alternative routes"* and *"The requirements of the DCO and Final CTMPs are legally binding and measures to enforce drivers to use construction routes will be set out in the Final CTMPs. Any drivers not following construction routes will receive retraining"*.
- 22.10. This is welcomed given the concern raised in the Wiltshire Council Written Representation [[REP1-138](#)] about HGV access from the east to the Lime Down Solar Park Sites A-C areas. As noted in this document, this is because the prescribed route westwards to M4 Junction 18 and then back eastwards along the B4040 / B4039 to Grittleton is considerably longer than exiting at M4 Junction 17 and using either 'The Street' through Hullavington to get to Grittleton or the Lime Down Solar Park Site D route beyond Bradfield Cottages to Fosse Way via Norton. Given the significant reduction in mileage with exiting at M4 Junction 17, it is considered there could be a considerable incentive for HGV drivers seeking to access the Lime Down Solar Park Sites A-C from this direction to do it. Given the legally binding powers under the DCO and OCTMP to comply with the prescribed HGV construction routes, it would be useful to understand what enforcement mechanisms can be applied and put in place beyond simple driver retraining. This seems rather 'light touch' and the power to impose fines against delivery operators consistently failing to comply with routing under the DCO or OCTMP would seem a more effective deterrent.
- 22.11. **Sub-Section 6.1.2 Road Condition Survey** has now been amended to include a requirement for highway condition surveys at 6-monthly intervals during the construction phase, as opposed to simple pre-construction and post construction highway condition surveys, which is welcomed. It now additionally

states in paragraph 6.12.1 that the purpose is “*to identify any additional defects that can reasonably be attributable to construction activities at the Site. Any identified highways defects or carriageway structural failures resulting from construction activities associated with the Site will be corrected to the satisfaction of the local highway authority, either on the completion of the Construction Phase or, if required for safety reasons, during the Construction Phase*”. This again is a welcome addition to the OCTMP, although the wording ‘reasonably be attributable’ is of concern as, in the view of the Council, the level of increased HGV trafficking needed along a lot of the minor roads over the two year construction will be wholly extra-ordinary as defined by s59 of the Highways Act. To refer in part to the definition here, this refers to traffic that is so exceptional in quality or quantity, or so unusual in ordinary occurrence, that it causes damage to the road beyond what is common. It is not defined by a specific vehicle type, but rather by the damage it causes and how it differs from the average traffic on that specific road.

22.12. In view of the above and, as set out in the Wiltshire Council Written Representation [[REP1-138](#)], the Council preference would be a formal s59 Agreement (Highways Act 1980) included as a DCO Requirement to cover highway damage liability, so not something the Applicant ‘might’ be prepared to entertain or agree to. As noted in the representation, this would be expected to cover the following as a minimum, some of which is now alluded to in the latest OCTMP draft:

- The required network extent of comprehensive ‘independent’ highway pre-condition surveys. Road lengths considered as a necessary ‘minimum’ by Wiltshire Council have been set out in its Local Impact Report [[REP1-137](#)].
- Agreement to do some pre-emptive highway works if necessary if the said precondition surveys reveal defects which could lead to early failure with the level of HGV construction traffic envisaged.
- Linked to the above, a mechanism to do necessary repairs at no cost to the council during the construction / decommissioning phase. This would require details of remedial works proposed to be firstly approved by the council, and the completed works subject to an inspection regime.
- Agreement to return the roads covered and used for HGV construction trafficking to ‘at least’ as good a condition as they were at outset after the construction / decommissioning phase.

22.13. In terms of the extents provisionally set out in **paragraph 6.12.2**, it is considered the length of Fosse Way serving as the construction access route to Lime Down areas A-C should additionally be included. It remains unclear as to whether Alderton Road should be, as this will be notably altered by the now proposed HIA works set out in Annex E to the Transport Assessment [[REP1-057](#) and [REP1-059](#)].

22.14. It is noted that the Applicant indicated in its Post Hearing Submissions for Issue Specific Hearing 1 [REP1A-012] that the Deadline 1 submission of the Outline Construction Traffic Management Plan contained updated plans showing the HGV routes and AIL routes on separate plans. However, both the “Clean” [REP1-112] and “Tracked” [REP1-113] versions submitted do not contain these. The Applicant is requested to address this at Deadline 3.

23. 8.1 Statement of Commonality [REP1-116]

23.1. The initial draft Statement of Common Ground between Wiltshire Council and the Applicant will be submitted into examination at Deadline 2.

23.2. However, the council has noted that the List and Status of SoCGs within **Table 3** in the Statement of Commonality for Wiltshire Council does not reflect the current position. Noise and vibration should not be marked as ‘Green’ or ‘Agreed’, as it remains ‘Under Discussion’ and should therefore be represented as ‘Amber’. However, Air Quality should be ‘Green’ instead of ‘Amber’. It is considered that this was a simple highlighting error by the Applicant, and the council asks that this is remedied in this document’s next iteration.

23.3. The council also notes that its SoCG indicates that Glint and Glare and BESS fire suppression remain ‘Under Discussion’ and therefore the Statement of Commonality should be updated accordingly.

23.4. As the same status for items in relation to Wiltshire Council was contained within the Statement of Commonality (Rev 2) [REP1A-010], the comments above apply to that submission as well.

24. 9.3 Applicant’s Response to Relevant Representations – Part 2 (Rev 2) [REP1-117]

24.1. The Applicant’s response to RR-1503 at CC-31 states “*The overall assessment concludes that the impact of embodied carbon from the Scheme during the construction phase is negligible and in line with the UK Carbon budget.*” Wiltshire Council does not agree that the embodied carbon is negligible.

25. 9.5 Technical Note on Landscape Fabric and Landscape Character [REP1-121]

25.1. Following concerns raised in Wiltshire Council’s Relevant Representation [RR-4934] regarding the way ‘Landscape Fabric’ components and landscape character receptors have been included and assessed within the Landscape and Visual Impact Assessment (LVIA), as presented in ES Volume 1, Chapter 8 Landscape and Visual [APP-060], the Applicant has prepared this additional

technical note owing to the Applicant's view that the council's landscape team has misunderstood the Applicant's approach to assessment of landscape fabric components. At **Paragraph 4.1.1** the Technical Note states *"The LVIA in ES Volume 1 Chapter 8 [APP-060] has assessed Landscape Fabric and Landscape Character independently as two separate receptors. Landscape Fabric relates only to land within the Order Limits of the Scheme and refers only to the physical elements and features within each of the five Lime Down Solar Sites and the physical changes they undergo."*

- 25.2. The council agrees with the advised approach but highlights to the ExA that assessment of landscape fabric should include consideration of effects to existing natural and manmade fabric components, alongside effects arising from the introduction of new fabric components (natural and manmade) within the DCO limits. There is no misunderstanding by the council in this regard. The council maintains its view that there is a failure to include any man-made or built landscape fabric components within the landscape assessment.
- 25.3. At **Paragraph 4.1.2** the Technical Note states *"By treating Landscape Fabric as a separate Landscape Receptor, the approach allows the physical landscape benefits of the Scheme (such as new hedgerows and meadows) at the Site level to be quantified without affecting the separate assessment on Landscape Character."* The council considers the assessment of landscape fabric components cannot be limited to natural landscape components only, or those only capable of potentially resulting in positive effects within the DCO site areas. It is the council's view that the assessment of Landscape fabric is not complete and does not give a true picture of the physical change effects likely for landscape fabric. The Technical Note provides no additional evidence that the effects have been adequately or accurately assessed, and the council maintains its view that it does not agree with the Applicant's approach or findings in this respect.
- 25.4. To illustrate the above points further, while the lengths of new or strengthened existing hedgerows and meadow planting areas are quantified within the assessment as tangible beneficial effects, the lengths of the existing hedgerow network requiring removal is not quantified. Also not considered or quantified as tangible and physical changes to the fabric of the site areas within the DCO limits include physical urbanising changes to the local road network (to accommodate necessary highway mitigations); the introduction of kilometres of new site access roads and internal access tracks replacing existing farmland. The physical introduction of Solar PV, BESS and Substation infrastructure components will represent new tangible urbanising components and features connected with the proposed land use change.

26. 9.6 Technical Note on Intra Project Cumulative Visual Effects [REP1-122]

- 26.1. While the council welcomes the Technical Note has been provided, it only refers to visual issues and not landscape character effects. The Technical Note does

not address the fundamental issues relating to the establishment of either cumulative visual or landscape effects. Cumulative effects are exactly that, an accumulation of effects from two or more sites or, in this case, project areas. They are assessed at a high level but should be assessed separately from the individual components of the view or the landscape. They cannot be determined by simply averaging the impacts of individual components. **Paragraphs 2.2.4 and 2.2.5** bring in 'inter cumulative' sites, the council has no idea where this has arisen from and why it is relevant to Intra project cumulative effects.

- 26.2. **Paragraph 2.3.6** is confused and although representative viewpoints are very useful for defining the broader visual amenity, specific views are also extremely important and can affect how cumulative developments are perceived from key viewpoints of high value and sensitivity.
- 26.3. **Section 4: Significant Intra Project Cumulative Visual Effects** states that that the intra project cumulative visual effects have been robustly assessed, however the council would disagree and finds that the Technical Note provides no additional evidence that the effects have been adequately or accurately assessed and will maintain its view that it does not agree with the Applicant's methodology or findings in this respect.

27. 9.7 Technical Note on Cumulative Sequential Visual Effects [[REP1-123](#)]

- 27.1. The submission of a Technical Note referring to the potential sequential cumulative effects of the proposals has been provided, and it is acknowledged that it has assessed three key inter project routes within the study area. However, the Technical Note only covers the inter-project cumulative effects and does not mention the intra-project sequential cumulative effects about which the council is particularly concerned and that the Technical Note has completely disregarded, despite these potential effects having been specifically mentioned at paragraph 8.23 of Wiltshire Council's Relevant Representation - [RR-4934](#)].
- 27.2. Therefore, the Council does not accept that Sequential Cumulative Effects have been adequately assessed and thus cannot agree to the content and assessments made in the Technical Note.

28. 9.10 ES Volume 3 Appendix 9-9 Watercourse Crossing Schedule [[REP1-126](#)]

- 28.1. It is noted that **Paragraph 1.1.4** indicates that the locations of the 35 proposed watercourse crossings identified across the Scheme are indicative only and that final locations will be determined at the detailed design stage. Whilst the council recognises the need for some flexibility in order to respond to conditions on the ground, the proposed locations should be relatively refined at this stage in the

council's view in order to suitably inform the review and determination of the DCO application. As such, it is considered that any subsequent changes to proposed watercourse crossing locations at the final design stage should be kept to a minimum.

- 28.2. **Table 1: Watercourse Crossing Details** includes a column titled 'Preferred Crossing Methodology'. Whilst it is appreciated that the confirmed method to be implemented will depend on the view of, and consent being granted by, the respective regulatory authority, such as the Environment Agency, it would have been provided more certainty of intent regarding proposals if the title of the column had instead been 'Proposed Crossing Methodology'.
- 28.3. Although **Table 1** includes a 'Crossing Ref' column, it would have been helpful if each of the features detailed within the Solar PV Sites had also included details of the respective Solar PV Site, namely A, B, C etc, rather than just stipulating 'Solar PV Sites' in the 'Location' column.
- 28.4. The document does not include plans that correspond with the crossing references detailed in Table 1. Furthermore, although **Paragraph 1.1** specifies that the document should be read in conjunction with a list of other documents provided therein, it omits a clear explanation regarding which plans illustrate the crossing references cited in Table 1 and which should therefore be reviewed alongside the document. As such, it isn't evident from a review of the Watercourse Crossing Schedule, exactly where each of the described features is located within the Order Limits, which in turn has frustrated the review process. It has therefore not been possible for the council's Ecology Officer to comprehensively review and appraise the proposed methods in the context of the Scheme.

29. Foxley Road Nurseries Comments on Relevant Representations [\[REP1-162\]](#)

- 29.1. Wiltshire Council have asked the Applicant to implement schemes that are hoped will further mitigate the economic impact of the solar park scheme. These include the provision of a visitor centre to help tourism and a compensation scheme for businesses that can show a reduction in income of over 10% during the construction and decommissioning periods and for one extra year after each event.

30. 6.3 ES Volume 3 Appendix 8-1 Landscape and Visual Impact Assessment Methodology (Rev 2) [\[REP1A-007\]](#)

- 30.1. The council notes this revision. While the single revision included at page 60 (sub-page 3) confirms its purpose is to provide further clarity regarding how the ground level is defined within the 3D modelling visualisations, it appears that the ground level assumptions used in relation to the methodology employed in the production of visual representation of the BESS, 132KV and 400KV

substations infrastructure parameter boxes have been changed from that originally stated. It is not clear if this was just an error in the stated methodology employed which has now been corrected, or if the visualisations updated in Figure 8-14 Baseline Photography and Photomontages [[REP1-033](#), [REP1-034](#) and [REP1-035](#)] have been revised as a consequence of this, or require further revision. Further clarification is required from the Applicant.

31. 9.20 ES Technical Addendum to Chapter 12 Cultural Heritage – Bradfield Manor Visualisations (Rev 1) [[REP1A-014](#)]

- 31.1. Annex A includes the visualisations from Bradfield Manor previously requested by Historic England. These are taken from the first floor of the Grade I Manor, one looking north-west across the southern part of Site D, and the other looking north-east. The images give some indication of the likely impact of the proposed installation on the designed views from the first-floor parlour windows and allow assessment of the potential for the proposed mitigation to limit the harm caused in this respect.
- 31.2. The visualisations indicate that the impact from the appearance of the solar panels within the designed views from the first-floor windows of the C17 rear parlour addition to the building will be relatively modest as the panels are at some distance (details will not be perceived). Some harm will, however, occur to the significance of the building as a result of the incongruous and industrialised appearance of the uniform extent and colour of panels within the otherwise rural agricultural landscape. Taking into account that the ability to appreciate the rural character of the landscape in the deliberately designed views from the parlour relate to only one element of the significance of the building as a whole, the harm to significance overall will be modest.
- 31.3. The visualisations suggest that the potential for impact from the installation on views to the north-west will be greater than from those to the north-east, where panels viewed will be at greater distance.
- 31.4. The submitted visualisations suggest that the additional landscape mitigation proposed to the southern boundary of fields D3 and D5 should, at maturity, be largely successful in providing screening of the solar panels to the north-west during the summer months, including those further away on the elevated ground i.e. D20 and 21. There may be limited and filtered views available during the winter months through the trees but the landscaping will still provide a level of mitigation. The panels to the north-east will be visible but not prominent, being in the distance and filtered by the enhancement of the existing hedgerow and hedgerow trees.
- 31.5. The submitted Addendum is helpful in providing confidence in the council's previous agreement that the harm to Bradfield Manor resulting from the scheme will be less than substantial at the lower end of the scale, albeit that the council's Conservation Officer would give this slightly more weight than the Applicant

team as a result of the high significance of the asset, the designed nature of the views under consideration within this study and the likelihood that the proposed woodland belt mitigation will take some time to mature and provide effective screening.