



Lime Down

Solar Park

**Statement of Common
Ground with Cotswolds
National Landscape Board**

May 2026

Revision 1

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Statement of Common Ground Signatures

This Statement of Common Ground has been prepared and agreed by Lime Down Solar Park Limited (the Applicant) and Cotswolds National Landscape Board.

Signed on behalf of Lime Down Solar Park Limited

Name:

Position:

Date:

Signature:

Signed by Cotswolds National Landscape Board

Name:

Position:

Date:

Signature

1 Introduction

1.1 Purpose of this document

- 1.1.1 This Statement of Common Ground (SoCG) has been prepared as part of the proposed Lime Down Solar Park Development Consent Order (DCO) (the Application) made by Lime Down Solar Park Limited (the Applicant) to the Secretary of State for Energy Security & Net Zero (the Secretary of State) pursuant to the Planning Act 2008 (PA 2008).
- 1.1.2 This SoCG does not seek to replicate information which is available elsewhere within the Application documents. All documents are available in the deposit locations and/or the Planning Inspectorate website.
- 1.1.3 This SoCG has been produced to confirm to the Examining Authority (ExA) where agreement has been reached between the parties, and where agreement has not yet been reached. SoCGs are an established means in the DCO consenting process of allowing all parties to identify and focus on specific issues that may need to be addressed during the examination.

1.2 Parties to this Statement of Common Ground

- 1.2.1 This SoCG has been prepared by (1) Lime Down Solar Park Limited as the Applicant and (2) Cotswolds National Landscape Board (CNLB).
- 1.2.2 Collectively, Lime Down Solar Park Limited and CNLB are referred to as 'the parties'.

1.3 Terminology

- 1.3.1 In the tables in Section 3 of this SoCG:
- "Agreed" indicates where the issue has been resolved.
 - "Not Agreed" indicates a final position, and
 - "Under discussion" indicates where these points will be the subject of ongoing discussion wherever possible to resolve, or refine, the extent of disagreement between the parties.

2 Record of Engagement

2.1 Summary of engagement

2.1.1 The parties have been engaged in consultation since 17 September 2024. A summary of the meetings and correspondence that has taken place between the Applicant and CNLB is outlined in Table 2-1.

Table 2-1: Summary of engagement

| Date | Form of Correspondence | Key Topics Discussed and Key Outcomes |
|-------------------------------|-------------------------|--|
| 17 September 2024 | Microsoft Teams Meeting | Discussion regarding scoping response and viewpoint agreement |
| 15 th January 2025 | On Site Meeting | To discuss key views and the PEIR indicative Masterplan |
| 26 th February | On Site Meeting | To discuss key views in respect of Site C. |
| 26 th March 2025 | Microsoft Teams Meeting | Email proposal to prepare iterative section drawings to inform the developing layout of the Scheme as part of the iterative design process regarding: <ul style="list-style-type: none"> Proposed panels in C6, C7, & C9 and the southern part of A1 which are within the setting of the CNL, and Proposed panels in E2, E3 and E4. |
| 24 th April 2025 | Microsoft Teams Meeting | Meeting to discuss options for the red line boundary following removal of parcels A11, A12, C2, C3 and C4 in response to Statutory Consultation and to discuss positive enhancement measures in parcels on the edge of the Cotswolds National Landscape (to further the purposes of the CNL) within parcels on the edge of the CNL - parcels C1, C6, C8, C9 and C10. |

| Date | Form of Correspondence | Key Topics Discussed and Key Outcomes |
|------------------|-------------------------|--|
| 05 November 2025 | CNL Offices | Meeting to present progress of Scheme and respond to questions from CNL Officers. |
| 30 March 2026 | Microsoft Teams Meeting | Meeting to discuss Relevant Representations, the Technical Note on Tranquillity, the PMIEs and drafting of SOCG. |

3 Matters Raised

3.1.1 This section sets out a table for each relevant topic, identifying where matters are agreed, still under discussion, or not agreed.

3.2 Landscape and Visual

Table 3-1: Landscape and Visual

| Reference | Sub-topic | CNLB Position | Applicant's Position | Status |
|-----------|------------------------|--|--|---------------|
| 3.1.1 | Legislation and Policy | CNLB is satisfied with the legislation and planning policy applied for the assessment. | The Applicant considers that ES Volume 1, Chapter 8: Landscape and Visual [APP-060] and ES Volume 3, Appendix 8-6: Assessment of Effects on the Cotswolds National Landscape and its Special Qualities [APP197] has identified and appropriately considered all applicable legislation and policy. The Applicant notes that the Board has adopted an updated Management Plan covering the period 2025-2030 (https://www.cotswolds-nl.org.uk/wp/wp-content/uploads/2025/11/CNL-MANAGEMENT-PLAN_2025-30-FINAL.pdf). | Agreed |
| 3.1.2 | Methodology | CNLB officers have reviewed the methodology used for the LVIA and have no significant concerns regarding | The methodology adopted within section 8.7 of the ES Volume 1, Chapter 8: Landscape and Visual | Agreed |

| Reference | Sub-topic | CNLB Position | Applicant's Position | Status |
|-----------|---------------------|--|--|---------------|
| | | the methodology in assessing impacts of the Development upon the CNL and its setting. The CNLB previously commented on the LVIA methodology at scoping stage and amendments were incorporated. | <p>[APP-060] and ES Volume 3, Appendix 8-1: Landscape and Visual Impact Assessment Methodology [REP1A-005] follows the 'Guidelines for Landscape and Visual Impact Assessment' Third Edition (GLVIA3) and derived from consultation and engagement with stakeholders and by reviewing relevant guidance and studies and is considered acceptable to fully understand the extent of effects associated with the Development..</p> <p>Following a meeting with CNL on 30th March 2026, it was confirmed that the CNL Board has no concerns about the methodology of the LVIA.</p> | |
| 3.1.3 | Baseline Conditions | The CNLB agrees with the Applicant's position. | The description of the existing baseline landscape and visual conditions set out within Section 8.8 of in ES Volume 1, Chapter 8: Landscape and Visual [APP-060] and Volume 3, Appendix 8-6: Assessment of Effects on the Cotswolds National Landscape and its Special Qualities [APP-197] are representative of the baseline site conditions and therefore acceptable to inform the assessment.. | Agreed |

| Reference | Sub-topic | CNLB Position | Applicant's Position | Status |
|-----------|---------------------------------|---|---|-------------------------|
| 3.1.4 | Appendices and Figures | The CNLB is awaiting the submission of additional photomontages as requested within the Rule 8 letter issued by the Examining Authority on 24 April 2026. | The Appendices and Figures listed within Section 8.1 of ES Volume 1, Chapter 8: Landscape and Visual [APP-060] are presented in sufficient detail to inform the baseline, underpin the LVIA process and to identify the likely significant effects of the Scheme. The Applicant has produced and submitted additional photomontages at Deadline 2 showing Year 15 winter visualisations in ES Volume 2, Figure 8-14 Baseline Photography and Photomontages [REP1-033 to REP1-035] . | Under Discussion |
| 3.1.5 | Study Area/ Scope of Assessment | The CNLB agrees with the Applicant's position. | The Study Areas and Scope of Assessment set out within Section 8.5 of ES Volume 1, Chapter 8: Landscape and Visual [APP-060] is sufficient to inform the assessment baseline conditions and is acceptable to inform the LVIA process and to identify the likely significant effects of the Scheme. | Agreed |
| 3.1.6 | Landscape Character Assessments | Policy CE1 of the Cotswolds National Landscape Management Plan 2025-2030 states that proposals that have the potential to impact on, or create | In consultation with the CNL Board, the applicant has applied a landscape-led approach at all phases of the development which address the natural | Under Discussion |

| Reference | Sub-topic | CNLB Position | Applicant's Position | Status |
|-----------|---|--|--|--------|
| | | <p>change in, the landscape of the Cotswolds National Landscape, should be delivered in a way that is compatible with and seek to further the conservation and enhancement of the landscape character of the location, as described by the CNL Board's Landscape Character Assessment and Landscape Strategy and Guidelines. There should be a presumption against the loss of key characteristics identified in the landscape character assessment. Proposals that have the potential to impact on, or create change in, the landscape of the CNL, should seek to further the conservation and enhancement of the scenic quality of the location and its setting, views, including those into and out of the National Landscape and visual amenity.</p> | <p>beauty of the CNL as primary consideration- especially in Sites A, B and C within the setting of the CNL. A standalone assessment on the CNL and its Special Qualities has been undertaken in ES Volume 3, Appendix 8-6: Assessment of Effects on the Cotswolds National Landscape and its Special Qualities [APP-197]. The applicant has specifically referenced the relevant CNL Board's publications in ES Volume 3, Appendix 8-6: Assessment of Effects on the Cotswolds National Landscape and its Special Qualities [APP-197]. The full list has been taken account of throughout the iterative design process and has steered the design of the Scheme and the approach to mitigation.</p> | |
| 3.1.7 | Visual Receptors: Assessment Viewpoints | The CNLB considers that the Assessment Viewpoints and the additional Viewpoints requested by the CNLB are acceptable to inform the | The viewpoints set out within Section 8.8 of ES Volume 1, Chapter 8: Landscape and Visual [APP-060] and ES Volume 2, Figure 8-10: Viewpoints [APP-099] are considered acceptable to inform the LVIA process | Agreed |

| Reference | Sub-topic | CNLB Position | Applicant's Position | Status |
|-----------|---|--|--|------------------|
| | | LVIA process and identify the likely significant effects of the Scheme. | and to identify the likely significant effects of the Scheme. These are considered acceptable to inform the LVIA process and to identify the likely significant effects of the Scheme. | |
| 3.1.8 | Additional Visual Receptors Assessment Viewpoints | The CNLB considers that the Assessment Viewpoints and the additional Viewpoints requested by the CNLB are acceptable to inform the LVIA process and identify the likely significant effects of the Scheme. | Representative Viewpoints have been agreed with the CNL, and seven additional Viewpoints are included in the landscape and visual assessment carried out in ES Volume 1, Chapter 8: Landscape and Visual [APP-060] . These are considered acceptable to inform the LVIA process and to identify the likely significant effects of the Scheme. | Agreed |
| 3.1.9 | Landscape Receptors: Value | The CNLB considers that this matter is still under discussion. | The judgements on the value of the CNL receptors, as set out within ES Volume 3, Appendix 8-6: Assessment of Effects on the Cotswolds National Landscape and its Special Qualities [APP197] are considered accurate and acceptable. | Under discussion |
| 3.1.10 | Landscape Assessment Results | The CNLB has concerns regarding the identified Moderate adverse effect upon landscape character within the 1 km local study area of the scheme which | The landscape assessment results on the CNL, set out within ES Volume 3, Appendix 8-6: Assessment of Effects on the Cotswolds National Landscape and its Special Qualities | Under discussion |

| Reference | Sub-topic | CNLB Position | Applicant's Position | Status |
|-----------|--|---|---|-------------------------|
| | | includes land both within the CNL and its setting. | [APP-197] including likely significant effects anticipated, are accurate and acceptable. | |
| 3.1.11 | Visual Assessment Results | The CNLB awaits the submission of additional photomontages as requested within the Rule 8 letter issued by the Examining Authority on 24 April 2026 before making further remarks regarding the visual assessment. | The visual assessment results set out within ES Volume 3, Appendix 8-6: Assessment of Effects on the Cotswolds National Landscape and its Special Qualities [APP-197] , including likely significant effects anticipated, are accurate and acceptable. The Applicant has produced and submitted additional photomontages at Deadline 2 showing Year 15 winter visualisations. | Under discussion |
| 3.1.12 | Effects on the CNL's Special Qualities | The CNLB awaits the submission of further information from the Applicant, notably a Technical Note explaining the reasons why construction traffic for sites A, B and C cannot be routed outside the CNL and the additional photomontages as requested within the Rule 8 letter on 24 April 2026. This will allow the CNLB to further assess the likely effects of the Scheme upon the special qualities of the CNL, as outlined at Section 4 of the | The results of the assessment on the Special Qualities of the CNL, set out within ES Volume 3, Appendix 8-6: Assessment of Effects on the Cotswolds National Landscape and its Special Qualities [APP197] , including likely significant effects anticipated, are accurate and acceptable. The Applicant has produced and submitted into Examination Construction routes in 9.15 Cotswolds | Under discussion |

| Reference | Sub-topic | CNLB Position | Applicant's Position | Status |
|-----------|----------------------------|---|--|-------------------------|
| | | Cotswolds National Landscape Management Plan 2025-2030. | National Landscape Technical Note [REP1-131] at Deadline 1. | |
| 3.1.13 | Embedded Design Mitigation | <p>The CNLB awaits the submission of further information from the Applicant, notably the additional photomontages as requested within the Rule 8 letter on 24 April 2026.</p> <p>This will allow the CNLB to further assess the approach and likely adequacy of the embedded design mitigation.</p> | <p>The approach and proposals for embedded mitigation set out within Section 8.9 of ES Volume 1, Chapter 8: Landscape and Visual [APP-060], considers the landscape and visual matters associated with the Scheme as part of an iterative process,</p> <p>Following the mitigation hierarchy, the Scheme has been designed sensitively to avoid Significant Adverse Effects to the CNL and its setting. These measures are set out in Section 8.9 of ES Volume 1, Chapter 8: Landscape and Visual [APP-060] and ES Volume 3, Appendix 8-6: Assessment of Effects on the Cotswolds National Landscape and its Special Qualities [APP-197]. The approach and proposals for the embedded design mitigation is considered appropriate and acceptable.</p> <p>The Applicant has produced and submitted additional photomontages in ES Volume 2, Figure 8-14: Baseline Photography and Photomontages</p> | Under discussion |

| Reference | Sub-topic | CNLB Position | Applicant's Position | Status |
|-----------|---|--|--|-------------------------|
| | | | [EN010168/APP/6.2 (Rev 3)] at Deadline 2 showing Year 15 winter visualisations. | |
| 3.1.14 | Outline Landscape and Ecological Management Plan (PMIE 7) | The CNLB confirm their general support for the aims, scope and content of the OLEMP. However, acknowledging that the site is located within the CNL's setting, the board has several specific recommendations for the Outline Landscape and Ecological Management Plan (OLEMP, APP-283) which can be addressed through subsequent submission of the Detailed Landscape and Ecological Mitigation Plan. | <p>The landscape and ecological improvements are set out in the ES Volume 2, Figure 3-4-1 to 3-4-5.2: Landscape and Ecology Mitigation Plans [REP1-029 to REP1-032].</p> <p>The Outline LEMP [APP 283] are considered acceptable. Following further development of the Scheme, more detailed planting plans including detail of areas of landscape mitigation, location and types of planting (species), as well as number, density and specification will be provided prior to any works commencing. The detailed landscape proposals will consist of the area and extent of the Scheme shown on ES Volume 2, Figure 3-4-1 to 3-4-5.2: Landscape and Ecology Mitigation Plans [REP1-029 to REP1-032].</p> <p>The Outline LEMP [APP 283] is secured by Requirement 7 of Schedule 2 of Draft DCO [REP1-007].</p> | Under Discussion |

| Reference | Sub-topic | CNLB Position | Applicant's Position | Status |
|-----------|--------------------------------|---|--|-------------------------|
| | | | <p>Following a meeting with the CNL on 30th March 2026, it was agreed that recommendations to the Outline LEMP [APP 283] can be addressed through the subsequent submission of the detailed Landscape and Ecological Management Plan post consent as secured by Requirement 7 of Schedule 2 of Draft DCO [APP 016].</p> <p>Detailed versions of the Outline LEMP [APP 283] will be prepared in consultation with stakeholders, with express reference to the CNL Board as a stakeholder for aspects of the Outline LEMP [APP 283] relevant to the CNL and its setting.</p> | |
| 3.1.15 | Harm to the National Landscape | The CNLB has yet to conclude its assessment on the likely level of harm to the CNL and its setting and awaits the submission of further information from the Applicant, notably a Technical Note explaining the reasons why construction traffic for sites A, B and C cannot be routed outside the CNL and the additional photomontages as requested within the Rule 8 letter on 24 April 2026. | <p>Significant harm to the CNL has been mitigated though avoidance measures and positive enhancement measures and the identified levels of harm are considered acceptable.</p> <p>The Applicant has produced and submitted into Examination Construction routes in 9.15 Cotswolds National Landscape Technical Note [REP1-131] at Deadline 1.</p> | Under discussion |

| Reference | Sub-topic | CNLB Position | Applicant's Position | Status |
|-----------|---|---|---|-------------------------|
| 3.1.16 | Removal of Solar PV Panels from Fields A11, A12, C2, C3 and C4 (PMIE 2) | The CNLB note and support the decision to remove Solar PV Sites from Fields A11, A12, C2, C3 and C4, to avoid significant adverse landscape and visual effects on the CNL and its setting. | The final iteration of the Scheme avoids panels in Fields A11, A12, C2, C3 and C4. These have been removed from the Scheme, to avoid significant adverse landscape and visual effects on the CNL and its setting. This was confirmed in a meeting with the CNL Board on 30th March 2026, it was confirmed that this relates to PMIE 2. PMIE 2 is now resolved. | Agreed |
| 3.1.17 | Removal of Solar PV Panels in the southern part of Field A1, the remainder of Field C6 and Fields C7 and C9 (PMIE 6). | CNLB support the decision to remove Solar PV Panels in the southern part of Field A1, the remainder of Field C6 and Fields C7. CNLB note that Field C9 remains unchanged from the design shown at statutory consultation (see PMIE 6). | The final iteration of the Scheme includes the avoidance of panels in the southern part of Field A1, the remainder of Field C6 and Fields C7. These areas are identified for habitat enhancement. Following a meeting with an officer from the CNL Board on 30th March 2026, it was confirmed that this relates to PMIE 3. Discussions are ongoing surrounding panels in C9. | Under Discussion |
| 3.1.18 | Significant effects | Notwithstanding the proposed mitigation and enhancement measures, the Board notes that Section 2.4 of Appendix 8-6 identifies that the proposal may give rise to several | Following a meeting with CNL on 30 March 2026, it was confirmed that the identification of 'some' significant effects would be acceptable and whether this outweighs the benefits of | Under Discussion |

| Reference | Sub-topic | CNLB Position | Applicant's Position | Status |
|-----------|--|--|---|-------------------------|
| | | significant adverse landscape and visual effects relating to the CNL and its setting. | the Scheme would be part of the planning balance. | |
| 3.1.19 | Impacts: Receptor: TR038 Alderton Road, Luckington | <p>The CNLB are concerned about the impacts on Receptor: TR038 Alderton Road, Luckington in relation to a rural road between Alderton and the Fosse Way which forms the boundary of the Cotswold National Landscape. The CNLB support the decision to remove Solar PV Panels in the remainder of Field C6 and note field C7 has been tested through sections to show that visibility would be limited.</p> <p>We note that Field C9 remains unchanged from the design shown at statutory consultation, and the remainder of it will still include Solar PV Panels. This matter is specifically considered in relation to PMIE 6.</p> | <p>Users of TR038 Alderton Road, Luckington represented by VP 25 and CNLG are assessed as having Moderate Adverse Significant Effects at construction and Year 1.</p> <p>Once mitigation planting matures the magnitude of change would reduce to Very Low and the effects at Year 15 would reduce to Minor and Neutral in nature, with no adverse effects identified during decommissioning.</p> <p>The Full assessment on this Receptor is set out in ES Volume 3, Appendix 8-3-2-2: Landscape and Visual Assessment Sheets (Significant) [APP-191].</p> <p>Although it is recognised that these temporary effects are within the setting of the CNL, there would be no significant long-term effects on views from Alderton Road and the CNL.</p> | Under Discussion |
| 3.1.20 | Impacts | The CNLB also have concerns on the other identified adverse effects within | The full assessment on these Receptors are set out in ES Volume 3, Appendix 8-3-2-2: Landscape and | Under Discussion |

| Reference | Sub-topic | CNLB Position | Applicant's Position | Status |
|-----------|-----------|--|--|--------|
| | | <p>the setting of the CNL including, but not limited to:</p> <p>Major/moderate adverse effect for receptors at viewpoint 18 at construction and Year 1 - Receptor TP037: Users of Footpath WT NORT 1</p> <p>Moderate adverse effect for receptors at TR043 at construction and Year 1 Receptor -TR043: Users of Ford Road and Widleys Road Junction East to Bottom of Bustlers Hill, Sherston represented by VP 6</p> <p>Moderate adverse effect for receptors at TR143 at construction and Year1 - Receptor TR143; Users of Commonwood Lane</p> <p>Moderate adverse effect for receptors at TR145 at construction and Year 1 - Receptor TR145: Users of Fosse Way</p> <p>Moderate adverse effect for receptors at TR154 at construction and Year 1- Receptor TR154 Users of Road Junction at Southfields South East to Y Junction, Sherston Lane</p> <p>The CNLB awaits the submission of the additional photomontages as requested within the Rule 8 letter on 24 April 2026</p> | <p>Visual Assessment Sheets (Significant) [APP-191].</p> <p>The effects on these receptors are temporary in nature land at the start of the operation phase infrastructure would be visible to varying degrees as mitigation planting would have a limited effect initially. However, once mitigation planting matures the magnitude of change would reduce to Very Low and the effects at Year 15 would reduce to Minor and Neutral in nature, with no adverse effects identified during decommissioning. Although it is recognised that these temporary effects are within the setting of the CNL, there would be no significant long-term effects on these receptors and the CNL.</p> <p>The Applicant notes National Policy Statements relating to National Landscapes (NPS EN-1) which states: <i>“The fact that a proposed project will be visible from within a designated area should not in itself be a reason for the Secretary of State to refuse consent”</i> (Paragraph 5.10.34)</p> | |

| Reference | Sub-topic | CNLB Position | Applicant's Position | Status |
|-----------|--------------------------------|--|---|-------------------------|
| | | and will update its assessment of likely significant visual effects accordingly. | The Applicant has produced and submitted additional photomontages at Deadline 2 showing Year 15 winter visualisations. | |
| 3.1.21 | Impacts on landscape character | The CNLB has concerns regarding the identified Moderate adverse effect upon landscape character within the 1 km local study area of the scheme which includes land both within the CNL and its setting | As set out in ES Volume 3, Appendix 8-6: Assessment of Effects on the Cotswolds National Landscape and its Special Qualities [APP-197]] the significant effects within the 1 km local study area as shown above are primarily related to the change in land use from agriculture to the solar farm. This change does not directly affect the CNL as the buffer to the development provided by the avoidance measures contains the development away from the edge of the CNL. As such, the development would be barely discernible from within the CNL. Harm to the CNL itself would be minimal with beneficial effects in the long term which further the purposes of the designation. | Under Discussion |
| 3.1.22 | Tranquillity | Construction traffic through the Cotswolds National Landscape (CNL) has the potential to impact tranquillity, as well as landscape and visual quality. The Board recommends routing | The effect of the development on Tranquillity within the CNL has been assessed in Section 3 of ES Volume 3, Appendix 8-6: Assessment of Effects on the Cotswolds National | Under Discussion |

| Reference | Sub-topic | CNLB Position | Applicant's Position | Status |
|-----------|-----------|--|---|--------|
| | | <p>construction traffic outside the CNL to avoid significant adverse effects. Tranquillity is a special quality of the CNL. Policy CE5 of the CNL Management Plan states that proposals that have the potential to impact on the tranquillity of the CNL should be delivered in a way that is compatible with and seek to further the conservation and enhancement of this tranquillity, by seeking to avoid and where avoiding is not possible, minimise noise and other aural and visual disturbance. Proposals that have the potential to impact on the tranquillity of the CNL should have regard to – and be compatible with – the CNL Board's Tranquillity Position Statement. Guidance for assessing traffic impacts recommends considering effects where overall traffic or HGV flows increase by more than 30%.</p> <p>Section 4.5 of the Board's Tranquillity Position Statement referenced above outlines how The Institute of Environmental Assessment's 'Guidelines for the Environmental Assessment of Road Traffic'</p> | <p>Landscape and its Special Qualities [APP-197].</p> <p>Following a meeting with an officer from the CNL Board on 30th March 2026, it was confirmed that impacts of the construction route upon the tranquillity of the CNL relates to PMIE 4. It was agreed to prepare a technical note to demonstrate that alternative construction routes have been considered.</p> <p>9.2 Tranquillity Technical Note [PDA-010] was submitted for Examination at Deadline A. The Applicant looks forward to a response to the Technical Note on Tranquillity.</p> <p>The Applicant has produced and submitted into Examination Construction routes in the Cotswolds National Landscape Technical Note [REP1-131] at Deadline 1.</p> | |

| Reference | Sub-topic | CNLB Position | Applicant's Position | Status |
|-----------|-----------|---|----------------------|--------|
| | | <p>recommends using two 'rules of thumb' for identifying the scale at which increases in traffic movements should be considered in an Environmental Impact Assessment (EIA):</p> <ul style="list-style-type: none"> • Rule 1: Where traffic flows will increase by more than 30% (or the number of heavy goods vehicles (HGVs) will increase by more than 30%). • Rule 2: Any other sensitive areas where traffic flows have increased by 10% or more. <p>National Landscapes (AONBs) are specifically identified as 'sensitive areas' in the Town and Country Planning (Environmental Impact Assessment) Regulations 2017. As such, Rule 2 should be applied in the Cotswolds National Landscape and should relate to both traffic flows and HGV movements. On this basis, it can be argued that an increase in traffic flows or HGV movements of more than 10% from a development proposal or in combination with other proposals is likely to be significant and have an adverse impact on the tranquillity of the</p> | | |

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|-----------|-----------|--|----------------------|--------|
| | | <p>Cotswolds National Landscape. This would apply to traffic movements on roads along the CNL boundary as well as to traffic movements on roads within the CNL.</p> <p>Figure 13.1 of the ES shows a proposed construction traffic route to serve Sites A, B and C which runs from M4 J18 through the CNL along the A46, B4040, B4039, an unnamed road east to Grittleton and then the Alderton Road and Fosse Way, leaving the CNL at the crossroads with Fosse Lodge. The route then continues outside of the CNL up the Fosse Way.</p> <p>Table 13-24 identifies that overall traffic flows along the B4040, the unnamed road west of Grittleton, Alderton Road and Fosse Way all within the CNL would exceed the 10% threshold in terms of total traffic. Increases in HGV flows along these roads would also exceed the 10% threshold along these routes as well as along the B4039. HGV flows would increase by between 68.5% and 250% on these routes and</p> | | |

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|-----------|-----------|--|----------------------|--------|
| | | <p>as such even the 30% rule of thumb would be breached.</p> <p>Using Table 13-4, there would be a medium or high magnitude of impact for a number of these roads and when combined with the high sensitivity of the CNL, this would indicate a major or major/moderate adverse effects on its tranquillity in multiple locations.</p> <p>Whilst it is recognised that construction traffic would be temporary and that the high percentage changes in HGVs typically reflect a low baseline number of HGVs, the construction phase would last around two years and the actual increase of HGVs travelling along the link which experiences the highest increase in HGV traffic, Alderton Road, the increase of HGVs is still 50 movements a day which is a significant number for a minor road.</p> <p>As well as impacts upon tranquillity, the construction route has other potential adverse landscape implications. The proposed route serving Sites A, B and C runs through two separate LCTs within the CNL, the High Wold Dip Slope (LCT 9) for the stretch up the</p> | | |

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|-----------|-----------|--|----------------------|--------|
| | | <p>A46 and east along the B4040 for roughly half the distance between the A46 junction and Acton Turville and Dip Slope Lowland (LCT 11) for the remainder of the route until it leaves the CNL at Fosse Lodge.</p> <p>Sections 9.13 and 11.12 of the Cotswolds AONB Landscape Strategies and Guidelines referred to above identify 'Road upgrading and improvements, especially of minor country roads, as a result of development or general improvement schemes' as a local force for change with potential adverse landscape implications. Sections 9.14 and 11.13 identify 'Excessive traffic and/or speed on minor local roads and lanes and increase in size of vehicle using lanes' as a further local force for change. These sections identify increased traffic movements, loss of tranquillity, danger to walkers/riders and other non-motorised users and damage to verges and roadside boundaries by HGVs as potential adverse landscape implications.</p> | | |

| Reference | Sub-topic | CNLB Position | Applicant's Position | Status |
|-----------|-----------|---|----------------------|--------|
| | | <p>As such we still consider it likely that construction traffic would have a significant adverse impact upon the tranquillity of the National Landscape, one of its special qualities, and this would conflict with Policy CE5 of the CNL Management Plan. It would also not seek to further the purposes of CNL designation.</p> <p>Therefore, at this stage our position in terms of PMIE 4 is that construction traffic should be routed outside of the CNL to avoid significant adverse impacts upon its tranquillity and landscape and scenic beauty.</p> <p>The CNLB notes and welcomes the Applicant's submission of a Tranquillity Technical Note (PDA-010, dated March 2026), submitted on 9 March 2026.</p> <p>Following an online meeting between the Applicant and the CNLB's Planning Officer on 30 March 2026, the CNLB understands that the Applicant intends to submit a further Technical Note explaining the reasons why construction traffic for sites A, B and C</p> | | |

| Reference | Sub-topic | CNLB Position | Applicant's Position | Status |
|-----------|---|---|---|-------------------------|
| | | <p>cannot be routed outside the CNL. This Technical Note therefore directly addresses the first 'prevent/ avoid' step of the mitigation hierarchy in respect of construction traffic routing and potential resultant impacts upon the CNL.</p> <p>The CNLB intends to provide further assessment of this matter once this Technical Note can be reviewed along the Tranquillity Technical Note.</p> | | |
| 3.1.23 | Receptors located on Alderton Road (viewpoint reference number VP CNL G) (PMIE 6) | <p>CNLB have concerns about potential significant adverse visual effects for receptors located on Alderton Road (viewpoint reference number VP CNL G). We support the removal of panels in the remainder of Field C6 and its retention for habitat mitigation and enhancement. Based on the photography and visualisations provided, we agree with the applicant's assessment that there would be a moderate adverse (significant) effect during construction and at year 1 for receptors (principally motorists and cyclists) travelling along this road which marks the CNL's boundary, though this</p> | <p>In a meeting with an officer from the CNL Board on 30th March 2026, the effects on Alderton Road were discussed and whether identified temporary adverse effects associated would outweigh the benefits of the Scheme.</p> <p>It was confirmed that the identification of 'some' significant effects would be acceptable and whether this outweighs the benefits of the Scheme would be part of the planning balance.</p> <p>The full assessment for Alderton Road (transport Receptor TR038 is set out from page 319 in ES Volume 3, Appendix 8-3-2-2: Landscape and</p> | Under Discussion |

| Reference | Sub-topic | CNLB Position | Applicant's Position | Status |
|-----------|---|--|---|-------------------------|
| | | would reduce to minor adverse by year 15 with the maturation of mitigation measures. | Visual Assessment Sheets (Significant) [APP-191]. | |
| 3.1.24 | Potential compensation measures for residual adverse effects (PMIE 8) | Without prejudice, if the Secretary of State is minded to permit this DCO application, he should provide proportionate, reasoned, and documented evidence to demonstrate how he sought to further the purpose, not merely through mitigation of harm but by taking all reasonable steps to further the purpose. If it is not practicable or feasible to take measures to further this purpose, the Secretary of State should provide evidence to show why it is not practicable or feasible. | With reference to the 'Positive contributions to further the purpose of the AONB designation' set out in Section 3.5 of ES Volume 3, Appendix 8-6: Assessment of Effects on the Cotswolds National Landscape and its Special Qualities [APP-197] the Applicant is confident that the SoS would conclude the purposes will be furthered. As set out in the Appendix 8-6, the beneficial effects of the Scheme within the setting of the CNL in Sites A, B and C are not merely mitigating harm as this has been achieved through the use of avoidance measures embedded within the scheme to protect the CNL and its setting as set out in paragraphs 2.3.5- 2.3.8 of ES Volume 3, Appendix 8-6: Assessment of Effects on the Cotswolds National Landscape and its Special Qualities [APP-197] . | Under Discussion |

3.3 Ecology and Biodiversity

Table 3-2: Ecology and Biodiversity

| Reference | Sub-topic | CNLB's Position | Applicants Position | Status |
|-----------|------------------------|---|--|--------|
| 3.2.1 | Legislation and Policy | The CNLB has not raised substantive comments in relation to legislation and policy considerations | The Applicant considers that ES Volume 1, Chapter 9: Ecology and Biodiversity [REP1-015] has identified and appropriately considered all applicable legislation and policy. | Agreed |
| 3.2.2 | Methodology | The CNLB has not raised substantive comments in relation to the Impact Assessment methodology. | The methodology adopted within section 9.6 of ES Volume 1, Chapter 9: Ecology and Biodiversity [REP1-015] has been derived from the information obtained through consultation with stakeholders and by reviewing relevant guidance and studies and is considered acceptable. The methodology for Impact Assessment has followed the standard approach developed by the Chartered Institute of Ecology and Environmental Management (CIEEM) in their 'Guidelines for Ecological Impact Assessment in the UK and Ireland: Terrestrial, Freshwater, Coastal and Marine (2018)' and is considered acceptable. | Agreed |

| Reference | Sub-topic | CNLB's Position | Applicants Position | Status |
|-----------|---|---|--|--------|
| 3.2.3 | Baseline | The CNLB has not raised substantive comments in relation to the baseline conditions presented | The baseline conditions which are detailed in ES Volume 1, Chapter 9: Ecology and Biodiversity [REP1-015] and ES Volume 3, Appendix 9-1: Ecological Baseline Report [APP-198] and ES Volume 3, Appendix 9-6: Otter and Water Vole Survey Report [APP-203] are representative of the baseline site conditions. | Agreed |
| 3.2.4 | Assessment Results | The CNLB has not raised substantive comments in relation to the assessment results presented | The assessment results set out within ES Volume 1, Chapter 9: Ecology and Biodiversity [REP1-015] , including likely significant effects anticipated, are acceptable. | Agreed |
| 3.2.5 | Mitigation Measures | The CNLB has not raised substantive comments in relation to the mitigation measures identified | The proposed mitigation measures set out within sections 9.9 and 9.12 of ES Volume 1, Chapter 9: Ecology and Biodiversity [REP1-015] and secured within the Outline EPMS [REP1-106] and the Outline LEMP [APP-283] are considered acceptable. | Agreed |
| 3.2.6 | Outline Ecological Protection and Mitigation Strategy | The CNLB has not raised substantive comments in relation to the Outline Ecological Protection and Mitigation Strategy, other than comments related to lighting which are addressed below. | The proposed ecological protection measures set out within the Outline EPMS [REP1-106] are correctly identified and considered appropriate | Agreed |

| Reference | Sub-topic | CNLB's Position | Applicants Position | Status |
|-----------|---|--|--|--------|
| | (Outline EPMS) | | for protecting habitats and species during the construction phase. | |
| 3.2.7 | Lighting Impacts | <p>Temporary lighting may be required during construction, particularly for compounds, offices, and stores. Under NPPF paragraph 198c and PPG on Light Pollution, planning should limit artificial light impacts on local amenity, nature conservation, and intrinsically dark landscapes. The Cotswolds National Landscape is considered an intrinsically dark landscape under these policies, with dark skies being a special quality (Policy CE6).</p> <p>New lighting should avoid or minimise light impacts, be dark sky compliant, and follow the ILP Guidance Note 01/21. The environmental zone E1 standards should be applied, using the most rigorous limits where zones meet, to preserve dark skies and landscape character in the CNL and its setting</p> | <p>As set out in the Outline CEMP [REP1-096] the use of lighting would be minimised to that required for safe site operations.</p> <ul style="list-style-type: none"> • Lighting would utilise directional fittings to minimise outward light spill and glare (e.g. via the use of light hoods/cowls which direct light below the horizontal plane, preferably at an angle greater than 20° from horizontal); • Lighting would be directed towards the middle of the Order limits rather than towards the boundaries. <p>There would be no direct effects on the CNL itself. Any effects would be temporary in nature and confined to the construction phase and would have a Very Low magnitude of change.</p> | Agreed |
| 3.2.8 | Outline Landscape and Ecological Management | While the OEPMS addresses bats, bats are not mentioned in the OLEMP. Impacts, mitigation, and enhancement for bats should be included in both documents. | The proposals for habitat creation, enhancement and management set out within the Outline LEMP [APP-283] will be expected to increase the value of habitats for foraging and commuting | Agreed |

| Reference | Sub-topic | CNLB's Position | Applicants Position | Status |
|-----------|-----------------------------|--|--|---------------|
| | Plan (Outline LEMP) | | bats, particularly in comparison to the arable fields which currently comprise the majority of the land within the Scheme. Furthermore, paragraphs 1.3.150 and 1.3.151 of the Outline LEMP [APP-283] prescribe the installation of new bat roosting features as part of the Scheme, designed to increase roosting opportunities for a range of bat species. | |
| 3.2.9 | Biodiversity Net Gain (BNG) | The CNLB has not raised substantive comments in relation to the assessment or proposed delivery of BNG | BNG for NSIPs is not yet mandatory, but the Applicant has sought to meet the requirements as if it were. The approach to assessing and securing BNG, which is detailed in the BNG Assessment Report [REP1-089] is considered acceptable. | Agreed |

3.4 Transport and Access

Table 3-3: Transport and Access

| Reference | Sub-topic | CNLB Position | Applicant's Position | Status |
|-----------|------------------------|---|---|-------------------------|
| 3.3.1 | Legislation and Policy | The CNLB agrees that the legislation and policy relevant to Transport and Access is included within Volume 1, Chapter 13. Policy, including CNLB Management Plan policies, relevant to the impact of construction traffic on natural beauty should primarily be considered within the LVIA chapter. | The Applicant considers that Volume 1, Chapter 13: Transport and Access [REP1-019] has identified and appropriately considered all applicable legislation and policy. | Agreed |
| 3.3.2 | Methodology | Section 4.5 of the CNLB's Tranquillity Position Statement referenced above outlines how The Institute of Environmental Assessment's 'Guidelines for the Environmental Assessment of Road Traffic' recommends using two 'rules of thumb' for identifying the scale at which increases in traffic movements should be considered in an Environmental Impact Assessment (EIA): <ul style="list-style-type: none"> • Rule 1: Where traffic flows will increase by more than 30% (or the number of heavy goods vehicles | In the assessment of transport impacts we assign a receptor to the nearest highway link and identify the sensitivity of receptors based on the relationship with the highway environment in line with paragraph 1.31 IEMA transport and access guidelines. The relationship to the highway environment is determined on the following transport factors: <ul style="list-style-type: none"> • Severance of communities • Road vehicle driver and passenger delay • Non-motorised user delay • Non-motorised amenity | Under Discussion |

| Reference | Sub-topic | CNLB Position | Applicant's Position | Status |
|-----------|-----------|---|--|--------|
| | | <p>(HGVs) will increase by more than 30%).</p> <ul style="list-style-type: none"> • Rule 2: Any other sensitive areas where traffic flows have increased by 10% or more. <p>National Landscapes (AONBs) are specifically identified as 'sensitive areas' in the Town and Country Planning (Environmental Impact Assessment) Regulations 2017. As such, Rule 2 should be applied in the Cotswolds National Landscape and should relate to both traffic flows and HGV movements. On this basis, it can be argued that an increase in traffic flows or HGV movements of more than 10% from a development proposal or in combination with other proposals is likely to be significant and have an adverse impact on the tranquillity of the Cotswolds National Landscape. This would apply to traffic movements on roads along the CNL boundary as well as to traffic movements on roads within the CNL.</p> <p>In considering the impacts of construction traffic on natural beauty</p> | <ul style="list-style-type: none"> • Fear and intimidation on and by road users • Road user and pedestrian safety • Hazardous/large loads <p>In regard to the CNL, the Applicant assigned the links in the CNL as medium sensitivity when it is related to the highway environment, as they don't route passed any schools or significant residential centres, have good forward visibility along the majority of the route, no accident hotspots, and no narrow or weak bridge structures Wiltshire County Council agreed to this assignation (see paragraph 20 [RR-008]).</p> <p>The assessment of transport impact has then been undertaken in accordance with the Institute of Environmental Management and Assessment (IEMA) Guidelines: Environmental Assessment of Traffic and Movement.</p> | |

| Reference | Sub-topic | CNLB Position | Applicant's Position | Status |
|-----------|-----------|--|---|-------------------------|
| | | (including tranquillity), the Environmental Statement as a whole should consider the CNL as a sensitive receptor (high sensitivity) and consider the potential for significant environmental effects upon it in line with Rule 2 referred to above | | |
| 3.3.3 | Baseline | <p>The CNLB notes and welcomes the Applicant's submission of a Tranquillity Technical Note (PDA-010, dated March 2026), submitted on 9 March 2026.</p> <p>Following an online meeting between the Applicant and the CNLB's Planning Officer on 30 March 2026, the CNLB understands that the Applicant intends to submit a further Technical Note explaining the reasons why construction traffic for sites A, B and C cannot be routed outside the CNL. This Technical Note therefore directly addresses the first 'prevent/ avoid' step of the mitigation hierarchy in respect of construction traffic routing and potential resultant impacts upon the CNL.</p> <p>The CNLB intends to provide further assessment of this matter once this</p> | The baseline conditions which are detailed in ES Volume 1, Chapter 13: Transport and Access [REP1-019] are representative of the baseline site conditions. | Under Discussion |

| Reference | Sub-topic | CNLB Position | Applicant's Position | Status |
|-----------|-------------------------------|--|---|-------------------------|
| | | Technical Note can be reviewed along the Tranquillity Technical Note. | | |
| 3.3.4 | Assessment Results | <p>The CNLB notes and welcomes the Applicant's submission of a Tranquillity Technical Note (PDA-010, dated March 2026), submitted on 9 March 2026.</p> <p>Following an online meeting between the Applicant and the CNLB's Planning Officer on 30 March 2026, the CNLB understands that the Applicant intends to submit a further Technical Note explaining the reasons why construction traffic for sites A, B and C cannot be routed outside the CNL. This Technical Note therefore directly addresses the first 'prevent/ avoid' step of the mitigation hierarchy in respect of construction traffic routing and potential resultant impacts upon the CNL.</p> <p>The CNLB intends to provide further assessment of this matter once this Technical Note can be reviewed along the Tranquillity Technical Note.</p> | The assessment results set out within ES Volume 1, Chapter 13: Transport and Access [REP1-019] including likely significant effects anticipated, are acceptable. | Under Discussion |
| 3.3.5 | Mitigation / Management Plans | The CNLB will provide further comment on mitigation and Management Plans once the Technical Note and | The proposed mitigation measures set out within Volume 1, Chapter 13: Transport and Access [REP1-019] | Under Discussion |

| Reference | Sub-topic | CNLB Position | Applicant's Position | Status |
|-----------|------------------|---|--|-------------------------|
| | | Tranquillity Technical Note have been reviewed. | and in Section 5 and 6 of the Outline CTMP [REP1-112] and the Outline PRoWPPMP [REP1-104] are considered acceptable. The Mitigation measures have been secured by DCO Requirements 14, 15 16 and 20. | |
| 3.3.6 | Transport Impact | <p>The CNLB are concerned that overall traffic flows along the B4040, the unnamed road west of Grittleton, Alderton Road and Fosse Way all within the CNL would exceed the 10% Rule 1 threshold in terms of total traffic. Increases in HGV flows along these roads would also exceed the 10% threshold along these routes as well as along the B4039. HGV flows would increase by between 68.5% and 250% on these routes and as such even the 30% rule of thumb would be breached.</p> <p>This would result in a medium or high magnitude of impact for a number of these roads and when combined with the high sensitivity of the CNL, this would indicate a major or</p> | <p>The impact on Tranquillity takes into account construction routes and has been assessed by a Landscape expert. The applicant's position on Tranquillity is provided in Table 3-2 above.</p> <p>See response to 3.4.6.</p> <p>As shown in Table 13-5 of ES Volume 1, Chapter 13: Transport and Access [REP1-019], the 30% threshold for further assessment for HGV traffic was exceeded along these roads. Additional assessment work was undertaken in accordance with the IEMA guidelines as presented in Paragraph 13.10.33 to 13.10.59, with impact concluded to be not significant in relation to the following transport factors:</p> <ul style="list-style-type: none"> • Severance of communities • Road vehicle driver and passenger delay | Under Discussion |

| Reference | Sub-topic | CNLB Position | Applicant's Position | Status |
|-----------|-----------|---|---|--------|
| | | <p>major/moderate adverse effects on its Tranquillity in multiple locations.</p> <p>The CNLB notes and welcomes the Applicant's submission of a Tranquillity Technical Note (PDA-010, dated March 2026), submitted on 9 March 2026.</p> <p>Following an online meeting between the Applicant and the CNLB's Planning Officer on 30 March 2026, the CNLB understands that the Applicant intends to submit a further Technical Note explaining the reasons why construction traffic for sites A, B and C cannot be routed outside the CNL. This Technical Note therefore directly addresses the first 'prevent/ avoid' step of the mitigation hierarchy in respect of construction traffic routing and potential resultant impacts upon the CNL.</p> <p>The CNLB intends to provide further assessment of this matter once this Technical Note can be reviewed along the Tranquillity Technical Note.</p> | <ul style="list-style-type: none"> • Non-motorised user delay • Non-motorised amenity • Fear and intimidation on and by road users • Road user and pedestrian safety • Hazardous/large loads <p>As set out in the Outline CTMP [REP1-112], a booking system will be set up to manage arrivals and departures to the Order Limits. This will prevent HGVs generated by the Scheme passing each other in opposite directions on the local roads forming part of the construction routes (including this route) and will be confirmed as part of the final CTMP. The Outline CTMP [REP1-112] includes measures to manage deliveries and restricted hours of deliveries outside of peak hours in order to minimise any detrimental impacts on the local highway network.</p> | |