Lime Down
Solar Park

Applicant's Response to the Local Impact Report

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1 Introduction

1.1.1 This document provides Lime Down Solar Park Limited (the Applicant's) response to the Local Impact Report (LIR), relating to the Development Consent Order Application (the 'Application') for Lime Down Solar Park (the 'Scheme').

1.1.2 Wiltshire Council and South Gloucestershire Council are the host authorities for the Scheme. Wiltshire Council submitted a Local Impact Report **[REP1-137]** at Deadline 1 of the Examination, which was published on the Planning Inspectorate's website on 11 May 2026. South Gloucestershire Council did not submit a Local Impact Report.

1.1.3 Local authorities have worked proactively with the Applicant during the preparation of the Application and since its submission and the Applicant thanks officers for their time.

1.1.4 Sections 2 to 15 below set out comments made by the Local Authority in their LIR and the Applicant's responses to them. Sections 16 and 17 provide the Applicant's response to comments made relating to suggested requirements and suggested Section 106 Agreements.

1.1.5 Where paragraphs or sections of the Local Impact Report **[REP1-137]** have not been included, this has been done where the Applicant does not have any commentary to make on the text provided. This is done only for passages where the Local Impact Report **[REP1-137]** refers to factual statements, repetition of text from the Applicant's documents, or where directly quoting local policy or guidance to which the Applicant has responded to through the submission.

1.1.6 Table 1-1 sets out the acronyms that are used throughout this document.

Table 1-1 - List of Acronyms

Acronym	Document
BESS	Battery Energy Storage System
BNG	Biodiversity Net Gain
BSMP	Battery Safety Management Plan
CEMP	Construction Environmental Management Plan
CNL	Cotswold National Landscape
CTMP	Construction Traffic Management Plan
DCO	Development Consent Order
DS	Decommissioning Strategy
EIA	Environmental Impact Assessment
EPMP	Ecological Protection and Mitigation Plan
EPMS	Ecological Protection and Mitigation Strategy
EqIA	Equality Impact Assessment
ES	Environmental Statement
FRADS	Flood Risk Assessment and Drainage Strategy

Acronym	Document
FTE	Full Time Equivalent
GVA	Gross Value Added
LEMP	Landscape and Ecological Management Plan
OEMP	Operational Environmental Management Plan
PEIR	Preliminary Environmental Information Report
PROWPPMP	Public Rights of Way and Permissive Paths Management Plan
SSCEP	Skills, Supply Chain and Employment Plan
SRMP	Soil Resources Management Plan
SWMP	Site Waste Management Plan
WRS	Water Resources Strategy

2 Economic and Regeneration

Table 2-1 - Economic and Regeneration

Wiltshire Council Comments	Applicant's Response
The main local impacts of the scheme on the local economy are shown in the table below. The established Plan for job growth set out in the WCS via facilitating growth of existing employers and delivering an attractive investment environment for new inward investment is key to the work of Wiltshire Council. This application is unlikely to help existing businesses meet their aspirations, or provide the right environment for business start-ups, instead disrupting businesses and inconveniencing their customers during the construction and decommissioning phases. This project would reduce visitor numbers to the local area potentially causing job losses in tourism, recreation and the retail sector locally. The overall impact on tourism will have negative impacts to the economy of the county and is therefore not in accordance with the economy-led policies set out in the WCS.	The Applicant has considered local policies in **ES Volume 3, Appendix 16-1: Socio Economics, Tourism and Recreation, Legislation, Policy, Guidance and Supporting Information [APP-240]** and the **Planning Statement [REP1-087]**. The Applicant has sought to comply with local planning policy in respect of economy wherever practicable. The Applicant reaffirms that the construction (and decommissioning) phase are likely to bring substantial (albeit not long-term) employment and economic uplift to the local area, including through indirect and induced effects, whilst the operational phase of the Scheme is anticipated to generate a modest quantum of skilled employment and economic stability for owner-occupier farm business who have land under option within the Scheme. The Applicant has sought to mitigate adverse effects on local businesses through measures to secure local skills training, employment, and establishment of localised supply chains where practicable through the **Outline Skills Supply Chain and Employment Plan (SSCEP) [REP1-108]**, with the intent of this having a legacy impact throughout the operational lifetime of the Scheme. This is secured by Requirement 18 in

Wiltshire Council Comments	Applicant's Response
	Schedule 2 to the **Draft Development Consent Order (DCO) [REP1-007]**.
Positive impacts – construction phase Increased employment, applicant states in Environmental Statement Volume 1, 6.1 Chapter 16 Socio-Economics, Tourism and Recreation [APP-068] 194 FTE- with a peak of 558. The applicant considers that could result in 145 jobs for local residents, but with unemployment already low in the area this seems optimistic. Unable to independently verify. Applicant states an increase in GVA of £21.1M/year GVA to UK economy, and £15.9m GVA to local economy [APP-068]. Unable to independently verify. Increased spend in hospitality and retail by construction staff. Unable to independently quantify. Some benefit to local supply chain.	The Applicant identifies that the reported impacts in this section by Wiltshire Council refer to the Applicant's Preliminary Environmental Information Report (PEIR), and not the assessment as submitted for the DCO Application. The Applicant therefore seeks to clarify the construction phase impacts as set out in **ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]**. Gross direct employment from the Scheme during construction is anticipated to be 268 Full Time Equivalent (FTE) staff, with a peak of 692 employees onsite. It is estimated up to 201 FTE staff could be located from the 20 km Study Area (the authority areas of Wiltshire, Bath and North East Somerset, Cotswold, Somerset, South Gloucestershire, Stroud, and Swindon), however due to the specified nature of construction work on the Scheme and relatively low unemployment in the Study Area, this is anticipated to result in a displacement of ~100 jobs (50% displacement factor) in the 'construction of utility infrastructure' industry subsector. The net economic uplift from the Scheme's construction is estimated to be £31.7 million Gross Value Added (GVA) per annum across the UK, of which £23.7 million GVA per annum is anticipated within the Study Area. These estimates are based on anticipated employment and labour requirement as

Wiltshire Council Comments	Applicant's Response
	assessed by the Applicant, and GVA per worker per annum estimates published by the Office for National Statistics (ONS). Increased spend in hospitality is considered in respect of economic uplift (see 'Economic Effects (Employment and GVA)' headings within Section 16.10 of **ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]**) associated with increased accommodation occupancy derived from the anticipated number of inbound construction workers required on the Scheme. Additional spending by construction workers in the wider economy (such as retail or food services) is considered as part of the induced effect from construction employment, based on findings for indirect and induced economic effects as published by the Centre for Economics and Business Research in their 2014 report for the Solar Trade Association. Benefits to local supply chains have not been directly quantified beyond the use of multipliers for indirect and induced economic effects. That notwithstanding, the Applicant is committed to maximising and enhancing local economic benefit through the measures set out in the **Outline SSCEP [REP1-108]**. This is secured by Requirement 18 in Schedule 2 to the **Draft DCO [REP1-007]**.
Positive impacts – operational	The Applicant identifies that the reported impacts in this section by Wiltshire Council refer to the Applicant's PEIR, and not the assessment as submitted for the DCO Application. The

Wiltshire Council Comments	Applicant's Response
Increase in GVA of £1.8m/annum [APP-068], but will mainly benefit landowners who are receiving payments.	Applicant therefore seeks to clarify the operational phase impacts as set out in **ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]**. The Applicant confirms that the net increase in GVA as a result of the operation of the Scheme is ~£1.5 million per annum. This includes for economic benefit generated through direct, indirect and induced employment from the Scheme, ground rent to landowners, and accounts for any adverse impacts to agriculture and tourism. Although not quantified as part of the assessment, the Applicant seeks to highlight that Wiltshire Council will also economically benefit from the Scheme by way of business rates as a result of the leasing of the land used for Solar PV Arrays, BESS and substations from the respective landowners. This is estimated to be in the region of £500,000 per annum. Furthermore, the Applicant is committed to maximising and enhancing local economic benefit through the measures set out in the **Outline SSCEP [REP1-108]**, including throughout the operational lifetime of the Scheme. This is secured by Requirement 18 in Schedule 2 to the **Draft DCO [REP1-007]**.
Positive impacts – decommissioning phase Increased employment - similar to construction phase. Increase in GVA – less than construction phase to UK economy, though this does not take inflation into account.	The Applicant confirms that decommissioning phase impacts, as set out in **ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]**, are anticipated to be similar to those during construction, based on the labour requirement for decommissioning being approximately 75-80%

Wiltshire Council Comments	Applicant's Response
Increased spend in hospitality and retail by construction staff.	that of construction. Therefore, gross direct employment from the Scheme during decommissioning is anticipated to be 214 FTE, with a peak of 554 employees onsite. The net economic uplift from the Scheme's decommissioning is estimated to be £25.2 million GVA per annum across the UK, of which £18.9 million GVA per annum is anticipated within the 20 km Study Area. The Applicant confirms these have not been adjusted for inflation and based on current GVA per annum figures to give a like-for-like comparison with current conditions. As for construction, increased spend in hospitality and retail by construction staff is considered both in respect of increased accommodation occupancy, and indirect and induced economic effects from onsite employment.
Neutral impacts None identified.	The Applicant notes this comment.
Negative impacts – construction phase Significant negative impact on tourism and recreational venues – applicant states £1.76m/year with the loss of 50 FTE jobs [APP-068]. Reduction in visitor numbers to the area, with their associated spend. Unable to quantify. Likely business closures.	The Applicant confirms adverse economic impacts during the construction phase of the Scheme have been assessed in **ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]**. Losses to tourism (~£1.76 million per annum, 50 FTE jobs) from reduced visitor spending have been identified based on worst-case estimates of the likely impacts to tourism and recreation receptors in **ES Volume 3, Appendix 16-2: Tourism and Recreation Receptor Tables [APP 241]**. These

Wiltshire Council Comments	Applicant's Response
Increased congestion on road network, potential for major disruption and considerable inconvenience to local resident and businesses that use C roads in particular. Landscape impact, reducing visitor and residents' enjoyment of the area and potentially affecting local people's mental health.	impacts have been considered against the quantum of employment in tourism-dependent business sectors (retail (excluding motor vehicles), accommodation, food and drinks services, arts, culture, entertainment recreation, and sports) as estimated in the Business Register and Employment Survey (BRES) for each relevant local area affected by the Scheme. This has generated an estimate for employment losses in these types of businesses. The Applicant reiterates that this estimate does not include for additional mitigation measures to reduce impacts on individual receptors, and is therefore considered a worst-case outcome. The Applicant does not however agree that this effect on tourism employment is significant, accounting for less than 0.7% of tourism-based employment within 5 km of the Scheme (Ref 1), and approximately 0.17% of tourism employment across Wiltshire (Visit Wiltshire, 2021).This is also a temporary effect, anticipated to occur during construction, with recovery to tourism businesses anticipated to begin as soon as construction works are complete. Business closures may occur where a specific business is disproportionately more likely to be affected than other businesses in the Study Area. Additional mitigation measures through the **Outline SSCEP [REP1-108]** seek to reduce tourism employment losses through focusing on local recruitment, promoting local suppliers where practicable, and through providing retraining opportunities for workers in tourism-dependent industries. The Applicant seeks to clarify

Wiltshire Council Comments	Applicant's Response
	that the measures in the **Outline SSCEP [REP1-108]** are intended to be implemented throughout construction and the operational lifetime of the Scheme to support ongoing skills and employment opportunities. While retraining opportunities would largely focus on disciplines related to the Scheme (such as engineering, logistics, and land management), retraining into other industries adjacent or similar to agriculture or tourism-based employment is not excluded from this offer and are therefore able to be provided beyond just direct construction employment and skills. This is secured by Requirement 18 in Schedule 2 to the **Draft DCO [REP1-007]**. In regard to congestion on the road network, impacts of the Scheme on the surrounding road network have been assessed in **ES Volume 1, Chapter 13: Transport and Access [REP1-019]**. This concludes that there will be no significant effects in respect of transport and access and, therefore, the Applicant does not consider the Scheme will result in significantly increased congestion, disruption or inconvenience to local residents and businesses. Landscape and visual effects of the Scheme have been assessed in **ES Volume 1, Chapter 8, Landscape and Visual Impact Assessment [APP-060]**. The Applicant recognises that there will be adverse effects on landscape character and visual amenity during the construction period which will result in

Wiltshire Council Comments	Applicant's Response
	temporary disturbance and perceptible change to local landscape character. The above transport and access and landscape and visual effects have then been fully considered and are fundamental to the assessment of effects to tourism and visitor destinations and receptors in **ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]** and supporting **ES Volume 3, Appendix 16-2: Tourism and Recreation Receptor Tables [APP-241]**. Impacts on residential amenity and the potential for resultant impacts on mental health and wellbeing are assessed in **ES Volume 1, Chapter 18: Human Health [APP-070]** which finds no significant adverse effects to human health and wellbeing during construction.
Negative impacts – operational Adverse negative impact on tourism and recreational venues. Applicant states £395,000/year and 11FTE jobs in tourism and associated sectors [APP-068]. Unable to verify. Potential reduction in visitor numbers to the area, with their associated spend. Likely business closures. Landscape impact, reducing visitors' enjoyment of the area and potentially affecting local people's mental health.	The Applicant confirms adverse economic impacts during the operation and maintenance phase of the Scheme has been assessed in **ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]**. Losses to tourism (~£395,000 per annum, 11 FTE jobs) from reduced visitor spending have been identified based on worst-case estimates of the likely impacts to tourism and recreation receptors in **ES Volume 3, Appendix 16-2: Tourism and Recreation Receptor Tables [APP-241]**. These impacts have been considered in the same manner as during construction. Business closures may occur where a specific business is

Wiltshire Council Comments	Applicant's Response
	disproportionately more likely to be affected than other businesses in the Study Area. This therefore accounts for approximately 0.2% of tourism-based employment within 5 km of the Scheme (Ref 1), and approximately 0.04% of tourism employment across Wiltshire (Visit Wiltshire, 2021). The Applicant confirms additional mitigation measures through the **Outline SSCEP [REP1-108]** are intended to be implemented throughout the operational lifetime of the Scheme to support ongoing skills and employment opportunities where businesses are affected by the Scheme. This is secured by Requirement 18 in Schedule 2 to the **Draft DCO [REP1-007]**. Landscape and visual effects of the Scheme have been assessed in **ES Volume 1, Chapter 8: Landscape and Visual Impact Assessment [APP-060]**. The Applicant recognises that there will be adverse effects on landscape character and visual amenity during the early phases of operation. During operation and maintenance, the Scheme will introduce a large-scale and engineered influence across multiple parcels of open countryside. Although the mitigation planting and habitat measures will provide long-term benefits to the landscape fabric within the Solar PV Sites, these will not be fully effective until mature. Adverse effects on landscape character at Year 1 of operation and maintenance is acknowledged but, by Year 15, the effects of the mitigation will reduce the adverse effects on landscape to non-significant levels.

Wiltshire Council Comments	Applicant's Response
	The above landscape and visual impacts have then been fully considered and are fundamental to the assessment of effects to tourism and visitor destinations and receptors in **ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]** and supporting **ES Volume 3, Appendix 16-2: Tourism and Recreation Receptor Tables [APP 241]**. These have been based on the assessment findings in **ES Volume 1, Chapter 8: Landscape and Visual Impact Assessment [APP-060]**. Impacts on residential amenity and the potential for resultant impacts on mental health and wellbeing are assessed in **ES Volume 1, Chapter 18: Human Health [APP-070]** which finds no significant adverse effects to human health and wellbeing during the operational lifetime of the Scheme.
Negative impacts – decommissioning phase Significant negative impact on tourism and recreation – similar to construction phase. Likely business closures. Increased congestion on road network, potential for major disruption on C roads in particular. Landscape impact, reducing visitors' enjoyment of the area and potentially affecting local people's mental health.	The Applicant confirms adverse economic impacts during the decommissioning phase of the Scheme have been assessed in **ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]**. Losses to tourism (~£1.41 million per annum, 40 FTE jobs) from reduced visitor spending during decommissioning have been identified based on worst-case estimates of the likely impacts to tourism and recreation receptors in **ES Volume 3, Appendix 16-2: Tourism and Recreation Receptor Tables [APP 241]**. These impacts have been considered in the same manner as during construction. This therefore accounts for approximately 0.5% of tourism-based employment within 5 km

Wiltshire Council Comments	Applicant's Response
	of the Scheme (Ref 1), and approximately 0.04% of tourism employment across Wiltshire (Visit Wiltshire, 2021). The Applicant confirms additional mitigation measures through the **Outline SSCEP [REP1-108]** introduced at the construction phase are also intended to be implemented throughout the decommissioning phase of the Scheme to support ongoing skills and employment opportunities where businesses are affected by the Scheme, as set out in the **Outline Decommissioning Strategy [REP1-100]**. These are secured by Requirements 18 and 20 in Schedule 2 to the **Draft DCO [REP1-007]**, respectively. Impacts on landscape and visual impacts to tourism and visitor destinations and receptors have been fully considered and are fundamental to the assessment of effects in **ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]** and supporting **ES Volume 3, Appendix 16-2: Tourism and Recreation Receptor Tables [APP 241]**. Impacts on residential amenity and the potential for resultant impacts on mental health and wellbeing are assessed in **ES Volume 1, Chapter 18: Human Health [APP-070]** which finds no significant adverse effects to human health and wellbeing during the decommissioning of the Scheme. At decommissioning, agricultural fields would be returned back to landowner's control. As infrastructure is removed, there would be an overall benefit to the character of the area with

Wiltshire Council Comments	Applicant's Response
	landscape mitigation retained providing long term benefit towards legacy landscape. Following decommissioning, the site would benefit from the significantly enhanced tree and hedgerow planting that has been carried out and has matured to create a much stronger and robust landscape, retaining, and enhancing. The proposed mitigation planting is set out in the **Outline Landscape and Ecology Management Plan (LEMP) [APP-283]** and includes for substantial areas of new woodland, hedgerow and meadow planting, which once established would provide positive contributions to the countryside in line with the Wiltshire's Nature Recovery Strategy. Regarding transport, the Applicant's responses to the comments on the construction phase apply. As set out in **ES Volume 1, Chapter 13: Transport and Access [REP1-019]**, the number of vehicles associated with the decommissioning phase are not anticipated to exceed the number set out for the Construction Phase.
Ranking the economic impacts in importance All the local impacts identified are considered material to the ExA, but in accordance with the national guidance the council would indicate the following as the most significant in relation to this theme:	The Applicant agrees that the increase in employment and GVA to the local area (and the UK), especially at construction, peak replacement, and decommissioning should be given material weight in consideration of the benefits of the Scheme. The Applicant furthermore agrees that the Scheme's ability to increase viability and economic stability for landowners/farm businesses that benefit from lease agreements with the Applicant. The agreements made with landowners to support

Wiltshire Council Comments	Applicant's Response
Increase in GVA to local area, but the increase will only benefit the wider economy during construction, replacement and decommissioning. Increase in viability for landowners/farm businesses that benefit from payments for hosting the solar farm. Significant negative impact on tourism and recreation throughout the solar farm's tenure.	tenants displaced by the Scheme as supported by the measures in the **Outline SSCEP [REP1-108]** should also be given adequate consideration as these demonstrate the Applicant's commitments to minimising adverse effects on the local agricultural industry. The Applicant acknowledges that adverse impacts to the tourism industry and recreation have been identified in **ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]** with residual significant adverse effects to individual PRoW and long-distance recreation routes identified. However, the Applicant does not agree that there is a significant negative impact overall to tourism or recreation within the Study Area surrounding the Scheme at any phase of its lifetime.

3 Archaeology

Table 3-1 - Archaeology

Wiltshire Council Comments	Applicant's Response
Overview and commentary The Wiltshire Council Archaeology Service (WCAS) has a statutory duty to advise the LPA on the impact of development proposals on archaeological remains in the County. Officers take into consideration direct physical impacts on known and potential designated and undesignated heritage assets, issues of setting and visual. The main impacts of the Lime Down Solar Park proposal are summarised in the following table.	The Applicant notes WCAS advisory role regarding the DCO Application.
Positive impacts – construction phase None identified.	As stated in Paragraph 12.10.12 of **ES Volume 1, Chapter 12: Cultural Heritage [APP-064]**, there is a potential for beneficial effects where archaeological remains are removed from regular ploughing during the construction phase of the Scheme. This is in line with Paragraph 3.10.101 of NPS EN-3 (Ref 4), which states solar PV developments may have a positive effect where archaeological remains are protected from agricultural activity.
Positive impacts – operational None identified.	As stated in Paragraph 12.10.12 of **ES Volume 1, Chapter 12: Cultural Heritage [APP-064]** there is a potential for beneficial effects where archaeological remains are removed from regular ploughing for the duration of the operational phase of the Scheme. This is in line with Paragraph 3.10.101 of NPS EN-3

Wiltshire Council Comments	Applicant's Response
	(Ref 4), which states solar PV developments may have a positive effect where archaeological remains are protected from agricultural activity.
Neutral impacts Two archaeological sites that have been scoped out of the development altogether B12-01 and D6 01 (Table 22-2 Summary of Significant Residual Effects (Operation and Maintenance) of 6.1 Environmental Statement Volume 1, Chapter 22 Summary of Residual Effects [APP-074]). An archaeological management plan will ensure that these areas are protected during the operational phase. Some features, such as isolated enclosures and field system ditches, will be avoided via careful placing of solar panels. A programme of public engagement by the archaeological consultants and contractor will disseminate knowledge of the mitigation works to the wider public and improve knowledge of the archaeological resource in the local area and beyond.	The Applicant notes WCAS summary of archaeological sites scoped out of the development (B12-01 and D6 as listed by WCAS are two examples of eight archaeological mitigation areas which have been proposed for preservation in situ in the form of 'no development'). The Applicant agrees that an Archaeological Management Plan will be sufficient to ensure the protection of these assets. The Applicant agrees that a programme of public engagement will allow archaeological information attained by the Scheme to be disseminated to the wider public. The archaeological evaluation works have greatly furthered understanding of the archaeological record within the area the Scheme is located. The Applicant considers this enhancement of the archaeological record and the delivery of public engagement to have a potential positive effect.
Negative impacts – construction phase A total of 38 archaeological sites has been identified within the proposed development area. Of this total, five sites have been identified within the Solar Farm in the Environmental Statement and in the subsequent 6.3 Environmental Statement Volume 3, Appendix 12-6 Outline	The Applicant notes WCAS summary of the archaeological sites identified within the Scheme and the approach to mitigation as detailed in **ES Volume 3, Appendix 12-6: Archaeological Mitigation Strategy [APP-230]**. The Applicant considers the geophysical survey along the cable route to form sufficient evaluation to inform the

Wiltshire Council Comments	Applicant's Response
Archaeological Mitigation Strategy [APP-230] which will require mitigation excavations: • B9-01 a Bronze age Round Barrow • C29 – a Roman kiln • C13 – a prehistoric ditch. • D24 – Iron Age/Romano-British settlement site and burial • D1 An Iron Age/Romano-British settlement site Three Iron age/Romano-British settlement sites (F37, F68 and F85) have been identified within proposed temporary compound sites. A further 15 sites (B5, F23, F34, F38, F46, F64, F70, F71, F80, F106, F113, F114, F116, F123 and O48) have been identified as likely to require mitigation excavation along the cable route. These consist of Bronze age Barrows, Iron Age/Romano-British settlement sites and medieval settlements. All these sites will require trial trench investigations before confirming this course of action. Fifteen more sites have been identified by WCAS (Wiltshire Council Relevant Representation [APP 4934]) following review of the Outline Mitigation Strategy [APP-230]: • A7-01 – A SMR excavation will be required for this site	archaeological mitigation strategy. Where archaeological sites have been identified mitigation in the form of 'strip, map and sample' excavation is considered appropriate to mitigate against the loss of archaeological remains and is in line with appropriate standards and guidance. **ES Volume 3, Appendix 12-6: Archaeological Mitigation Strategy [APP-230]** identifies five archaeological sites within the Solar PV Sites, as listed by WCAS, which are proposed for mitigation by record in the form of Strip, map and sample excavation. There are 20 archaeological sites within the cable route corridor, 15 of which are listed by WCAS, that are proposed for Strip, Map and Sample or in situ preservation trenchless cabling techniques (such as horizontal directional drilling (HDD). There are 40 archaeological sites that have been proposed for in situ preservation, either through a non-intrusive construction methodology (i.e. horizontal directional drilling, low-impact piling or concrete feet) or though areas of no development (i.e. exclusion zones). Archaeological evaluation in Field D20 identified several curvilinear ditches (potential ring ditches) and isolated pits; while finds were limited, the features are characteristic of prehistoric activity. These have been identified as archaeological mitigation area D20-01.

Wiltshire Council Comments	Applicant's Response
• Sites B6-01 and B9-01 are similar and should both be subject to either non-intrusive works or SMR excavation, to be agreed as part of the approval of the final mitigation strategy • C5 – 01 - A SMR excavation will be required for this site • C30-01 - A SMR excavation will be required for this site • C11-01 - A SMR excavation will be required for this site • C36-02 - A SMR excavation will be required for this site • C14- 01 - Either avoid this ring ditch altogether, or carry out a SMR excavation • C13 -01 - No need for a SMR excavation here • D20-01 - This site is not a ring ditch as described in Table 6.1.1, it is a square enclosure • D1 – 02 - No information has been provided on this site • D3 – 01 - Either avoid this ring ditch altogether, or SMR excavation • D6 – 01 - A SMR excavation will be required for this site • D6 – 02 - A SMR excavation will be required for this site • E14 – 01 - Either avoid this ring ditch altogether, or SMR excavation	Archaeological evaluation in the west of Field D1 identified isolated pits and a ditch containing sherds of prehistoric pottery. The archaeological mitigation area D1-02 reflects the impact area proposed for BESS in Lime Down D. While the Applicant considers the proposed mitigation is sufficient for the 13 sites that WCAS have identified as requiring an alternative mitigation approach to that detailed in **ES Volume 3, Appendix 12-6: Archaeological Mitigation Strategy [APP-230]**, the Applicant will discuss these sites with WCAS and update the archaeological mitigation strategy where appropriate. The Applicant notes WCAS comment that strip, map and sample excavation is not required for C13-01. As part of ongoing discussion, the Applicant is continuing to discuss approaches to low impact piling near archaeological features and notes WCAS comment regarding avoiding direct impacts to ancient field systems and enclosures.

Wiltshire Council Comments	Applicant's Response
• E14 – 02 - A SMR excavation will be required for this site • E20 – 01 - Either avoid this ring ditch altogether, or SMR excavation Although these mitigation measures can be built in to minimise impacts, the potential adverse impacts cannot be removed completely. There is an on-going discussion between WCAS and the archaeological contractor on the precise scope and methodology to be employed in placing solar panels in order to avoid features such as the elements of ancient field systems and enclosures. The council considers these features must be avoided in order to minimise negative impacts.	
Negative impacts – operational phase None identified.	As stated in Paragraph 12.8.8 of **ES Volume 1, Chapter 12: Cultural Heritage [APP-064]**, the Applicant agrees with WCAS that there will be no further impacts to archaeological assets during the operation phase to those experienced during the construction phase.
Negative impacts – Decommissioning phase WCAS are pleased to note that the ES has given thought to the impacts, not just of the construction phase, but also the operational phase (which is often dismissed) and the decommissioning phase, although looking ahead to	The Applicant notes this comment. As detailed in Section 12.8 of **ES Volume 1, Chapter 12: Cultural Heritage [APP-064]**, Paragraphs 12.8.10 to 12.8.13, it is not envisaged that there would be any further impacts to archaeological assets at the decommissioning phase beyond those during the construction and operation phases. If works are required during the

Wiltshire Council Comments	Applicant's Response
environmental and political conditions in 2085 may prove problematic. It is almost impossible to assess what work will be required to remove the installations in 60 years and what Local Government Authorities will exist to oversee the archaeological implications of such works. The council considers that it is imperative for all commitments to protect archaeology in the decommissioning phase must be sufficiently robust to ensure applicability in 60 years' time and to secure adherence in this future timeframe.	decommissioning phase of the Scheme that have the potential to cause additional impacts to buried archaeological remains, an assessment would be required to ascertain the extent of impact and appropriate mitigation in line with the **Outline Decommissioning Strategy [REP1-100].**
Ranking the Archaeology impacts in importance All the local impacts identified are considered material to the ExA, but in accordance with the national guidance[1] the council would indicate the following as the most significant in relation to this theme: • Romano-British settlement sites noted across the development area • Neolithic rectangular enclosure located at 386169 182793 • Bronze Age Ring ditches noted across the development area	The Applicant notes this comment and highlights that while the WCAS has identified these as the most sensitive archaeological assets identified within the Scheme, they form non-designated assets related to buried prehistoric and Roman settlement and funerary activity as typically found in Wiltshire (see Section 12.7, Tables 12-11 to 12-16 of **ES Volume 1, Chapter 12: Cultural Heritage [APP-064]** for details of archaeological sites located within the Scheme), and can be appropriately mitigated in line with mitigation strategy provided in **ES Volume 3, Appendix 12-6: Archaeological Mitigation Strategy [APP-230]**.

[1] National Guidance published in 2024, 'Nationally Significant Infrastructure Projects: Advice for Local Authorities'

Wiltshire Council Comments	Applicant's Response
• Later prehistoric stock enclosures and field systems	

4 Highways and Transport

Table 4-1 - Highways and Transport - Development Management

Wiltshire Council Comments	Applicant's Response
Overview and commentary Concerns are raised about the impact of construction traffic on narrow rural roads. Predicted HGV volumes (up to 80 two-way movements daily on some routes) pose safety and congestion risks, as these roads lack adequate passing opportunities and no mitigation has been proposed. There is also a risk of verge damage, amenity impacts near residential properties, and uncertainty over additional traffic for spoil removal. Wiltshire Council is further concerned about limited control over highway works under the DCO, which could lead to future liabilities and safety issues. Robust measures, including detailed traffic management plans, passing improvements, formal highway agreements, and condition surveys, are required.	The Applicant notes this comment. Responses to these comments are provided in the below responses. As concluded in **ES Volume 3, Appendix 13-1: Transport Assessment [REP1-057 and REP1-059]** all transport impacts will be temporary. As agreed with Wiltshire Council on 14 April 2026, the Applicant has prepared draft protective provisions for the protection of the Local Highway Authority which have been shared with Wiltshire Council for comment. Subject to any comments on the draft protective provisions that Wiltshire Council might have, the Applicant intends to include these protective provisions in the **Draft DCO [REP1-007]** at a future deadline. The Applicant is confident that the form of the protective provisions can be agreed with Wiltshire Council prior to the close of the Examination.
Positive impacts – construction phase There are not considered to be any positive highway impacts associated with the construction of the Solar PV sites. This will lead to regular HGV trafficking on several minor rural roads serving as the proposed construction traffic routes to Lime Down areas A-C and Lime Down D, where the carriageway	The Applicant makes note of this comment. **ES Volume 1, Chapter 13: Transport and Access [REP1-019]** sets out and assessed the likely effects of the Scheme in relation to transport and access. Likely effects have been assessed for the construction phase of the Scheme. It was concluded, the Scheme is not likely to result in any significant residual Transport and Access effects during the

Wiltshire Council Comments	Applicant's Response
width is narrow and inadequate for even car/HGV passage along certain sections.	construction phase and all impacts will be temporary. An **Outline Construction Traffic Management Plan (CTMP) [REP1-112]** and **Outline Public Rights of Way and Permissive Path Management Plan (PRoWPPMP) [REP1-104]** have been prepared to manage construction vehicle movement during the construction phase.
Positive impacts – operational Broadly neutral. Whilst there will be some additional trafficking associated with routine maintenance and/or replacement of solar farm components, this is expected to be occasional with limited impact on highway operation. Any highway mitigation left in place to improve passing opportunities on the minor roads could serve to benefit general traffic operation post construction.	The Applicant makes note of this comment. **ES Volume 1, Chapter 13: Transport and Access [REP1-019]** set out and assessed the likely effects of the Scheme in relation to transport and access. Likely effects have been assessed for the operational phase of the Scheme. **ES Volume 1, Chapter 13: Transport and Access [REP1-019]** concludes that the Scheme is not likely to result in any significant residual Transport and Access effects during the operation and maintenance phase. Mitigation measures to manage vehicle movements during the operation and maintenance phase are detailed in Section 3.8 of the **Outline Operational Environmental Management Plan (OEMP) [REP1-098]**. A Final OEMP will be prepared in substantial accord with the **Outline OEMP [REP1-098]** and, for the scheduled replacement periods, incorporate necessary measures from the **Outline CTMP [REP1-112]**.
Positive impacts – decommissioning phase	The Applicant makes note of this comment. **ES Volume 1, Chapter 13: Transport and Access [REP1-019]** sets out and assessed the likely effects of the Scheme in relation to

Wiltshire Council Comments	Applicant's Response
See impacts above on construction phase impacts. Decommissioning of the Solar PV site infrastructure will lead to necessary HGV trafficking along the same minor rural roads.	transport and access. Likely effects have been assessed for the decommissioning phase of the Scheme. It was concluded, the Scheme is not likely to result in any significant residual Transport and Access effects during the decommissioning phase and all impacts will be temporary. An **Outline CTMP [REP1-112]** and **Outline PRoWPPMP [REP1-104]** have been prepared to manage construction vehicle movement during the decommissioning phase.
Neutral impacts None identified.	The Applicant notes this comment.
Negative impacts – construction phase 6.3 Environmental Statement Volume 3, Appendix 13-1 Transport Assessment [APP-233] and expressly Annex H shows the 'Construction Route Swept Path Analysis' for all the minor road lengths serving as HGV construction routes. These show the swept path analysis 'passage' for a 16.5m articulated HGV and an estate car. Examination of the Lime Down D access route between Dyson Roundabout and Bradfield Cottages 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 this, 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	Annex J of **ES Volume 3, Appendix 13-1: Transport Assessment [REP1-057 and REP1-059]** demonstrates adequate carriageway width or frequency of passing place opportunity to pass at least an HGV and a light vehicle as requested in comments provided by Wiltshire Council in its response (August 2025) to the Transport Assessment Scoping Note and confirmed in Paragraph 4 of 'Appendix A - Highways and Transport Document Review - Detailed Comments' of the Wiltshire Council Relevant Representation **[RR-4934].** This confirms that no passing bay or widening improvements are needed to accommodate these movements on the construction route outside of the Order Limits. For the construction route between Dyson Roundabout and Bradfield Cottages, the distances between passing points outside of the Order Limits

Wiltshire Council Comments	Applicant's Response
indicated by the intervisibility distances shown between passing points. No part of the route has been assessed for passing opportunities for two opposing HGVs in 6.3 Environmental Statement Volume 3, Appendix 13-1 Transport Assessment [APP-233], which given the level of predicted HGV trafficking associated with Lime Down area D is a very real concern.	are all less than 50 metres, with forward visibility extending to the next passing point and beyond. 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 be implemented in coordination with banksmen, which will be able to hold back any cross-over, should there be any delays on the roads. This will prevent HGVs generated by the Scheme passing each other in opposite directions on the local roads forming part of the construction routes and will be confirmed as part of the Final CTMP(s). The construction route to Lime Down D is split between the route to Bradfield Cottages, which serves Lime Down D (West) and the A429, which serves Lime Down D (East). With regard to the Lime Down D (west) construction route, excessive widening of the existing rural route to allow two HGVs to pass would be over engineering, because of the following reasons: • Temporary nature of the construction period; • Trip generation of 56 HGVs on the route to Lime Down D (west) is an estimate of the deliveries on a peak day, so does not represent a daily average; • Trip generation of 56 HGV on the route to Lime Down D (west) is based on the worst-case assumptions, including but not limited to, all phases and Solar PV

Wiltshire Council Comments	Applicant's Response
	Sites being constructed simultaneously and a 50% uplift; • Assuming the proposed construction programme shown in Table 13-9 of **ES Volume 3, Appendix 13-1: Transport Assessment [REP1-057 and REP1-059]**, where all sites are not constructed concurrently, the maximum average daily number of HGV movements along the route to Lime Down D (west) is only 30 per day/less than 5 per hour/one every 14 minutes (less than the journey time along the route); • Delivery times during the construction phase are limited to those times set out in the **Outline CTMP [REP1-112]**. There will be no HGV construction trips outside of these hours; • There would be a much greater impact on hedgerow, trees and character if additional widening was implemented; and • Low level of existing HGVs on the route to Lime Down D (west) – The average number of existing HGV movements is only 46 per day, with some of these movements occurring outside of proposed construction hours set out in the **Outline CTMP [REP1-112]**). Annex K in **ES Volume 3, Appendix 13-1: Transport Assessment [REP1-057 and REP1-059]** demonstrates there is adequate carriageway width and/or passing place

Wiltshire Council Comments	Applicant's Response
	opportunity for two HGVs along the construction route to Lime Down D (west).
Negative impacts – construction phase HGV/Car swept path passage analysis presented for Alderton Road and Fosse Way again show that significant parts of the route sections are narrow and unable to pass an HGV/car, so relying on opposing driver inter-visibility through the lengths of narrowing. Given this part of the highway network will be required to accommodate the HGV trafficking associated with Lime Down areas A-C, there is a concern that no assessment has been done to consider passage opportunities for two opposing HGVs. Fosse Way typically has flat mown verges either side of its relatively narrow carriageway, so the risk of overrun damage with only moderate levels of increased HGV trafficking could be significant. Negative impacts will be associated with regular HGV trafficking along several minor rural roads serving as the proposed construction traffic routes to Lime Down areas A-C and Lime Down D, where the carriageway width is narrow and inadequate for even car/HGV passage along certain sections. As noted below under (2) 'Main Impacts', concerns are firstly potential highway operating and safety issues associated with an inability to pass two HGVs on these minor routes, notably as the existing passing point opportunities have not even been assessed or any mitigation proposed.	Annex J of **ES Volume 3, Appendix 13-1: Transport Assessment [REP1-057 and REP1-059]** demonstrates adequate carriageway width or frequency of passing place opportunity to pass at least an HGV and a light vehicle as requested in comments provided by Wiltshire Council in its response (August 2025) to the Transport Assessment Scoping Note and confirmed in Paragraph 4 of 'Appendix A - Highways and Transport Document Review - Detailed Comments' of the Wiltshire Council Relevant Representation **[RR-4934]** This confirms that no passing bay or widening improvements are needed to accommodate these movements on the construction route outside of the Order Limits. For the construction route to Lime Down A to C, the distances between passing points outside of the Order Limits are all less than 100 m, with forward visibility extending to the next passing point and beyond. 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 be implemented in coordination with banksmen, which will be able to hold back any cross-over, should there be any delays on the roads. This will prevent HGVs generated by the Scheme passing each other in opposite directions on the local roads forming part of the construction routes and will be confirmed as part of the Final CTMP(s).

Wiltshire Council Comments	Applicant's Response
	With regard to Lime Down A, excessive widening of the existing rural route to allow two HGVs to pass would be over engineering, because of the following reasons: • Temporary nature of the construction period; • Trip generation of 16 HGVs on the route to Lime Down A is an estimate of the deliveries on a peak day, so does not represent a daily average; • Trip generation of 16 HGVs on the route to Lime Down A is based on the worst-case assumptions, including but not limited to, all phases and Solar PV Sites being constructed simultaneously and a 50% uplift; • Assuming the proposed construction programme shown in Table 13-9 of **ES Volume 3, Appendix 13-1: Transport Assessment [REP1-057 and REP1-059]**, where all sites are not constructed concurrently, the maximum average daily number of HGV movements along the route to Lime Down A is only 10 per day/less than 2 per hour/one every 42 minutes (less than the journey time along the route), with the construction phase for Lime Down Site A only lasting 9 months; • Delivery times during the construction phase are limited to those times set out in the **Outline CTMP [REP1-112]**. There will be no HGV trips outside of these hours; • Much greater impact on hedgerow, trees and character would be greater if additional widening was implemented; and

Wiltshire Council Comments	Applicant's Response
	• Low level of existing HGVs on the route to Lime Down A (average number of existing HGV movements is only 40 per day, with some of these movements occurring outside of proposed construction hours set out in the **Outline CTMP [REP1-112]**). With regard to the construction route to Lime Down A-C, excessive widening of existing rural routes to allow two HGVs to pass would be over engineering, because of the following reasons: • Temporary nature of the construction period; • Trip generation of 50 HGVs on the route to Lime Down A-C is an estimate of the deliveries on a peak day, so does not represent a daily average; • Trip generation of 50 HGVs on the route to Lime Down A-C is based on the worst-case assumptions, including but not limited to, all phases and Solar PV Sites being constructed simultaneously and a 50% uplift; • Assuming the proposed construction programme shown in Table 13-9 of **ES Volume 3, Appendix 13-1: Transport Assessment [REP1-057 and REP1-059]**, the maximum average daily number of HGV movements along the route to Lime Down A is 32 per day/less than 7 per hour/one every 8 minutes (less than the journey time along the route);

Wiltshire Council Comments	Applicant's Response
	• Delivery times during the construction phase are limited to those times set out in the **Outline CTMP [REP1-112]**. There will be no HGV trips outside of these hours; • Much greater impact on hedgerow, trees and character would be greater if additional widening was implemented; and • Low level of existing HGVs on the route to lime down a-c (average number of existing HGV movements is only 20 per day, with some of these movements occurring outside of proposed construction hours set out in the **Outline CTMP [REP1-112].** The construction route to Lime Down D is split between the route to Bradfield Cottages, which serves Lime Down D (West) and the A429, which serves Lime Down D (East). With regard to the Lime Down D (west) construction route, excessive widening of the existing rural route to allow two HGVs to pass would be over engineering, because of the following reasons: • Temporary nature of the construction period; • Trip generation of 56 HGVs on the route to Lime Down D (west) is an estimate of the deliveries on a peak day, so does not represent a daily average; • Trip generation of 56 HGV on the route to Lime Down D (west) is based on the worst-case assumptions, including but not limited to, all phases and Solar PV

Wiltshire Council Comments	Applicant's Response
	Sites being constructed simultaneously and a 50% uplift; • Assuming the proposed construction programme shown in Table 13-9 of **ES Volume 3, Appendix 13-1: Transport Assessment [REP1-057 and REP1-059]**, where all sites are not constructed concurrently, the maximum average daily number of HGV movements along the route to Lime Down D (west) is only 30 per day/less than 5 per hour/one every 14 minutes (less than the journey time along the route); • Delivery times during the construction phase are limited to those times set out in the **Outline CTMP [REP1-112]**. There will be no HGV construction trips outside of these hours; • There would be a much greater impact on hedgerow, trees and character; and • Low level of existing HGVs on the route to Lime Down D (west) – The average number of existing HGV movements is only 46 per day, with some of these movements occurring outside of proposed construction hours set out in the **Outline CTMP [REP1-112]**). Annex K in **ES Volume 3, Appendix 13-1: Transport Assessment [REP1-057 and REP1-059]** demonstrates where there is adequate carriageway width and/or passing place opportunity for two HGVs along the construction routes.

Wiltshire Council Comments	Applicant's Response
	As set out in the **Outline CTMP [REP1-112]**, pre-construction, interim and post-construction Road Condition Surveys will be undertaken to repair any damage caused to verges during the construction period. The details of these surveys will be confirmed as part of the Final CTMP(s).
Negative impacts – construction phase Secondly, the highway damage consequences of this where verges are regularly over-run. These damage risks could include total structural pavement failure where the construction depth of the more minor roads proposed for HGV construction access is thin, and so not potentially designed or adequate for sustained heavy vehicle axle loadings. In short, highway damage and remedial costs could be very substantive and widespread and not necessarily limited to verge over-run or edge damage. The 7.22 Outline CTMP [REP1-112] proposes that pre-construction condition surveys would be undertaken, albeit the extents are still to be agreed. However, if the baseline condition is poor in certain locations, then it is conceivable that an unacceptable level of damage could occur with HGV trafficking during the construction phase. It is unclear what the applicant would be required to do under the DCO in this circumstance during the construction phase, so short-term remedials necessary to make the highway safe. It should not fall on Council budgets to do this.	As set out in the **Outline CTMP [REP1-112]**, pre-construction, interim and post-construction Road Condition Surveys will be undertaken to repair any damage caused to highway infrastructure during the construction period. The details of these surveys will be confirmed as part of the detailed CTMP(s). Where defects are identified and are reasonably attributable to construction activities associated with the Scheme, these will be repaired to the satisfaction of the relevant highway authority, either during the construction phase where required for safety reasons, or following completion of the works (Paragraph 6.12.1). At Deadline 1, the Applicant also included amendments to the **Outline CTMP [REP1-112]** to make the process for remediation of road damage during the construction phase clearer. Where immediate repairs are required during the construction phase for safety reasons, the **Outline CTMP [REP1-112]** now expressly requires these to be undertaken at the time.

Wiltshire Council Comments	Applicant's Response
Negative impacts – construction phase Regular extra-ordinary HGV trafficking over the entirety of the construction period will also have an amenity impact on roads identified as 'sensitive' in the Environmental Statement, so where receptors such as residential properties are close to the road edge.	The potential effects of construction traffic on the local highway network are assessed in **ES Volume 1, Chapter 13: Transport and Access [REP1-019]**, which considers construction vehicle movements, traffic volumes, road safety and effects on road users. In the assessment of transport impacts we assign a receptor (which includes for residential areas) 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 of the IEMA transport and access guidelines. The relationship to the highway environment is determined on the following transport factors: • Severance of communitiesRoad vehicle driver and passenger delay; • Non-motorised user delay; • Non-motorised amenity; • Fear and intimidation on and by road users; • Road user and pedestrian safety; and • Hazardous/large loads. As per the IEMA transport and access guidelines and where required, further assessment of sensitive links was undertaken in accordance with either Rule 1 or Rule 2 as set out in

Wiltshire Council Comments	Applicant's Response
	Paragraph 13.6.25 of **ES Volume 1, Chapter 13: Transport and Access [REP1-019]**. **ES Volume 1, Chapter 13: Transport and Access [REP1-019]** concludes that the effects on the construction route links are negligible to minor and the transport impacts of the scheme will be temporary. The impacts of construction traffic will be managed by mitigation measures set out in the **Outline CTMP [REP1-112]**. These mitigation measures include restrictions on delivery times, undertaking Road Condition Surveys and repairs to any damage caused to highway infrastructure during the construction period and a booking system to limit the potential for construction vehicles meeting on minor roads.
Negative impacts – construction phase The proposed temporary accesses (25 number) needed along the cable route corridor impact on roads of different standards but will include a need for temporary traffic management (TTM) on major routes such as the A420 and the A4 Bath Road. This can be expected to create some operating and delay impacts where roads are heavily trafficked, even accepting that most of these temporary accesses will not be needed for a significant length of time. Specific operating impacts will also depend on the specific form of the TTM, such as any need for 'shuttle' or one-way working on the major roads affected by the cable cross-over works.	As shown in **ES Volume 2, Figure 3-2-8: Key Construction Phase Features [APP-082],** the A420 and A4 Bath Road are identified as Avoidance Areas, where cable crossover works will be undertaken by Horizontal Directional Drilling (HDD) beneath the highway. This will ensure these roads remain open and unaffected throughout construction and remove the need for TTM in these locations.

Wiltshire Council Comments	Applicant's Response
Negative impacts – construction phase Volumes of HGVs HGV types and numbers are set out in Table 13-12 in 6.3 Environmental Statement Volume 3, Appendix 13-1 Transport Assessment [APP-233] and Table 13-20 in 6.1 Environmental Statement Volume 1, Chapter 13 Transport and Access [APP-065]. This table shows the overall numbers of HGV movements expected during the construction phases for each Lime Down area (A-E), with daily volumes then estimated based on the construction period for each. There is still 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 farms sites. For example, whilst the total number assumed PV Modules for each of the Lime Down sites (A-E) is stated, 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 further breakdown of Solar PV Sites Trip Generation Calculations is provided at Annex E of **ES Volume 3, Appendix 13-1: Transport Assessment [REP1-057 and REP1-059]** and was provided at Deadline 1. This presents specific assessed quantities of material volumes and component type/numbers for each Solar PV Site. Notes are included for clarity, with a breakdown of Trip Generation based on construction phasing also provided.
Negative impacts – construction phase Volumes of HGVs	A further breakdown of Solar PV Sites Trip Generation Calculations is provided at Annex E of **ES Volume 3, Appendix 13-1: Transport Assessment [REP1-057 and REP1-059]** submitted at Deadline 1. This presents specific

Wiltshire Council Comments	Applicant's Response
The same query applies to module mounting structures. 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 material associated with the construction of the access trackways, the construction compounds 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. However, nothing is stated so the worst case scenario must be clarified.	assessed quantities of material volumes and component type/numbers for each Solar PV Site. Notes are included for clarity, with a breakdown of Trip Generation based on construction phasing also provided. In terms of excavated material, there will be no site wide reprofiling required. It has been assumed that any excavated material will be reused on site. In the event of any spoil being taken off site, where possible this will be undertaken by the same tippers used for incoming supply of aggregate. While it is anticipated that most of the spoil from the construction of access tracks etc. will remain on site, the calculations at Annex E of **ES Volume 3, Appendix 13-1: Transport Assessment [REP1-057 and REP1-059]** allow a buffer (17% of total movements) for general construction activities, including the removal of spoil, other construction waste and the installation and removal of construction compounds.
Negative impacts – construction phase Volumes of HGVs Notwithstanding the above, the HGV volume figures as presented in 6.3 Environmental Statement Volume 3, Appendix 13-1 Transport Assessment [APP-233] estimate that the minor road route via Bradfield Cottages will see around 70-80 two-way movements per day associated with the construction of Lime Down area D. Furthermore, as Lime Down areas A-C	Annex J of **ES Volume 3, Appendix 13-1: Transport Assessment [REP1-057 and REP1-059]** demonstrates adequate carriageway width or frequency of passing place opportunity to pass at least an HGV and a light vehicle as requested in comments provided by Wiltshire Council in its response (August 2025) to the Transport Assessment Scoping Note and confirmed in Paragraph 4 of 'Appendix A - Highways and Transport Document Review - Detailed Comments' of the Wiltshire Council Relevant Representation **[RR-4934].** This

Wiltshire Council Comments	Applicant's Response
could all be under construction at the same time at a certain point according to the proposed programme, the cumulative daily HGV movements could be around 50 on Alderton Road and Fosse Way. These increases in heavy vehicle movements on the minor roads are notable impacts, particularly when viewed in overall terms over the full construction period. It also highlights the concerns expressed with passage opportunities for two HGVs on the minor roads forming the construction routes, and the likelihood that opposing HGVs could meet despite attempts to manage arrivals and departures in site specific 7.22 Outline Construction Traffic Management Plans [APP-287].	confirms that no passing bay or widening improvements are needed to accommodate these movements on the construction route outside of the Order Limits. For the construction route to Lime Down A-C, the distances between passing points outside of the Order Limits are all less than 100 metres, with forward visibility extending to the next passing point and beyond. 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 be implemented in coordination with banksmen, which will be able to hold back any cross-over, should there be any delays on the roads. This will prevent HGVs generated by the Scheme passing each other in opposite directions on the local roads forming part of the construction routes and will be confirmed as part of the Final CTMP(s). With regard to Lime Down A, excessive widening of the existing rural route to allow two HGVs to pass would be over engineering, because of the following reasons: • Temporary nature of the construction period; • Trip generation of 16 HGVs on the route to Lime Down A is an estimate of the deliveries on a peak day, so does not represent a daily average; • Trip generation of 16 HGVs on the route to Lime Down A is based on the worst-case assumptions, including but not limited to, all phases and Solar PV Sites being constructed simultaneously and a 50% uplift;

Wiltshire Council Comments	Applicant's Response
	• Assuming the proposed construction programme shown in Table 13-9 of **ES Volume 3, Appendix 13-1: Transport Assessment [REP1-057 and REP1-059]**, where all sites are not constructed concurrently, the maximum average daily number of HGV movements along the route to Lime Down A is only 10 per day/less than 2 per hour/one every 42 minutes (less than the journey time along the route), with the construction phase for Lime Down Site A only lasting 9 months; • Delivery times during the construction phase are limited to those times set out in the **Outline CTMP [REP1-112]**. There will be no HGV trips outside of these hours; • Much greater impact on hedgerow, trees and character would be greater if additional widening was implemented and • Low level of existing HGVs on the route to Lime Down A (average number of existing HGV movements is only 40 per day, with some of these movements occurring outside of proposed construction hours set out in the **Outline CTMP [REP1-112]**). With regard to the construction route to Lime Down A-C, excessive widening of existing rural routes to allow two HGVs to pass would be over engineering, because of the following reasons: • Temporary nature of the construction period;

Wiltshire Council Comments	Applicant's Response
	• Trip generation of 50 HGVs on the route to Lime Down A-C is an estimate of the deliveries on a peak day, so does not represent a daily average; • Trip generation of 50 HGVs on the route to Lime Down A-C is based on the worst-case assumptions, including but not limited to, all phases and Solar PV sites being constructed simultaneously and a 50% uplift; • Assuming the proposed construction programme shown in Table 13-9 of **ES Volume 3, Appendix 13-1: Transport Assessment [REP1-057 and REP1-059]**, the maximum average daily number of HGV movements along the route to Lime Down A is 32 per day/less than 7 per hour/one every 8 minutes (less than the journey time along the route); • Delivery times during the construction phase are limited to those times set out in the **Outline CTMP [REP1-112].** There will be no HGV trips outside of these hours; • Much greater impact on hedgerow, trees and character would be greater if additional widening was implemented and • Low level of existing HGVs on the route to lime down a-c (average number of existing HGV movements is only 20 per day, with some of these movements occurring outside of proposed construction hours set out in the **Outline CTMP [REP1-112].**

Wiltshire Council Comments	Applicant's Response
	The construction route to Lime Down D is split between the route to Bradfield Cottages, which serves Lime Down D (West) and the A429, which serves Lime Down D (East). With regard to the Lime Down D (west) construction route, excessive widening of the existing rural route to allow two HGVs to pass would be over engineering, because of the following reasons: • Temporary nature of the construction period; • Trip generation of 56 HGVs on the route to Lime Down D (west) is an estimate of the deliveries on a peak day, so does not represent a daily average; • Trip generation of 56 HGV on the route to Lime Down D (west) is based on the worst-case assumptions, including but not limited to, all phases and Solar PV Sites being constructed simultaneously and a 50% uplift; • Assuming the proposed construction programme shown in Table 13-9 of **ES Volume 3, Appendix 13-1: Transport Assessment [REP1-057 and REP1-059]**, where all sites are not constructed concurrently, the maximum average daily number of HGV movements along the route to Lime Down D (west) is only 30 per day/less than 5 per hour/one every 14 minutes (less than the journey time along the route); • Delivery times during the construction phase are limited to those times set out in the **Outline CTMP [REP1-**

Wiltshire Council Comments	Applicant's Response
	112]. There will be no HGV construction trips outside of these hours; • There would be a much greater impact on hedgerow, trees and character; and • Low level of existing HGVs on the route to Lime Down D (west) – The average number of existing HGV movements is only 46 per day, with some of these movements occurring outside of proposed construction hours set out in the **Outline CTMP [REP1-112]**). Annex K in **ES Volume 3, Appendix 13-1: Transport Assessment [REP1-057 and REP1-059]** demonstrates where there is adequate carriageway width and/or passing place opportunity for two HGVs along the construction routes. As set out in the **Outline CTMP [REP1-112],** pre-construction, interim and post-construction Road Condition Surveys will be undertaken to repair any damage caused to verges during the construction period. The details of these surveys will be confirmed as part of the Final CTMP(s).
Negative impacts – Ability to Control Design and Execution of Highway Works under conferred DCO Powers The council's Highways and Transport officers remain concerned over the ability of the council to satisfactorily control works being undertaken within the public highway, notably our	As agreed with Wiltshire Council on 14 April 2026, the Applicant has prepared draft protective provisions for the protection of the Local Highway Authority which have been shared with Wiltshire Council for comment. Subject to any comments on the draft protective provisions that Wiltshire Council might have, the Applicant intends to include these protective provisions in the **Draft DCO [REP1-007]** at a future

Wiltshire Council Comments	Applicant's Response
normal powers to assure that proposed site access and other construction works will meet the council's adoptable standard. Section 2.3 of 7.22 Outline CTMP [REP1-112] 'Detailed Design' states in part that: "Prior to carrying out a work to the public highway, the detailed design of such works must be submitted to the highway authority for approval". This goes on to say that this will include, in part, a construction programme for the works, a method statement, any traffic management proposals, detailed technical drawings and a Stage 1-2 Road Safety Audit (RSA). Whilst this is welcomed, it is not considered a substitute for 'requiring' bespoke highway agreements under Article 15 of 3.1 Draft DCO [REP1-007] for 'all' works undertaken within the public highway. These agreements should subsume the technical approval requirement of all drawings and allied documentation for the design of the permanent highway works anyway, which should not be a CTMP matter. Furthermore, formal agreements are needed to additionally put in place, for example, Bond requirements, suitable indemnity provision for Wiltshire Council against claims arising from the undertakers works on the highway and provision for Wiltshire Council inspection/works sign-off during construction including supervision fees.	deadline. The Applicant is confident that the form of the protective provisions can be agreed with Wiltshire Council prior to the close of the Examination. The **Outline CTMP [REP1-112]** submitted at Deadline 1 also included the following updates that address the points raised: • Further clarifications as to what drawings might be provided for accesses in the Final CTMP(s); • Further clarifications as to what monitoring/reporting/actions would be implemented in cases where proposed construction routes are not followed (e.g. training/retraining); and • Further clarifications as to how damage to highways would be identified and fixed during the construction/decommissioning phases.
Negative impacts –	As agreed with Wiltshire Council on 14 April 2026, the Applicant has prepared draft protective provisions for the

Wiltshire Council Comments	Applicant's Response
Ability to Control Design and Execution of Highway Works under conferred DCO Powers Whilst this may not seem a bespoke 'network impact', it could become one if highway works being implemented by the undertaker are not properly managed and the council has ineffective powers to intervene or take corrective action. Furthermore, poor design or quality of constructed works could lead to a future maintenance liability on the council to correct or potentially create safety risks for highway users.	protection of the Local Highway Authority which have been shared with Wiltshire Council for comment. Subject to any comments on the draft protective provisions that Wiltshire Council might have, the Applicant intends to include these protective provisions in the **Draft DCO [REP1-007]** at a future deadline. The Applicant is confident that the form of the protective provisions can be agreed with Wiltshire Council prior to the close of the Examination. The **Outline CTMP [REP1-112]** submitted at Deadline 1 also included the following updates that address the points raised: • Further clarifications as to what drawings might be provided for accesses in the Final CTMP(s); • Further clarifications as to what monitoring/reporting/actions would be implemented in cases where proposed construction routes are not followed (e.g. training/retraining); and • Further clarifications as to how damage to highways would be identified and fixed during the construction/decommissioning phases.
Negative impacts – operational Broadly neutral. See above comments under 'Positive' impact outcomes.	The Applicant notes this comment.
Negative impacts – decommissioning phase	The Applicant notes this comment.

Wiltshire Council Comments	Applicant's Response
See comments above on the negative construction phase impacts. Decommissioning of the Solar PV site infrastructure will lead to necessary HGV trafficking along the same minor rural roads.	The Applicants responses to the comments on the construction phase apply.
Ranking the Highways Development Management impacts in importance All the local impacts identified are considered material to the ExA, but in accordance with the national guidance[2] the council would indicate the following as the most significant in relation to this theme:	The Applicant notes this comment, and responses are provided below.
HGV Construction Routes and Two-Way Passage In summary, the concerns based on the analyses submitted are firstly potential highway operating and safety issues associated with an inability to pass two HGVs on these minor routes, notably as the existing passing point opportunities have not even been assessed or any mitigation proposed. Secondly, the highway damage consequences of this where verges are regularly over-run, which as the analyses show, could happen with HGV/car passage along many sections where the carriageway width is inadequate to accommodate even this. It is noted 7.22 Outline CTMP [REP1-112] does include a section	Annex J of **ES Volume 3, Appendix 13-1: Transport Assessment [REP1-057 and REP1-059]** demonstrates adequate carriageway width or frequency of passing place opportunity to pass at least an HGV and a light vehicle as requested in comments provided by Wiltshire Council in its response (August 2025) to the Transport Assessment Scoping Note and confirmed in Paragraph 4 of 'Appendix A - Highways and Transport Document Review - Detailed Comments' of the Wiltshire Council Relevant Representation **[RR-4934].** This confirms that no passing bay or widening improvements are needed to accommodate these movements on the construction

[2] National Guidance published in 2024, 'Nationally Significant Infrastructure Projects: Advice for Local Authorities'

Wiltshire Council Comments	Applicant's Response
on 'Road Condition Surveys' stating that: "The extent of the survey will be agreed with the local highway authority prior to commencement and as part of the Final CTMP". It is considered this need for monitoring could be extensive in view of the above. However, it would seem preferable to put in place suitable passing improvements at outset, rather than accept significant highway damage as a risk to be addressed later, this assuming liability by the undertaker is accepted and not disputed.	route outside of the Order Limits. For the construction route to Lime Down A-C, the distances between passing points outside of the Order Limits are all less than 100 metres, with forward visibility extending to the next passing point and beyond. 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 be implemented in coordination with banksmen, which will be able to hold back any cross-over, should there be any delays on the roads. This will prevent HGVs generated by the Scheme passing each other in opposite directions on the local roads forming part of the construction routes and will be confirmed as part of the Final CTMP(s). With regard to Lime Down A, excessive widening of the existing rural route to allow two HGVs to pass would be over engineering, because of the following reasons: • Temporary nature of the construction period; • Trip generation of 16 HGVs on the route to Lime Down A is an estimate of the deliveries on a peak day, so does not represent a daily average; • Trip generation of 16 HGVs on the route to Lime Down A is based on the worst-case assumptions, including but not limited to, all phases and Solar PV Sites being constructed simultaneously and a 50% uplift; • Assuming the proposed construction programme shown in Table 13-9 of **ES Volume 3, Appendix 13-1:**

Wiltshire Council Comments	Applicant's Response
	Transport Assessment [REP1-057 and REP1-059], where all sites are not constructed concurrently, the maximum average daily number of HGV movements along the route to Lime Down A is only 10 per day/less than 2 per hour/one every 42 minutes (less than the journey time along the route), with the construction phase for Lime Down Site A only lasting 9 months; • Delivery times during the construction phase are limited to those times set out in the **Outline CTMP [REP1-112].** There will be no HGV trips outside of these hours; • Much greater impact on hedgerow, trees and character; and • Low level of existing HGVs on the route to Lime Down A (average number of existing HGV movements is only 40 per day, with some of these movements occurring outside of proposed construction hours set out in the **Outline CTMP [REP1-112]**). With regard to the construction route to Lime Down A-C, excessive widening of existing rural routes to allow two HGVs to pass would be over engineering, because of the following reasons: • Temporary nature of the construction period; • Trip generation of 50 HGVs on the route to Lime Down A-C is an estimate of the deliveries on a peak day, so does not represent a daily average;

Wiltshire Council Comments	Applicant's Response
	• Trip generation of 50 HGVs on the route to Lime Down A-C is based on the worst-case assumptions, including but not limited to, all phases and Solar PV sites being constructed simultaneously and a 50% uplift; • Assuming the proposed construction programme shown in Table 13-9 of **ES Volume 3, Appendix 13-1: Transport Assessment [REP1-057 and REP1-059]**, the maximum average daily number of HGV movements along the route to Lime Down A is 32 per day/less than 7 per hour/one every 8 minutes (less than the journey time along the route); • Delivery times during the construction phase are limited to those times set out in the **Outline CTMP [REP1-112].** There will be no HGV trips outside of these hours; • There would be a much greater impact on hedgerow, trees and character; and • Low level of existing HGVs on the route to Lime Down A-C (average number of existing HGV movements is only 20 per day, with some of these movements occurring outside of proposed construction hours set out in the **Outline CTMP [REP1-112]**). The construction route to Lime Down D is split between the route to Bradfield Cottages, which serves Lime Down D (West) and the A429, which serves Lime Down D (East). With regard to the Lime Down D (west) construction route, excessive

Wiltshire Council Comments	Applicant's Response
	widening of the existing rural route to allow two HGVs to pass would be over engineering, because of the following reasons: • Temporary nature of the construction period; • Trip generation of 56 HGVs on the route to Lime Down D (west) is an estimate of the deliveries on a peak day, so does not represent a daily average; • Trip generation of 56 HGV on the route to Lime Down D (west) is based on the worst-case assumptions, including but not limited to, all phases and Solar PV Sites being constructed simultaneously and a 50% uplift; • Assuming the proposed construction programme shown in Table 13-9 of **ES Volume 3, Appendix 13-1: Transport Assessment [REP1-057 and REP1-059]**, where all sites are not constructed concurrently, the maximum average daily number of HGV movements along the route to Lime Down D (west) is only 30 per day/less than 5 per hour/one every 14 minutes (less than the journey time along the route); • Delivery times during the construction phase are limited to those times set out in the **Outline CTMP [REP1-112].** There will be no HGV construction trips outside of these hours; • There would be a much greater impact on hedgerow, trees and character; and

Wiltshire Council Comments	Applicant's Response
	• Low level of existing HGVs on the route to Lime Down D (west) – The average number of existing HGV movements is only 46 per day, with some of these movements occurring outside of proposed construction hours set out in the **Outline CTMP [REP1-112]**). Annex K in **ES Volume 3, Appendix 13-1: Transport Assessment [REP1-057 and REP1-059]** demonstrates where there is adequate carriageway width and/or passing place opportunity for two HGVs along the construction routes. As set out in the **Outline CTMP [REP1-112],** pre-construction, interim and post-construction Road Condition Surveys will be undertaken to repair any damage caused to verges during the construction period. The details of these surveys will be confirmed as part of the Final CTMP(s), the development of which is secured through Requirement 15 of the **Draft DCO [REP1-007]**.
Volumes of HGVs The proposal will result in a substantial increase in HGV traffic on minor rural roads during construction, with up to 70–80 two-way movements per day on the Bradfield Cottages route and around 50 daily movements on Alderton Road and Fosse Way if multiple areas are built concurrently. These volumes raise concerns about congestion and safety due to limited passing opportunities for large vehicles. Additionally, there is	Annex J of **ES Volume 3, Appendix 13-1: Transport Assessment [REP1-057 and REP1-059]** demonstrates adequate carriageway width or frequency of passing place opportunity to pass at least an HGV and a light vehicle as requested in comments provided by Wiltshire Council in its response (August 2025) to the Transport Assessment Scoping Note and confirmed in Paragraph 4 of 'Appendix A - Highways and Transport Document Review - Detailed Comments' of the Wiltshire Council Relevant Representation **[RR-4934].** This

Wiltshire Council Comments	Applicant's Response
uncertainty over the disposal of excavated material from access tracks and substation foundations, which could lead to further HGV movements if off-site removal is required. Overall, the key impacts are increased heavy vehicle traffic on sensitive routes, potential cumulative effects, and operational challenges in managing vehicle movements.	confirms that no passing bay or widening improvements are needed to accommodate these movements on the construction route outside of the Order Limits. For the construction route to Lime Down A-C, the distances between passing points outside of the Order Limits are all less than 100 metres, with forward visibility extending to the next passing point and beyond. 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 be implemented in coordination with banksmen, which will be able to hold back any cross-over, should there be any delays on the roads. This will prevent HGVs generated by the Scheme passing each other in opposite directions on the local roads forming part of the construction routes and will be confirmed as part of the Final CTMP(s). With regard to Lime Down A, excessive widening of the existing rural route to allow two HGVs to pass would be over engineering, because of the following reasons: • Temporary nature of the construction period; • Trip generation of 16 HGVs on the route to Lime Down A is an estimate of the deliveries on a peak day, so does not represent a daily average; • Trip generation of 16 HGVs on the route to Lime Down A is based on the worst-case assumptions, including but not limited to, all phases and Solar PV Sites being constructed simultaneously and a 50% uplift;

Wiltshire Council Comments	Applicant's Response
	• Assuming the proposed construction programme shown in Table 13-9 of **ES Volume 3, Appendix 13-1: Transport Assessment [REP1-057 and REP1-059]**, where all sites are not constructed concurrently, the maximum average daily number of HGV movements along the route to Lime Down A is only 10 per day/less than 2 per hour/one every 42 minutes (less than the journey time along the route), with the construction phase for Lime Down Site A only lasting 9 months; • Delivery times during the construction phase are limited to those times set out in the **Outline CTMP [REP1-112].** There will be no HGV trips outside of these hours; • Much greater impact on hedgerow, trees and character; and • Low level of existing HGVs on the route to Lime Down A (average number of existing HGV movements is only 40 per day, with some of these movements occurring outside of proposed construction hours set out in the **Outline CTMP [REP1-112]**). With regard to the construction route to Lime Down A-C, excessive widening of existing rural routes to allow two HGVs to pass would be over engineering, because of the following reasons: • Temporary nature of the construction period; • Trip generation of 50 HGVs on the route to Lime Down

Wiltshire Council Comments	Applicant's Response
	A-C is an estimate of the deliveries on a peak day, so does not represent a daily average; • Trip generation of 50 HGVs on the route to Lime Down A-C is based on the worst-case assumptions, including but not limited to, all phases and Solar PV sites being constructed simultaneously and a 50% uplift; • Assuming the proposed construction programme shown in Table 13-9 of **ES Volume 3, Appendix 13-1: Transport Assessment [REP1-057 and REP1-059]**, the maximum average daily number of HGV movements along the route to Lime Down A is 32 per day/less than 7 per hour/one every 8 minutes (less than the journey time along the route); • Delivery times during the construction phase are limited to those times set out in the **Outline CTMP [REP1-112].** There will be no HGV trips outside of these hours; • There would be a much greater impact on impact on hedgerow, trees and character; and • Low level of existing HGVs on the route to Lime Down A-C (average number of existing HGV movements is only 20 per day, with some of these movements occurring outside of proposed construction hours set out in the **Outline CTMP [REP1-112]**). The construction route to Lime Down D is split between the route to Bradfield Cottages, which serves Lime Down D (West) and the A429, which serves Lime Down D (East). With regard

Wiltshire Council Comments	Applicant's Response
	to the Lime Down D (west) construction route, excessive widening of the existing rural route to allow two HGVs to pass would be over engineering, because of the following reasons: • Temporary nature of the construction period; • Trip generation of 56 HGVs on the route to Lime Down D (west) is an estimate of the deliveries on a peak day, so does not represent a daily average; • Trip generation of 56 HGV on the route to Lime Down D (west) is based on the worst-case assumptions, including but not limited to, all phases and Solar PV Sites being constructed simultaneously and a 50% uplift; • Assuming the proposed construction programme shown in Table 13-9 of **ES Volume 3, Appendix 13-1: Transport Assessment [REP1-057 and REP1-059]**, where all sites are not constructed concurrently, the maximum average daily number of HGV movements along the route to Lime Down D (west) is only 30 per day/less than 5 per hour/one every 14 minutes (less than the journey time along the route); • Delivery times during the construction phase are limited to those times set out in the **Outline CTMP [REP1-112].** There will be no HGV construction trips outside of these hours; • There would be a much greater impact on hedgerow, trees and character; and

Wiltshire Council Comments	Applicant's Response
	• Low level of existing HGVs on the route to Lime Down D (west) – The average number of existing HGV movements is only 46 per day, with some of these movements occurring outside of proposed construction hours set out in the **Outline CTMP [REP1-112]**). Annex K in **ES Volume 3, Appendix 13-1: Transport Assessment [REP1-057 and REP1-059]** demonstrates where there is adequate carriageway width and/or passing place opportunity for two HGVs along the construction routes. As set out in the **Outline CTMP [REP1-112]**, pre-construction, interim and post-construction Road Condition Surveys will be undertaken to repair any damage caused to verges during the construction period. The details of these surveys will be confirmed as part of the Final CTMP(s).
Ability to Control Design and Execution of Highway Works under conferred DCO Powers The requirement to submit and approve detailed design information is not an adequate substitute for formal highway agreements under Article 15 of 3.1 Draft DCO [REP1-007] for all works within the public highway. These agreements should cover technical approval of permanent highway designs and include provisions such as bonds, indemnity for Wiltshire Council, and inspection and sign-off during construction. Without such agreements or comprehensive protective	The Applicant makes note of this comment. As agreed with Wiltshire Council on 14 April 2026, the Applicant has prepared draft protective provisions for the protection of the Local Highway Authority which have been shared with Wiltshire Council for comment. Subject to any comments on the draft protective provisions that Wiltshire Council might have, the Applicant intends to include these protective provisions in the **Draft DCO [REP1-007]** at a future deadline. The Applicant is confident that the form of the protective provisions can be

Wiltshire Council Comments	Applicant's Response
provisions for the benefit of the local highway authority, poorly managed works could leave the council unable to intervene, creating future maintenance liabilities or safety risks for road users.	agreed with Wiltshire Council prior to the close of the Examination.

Table 4-2 - Highways and Transport - Network Management

Wiltshire Council Comments	Applicant's Response

Overview and commentary
 	
The 3.1 Draft DCO (DCO) [APP-016] raises significant concerns. The most critical issue is the proposed rescinding or dilution of statutory powers under legislation such as the New Roads and Street Works Act 1991 (NRSWA), the Road Traffic Regulations Act 1984 (RTWA) and the Traffic Management Act 2004 (TMA). These changes would undermine the council's ability to coordinate works, warn and inform the travelling public, protect highway assets, and enforce reinstatement standards.
 	
The impact on the travelling public could mean:
• Multiple uncoordinated works affecting people's ability to navigate around the network in a planned way;
• Negatively affecting the expeditious movement of traffic on the local highway network by creating unpredictable journey times, leading to:
  ○ Missed appointments,
  ○ Slower blue light response times, and
  ○ Lack of adherence to public transport timetables.
	The Applicant makes note of this comment and confirms that a meeting was held with Wiltshire Council's highways team on 14 April 2026 to discuss the mechanisms through which it retains oversight and control over matters relating to the local highway network as the local highway authority. This is primarily through Articles 8 to 16 of the **Draft DCO [REP1-007],** combined with Wiltshire Council's powers in approving the detailed CTMP(s) under Requirement 15. The Applicant has also updated the **Outline CTMP [REP1-112]** at Deadline 1 to provide further detail on matters requested by Wiltshire Council. This includes more specific construction access details to be provided to Wiltshire Council, a robust monitoring and enforcement regime for construction routes, and a clearer process for addressing local road repairs during the construction phase.
	
	As agreed with Wiltshire Council on 14 April 2026, the Applicant has prepared draft protective provisions for the protection of the Local Highway Authority which have been shared with Wiltshire Council for comment. Subject to any comments on the draft protective provisions that Wiltshire Council might have, the Applicant intends to include these protective provisions in the **Draft DCO [REP1-007]** at a future deadline. The Applicant is confident that the form of the protective provisions can be agreed with Wiltshire Council prior to the close of the Examination.

Wiltshire Council Comments	Applicant's Response
• Public confidence and trust in the council's ability to coordinate and manage works on the highway takes a long time to garner, and is very easily lost; and • Complaints would increase.	As no significant effects in respect of journey delay for motorised or non-motorised users have been identified in **ES Volume 1, Chapter 13: Transport and Access [REP1-019]**, the Applicant does not consider there to be a respective significant adverse effect on transport connectivity or access to healthcare services as receptors of human health. This is confirmed in **ES Volume 1, Chapter 18: Human Health [APP-070]** which identifies no related significant adverse effects to human health and wellbeing. This is subject to the mitigation measures to control construction traffic movements, including HGVs, as set out in the **Outline CTMP [REP1-112]**, secured by Requirepement 15 in Schedule 2 to the **Draft DCO [REP1-007]**.
Overview and commentary Additional concerns include the proposal for expedited road closures with minimal notice in direct conflict with national best practice. This proposal will not allow time to advertise the road closures twice in local papers and therefore undermines the current legal framework which ensures the local community is able to comment and/or object to any proposed closure. The closure might also propose to close routes the council have already reserved to accommodate other closures on the local highway network, unrelated to the Lime Down Solar Park works.	The Applicant makes note of this comment. As agreed with Wiltshire Council on 14 April 2026, the Applicant has also prepared draft protective provisions for the protection of the Local Highway Authority which have been shared with Wiltshire Council for comment. Subject to any comments on the draft protective provisions that Wiltshire Council might have, the Applicant intends to include these protective provisions in the **Draft DCO [REP1-007]** at a future deadline. The Applicant is confident that the form of the protective provisions can be agreed with Wiltshire Council prior to the close of the Examination.

Wiltshire Council Comments	Applicant's Response
	The updated **Outline CTMP [REP1-112]** submitted at Deadline 1 confirms further detail on carrying out works in the public highway, including the requirement to book road space with Wiltshire Council. This will work the same as Wiltshire Council's current permit scheme but with a more condensed two-month timeframe to provide the Applicant with certainty of delivery. Wiltshire Council will be able to effectively coordinate, and control works on the public highway.
Overview and commentary There is also lack of clarity on responsibilities for cable maintenance post-construction, and insufficient provisions for managing abnormal loads and mitigating damage from heavy vehicles. Further impact to the public could be poorly reinstated openings in the highway if the Specification of Openings in the Highway (SROH) is not adhered to, which could result in early trench failure and the need for repeat works and consequential disruptive traffic management while those works are rectified.	The Applicant makes note of this comment. As agreed with Wiltshire Council on 14 April 2026, the Applicant has also prepared draft protective provisions for the protection of the Local Highway Authority which have been shared with Wiltshire Council for comment. Subject to any comments on the draft protective provisions that Wiltshire Council might have, the Applicant intends to include these protective provisions in the **Draft DCO [REP1-007]** at a future deadline. The Applicant is confident that the form of the protective provisions can be agreed with Wiltshire Council prior to the close of the Examination. As set out in Section 6.12 of the **Outline CTMP [REP1-112]**, pre-construction, interim and post-construction Road Condition Surveys will be undertaken to repair any damage caused to highway infrastructure during the construction phase. The details of these surveys will be confirmed as part of the Final CTMP(s). For the Abnormal Loads, the appointed haulage

Wiltshire Council Comments	Applicant's Response
	contractor will also provide indemnities to highway and bridge authorities to cover any potential damage caused during transport.
Overview and commentary Overall, the council's Network Management officers have concerns about the proposal in its current form, emphasising that these altered measures are unnecessary and risk compromising established best practices that ensure safety, quality, and network efficiency. The council has a proven record of collaborating with promoters under existing frameworks, and the draft DCO's approach, which would be to grant powers to override these frameworks, would create operational challenges and expose the highway network to avoidable risks and cause reputational damage to the council's reputation.	The Applicant makes note of this comment and that a meeting was held with Wiltshire Council's highways team on 14 April 2026 to discuss the mechanisms through which it retains oversight and control over matters relating to the local highway network as the local highway authority. This is primarily through Articles 8 to 16 of the **Draft DCO [REP1-007]**, combined with Wiltshire Council's powers in approving the detailed CTMP under Requirement 15. The Applicant has also updated the **Outline CTMP [REP1-112]** at Deadline 1 to provide further detail on matters requested by Wiltshire Council. This includes more specific construction access details to be provided to Wiltshire Council, a robust monitoring and enforcement regime for construction routes, and a clearer process for addressing local road repairs during the construction phase. As agreed with Wiltshire Council on 14 April 2026, the Applicant has prepared draft protective provisions for the protection of the Local Highway Authority which have been shared with Wiltshire Council for comment. Subject to any comments on the draft protective provisions that Wiltshire Council might have, the Applicant intends to include these protective provisions in the **Draft DCO [REP1-007]** at a future deadline. The Applicant is confident that the form of the

Wiltshire Council Comments	Applicant's Response
	protective provisions can be agreed with Wiltshire Council prior to the close of the Examination.
Positive impacts – construction phase None identified.	The Applicant makes note of this comment. **ES Volume 1, Chapter 13: Transport and Access [REP1-019]** set out and assessed the likely effects of the Scheme in relation to transport and access. Likely effects have been assessed for the construction phase of the Scheme. It was concluded, the Scheme is not likely to result in any significant residual Transport and Access effects during the construction phase and all impacts will be temporary. An **Outline CTMP [REP1-112]** and **Outline PRoWPPMP [REP1-104]** have been prepared to manage construction vehicle movement during the construction phase.
Positive impacts – operational None identified.	The Applicant makes note of this comment. **ES Volume 1, Chapter 13: Transport and Access [REP1-019]** set out and assessed the likely effects of the Scheme in relation to transport and access. Likely effects have been assessed for the operational phase of the Scheme. It was concluded that the Scheme is not likely to result in any significant residual Transport and Access effects during the operation and maintenance phase. Mitigation measures to manage vehicle movements during the operation and maintenance phase are detailed in Section 3.8 of the **Outline OEMP [REP1-098]**. A Final OEMP will be prepared in

Wiltshire Council Comments	Applicant's Response
	substantial accord with the **Outline OEMP [REP1-098]** and, for the scheduled replacement periods, incorporate necessary measures from the **Outline CTMP [REP1-112]**.
Positive impacts – decommissioning phase None identified.	The Applicant makes note of this comment. **ES Volume 1, Chapter 13: Transport and Access [REP1-019]** set out and assessed the likely effects of the Scheme in relation to transport and access. Likely effects have been assessed for the decommissioning phase of the Scheme. It was concluded that the Scheme is not likely to result in any significant residual Transport and Access effects during the decommissioning phase and all impacts will be temporary. An **Outline CTMP [REP1-112]** and **Outline PRoWPPMP [REP1-104]** have been prepared to manage construction vehicle movement during the decommissioning phase.
Neutral impacts None identified.	The Applicant makes note of this comment. **ES Volume 1, Chapter 13: Transport and Access [REP1-019]** set out and assessed the likely effects of the Scheme in relation to transport and access. Likely effects have been assessed for the construction, operational and decommissioning phase of the Scheme. It was concluded that the Scheme is not likely to result in any significant residual Transport and Access effects during the operation and maintenance phase. Mitigation measures to manage vehicle movements during the operation and

Wiltshire Council Comments	Applicant's Response
	maintenance phase are detailed in Section 3.8 of the **Outline OEMP [REP1-098]**. A Final OEMP will be prepared in substantial accord with the **Outline OEMP [REP1-098]** and, for the scheduled replacement periods, incorporate necessary measures from the **Outline CTMP [REP1-112]**.
Negative impacts – construction phase Concerns about rescinding powers under the New Roads and Street Works Act 1991 (NRSWA) The proposed changes to existing legislative frameworks that the Draft DCO [REP1-007] seems to require would undermine the council's ability and responsibility to work with all scheme promoters when fulfilling its network management duties. It would essentially create a two-tier system, creating one set of rules for the Lime Down Solar Park scheme and another for all other works on the local highway network within Wiltshire. The local authority (especially the Network Management Team) have a track record for working collaboratively with promoters of large infrastructure projects within the existing legal framework and consider that it would be untenable to have different sets of rules for different promoters on its network. Therefore, the council considers that it is necessary to retain control over all works.	Section 4.3 of the **Explanatory Memorandum [REP1-009]** sets out the application of the powers under the New Roads and Street Works Act 1991 (NRSWA) as proposed to be modified by the **Draft DCO [REP1-007].** Article 8 provides the Applicant with the authority to undertake street works on streets identified in Schedule 4 of the draft DCO, which is treated as a statutory right in accordance with sections 48(3) and 51(1) of the NRSWA. Article 8(3) provides that where the Applicant is not the street authority, sections 54 to 106 of the NRSWA apply. This ensures all of the protections available to Wiltshire Council will apply where it is the relevant street authority including regarding provision of notice and coordination of works, implementation of works, reinstatement, inspections, and charges and contributions. Any permanent or temporary alterations of streets under Article 10 must also be to the reasonable satisfaction of the street authority under Article 11. It is therefore not correct to say powers under the NRSWA are "rescinded" but are necessarily modified as part of their incorporation into the draft DCO as a piece of legislation in its own right.

Wiltshire Council Comments	Applicant's Response
	Wiltshire Council's powers under permit schemes are constrained under Article 9 of the draft DCO only to the extent that would be subject to conditions that either amount to a moratoria, or the compliance of which would constitute a breach of the draft DCO or where the Applicant would be unable to comply with those conditions pursuant to the powers conferred by the draft DCO. This is necessary to ensure certainty of delivery of the Scheme within the timeframes required, as intended by the NSIP regime under the Planning Act 2008 (Ref 7). As agreed with Wiltshire Council on 14 April 2026, the Applicant has prepared draft protective provisions for the protection of the Local Highway Authority which have been shared with Wiltshire Council for comment. Subject to any comments on the draft protective provisions that Wiltshire Council might have, the Applicant intends to include these protective provisions in the **Draft DCO [REP1-007]** at a future deadline. The Applicant is confident that the form of the protective provisions can be agreed with Wiltshire Council prior to the close of the Examination.
Negative impacts – construction phase Concerns about rescinding powers under the New Roads and Street Works Act 1991 (NRSWA) The impact on the travelling public could mean:	As noted above it is not correct to say that Wiltshire Council's powers under the NRSWA have been "rescinded" but are captured through a range of different mechanisms within the **Draft DCO [REP1-007]** and associated documents. In particular, measures for managing impacts on public users of

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• Multiple uncoordinated works affecting people's ability to navigate around the network in a planned way;
• Negatively affecting the expeditious movement of traffic on its network by creating unpredictable journey times, leading to:
  ○ Missed appointments,
  ○ Slower blue light response times,
  ○ Lack of adherence to public transport timetables.
• Public confidence and trust in the council's ability to coordinate and manage works on the highway takes a long time to garner, and is very easily lost;
• Complaints would increase.
	the road network are controlled through the **Outline CTMP [REP1-112],** with key measures summarised below:
	• Road widening;
	• Traffic Management;
	• Signage;
	• Restriction of construction vehicle movements to specific times and outside of the peak hours;
	• Implementation and operation of a booking system;
	• Provision of appropriate parking;
	• Wheel wash facilities;
	• Noise reduction and air quality;
	• Site security;
	• Road condition surveys;
	• Community engagement; and
	• Monitoring.
	The updated **Outline CTMP [REP1-112]** submitted at Deadline 1 confirms further detail on carrying out works in the public highway, including the requirement to book road space with Wiltshire Council. This will work the same as Wiltshire Council's current permit scheme but with a more condensed two-month

Wiltshire Council Comments	Applicant's Response
	timeframe to provide the Applicant with certainty of delivery. Wiltshire will be able to effectively coordinate, and control works on the public highway, including coordination with other construction works from other projects. The updated **Outline CTMP [REP1-112]** submitted at Deadline 1 also sets out further detailed on the proposed monitoring process at Section 6.14. This included details of how any complaints will be processed and responded to.
Wiltshire Council runs a very robust network management regime with clear procedures around permitting, NRSWA, RTRA and TMA, and have a good track record of working with promoters to achieve their infrastructure projects. This regime and its procedure, reflect clear national rules of engagement, and the proposed powers the Applicant is seeking in the Draft DCO [REP1-007] would compromise the council's ability to control works and quality of reinstatements in the area (including the cable corridor). The local authority must ensure that all operators on the council's network, comply with all relevant codes of practice and procedures, otherwise this would have a significant impact on the public as set out above.	Wiltshire Council will retain control and oversight over matters relating to the management of the local road network through the **Draft DCO [REP1-007]** and **Outline CTMP [REP1-112]** and associated documents and responds to specific matters raised below.
1. Concerns over Road closure in the DCO The Draft DCO [REP1-007] as currently drafted, suggests that road closure orders could take effect in as little as a month – this would therefore involve the applicant rescinding Section 14	The Applicant understands that Wiltshire Council is referring to the Traffic Regulation measures under Article 16 of the **Draft DCO [REP1-007]** that provide a minimum of 4 weeks' notice in writing to the policy and traffic authority of the intention to implement traffic regulation measures for the Scheme. For

Wiltshire Council Comments	Applicant's Response
of the Road Traffic Regulation Act 1984, a process that has nationally been fine-tuned over the years. It would negatively impact the time for advertising and appropriate consultation and notification of key stakeholders, including parish councils, the blue light services and public transport. Normal engagement and regular update meetings with the Network Management Team is the standard operating procedure with larger infrastructure projects and this process has been implemented successfully on previous schemes. The local authority cannot manage its highway network effectively when different sets of rules affect a swath of the county's network. The impact to the travelling public would be a lack of notice or ability to feedback through consultation on concerns over a proposed closure. Insufficient time would be left to amend public transport timetables, and blue light services ability to make alternative routing arrangements for their response vehicles. The council considers that the revised timescales sought in the draft DCO are unnecessary if the applicant is able to plan ahead and follow a programme of works.	Nationally Significant Infrastructure Projects (NSIPs) under the Planning Act 2008 (Ref 7), this time period is typical and has precedent in a number of recent made solar DCOs, including The West Burton Solar Project Order 2025, The Tillbridge Solar Order 2025, The Fenwick Solar Farm Order 2026, The Springwell Solar Farm Order 2026.
2. Concerns over controlling reinstatement (the council's asset) It is currently unclear as to whether the applicant is proposing to agree inspection units with the council, which is something that all local authorities do for all utilities and Section 50 license holders as set out in the Code of Practice for Inspections. The impact of diverging from existing best practice would be that	Article 11 of the **Draft DCO [REP1-007]** requires the Applicant to complete any construction or maintenance of altered streets to the reasonable satisfaction of the street authority. As agreed with Wiltshire Council on 14 April 2026, the Applicant has prepared draft protective provisions for the protection of the Local Highway Authority which have been shared with Wiltshire Council for comment. Subject to any comments on the draft

Wiltshire Council Comments	Applicant's Response
Wiltshire Council would have to arrange themselves to undertake the adherence to the Safety Codes and the Specification of Reinstatement of Openings in the Highway 5th Edition (SROH) to ensure the site was safe and the reinstatement was done correctly to avoid the public purse having to fund any repairs for early failure. This ensure site safety and that the road is reinstated to regulated standards set out in SROH.	protective provisions that Wiltshire Council might have, the Applicant intends to include these protective provisions in the **Draft DCO [REP1-007]** at a future deadline. The Applicant is confident that the form of the protective provisions can be agreed with Wiltshire Council prior to the close of the Examination.
3. Network Management Duties The Draft DCO [REP1-007] does not clearly indicate how the DCO would dovetail with the council's Network Management Duties under Section 16 of the Traffic Management Act (TMA). The TMA strengthened the council's powers to coordinate all works and activities on the highway to ensure the expeditious movement of traffic on the council's network and the networks of neighbouring authorities. The council considers that the applicant cannot work in isolation otherwise the council's ability to coordinate works on a large swathe of Wiltshire's network would be compromised. The impact of this would be that other promoters may seek compensation for the council not being reasonable in allowing their planned works to go ahead if the DCO contractor chose to start works of their own that meant other planned works permits had to be revoked. This would lead to confusion, complaints and a lack of trust in the council's ability to coordinate all works and events on its network.	The Applicant makes note of this comment. As agreed with Wiltshire Council on 14 April 2026, the Applicant has prepared draft protective provisions for the protection of the Local Highway Authority which have been shared with Wiltshire Council for comment. Subject to any comments on the draft protective provisions that Wiltshire Council might have, the Applicant intends to include these protective provisions in the **Draft DCO [REP1-007]** at a future deadline. The Applicant is confident that the form of the protective provisions can be agreed with Wiltshire Council prior to the close of the Examination. The updated **Outline CTMP [REP1-112]** submitted at Deadline 1 confirms further detail on carrying out works in the public highway, including the requirement to book road space with Wiltshire Council. This will work the same as Wiltshire Council's current permit scheme but with a more condensed two-month timeframe to provide the Applicant with certainty of delivery.

Wiltshire Council Comments	Applicant's Response
	Wiltshire will be able to effectively coordinate, and control works on the public highway, including coordination with other construction works from other projects.
4. Management of AILs (Abnormal and Indivisible Loads) The local authority doesn't consider that the management of AIL's is adequately covered in the Draft DCO [REP1-007] or accompanying outline management plans. Whilst there is mention of liaising with Highways, it is the council's Network Management Team that manage this process on Wiltshire's network. The council acknowledges that there will need to be road closures in association with these deliveries, therefore closure orders will need to be in place. Wiltshire Council are used to doing "blanket" orders for works that are planned but are weather dependant. Wiltshire Council procedures are that they check whether the routes have any weak structures on the proposed route that might make that route unsuitable, so the haulier must work with Wiltshire Council through established procedures in managing these movements. The impact of this not being managed properly is: • Damage to the county's structures, • Reduction in the serviceable life of those structures, account isn't taken of Sites of Engineering Difficulty (SED) on the local highway network	All AIL movements will be subject to Special Type General Orders (STGO)/Individual Special Orders (ISO) where required and will be separate to the DCO. This will be secured by the Final CTMP(s) undertaken using the standard process for managing AIL movements on the public highway. The preparation, approval and implementation of the Final CTMP(s), substantially in accordance with the outline CTMP, are secured through Requirement 15 of Schedule 2 of the **Draft DCO [REP1-007]**, ensuring construction traffic impacts are appropriately managed throughout the construction phase of the Scheme.

Wiltshire Council Comments	Applicant's Response
• Possible closures to do urgent and permanent repairs which will then negatively impact the travelling public.	
5. Damage to the highway by heavy and oversized vehicles. The Draft DCO [REP1-007] does not currently cover the matter of damage to highways (including verges) as a consequence of the scheme's heavy equipment, deliveries and sheer percentage increase of extra traffic throughout the project construction phase. The verges will suffer noticeably because of the lack of passing places on some of the access roads with the present passing bays being very far apart. Section 59 of the Highways Act 1980 covers this, and this is covered in greater detail in the section above. The council proposes that perhaps passing bays should be constructed prior to the start of the project under a S278, or suitably robust protective provisions for the protection of local highway authorities within the draft DCO, and this is currently being discussed with the applicant.	The Applicant makes note of this comment. As set out in Section 6.12 of the **Outline CTMP [REP1-112]**, pre-construction, interim and post-construction Road Condition Surveys will be undertaken to repair any damage caused to highway infrastructure during the construction period. The details of these surveys will be confirmed as part of the Final CTMP(s). For the Abnormal Loads, the appointed haulage contractor will also provide indemnities to highway and bridge authorities to cover any potential damage caused during transport. As agreed with Wiltshire Council on 14 April 2026, the Applicant has prepared draft protective provisions for the protection of the Local Highway Authority which have been shared with Wiltshire Council for comment. Subject to any comments on the draft protective provisions that Wiltshire Council might have, the Applicant intends to include these protective provisions in the **Draft DCO [REP1-007]** at a future deadline. The Applicant is confident that the form of the protective provisions can be agreed with Wiltshire Council prior to the close of the Examination.
Negative impacts – operational	The Applicant makes note of this comment and notes that any repair works would be undertaken using the powers in the DCO

Wiltshire Council Comments	Applicant's Response
Clarification is required as to who will be responsible for the cable under the road once it is operating. If there is a fault with this cable, whilst it is acknowledged that the repair could be undertaken under the DCO, the local authority would still need to coordinate and control essential works as set out above.	subject to the protective provisions. As agreed with Wiltshire Council on 14 April 2026, the Applicant has prepared draft protective provisions for the protection of the Local Highway Authority which have been shared with Wiltshire Council for comment. Subject to any comments on the draft protective provisions that Wiltshire Council might have, the Applicant intends to include these protective provisions in the **Draft DCO [REP1-007]** at a future deadline. The Applicant is confident that the form of the protective provisions can be agreed with Wiltshire Council prior to the close of the Examination.
Negative impacts – decommissioning phase As above.	The Applicant makes note of this comment. An **Outline Decommissioning Strategy [REP1-100]** has been prepared, and a final Decommissioning Strategy will be submitted to the local planning authority, in consultation with the relevant highway authority, for approval prior to decommissioning. This is secured by Requirement 20 in Schedule 2 of the **Draft DCO [REP1-007]**.
Ranking the Highways- Network Management impacts in importance All the local impacts identified are considered material to the ExA, but in accordance with the national guidance[3] the council	The Applicant makes note of this comment and refers to the responses set out above in respect of how the powers in the **Draft DCO [REP1-007]** operate. As agreed with Wiltshire Council on 14 April 2026, the Applicant has prepared draft

[3] National Guidance published in 2024, 'Nationally Significant Infrastructure Projects: Advice for Local Authorities'

Wiltshire Council Comments	Applicant's Response
would indicate the following as the most significant in relation to this theme: The proposed rescinding of established laws, regulation and best practice that ensures all works are coordinated and reinstatements are done correctly is not considered necessary and would be detrimental to the council's ability to fulfil its network management duties. The Network Management team work positively with all promoters to ensure essential works are undertaken, however there is a need to ensure that all works comply with the New Road and Street Works Act 1991, Traffic Management Act 2004, Road Traffic Regulation Act 1984, Road Vehicle (construction &use) Regulations 1986 or Road Vehicles (Authorisation of Special Types) (General) Order (STGO), 2003.	protective provisions for the protection of the Local Highway Authority which have been shared with Wiltshire Council for comment. Subject to any comments on the draft protective provisions that Wiltshire Council might have, the Applicant intends to include these protective provisions in the **Draft DCO [REP1-007]** at a future deadline. The Applicant is confident that the form of the protective provisions can be agreed with Wiltshire Council prior to the close of the Examination.

5 Public Rights of Way

Table 5-1 - Public Rights of Way

Wiltshire Council Comments	Applicant's Response
Overview and commentary The proposed development presents both opportunities and challenges for the Public Rights of Way (PRoW) network. Positive impacts include potential surface improvements to access tracks and opportunities for Section 106 contributions to enhance connectivity and accessibility, including new permissive routes for walkers, cyclists, and equestrians. However, concern is identified around issues relating to visual amenity, noise, and construction impacts, including temporary closures, diversions, and increased traffic on narrow rural roads and bridleways, which may create safety risks and conflicts between users and construction vehicles.	The Applicant confirms that opportunities to improve access on the PRoW network have been explored for the operational lifetime of the Scheme through the provision of permissive paths for pedestrians, and permissive routes for pedestrians, cyclists, and equestrians. These are set out as Work No. 10 on the **Works Plan [REP1-005]** and illustrated on **ES Volume 2, Figure 3-4: Landscape and Ecology Mitigation Plan [REP1-029 to REP1-032]**. Further commitments include ensuring surfaces and access structures are made safe and easy to use, and waymarking is clear and unambiguous. These measures are all secured through the **Outline PRoWPPMP [REP1-104]** by Requirement 16 of Schedule 2 of the **Draft DCO [REP1-007]**. A detailed assessment of the likely significance of effects from the Scheme on the use and desirability of individual PRoW and recreational access to the countryside is included in **ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]** and **ES Volume 3, Appendix 16-2: Tourism and Recreation Receptor Tables [APP-241]**. This assessment considers the impact on individual recreational routes, including their practical use, enjoyment and desirability. The Applicant confirms that the majority of significant adverse

Wiltshire Council Comments	Applicant's Response
	effects can be mitigated. However, some significant adverse effects to users of PRoW MALW54 and unsurfaced roads (parallel to, and crossing the railway) in Lime Down E during construction cannot be mitigated further due to their use during construction for HGV access to the Solar PV array areas. No significant residual effects are anticipated during the operational phase of the Scheme. The **Outline PRoWPPMP [REP1-104]** sets out mitigation measures specifically to minimise impacts on PRoW users and ensure they maintain safe access to the countryside. This is secured through Requirement 16 of Schedule 2 of the **Draft DCO [REP1-007]**. Further relevant mitigation measures are secured through the **Outline CEMP [REP1-096]** and **Outline CTMP [REP1-112]**, through Requirements 13 and 15 respectively in Schedule 2 of the **Draft DCO [REP1-007]**, ensuring that impacts on PRoW and recreational routes are appropriately managed during construction.
Overview and commentary To mitigate these impacts, Wiltshire Council recommends measures such as replacing stiles with gates, improving bridges for accessibility, installing additional waymarking, conducting condition surveys, and providing passing bays on bridleways and unclassified roads. A Section 106 contribution of £20,000 per annum is also sought to improve PRoW outside the site boundary and maintain network quality over the	The Applicant is able to provide improvements and/or enhancements to PRoW within the Order Limits where these would help to mitigate or offset adverse effects as a result of the Scheme, and where such features would fall under the responsibly of the Applicant. Where applicable, these measures are secured through the **Outline CTMP [REP1-112]** and **Outline PRoWPPMP [REP1-104]** by Requirements 15

Wiltshire Council Comments	Applicant's Response
project's lifespan. These steps aim to balance the development's operational needs with safeguarding public access and enjoyment of the countryside.	and 16 respectively in Schedule 2 of the **Draft DCO [REP1-007]**. Financial contributions to PRoW network maintenance and upgrades beyond this would need to be agreed through the Community Benefit Fund which operates and is to be agreed outside of the DCO process. The Applicant is exploring bespoke mechanisms through which requests, such as the provision of funds for specific purposes, could be implemented. The Applicant considers the specific request for an annual sum from the local authority to be a suitable use of the Community Benefit Fund. The Applicant confirms that discussions with representatives of Wiltshire Council's Countryside Access Team have been undertaken and are ongoing through the process of discussions to agree a Statement of Common Ground, a first draft of which is to be published for Deadline 2.
Positive impacts – construction phase Surface improvements to the access tracks will provide a better surface for some user groups, e.g. pedestrians and cyclists and horse riders. The tracks should have a camber on them to help rainwater flow off the track rather than pooling on it.	The Applicant confirms that surface conditions on PRoW and unsurfaced roads used by recreational users can be 'made good' through the measures secured through the **Outline CTMP [REP1-112]** and **Outline PRoWPPMP [REP1-104]** by Requirements 15 and 16 respectively in Schedule 2 of the **Draft DCO [REP1-007]**. This also includes for making good and repairing any surfaces disturbed or altered during construction works.

Wiltshire Council Comments	Applicant's Response
	Where a request for an upgraded PRoW surface is made, this would likely have to be implemented through funding allocated within the Community Benefit Fund.
Positive impacts – operational Opportunity to secure section 106 contributions to improve the Public Rights of Way network. With improvements to the infrastructure making the PRoWs more accessible and inclusive to users with different access requirements, for example users with mobility aids. If a section 106 contribution is achieved, then the council would have the opportunity to divert some of the offsite PRoW onto routes that would provide a more connected network and help to make a network which is suitable for the current demands of users. A reasonable section 106 would allow compensation to be paid to landowners should the diversion require more land than the existing route or if it was for a new PRoW. The development will provide additional permissive routes for pedestrians, cyclists and equestrians. The change of land use may provide a more accessible surface during winter months with a grass surface being easier to walk on than bare soil which has been subject to the arable farming cycle. The paths will no longer be subject to the ploughing and cropping cycle which means a less disturbed surface for the PRoW.	Financial contributions to PRoW network maintenance and upgrades are to be agreed through the Community Benefit Fund which operates and is to be agreed outside of the DCO process. The Applicant is exploring bespoke mechanisms through which requests, such as the provision of funds for specific purposes, could be implemented. The Applicant considers the specific request made by the local authority for an annual sum for PRoW improvements to be a suitable use of the Community Benefit Fund. Where prospective PRoW upgrades fall within the Scheme's Solar PV Sites, the Applicant looks forward to engaging with Wiltshire Council on how these can be implemented with the operation of the Scheme. The Applicant confirms that discussions with representatives of Wiltshire Council's Countryside Access Team have been undertaken and are ongoing through the process of agreeing a Statement of Common Ground, a first draft of which is to be published for Deadline 2. The Applicant confirms that opportunities to improve access on the PRoW network have been explored for the operational lifetime of the Scheme through the provision of permissive

Wiltshire Council Comments	Applicant's Response
	paths for pedestrians, and permissive routes for pedestrians, cyclists, and equestrians. These are set out as Work No. 10 on the **Works Plan [REP1-005]** and illustrated on **ES Volume 2, Figure 3-4: Landscape and Ecology Mitigation Plan [REP1-029 to REP1-032]**. Further commitments include ensuring surfaces and access structures are made safe and easy to use, and waymarking is clear and unambiguous. These measures are all secured through the **Outline PRoWPPMP [REP1-104]** by Requirement 16 of Schedule 2 of the **Draft DCO [REP1-007]**.
Positive impacts – decommissioning phase Decommissioning works should lead to improvements to any PRoW or unclassified road that are used for access during the decommissioning work (potholes filled/tracks regraded). The return of the land to agricultural use may mean that new access furniture will be required, which should be of the most accessible type (this would not strictly be an improvement is a gap is being replaced).	The Applicant confirms that all mitigation measures set out in the **Outline CTMP [REP1-112]** and **Outline PRoWPPMP [REP1-104]** that are also relevant to decommissioning are implemented through the measures set out in the **Outline Decommissioning Strategy [REP1-100]**. These are secured by Requirements 15, 16 and 20 within Schedule 2 (Requirements) to the **Draft DCO [REP1-007]**. The Applicant confirms that any changes to access furniture undertaken as part of the Scheme or through additional funding will be agreed with the Applicant, relevant landowner(s) and Wiltshire Council to ensure that it does not prejudice against the future use of the land once the Scheme is decommissioned. As such, the Applicant expects this process to be undertaken, and any access furniture provision, to be agreed ahead of decommissioning being undertaken.

Wiltshire Council Comments	Applicant's Response
Neutral impacts While some users will not enjoy using the Public Rights of Way within the sites due to tranquillity and adverse visual effects, the change in land use provides an opportunity for those less confident walking through livestock to use those paths.	The Applicant acknowledges that the experience for PRoW users within or adjacent to the Solar PV Sites will be substantially different than current conditions due to the visual and auditory changes associated with the Solar PV infrastructure. That notwithstanding, the Applicant has sought to enhance the experience for users of these routes through the provision of landscape planting and screening to minimise visual impacts, while ecology and biodiversity enhancement planting at ground-level in the 15 m buffer zones between PRoWs and nearby onsite infrastructure should go some way to improve the immediate surroundings for PRoW users. These measures are shown on **ES Volume 2, Figure 3-4: Landscape and Ecology Mitigation Plan [REP1-029 to REP1-032]** and are secured through the **Outline LEMP [APP-283]** by Requirement 7 of Schedule 2 to the **Draft DCO [REP1-007]**.
Negative impacts – construction phase Increased noise during construction, extra traffic on the narrow country roads which are shared with more vulnerable users and the increased traffic on the unclassified roads and Bridleways creating safety concerns for users. Temporary closure and diversion of two Public Rights of Way, namely GRIT20 and MALW54, during construction of the cable route and compounds.	A detailed assessment of the likely significance of effects from the Scheme on the use and desirability of individual PRoW and recreational access to the countryside is included in **ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]** and **ES Volume 3, Appendix 16-2: Tourism and Recreation Receptor Tables [APP-241]**. This assessment considers the impact on individual recreational routes, including their practical use, safety of users, enjoyment and desirability. The Applicant confirms that the majority of significant adverse effects can be mitigated through the

Wiltshire Council Comments	Applicant's Response
	measures secured in the **Outline CTMP [REP1-112]** and **Outline PRoWPPMP [REP1-104]** by Requirements 15 and 16 respectively in Schedule 2 of the **Draft DCO [REP1-007]**. The Applicant confirms that residual significant adverse effects during construction are anticipated on bridleway MALW54 and on the unsurfaced roads in Lime Down E west of Rodbourne. Footpath GRIT20 is subject to diversion measures during construction to facilitate construction works for the Cable Route Corridor. As part of this, the diversion route will be fully waymarked and segregated from HGV traffic and the proposed construction compound. Once construction of this section of the Cable Route Corridor is completed, footpath GRIT20 will be restored to its original route and all waymarking will be restored. Bridleway MALW54 (and connecting footpath MALW55) are subject to diversion measures during construction to facilitate access to Lime Down E for HGVs. As part of this, the diversion route will be fully waymarked and segregated from HGV traffic. Once construction at Lime Down E has completed, bridleway MALW54 will be restored to its original route and all waymarking will be restored. The unclassified roads designated 'Track parallel to railway, Rodbourne' and 'Track crossing railway, Rodbourne' are

Wiltshire Council Comments	Applicant's Response
	proposed for construction and operational access within Lime Down E.
Negative impacts – operational Visual amenity and enjoyment of using the PRoW network by users, including a change in noise levels produced by this development over the normal agricultural noise that you would expect.	A detailed assessment of the likely significance of effects from the Scheme on the use and desirability of individual PRoW and recreational access to the countryside during the operational lifetime of the Scheme is included in **ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]** and **ES Volume 3, Appendix 16-2: Tourism and Recreation Receptor Tables [APP-241]**. This assessment considers that there is no significant adverse effect to PRoW users during the operational lifetime of the Scheme. This is as a result of the visual, ecological and experiential mitigation and enhancement measures secured in the **Outline LEMP [APP-283]** and **Outline PRoWPPMP [REP1-104]** by Requirements 7 and 16 respectively in Schedule 2 of the **Draft DCO [REP1-007]**.
Negative impacts – decommissioning phase This will be similar to the construction phase. Decommissioning traffic on the highway network to access the site, which will impact on users accessing the PRoW network. Noise, dust and/or mud, depending on the time of year, could be an issue from the work. The possibility that PRoW will be temporarily closed (temporary alternative routes must be made available where possible).	A detailed assessment of the likely significance of effects from the Scheme on the use and desirability of individual PRoW and recreational access to the countryside is included in **ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]** and **ES Volume 3, Appendix 16-2: Tourism and Recreation Receptor Tables [APP-241]**. This assessment considers the impact on individual recreational routes, including their practical use, safety of users, enjoyment and desirability. The Applicant confirms that significant adverse effects to individual PRoWs and unsurfaced roads can be

Wiltshire Council Comments	Applicant's Response
	mitigated through the measures secured in the **Outline PRoWPPMP [REP1-104]** and **Outline Decommissioning Strategy [REP1-100]** (including in relation to noise impacts and dust and mud tracking) by Requirements 16 and 20 respectively in Schedule 2 of the **Draft DCO [REP1-007]**. The Applicant confirms that no residual significant adverse effects on the use and desirability of individual PRoW during decommissioning are anticipated. Footpath GRIT20 is likely subject to diversion measures during construction to facilitate decommissioning works for the Cable Route Corridor. As part of this, the diversion route will be fully waymarked and segregated from HGV traffic and the proposed decommissioning compound (based on its location being the same as the proposed construction compound). Once decommissioning of this section of the Cable Route Corridor is completed, footpath GRIT20 will be restored to its original route and all waymarking will be restored. Bridleway MALW54 (and connecting footpath MALW55) are subject to diversion measures during decommissioning to facilitate access to Lime Down E for HGVs. As part of this, the diversion route will be fully waymarked and segregated from HGV traffic. Once decommissioning at Lime Down E has completed, bridleway MALW54 will be restored to its original route and all waymarking will be restored.

Wiltshire Council Comments	Applicant's Response
	The unclassified roads designated 'Track parallel to railway, Rodbourne' and 'Track crossing railway, Rodbourne' are proposed for decommissioning access within Lime Down E.
Ranking the Public Rights of Way impacts in importance All the local impacts identified are considered material to the ExA, but in accordance with the national guidance10 the council would indicate the following as the most significant in relation to this theme: • Reduction in visual amenity (setting of Public Right of Way) • Increase in noise • Impact on usability of PRoW network during construction, operation (replacement) and decommissioning phases • Possible conflicts and safety implications between PRoW users using the highway network to get to PRoW	The Applicant agrees that impacts on PRoW, unsurfaced roads, and the recreational use of local highways are a material consideration in the determination of the Scheme. The Applicant has therefore duly assessed these receptors in **ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]** and **ES Volume 3, Appendix 16-2: Tourism and Recreation Receptor Tables [APP-241]**. The Applicant therefore directs attention to the mitigation measures set out to minimise impacts to these receptors at all phases of the Scheme. Mitigation measures, such as providing offsets to onsite infrastructure and landscape screening to reduce the impacts on visual amenity to PRoW users are secured through the **Design Principles and Parameters [REP1A-008]** and **Outline LEMP [APP-283]** by Requirements 5 and 7 of Schedule 2 to the **Draft DCO [REP1-007]**. Mitigation measures to minimise noise from onsite activities, and site noisy infrastructure away from PRoWs and highways where practicable are secured for all phases of the Scheme in the **Outline CEMP [REP1-096]**, **Outline OEMP [REP1-098]** and **Outline Decommissioning Strategy [REP1-100]**,

Wiltshire Council Comments	Applicant's Response
	secured respectively by Requirements 13, 14, and 20 of Schedule 2 to the **Draft DCO [REP1-007]**. With reference to **ES Volume 2, Figure 2-4: Public Right of Way and Highways [APP-080]** and **Figure 14-2: Daytime Operational Noise Contours [APP-160]**, operational noise associated with the Scheme would typically be between 20 and 50 dB on PRoW. These levels are below WHO guidelines on moderate community annoyance and are akin to the existing ambient sound environment in the area as evidenced by the baseline sound survey results given in Table 1 of **ES Volume 3, Appendix 14-3: Baseline Noise Survey [APP-236]**. As such the enjoyment of bridleways, and PRoW in general, with respect to the sound level experienced, is not expected to be significantly adversely affected by the operation of the Scheme. The Applicant is committed to providing mitigation measures to protect the usability of PRoWs from impacts at all phases of the Scheme through protecting measures to control HGV movement, use signage and banksmen to protect PRoW users, and to provide adequate diversions in the requirement of PRoW use or closure for works. Where applicable, these measures are secured through the **Outline CTMP [REP1-112]** and **Outline PRoWPPMP [REP1-104]** by Requirements 15 and 16 respectively in Schedule 2 of the **Draft DCO [REP1-007]**. The Applicant confirms that all mitigation measures set out in these documents that are also relevant to operation and

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	decommissioning are implemented through the measures set out in the **Outline OEMP [REP1-098]** and **Outline Decommissioning Strategy [REP1-100]**. These are secured respectively by Requirements 14 and 20 in Schedule 2 to the **Draft DCO [REP1-007]**. With these measures in place, the Applicant is confident in the assessment outcomes, as set out in in **ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]**, are representative of the likely worst-case outcomes of the Scheme. This is: there are significant adverse effects at construction only to bridleway MALW54, and unsurfaced roads "Track crossing railway, Rodbourne" and "Track parallel to railway, Rodbourne" during construction, and that there are no significant adverse effects to any other PRoW or highway, or at any other phase of the Scheme.

6 Landscape and Visual

Table 6-1 - Landscape and Visual

Wiltshire Council Comments	Applicant's Response
Overview and commentary Wiltshire Council has regulatory responsibility for managing Wiltshire's natural environment and landscape. Development Plan policies considered primary and material to consideration of landscape and visual matters for this project include Core Policy 51 (Landscape) of the WCS, and Policy 91 (Conserving and enhancing Wiltshire's Landscapes) of the WLP Reg 19 Pre-submission Draft (2023). Both policies seek to protect, conserve and where possible enhance Wiltshire's distinctive landscape character. Compliance with Wiltshire Core Strategy, Policy 'CP51: Landscape' is not possible as the project cannot fulfil the requirement to: 'protect, conserve and where possible enhance landscape character and that new development must not have a harmful impact upon landscape character'. There is also conflict with Wiltshire Core Strategy, Policy CP42 (i) which is a listed policy factor requiring specific landscape resolution particularly in and around AONB's (now referred to as National Landscapes).	The Applicant considers that the Scheme complies with Wiltshire Core Policies (Ref 9) "CP51: Landscape", "CP42(i): Standalone Renewable Energy Installations" and Wiltshire Local Plan (Ref 8) Regulation 19 Pre-submission Draft "Policy 91: Conserving and Enhancing Wiltshire's Landscapes.". The reasoning is set out in further detail in Annex B – Local Policy Accordance Tables of the **Planning Statement [REP1-087]** (see pages 668, 687 and 803 for detailed reasons why the Scheme is viewed as compliant with these policies). The Applicant considers that although there are some short term significant adverse effects to the character of the landscape due to the change in land use caused by the infrastructure, there would also be permanent beneficial effects to the fabric of the land within the Order Limits as a result of the embedded mitigation measures which would contribute positively to the legacy landscape and be in line with Core Policy 51 and Wiltshire's Nature Recovery Strategy. It is recognised that the Scheme is within the setting of the Cotswolds National Landscape (CNL). Although there are no direct impacts on the CNL, the effects of the Scheme are fully assessed as a standalone receptor within **ES Volume 3, Appendix 8-6: Assessment of Effects on the Special**

Wiltshire Council Comments	Applicant's Response
	Qualities of the Cotswolds National Landscape [APP-197]. This assessment considers the effects of the Scheme on landscape character, visual amenity and the special qualities of the CNL, including tranquillity. The Scheme was refined through an iterative design process, to avoid and reduce effects on the CNL and its setting. Panels along the edge of the CNL have been avoided from the Order Limits in fields C2, C3 and C4 where significant visual effects on receptors within the CNL were identified. Panels were also avoided within fields C1, C6, C8, the western section of C9 and the majority of C10, with this land now proposed for ecological mitigation to protect the setting of the CNL. In addition, panels within fields A11 and A12 have been avoided and the land repurposed for ecological mitigation to protect the setting of the CNL towards Sherston. All land parcels adjacent to the CNL are proposed to deliver habitat enhancement, as shown in the **Work Plans [REP1-005],** informed by the CNL Management Plan and the Cotswolds National Landscape Strategy and Guidelines, to further the purposes of the designation. The Applicant considers the proposals to be in line with Core Policy CP42 (i).
Overview and commentary It is the Council's view that the project will have a significant harmful impact on landscape character due to its contrasting nature with the existing baseline situation and the huge scale of	The Scheme has been designed to deliver the greatest possible benefit from the available land and the available grid connection, whilst avoiding, minimising and/or mitigating harmful environmental effects. The effects of the Scheme have

Wiltshire Council Comments	Applicant's Response
land use change proposed, impacting an extensive area of high quality and relatively tranquil, highly rural, unspoilt Limestone Lowland countryside, which provides important setting and amenity functions to the Cotswolds National Landscape and for numerous small highly distinctive Limestone settlements. The overall impact on the unique character of the Limestone Lowland Landscape Character will be significantly negative across all phases of the project. The main impacts of the Lime Down Solar Park proposal are summarised in the table below.	been assessed in the LVIA presented in **ES Volume 1, Chapter 8: Landscape and Visual Impact Assessment (LVIA) [APP-060]**. The LVIA assesses effects on identified landscape and visual receptors, including residential properties and users of public rights of way, and identifies where significant effects may occur. The LVIA recognises that there would be temporary Moderate Adverse Significant effects on Landscape Character within the 1 km Study Area as a result of the change in land use from arable farmland to solar infrastructure. However, the Scheme proposes areas of new planting to mitigate the adverse effects of the Scheme on landscape character which, once established will provide significant beneficial effects to the fabric of the Sites and the legacy landscape. **ES Volume 1, Chapter 8: Landscape and Visual Impact Assessment [APP-060]** takes into account the effects on landscape character and visual amenity in detail, and acknowledges that there would be there would be an immediate change to the character of the Sites themselves and their immediate surroundings as they change from an area of arable farmland to solar infrastructure. However, the introduction of the solar arrays and other associated infrastructure would not become a defining feature on the landscape once operational (e.g. at year 1 and year 15). The six primary reasons are set out below:

Wiltshire Council Comments	Applicant's Response
	1. Dispersed nature of the Sites: The Scheme comprises a series of independent Sites set across an extensive agricultural landscape, with large areas of land between each of the Sites helping assist with assimilation. Each Site is set apart by their associated features such as robust hedgerows, woodland and tree cover, intervening settlements and the road and rail infrastructure and the changing topography. The discrete areas of land in the Scheme are placed so far apart that the Scheme would not be perceived in its entirety from any single location and the solar panels are distributed 'in and amongst' the landscape features to assimilate them into the landscape. 2. Nature of Scheme being 'overlaid' and reversable: For example, developments for mineral extraction fundamentally change the nature of the landscape in which they operate, whereas solar projects, with the exception of the footprint of the buildings, are 'overlaid' across the landscape with only the metal posts directly contacting with the land. This allows the important landscape features such as hedgerows, trees and watercourses to remain and continue to contribute to the landscape character of the receiving area. 3. Strong framework of existing vegetation: The strong framework of existing vegetation means that this would

Wiltshire Council Comments	Applicant's Response
	provide the structure for the Scheme to be set comfortably and not become intrusive within the landscape. The intermediary areas between the separate Sites boast a strong network of existing vegetation providing structural benefits to the landscape. The existing vegetation also acts as a backdrop for the panels and helps them integrate, particularly in views towards the horizon. 4. The benefits of mitigation: Year 15 would bring forward the benefits of the new planting in reducing the adverse landscape effects. The Scheme would deliver the following landscape enhancements as set out in Table 8-16: Total Landscape Enhancements of **ES Volume 1, Chapter 8 Landscape and Visual Impact Assessment [APP-060]** and shown below: a. Green Corridor & Woodland Planting 11.45ha; b. Enhanced Riparian Native Planting 7.78 ha; c. Hedgerow Reinforcement & Reinforced Roadside Vegetation 54.92km; d. Proposed Hedgerows 16.23km; e. Proposed Ponds and Wader Scrapes 14; and f. Groundcover 702.8 ha.

Wiltshire Council Comments	Applicant's Response
	5. Biodiversity Net Gain: In following the mitigation hierarchy, the Scheme would deliver significant areas of mitigation that would enhance the natural environment by providing net gains for biodiversity. This would deliver additional enhancement and connections to wider ecological networks as well as contributing to the enhancement of the quality of the landscape. 6. Legacy Landscape: Legacy Landscape is where, because of the development, the landscape would be left in a better condition than current day. This betterment is established as a consequence of the landscape proposals resulting in greater species variety, greater age depth, enhanced structure, resilience to pest and disease and reinforcement of local landscape character across the Sites. At decommissioning, agricultural fields would be returned back to landowner control. The landowners would choose how the land is to be used and managed, and it is likely that established habitats such as hedgerows and woodland would be retained under future equivalents of the modern day countryside protection laws. As infrastructure is removed, there would be an overall benefit to the character of the area with landscape mitigation likely to be retained under future countryside protections providing long term benefit towards legacy landscape. Following decommissioning, the site would benefit from

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	the significantly enhanced tree and hedgerow planting that has been carried out and has matured to create a much stronger and robust landscape, retaining, and enhancing the overall character and providing considerable biodiversity benefits over the years. Due to the development, the landscape would be left in a better condition than current day. This betterment is established as a consequence of the landscape proposals resulting in greater species variety, greater age depth, enhanced structure, resilience to pest and disease and reinforcement of local landscape character across the Sites. The defining legacy of the landscape would be the robust framework of features that have improved through the mitigation and landscape enhancements. This mitigation in turn would give rise to long-term wider benefits, including maintaining and enhancing biodiversity and in promoting the resilience of ecosystems.
Positive impacts – construction phase Visual Impacts None identified for Lime Down Areas A to E or for the CRC.	**ES Volume 1, Chapter 8: Landscape and Visual Impact Assessment [APP-060]** does not identify positive likely significant visual impacts during the construction phase. Construction will result in significant but temporary adverse visual effects.
Positive impacts – construction phase <u>Landscape Impacts</u> None identified for Lime Down Areas A to E or for the CRC.	**ES Volume 1, Chapter 8 Landscape and Visual Impact Assessment [APP-060]** does not identify positive likely significant landscape impacts during the construction phase.

Wiltshire Council Comments	Applicant's Response
	Construction will result in significant but temporary adverse landscape effects on the character of the landscape within the 1 km Study Area. However, the LVIA identifies that there would be Moderate/Minor Neutral Effects to the Landscape Fabric of the Lime Down Sites A-E. This is due to the retention of the landscape features. The LVIA recognises that prior to the establishment of the Embedded Mitigation planting, there would be an immediate change to the character of the Sites as it changes from an area of arable farmland to solar infrastructure above grassland. No Significant effects have been recorded to Landscape fabric during construction and Year 1 as Embedded Mitigation measures (including buffer/offsets from existing features) have been included within the design of the Scheme to protect the landscape fabric of the existing landscape features within the Scheme.
Positive impacts – operational Visual Impacts None identified for Lime Down Areas A to E or for CRC.	**ES Volume 1, Chapter 8: Landscape and Visual Impact Assessment [APP-060]** does not identify positive likely significant visual impacts during the operation and maintenance phase.
Positive impacts – operational Landscape Impacts Landscape Fabric: There is likely to be a slight positive impact for some landscape fabric components (hedgerows, hedgerow	Moderate Beneficial (positive) Significant effects on Landscape Fabric at Year 15 are recorded in **ES Volume 1, Chapter 8 Landscape and Visual Impact Assessment [APP-060]**. This is as a result of the Scheme delivering the following landscape enhancements as set out in Table 8-16: Total Landscape

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trees, ponds, and pastoral land cover) if embedded ecology and landscape mitigation and enhancement measures are appropriately designed (in detail), successfully established, maintained and managed in accordance with an approved LEMP throughout the operational life of development.	Enhancements of **ES Volume 1, Chapter 8 Landscape and Visual Impact Assessment [APP-060]** and shown below: • Green Corridor & Woodland Planting 11.45ha; • Enhanced Riparian Native Planting 7.78 ha; • Hedgerow Reinforcement & Reinforced Roadside; Vegetation 54.92km • Proposed Hedgerows 16.23km; • Proposed Ponds and Wader Scrapes 14; and • Groundcover 702.8 ha. Mitigation and enhancement measures are detailed in the **Outline LEMP [APP-283]** and the **Outline Ecological Protection and Mitigation Strategy (EPMS) [REP1-106],** which set out habitat creation, species protection measures, buffer zones and long-term ecological management. The preparation, approval and implementation of the detailed LEMP, substantially in accordance with the **Outline LEMP [APP-283],** is secured through Requirement 7 in Schedule 2 of the **Draft DCO [REP1-007].** The preparation, approval and implementation of the detailed EPMS, substantially in accordance with the **Outline EPMS [REP1-106],** is secured through Requirement 8 in Schedule 2 of the **Draft DCO [REP1-007].** These requirements ensure that ecological protection and enhancement measures are delivered and maintained

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	throughout construction and operation and maintenance of the Scheme.
Positive Impacts - operational Physical Public Rights of Way network (byways, bridleways, footpaths). There may be a slight positive impact arising from the creation of new additional and linking 'permissive' Public Rights of Way routes in terms of increasing opportunities to access countryside for informal recreation, although it should be noted that user's experiential/perceptual experience of rural countryside would be negatively influenced by the contrasting nature and scale of the introduced operational energy infrastructure and ancillary development to varying degrees.	The Applicant confirms that opportunities to improve access on the PRoW network have been explored for the operational lifetime of the Scheme through the provision of permissive paths for pedestrians, and permissive routes for pedestrians, cyclists, and equestrians. These are set out as Work No.10 on the **Works Plan [REP1-005]** and illustrated on **ES Volume 2, Figure 3-4: Landscape and Ecology Mitigation Plan [REP1-029 to REP1-032]**. Further commitments include ensuring surfaces and access structures are made safe and easy to use, and waymarking is clear and unambiguous. These measures are all secured through the **Outline PRoWPPMP [REP1-104]** by Requirement 16 of Schedule 2 of the **Draft DCO [REP1-007]**. The Applicant acknowledges that the experience for users of existing PRoW within or adjacent to the Solar PV Sites will be different than current conditions due to the visual and auditory changes associated with the Solar PV infrastructure. That notwithstanding, the Applicant has sought to enhance the experience for users of these routes through the provision of landscape planting and screening to minimise visual impacts, while ecology and biodiversity enhancement planting at ground-level in the 15 m buffer zones between PRoWs and nearby onsite infrastructure should go some way to improve the

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	immediate surroundings for PRoW users. These measures are shown on **ES Volume 2, Figure 3-4: Landscape and Ecology Mitigation Plan [REP1-029 to REP1-032]** and are secured through the **Outline LEMP [APP-283]** by Requirement 7 of Schedule 2 to the **Draft DCO [REP1-007]**. The landscape and visual effects of the Scheme in **ES Volume 1, Chapter 8: Landscape and Visual Impact Assessment [APP-060]** assess the effects on users of PRoW and identify where significant adverse effects may occur. The LVIA recognises that as a consequence of the development there would be long term adverse effects on the Landscape Character of the area as well as long term significant adverse effects to 10 Visual Receptors, all of which are local PRoW which are either within or directly adjacent to the proposed arrays.
Positive Impacts - operational Landscape Character: None identified for Lime Down Areas A to E or for CRC.	The design development of the Scheme recognises the need for careful siting, design and mitigation, and the importance of an iterative approach to design to ensure appropriate design solutions are reached. The Scheme has been designed to be sympathetic to local character and setting, helping to protect and enhance the landscape through the landscape-led design. The nature of solar developments results in infrastructure being 'overlaid' on the landscape and reversable. For example, developments for mineral extraction fundamentally change the nature of the landscape in which they operate, whereas solar

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	projects, with the exception of the footprint of the buildings, are 'overlaid' across the landscape and are reversable. This allows the important landscape features such as hedgerows, trees and watercourses to remain and continue to contribute to the landscape character of the receiving area. The strong framework of existing vegetation across the Scheme as well as the rolling topography of the Hullavington Rolling Lowland would provide the structure for the Scheme to be set comfortably and not become wholly intrusive within the landscape. The existing vegetation also acts as a backdrop for the panels and helps them integrate into the countryside surrounding. The LVIA takes into account the effects on landscape character and visual amenity in detail and acknowledges that there would be there would be a change to the character of the Sites themselves and their immediate surroundings as they change from an area of arable farmland to solar infrastructure. However, the introduction of the solar arrays and other associated infrastructure would not become a defining feature on the landscape once operational (e.g. at year 1 and year 15). The introduction of solar arrays and associated infrastructure is not expected to become a defining feature of the landscape during operation (e.g., at Year 1 and Year 15). This conclusion is based on six key factors: the dispersed layout of the Sites; the reversible and 'overlaid' nature of the Scheme; the effectiveness of mitigation planting, particularly by Year 15; the

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	delivery of Biodiversity Net Gain (BNG); and the creation of a strengthened legacy landscape.
Positive impacts – decommissioning phase Visual Impacts None identified.	It is **ES Volume 1, Chapter 8 Landscape and Visual Impact Assessment [APP-060]** does not identify positive likely significant visual impacts during the operational phase.
Positive impacts – decommissioning phase Landscape Impacts Landscape Fabric: Post decommissioning, there could be slight positive impact for soft landscape fabric components (new hedgerows, hedgerow trees, woodlands and ponds) if character supporting mitigation and enhancement planting measures are retained at the end of decommissioning phases for Lime Down Areas A to E, as a landscape legacy of the project.	At decommissioning, other than the buried cabling, all infrastructure would be removed. Although an adverse effect will be experienced during the process of decommissioning, once decommissioning is completed, the adverse effect would be ceased. The reinforced landscape would have ability to absorb short term decommissioning activities. At decommissioning, land within the Scheme would be returned back to the landowner's control. It is assumed at decommissioning the equivalent of the current day landscape protection policies/regulations will exist to ensure retention of the landscape features. Therefore, as infrastructure is removed, there would be an overall benefit to the character of the area with landscape mitigation retained providing long term benefit towards the legacy landscape. The defining legacy of the landscape would be the robust framework of features that have improved through the mitigation and landscape enhancements. This mitigation in turn would give rise to long-term wider benefits, including

Wiltshire Council Comments	Applicant's Response
	maintaining and enhancing biodiversity and in promoting the resilience of ecosystems.
Positive impacts – decommissioning phase Landscape Impacts Landscape Character: Post decommissioning, following removal of all introduced above ground energy infrastructure components and restoration of the land back to farming land use or alternative appropriate agri-environment use(s), there could be slight positive impact for landscape character if the embedded character supporting mitigation and planting enhancement measures are retained at the end of decommissioning phases for Lime Down Areas A to E, as a positive landscape legacy of the project.	At decommissioning, other than the buried cabling, all infrastructure would be removed. Although an adverse effect will be experienced during the process of decommissioning, once decommissioning is completed, the adverse effect would be ceased. The reinforced landscape would have ability to absorb short term decommissioning activities. Land within the Scheme would be returned back to landowner's control. It is assumed at decommissioning, the equivalent of the current day landscape protection policies/regulations will exist to ensure retention of hedgerows and trees. Therefore, as infrastructure is removed, there would be an overall benefit to the character of the area with landscape mitigation retained providing long term benefit towards the legacy landscape The defining legacy of the landscape would be the robust framework of features that have improved through the mitigation and landscape enhancements. This mitigation in turn would give rise to long-term wider benefits, including maintaining and enhancing biodiversity and in promoting the resilience of ecosystems.
Neutral impacts Visual Impacts	At decommissioning, land within the Scheme would be returned back to landowner's control. It is assumed at decommissioning, the equivalent of the current day landscape protection

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It is not currently clear from the information submitted, whether the existing baseline condition of low maintained hedgerow structure which characteristically supports more open views over the rolling limestone fields and field patterns structure, and which are proposed to be managed at greater height alongside new planting in order to provide visual mitigation for the development, would be restored back to baseline conditions at decommissioning stage. If existing and new hedgerow structure is reduced in height back to baseline height conditions, then this would represent a neutral effect. If the mitigating hedgerow structure located within and bordering Lime Down Areas A to E is retained in a higher managed state following the decommissioning phase, then the loss of open views and the appreciation of rolling limestone fields viewed over lower maintained hedgerows would not be a neutral effect.	policies/regulations will exist to ensure retention of the landscape features. Therefore, as infrastructure is removed, there would be an overall benefit to the character of the area with landscape mitigation retained providing long term benefit towards the legacy landscape.
Neutral impacts Landscape Impacts Landscape Fabric: Following decommissioning, the removal of the discordant industrialising energy components from Lime Down Areas A to E, including maintenance tracks, restoration of site access points back to conventional agricultural field access gateways, removal of 'highway improvement works' from rural lanes,	The design of the Scheme integrates a suite of landscape and ecological measures intended to reduce visual effects, reinforce local landscape structure and deliver biodiversity enhancement. At decommissioning, land within the Scheme would be returned back to landowner's control. It is assumed at decommissioning, the equivalent of the current day landscape protection policies/regulations will exist to ensure retention of the landscape features. Therefore, as infrastructure is removed,

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restoration of the land back to farmland and restoring the perceptual rural qualities of the countryside back to baseline conditions, would represent a neutral impact in terms of land use and perceptual qualities of rural countryside. Following decommissioning, the removal of the additional and linking 'Permissive' Public Rights of Way and the corresponding loss of additionally created recreational PRoW access to countryside would be a neutral effect by returning the PRoW network back to its original baseline status prior to the project taking place.	there would be an overall benefit to the character of the area with landscape mitigation retained providing long term benefit towards the legacy landscape. Following decommissioning, the Solar PV Sites would benefit from the substantial enhanced tree and hedgerow planting that has been carried out and has matured to create a much stronger and robust landscape, retaining, and enhancing the overall character and providing considerable biodiversity benefits over the years. Due to the development, the landscape would be left in a better condition than current day. This betterment is established as a consequence of the landscape proposals resulting in greater species variety, greater age depth, enhanced structure, resilience to pest and disease and reinforcement of local landscape character across the Sites. The defining legacy of the landscape would be the robust framework of features that have improved through the mitigation and landscape enhancements. This mitigation in turn would give rise to long-term wider benefits, including maintaining and enhancing biodiversity and in promoting the resilience of ecosystems. At decommissioning, as defined in the **Draft DCO [REP1-007],** the requirement to provide the permissive paths would cease to allow the land to be returned to its current use. The permissive paths would therefore be removed as part of the decommissioning process, with the precise timing to be

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	determined by the contractor(s) and set out within the **Outline Decommissioning Strategy [REP1-100],** which would be communicated to Wiltshire Council. As set out in the **Outline PRoWPPMP [REP1-104]** under Section 5, where reasonably practicable, the **Outline Decommissioning Strategy [REP1-100]** may provide for permissive path access to be maintained during the initial stages of decommissioning. In such circumstances, the permissive paths would be managed in the same manner as PRoW. Appropriate signage would also be installed to notify users of the closure date for each permissive path, with measures implemented to ensure the safety of all users throughout the process. An **Outline Decommissioning Strategy [REP1-100]** has been prepared, and a final Decommissioning Strategy will be submitted to the local planning authority for approval prior to decommissioning. This is secured by Requirement 20 in Schedule 2 of the **Draft DCO [REP1-007]**.
Negative impacts – construction phase Visual Impacts Removal of hedgerow sections to create access points with associated highway visibility splays, soil stripping, plant movement, construction of access tracks, 'highway improvements' to facilitate AIL and HGV traffic, and	The potential for loss of hedgerows and trees within the Solar PV Sites is limited as existing hedgerow gaps have been utilised for access points wherever possible during both construction and operation and maintenance. A small number of new, permanent (for the duration of the Scheme) gaps need to be created to facilitate access to particular fields/parts of the Solar PV Sites including providing access for Abnormal

Wiltshire Council Comments	Applicant's Response
construction and operation of compound areas will all create short-term (2 years) but high-intensity noise and visual disruption across multiple site areas (Lime Down areas A to E and along the entire length of the CRC). This will impact upon the amenity and views experienced by local residents and rural communities using Public Rights of Way and the local road network. This will be compounded by programmed multi-site working at the same time, extending the visual and audible impact over a large, disaggregated area impacting multiple receptors.	Indivisible Loads (AIL), totalling approximately 327 m in length. In the context of the hedgerow network across the Solar PV Sites (which is 73.44 km), this loss will be proportionately very small (far less than 1 %), and new planting will be implemented to ensure that any losses are compensated for. The vast majority of hedgerows within the Solar PV Sites were classified as being 'Important' as shown in the **Tree Protection Order (TPO) and Hedgerow Plan [APP-011].** A Hedgerow Removal Plan showing anticipated permanent hedgerow losses is provided in the **Outline EPMS [REP1-106].** Total Landscape Enhancements are set out within **ES Volume 1, Chapter 8 Landscape and Visual Impact Assessment [APP-060]** and shown below: • Green Corridor & Woodland Planting 11.45ha; • Enhanced Riparian Native Planting 7.78 ha; • Hedgerow Reinforcement & Reinforced Roadside Vegetation 54.92km; • Proposed Hedgerows 16.23km; • Proposed Ponds and Wader Scrapes 14; and • Groundcover 702.8 ha. As set out in Tables 8-19 to 8-21: Significant Visual Effect within **ES Volume 1, Chapter 8: Landscape and Visual**

Wiltshire Council Comments	Applicant's Response
	Impact Assessment [APP-060] the LVIA identifies significant visual effects on 48 separate visual receptors during the Construction phase. The Applicant confirms a detailed assessment of the likely significance of effects from the Scheme on the use and desirability of individual PRoW and recreational access to the countryside is included in **ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]** and **ES Volume 3, Appendix 16-2: Tourism and Recreation Receptor Tables [APP-241]**. This assessment considers the impact on individual recreational routes, including their practical use, safety of users, enjoyment (including consideration of visual and auditory impacts) and desirability. The assessment considers that aggregated effect of all parts of the Scheme on any individually assessed receptor. The Applicant confirms that the majority of significant adverse effects can be mitigated through the measures secured in the **Outline CTMP [REP1-112]** and **Outline PRoWPPMP [REP1-104]** by Requirements 15 and 16 respectively in Schedule 2 of the **Draft DCO [REP1-007]**. The Applicant confirms that residual significant adverse effects during construction are anticipated on bridleway MALW54 and on the unsurfaced roads in Lime Down E west of Rodbourne.
Negative impacts – construction phase	The effects on the Cotswolds National Landscape and its Special Qualities are set out in a standalone assessment in **ES**

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Noise and visual disturbance including artificial light, impacting the relative rural tranquillity adjoining the setting to the eastern and southern edges of the Cotswold National Landscape (CNL), and for users of the Public Rights of Way and rural road network approaching and exiting the CNL within its setting including visitors and tourists.	**Volume 3, Appendix 8-6: Assessment of Effects on the Cotswolds National Landscape and its Special Qualities [APP-197]**. The standalone assessment provides a robust assessment of views to and from the Scheme. The applicant considers that the effect of existing and proposed vegetation to screen views from and towards the CNL has been robustly assessed and considered in the layout of the Scheme. The non-visual aesthetic and perceptual effects on character are appropriately considered and are also assessed within the assessment of effects on the Special Qualities of the CNL is Section 3 of **ES Volume 3, Appendix 8-6: Assessment of Effects on the Cotswolds National Landscape and its Special Qualities [APP-197]**. The LVIA identifies Significant Adverse effects on eight visual receptors associated with views to and from the CNL as set out in detail in **ES Volume 3, Appendix 8-6: Assessment of Effects on the Cotswolds National Landscape and its Special Qualities [APP-197]**. A **Tranquillity Technical Note [PDA-010]** has been submitted by the Applicant. This provides a summary of where tranquillity is considered within the landscape and visual, cultural heritage, transport and access, noise and vibration, and socio-economics, tourism and recreation chapters and appendices of the ES for the Scheme.

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	With reference to **ES Volume 2, Figure 14-2: Daytime Operational Noise Contours of [APP-160]**, daytime operational noise levels from the Scheme on PRoW and the rural road network approaching and exiting the CNL are anticipated to be below 30 dB L_{Aeq}, which is around the level of a faint whisper, and therefore not likely to cause undue disturbance. The Applicant confirms a detailed assessment of the likely significance of effects from the Scheme on the use and desirability of individual PRoW and recreational access to the countryside during the operational lifetime of the Scheme is included in **ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]** and **ES Volume 3, Appendix 16-2: Tourism and Recreation Receptor Tables [APP-241]**. This assessment considers that there is no significant adverse effect to PRoW users during the operational lifetime of the Scheme. This is as a result of the visual, ecological and experiential mitigation and enhancement measures secured in the **Outline LEMP [APP-283]** and **Outline PRoWPPMP [REP1-104]** by Requirements 7 and 16 respectively in Schedule 2 of the **Draft DCO [REP1-007]**. This assessment has also considered the impact on the Cotswolds National Landscape as a tourism attraction and receptor, and finds that with the mitigation measures as set out above, there

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	is no significant adverse effect on the Cotswold National Landscape for visitors and tourists. Temporary site lighting during construction will be required to enable safe working during construction and decommissioning during hours of darkness and will be designed as far as reasonably practicable to minimise potential for light spillage outside the Scheme and Cable Corridor, particularly towards houses, traffic and ecological habitats. Standard good practice measures would be employed to minimise light spill, including glare during construction, operation and decommissioning. Temporary lighting is to be used for construction in exceptional circumstances and very likely for construction compounds, particularly for site offices and stores. As set out in the **Outline CEMP [REP1-096]** the use of lighting would be minimised to that required for safe site operations; 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. 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. From the outset, the dark-sky-compliant lighting strategy would be fully implemented. Lighting is not required

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	within the Solar PV Sites during the operation and maintenance phase of the Scheme. All routine maintenance activities would be scheduled for daylight hours as far as is practicable. Focussed task specific lighting would only be required in the event of emergency works or equipment failure requiring night-time working.
Negative impacts – construction phase Cable corridors, new access points and access tracks risk severing hedgerow networks and introducing linear scars during construction, fragmenting visual connectivity and visual amenity.	The LVIA in **ES Volume 1, Chapter 8: Landscape and Visual Impact Assessment [APP-060]** has assessed the effects of the Cable Route Corridor. The construction phase of the Cable Route Corridor would have a Very Low level of change on the character of the landscapes within the Study Area of the Cable Route Corridor and associated effects on the landscape are considered to result in Minor/Negligible Adverse (Not Significant) landscape effects. In visual terms, the LVIA in Table 8-25 in **ES Volume 1, Chapter 8: Landscape and Visual Impact Assessment [APP-060]** demonstrates that Moderate Significant effects were recorded for six Private Receptors and six Public Receptors during the construction Phase, along with one Major/Moderate Adverse effect for one public receptor. These receptors are in close proximity to both the Cable Route Corridor and Temporary Construction Compounds which would cause a noticeable change in views and visual amenity. As noted above these effects would be restricted to the construction phase and there would be no further effects on these receptors. None of

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	these receptors are within the CNL. For all other receptors, during the construction phase, there would be an appreciation of the digging and the presence of small-scale machinery along the length of the Cable Route Corridor as the cable is installed. However, this would not be above that typically associated with utility installation of this nature and would be limited to a short-term duration. During this time the installation would appear as standard ground level construction practices alongside an existing busy highway route or across open countryside. The potential for loss of hedgerows and trees within the Solar PV Sites is limited as existing hedgerow gaps have been utilised for access points wherever possible during both construction and operation and maintenance. A small number of new, permanent (for the duration of the Scheme) gaps need to be created to facilitate access to particular fields/parts of the Solar PV Sites including providing access for AIL, totalling approximately 327 m in length. In the context of the hedgerow network across the Solar PV Sites (which is 73.44 km), this loss will be proportionately very small (far less than 1 %), and new planting will be implemented to ensure that any losses are compensated for. The vast majority of hedgerows within the Solar PV Sites were classified as being 'Important' as shown in the **TPO and Hedgerow Plan [APP-011].** A Hedgerow Removal Plan showing anticipated permanent hedgerow losses is provided in the **Outline EPMS [REP1-106].**

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	However, these losses are offset by the proposed planting within the Sites as set out in Table 8-16 of **ES Volume 1, Chapter 8: Landscape and Visual Impact Assessment [APP-060]** are shown below: • Green Corridor & Woodland Planting 11.45ha; • Enhanced Riparian Native Planting 7.78 ha; • Hedgerow Reinforcement & Reinforced Roadside Vegetation 54.92km; • Proposed Hedgerows 16.23km; • Proposed Ponds and Wader Scrapes; and • Groundcover 702.8 ha.
Negative impacts – construction phase Landscape Impacts Landscape fabric: The removal of existing hedgerow sections and trees to create numerous new and substantially widened field/site access points with associated highway visibility splays, alongside the introduction of very large-scale solar arrays and maintenance tracks, associated battery storage systems and substations, will introduce new discordant engineered patterns and industrialising features at scale into a landscape currently defined by highly rural, open, gently undulating limestone	The potential for loss of hedgerows and trees within the Solar PV Sites is limited as existing hedgerow gaps have been utilised for access points wherever possible during both construction and operation and maintenance. A small number of new, permanent (for the duration of the Scheme) gaps need to be created to facilitate access to particular fields/parts of the Solar PV Sites including providing access for AIL, totalling approximately 327 m in length. In the context of the hedgerow network across the Solar PV Sites (which is 73.44 km), this loss will be proportionately very small (far less than 1 %), and new planting will be implemented to ensure that any losses are compensated for. The vast majority of hedgerows within the

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farmland. This landscape currently provides the rural setting for villages, hamlets and outlying rural farmsteads/country houses with a strong Cotswold stone vernacular.	Solar PV Sites were classified as being 'Important' as shown in the **TPO and Hedgerow Plan [APP-011].** A Hedgerow Removal Plan showing anticipated permanent hedgerow losses is provided in the **Outline EPMS [REP1-106].** However, these losses are offset by the proposed planting within the Sites as set out in Table 8-16 of **ES Volume 1, Chapter 8: Landscape and Visual Impact Assessment [APP-060]** are shown below: • Green Corridor & Woodland Planting 11.45ha; • Enhanced Riparian Native Planting 7.78 ha; • Hedgerow Reinforcement & Reinforced Roadside Vegetation 54.92km; • Proposed Hedgerows 16.23km; • Proposed Ponds and Wader Scrapes; and • Groundcover 702.8 ha. **ES Volume 1, Chapter 8: Landscape and Visual Impact Assessment [APP-060]** takes into account the effects on landscape character and visual amenity in detail, and acknowledges that there would be there would be an immediate change to the character of the Sites themselves and their immediate surroundings as they change from an area of arable farmland to solar infrastructure. However, the

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	introduction of the solar arrays and other associated infrastructure would not become a defining feature on the landscape once operational (e.g. at year 1 and year 15).
Negative impacts – construction phase Landscape Impacts Landscape fabric: The development will also change the perceptual aspects of the landscape at a site and local level close to and separating rural settlements. The introduction of security fencing, substations, and battery storage compounds will create a large-scale utilitarian aesthetic at odds with the traditional limestone vernacular. Dense panel layouts, fencing and high hedgerows will obscure historic enclosure patterns currently expressed by low hedgerows and dry-stone walls.	The perceptual aspects of the landscape are considered within the assessment of landscape character within the 1km Study Area. The LVIA presented in **ES Volume 1, Chapter 8: Landscape and Visual Impact Assessment [APP-060]** recognises that there will be Moderate Adverse (Significant) effects on the character of the Landscape (including within the Lime Down Sites) during construction as a result of the Scheme and the change from agricultural land to a solar infrastructure. It is agreed that the mitigation planting, particularly allowing hedgerows to become taller and maintained to a height of 4.5m would cause a change in landscape character and loss of longer views over the landscape in some places. However, it is noted that not all of Wiltshire's hedgerows are maintained to a low height. Dry stone walls are distinctly absent within the Lime Down Sites as compared to the adjacent CNL with only one dry stone wall within Field A2 which will be retained.
Negative impacts – operational Visual Impact	The LVIA presented in **ES Volume 1, Chapter 8: Landscape and Visual Impact Assessment [APP-060]** recognises that there are some footpaths where there will be long term

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For PRoW that pass through solar panel field areas (Lime Down Areas A to E), the negative visual effects experienced by users will not diminish during the operational life of development. Users of these PRoW will experience an obvious and notable change in views, including Combined and Sequential Cumulative Visual Impacts for the individual site areas A to E and the CRC, as well as with similar projects within the study area. The change is from the existing visual baseline situations for Lime Down areas A to E, with open rural views across agricultural fields to that of views of and between renewable energy infrastructure components. The existing perceptual experience and value of countryside for these PRoW users will fundamentally change, impacting the visual amenity value for users along these impacted routes. The visual effects, including Cumulative Visual Impacts, arising from the development, that users of local roads and PRoW that run adjacent or in close proximity to Lime Down areas A to E, are likely to experience the new development during initial early years of the operational phase (estimate 0-7 years), where the existing structure (hedgerows, trees, woodland) of the landscape does not provide effective visual screening to development areas, will be most notable during winter months without benefit of screening leaf cover, or where numerous new or widened field access gateway openings will provide new or increased views to development areas. The existing perceptual experience and value of countryside for these PRoW users	Significant adverse effects. These are set out in Table 8-30. The majority of these footpaths diagonally cross fields where solar infrastructure is proposed and where mitigation such as hedgerow screening would be inappropriate to the legacy landscape. The combined or Intra project cumulative effects were assessed in the LVIA in **ES Volume 1, Chapter 8: Landscape and Visual Impact Assessment [APP-060]** and the **Technical Note on Intra Project Cumulative Visual Effects [REP1-122]** which was submitted at Deadline 1 to explain the assessment undertaken in the LVIA and to summarise the significant effects. The **Technical Note on Intra Project Cumulative Visual Effects [REP1-122]** concluded that the Intra Project Cumulative Visual Effects were robustly assessed in the LVIA. It concluded that there is one private receptor; four public receptors and one transport receptor where Significant effects were recorded. In all cases, the effect of the secondary site is less than the primary Site. This is predominantly due to the distance to the Sites or the fact that they are seen from a different location from the route (referred to a sequential visibility). As such, this would not increase the level of effects above those described for the primary Site. Therefore, the Intra Project Cumulative Visual Effects are as identified for the primary Site.

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may also fundamentally change, impacting quality of amenity experienced for users along impacted routes.	This is due to the "disaggregated/disparate nature of the Lime Down Sites A to E" combined with rolling character of the Hullavington Lowlands. As such, the assessment does not consider there to be a greater Cumulative Visual Effect for these receptors than for the assessment of the level of harm identified from the individual sites themselves. The potential for loss of hedgerows and trees within the Solar PV Sites is limited. A small number of new, permanent (for the duration of the Scheme) gaps need to be created to facilitate access to particular fields/parts of the Solar PV Sites including providing access for AIL, totalling approximately 327 m in length. In the context of the hedgerow network across the Solar PV Sites (which is 73.44 km), this loss will be proportionately very small (far less than 1 %). A Hedgerow Removal Plan showing anticipated permanent hedgerow losses is provided in the **Outline EPMS [REP1-106]**. However, these losses are offset by the proposed planting within the Sites as set out in Table 8-16: Total Landscape Enhancements of **ES Volume 1, Chapter 8 Landscape and Visual Impact Assessment [APP-060]** which includes for 16.23km of proposed hedgerows. Landscape and visual effects of the Scheme have been assessed in **ES Volume 1, Chapter 8, Landscape and Visual Impact Assessment [APP-060]**. The Applicant recognises that there will be adverse effects on landscape character and visual

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	amenity during the early phases of operation. During operation and maintenance, the Scheme will introduce a large-scale and engineered influence across multiple parcels of open countryside. Although the mitigation planting and habitat measures will provide long-term benefits to the landscape fabric within the Solar PV Sites, these will not be fully effective until mature. Adverse effects on landscape character at Year 1 of operation and maintenance is acknowledged but, by Year 15, the effects of the mitigation will reduce the adverse effects on landscape to non-significant levels.
Negative impacts – operational Visual Impact Direct visual impacts of the development, including Cumulative Visual Impacts, will be sustained during the early years of the operational life of development (estimated to be minimum 5-7 years and subject to successful establishment and ongoing management of new planting for this purpose) until the proposed visual screening provides its intended mitigating function by allowing existing hedgerows to grow, and new screen planting to mature. This proposed visual screening will reduce the sense of openness and views currently experienced over the existing maintained low hedgerow structure.	The LVIA assesses the effects of the development at Year 1 and Year 15 of the operational phase to account for the time it takes for mitigation planting to mature. The visual effects of the Scheme are assessed in **ES Volume 1, Chapter 8: Landscape and Visual Impact Assessment [APP-060**] and identifies where significant adverse effects may occur. The LVIA recognises that as a consequence of the development there would be long term significant adverse effects to 10 Visual Receptors, all of which are local PRoW which are either within or directly adjacent to the proposed arrays.
Negative impacts – operational Landscape Impact	It is agreed that the change in land use change will change the character of the landscape within the 1km Study Area.

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Landscape fabric: The very large-scale land use change combined with the discordant industrialising nature of new introduced development elements will significantly and adversely impact upon the receiving landscape fabric baseline condition at a site and local level. In this regard the LPA raises significant concern in relation to the currently under-assessed effects for 'landscape fabric' including for cumulative assessment of landscape fabric, as included within the submitted Landscape Assessment at 6.1 Environmental Statement Volume 1, Chapter 8 Landscape and Visual [APP-060], and supporting tables and figures.	**ES Volume 1, Chapter 8: Landscape and Visual Impact [APP-060]** takes into account the effects on landscape character and visual amenity in detail, and acknowledges that there would be there would be an immediate change to the character of the Sites themselves and their immediate surroundings as they change from an area of arable farmland to solar infrastructure. However, the introduction of the solar arrays and other associated infrastructure would not become a defining feature on the landscape once operational (e.g. at year 1 and year 15).
Negative impacts – operational Landscape Impact Landscape fabric: The removal of existing hedgerow sections and trees to create numerous new and substantially widened (up to 16m wide) existing field access entrance gateways from the public highways and byways with associated necessary highway visibility splays, will in places likely require substantive hedgerow removals. Additionally, the introduction of very large-scale solar arrays and maintenance tracks, associated battery storage systems and substations will introduce new discordant engineered patterns and industrialising features into a	**ES Volume 1, Chapter 8: Landscape and Visual Impact [APP-060]** takes into account the effects on landscape character and visual amenity in detail, and acknowledges that there would be there would be an immediate change to the character of the Sites themselves and their immediate surroundings as they change from an area of arable farmland to solar infrastructure. However, the introduction of the solar arrays and other associated infrastructure would not become a defining feature on the landscape once operational (e.g. at year 1 and year 15). The potential for loss of hedgerows and trees within the Solar PV Sites is limited. A small number of new, permanent (for the duration of the Scheme) gaps need to be created to facilitate

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landscape which is currently defined by highly rural, open, gently undulating limestone farmland, which provides the landscape setting for, and rural countryside separation between: rural villages, hamlets and isolated farmsteads with a strong Cotswold stone vernacular.	access to particular fields/parts of the Solar PV Sites including providing access for AIL, totalling approximately 327 m in length. In the context of the hedgerow network across the Solar PV Sites (which is 73.44 km), this loss will be proportionately very small (far less than 1 %). A Hedgerow Removal Plan showing anticipated permanent hedgerow losses is provided in the **Outline EPMS [REP1-106].** However, these losses are offset by the proposed planting within the Sites as set out in Table 8-16 of **ES Volume 1, Chapter 8: Landscape and Visual Impact Assessment [APP-060]** which includes for 16.23 km of proposed hedgerows.
Negative impacts – operational Landscape Impact Landscape fabric: The development will change the perceptual aspects of the landscape fabric at a site and local level, close to and separating rural settlements. The introduction of solar PV arrays, substations, battery storage compounds and security fencing, will create a large-scale utilitarian aesthetic, at odds with the traditional and historic limestone vernacular. Dense panel layouts, utilitarian structures, fencing and higher-level hedgerow management will obscure historic field enclosure patterns currently expressed by lower maintained hedgerows	As noted above, the perceptual aspects of the landscape are considered within the assessment of landscape character within the 1km Study Area. The LVIA presented in **ES Volume 1, Chapter 8: Landscape and Visual Impact Assessment [APP-060]** recognises that there will be Moderate Adverse (Significant) effects on the character of the Landscape (including within the Lime Down Sites) during Year 1 of the operational phase as a result of the Scheme and the change from agricultural land to a solar infrastructure. The **Technical Note on Landscape Fabric and Landscape Character [REP1-121]** was submitted by the Applicant in response to Wiltshire Council's Relevant Representation **[RR-4934]**. Although the Methodology of the assessment is agreed,

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and dry-stone walls. These adverse landscape fabric impacts will remain for the operational life of development.	the application of the Methodology is not and there appears to be a degree of misunderstanding of the findings of the LVIA especially relating to Landscape Fabric and land use change. The Technical Note provides clarification on the Methodology used in the LVIA to assess the effects of the Scheme on Landscape Fabric and Landscape Character and clarifies that the assessment on Landscape Fabric is an independent and separate assessment to that undertaken on the effects of the Scheme on Landscape Character.
Negative impacts – operational Landscape Impact Landscape Character: The very large-scale land use change combined with the discordant industrialising nature of development proposed will significantly and adversely impact upon the receiving landscape character baseline condition at a site and local level. In this regard the LPA raises significant concern in relation to the currently assessed effects for 'landscape character' including for cumulative assessment of landscape character, included within the submitted Landscape Assessment at 6.1 Environmental Statement Volume 1, Chapter 8 Landscape and Visual [APP-060], and supporting tables and figures. The LPA does not accept that the likely landscape impact assessed to arise from development of this scale and nature	As noted above, the LVIA presented in **ES Volume 1, Chapter 8: Landscape and Visual Impact Assessment [APP-060]** recognises that there are Moderate Adverse (Significant) effects to Landscape Character as a result of the Lime Down Scheme at Year 1 of operation, with effects reducing as a result of the maturing embedded mitigation measures by Year 15. The **Technical Note on Landscape Fabric and Landscape Character [REP1-121]** was submitted by the Applicant in response to Wiltshire Council's Relevant Representation **[RR-4934]**. Although the Methodology of the assessment is agreed, the application of the Methodology is not and there appears to be a degree of misunderstanding of the findings of the LVIA especially relating to Landscape Fabric and land use change. The Technical Note provides clarification on the Methodology used in the LVIA to assess the effects of the Scheme on Landscape Fabric and Landscape Character and clarifies that

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has been appropriately assessed in this regard. Further detailed technical justification and the reasons for this are explained within the council's Relevant Representation response [RR-4934], under 'Landscape and Visual Considerations Section' comments.	the assessment on Landscape Fabric is an independent and separate assessment to that undertaken on the effects of the Scheme on Landscape Character.
Negative impacts – operational Landscape Impact Landscape Character: The LPA does not accept that the likely landscape impact assessed to arise from development of this scale and nature has been appropriately assessed in this regard. Further detailed technical justification and the reasons for this are explained within the council's Relevant Representation response [RR-4934], under 'Landscape and Visual Considerations Section' comments.	The **Technical Note on Landscape Fabric and Landscape Character [REP1-121]** was submitted by the Applicant in response to Relevant Representation response **[RR-4934]**. Although the Methodology of the assessment is agreed, the application of the Methodology is not and there appears to be a degree of misunderstanding of the findings of the LVIA especially relating to Landscape Fabric and land use change. The Technical Note provides clarification on the Methodology used in the LVIA to assess the effects of the Scheme on Landscape Fabric and Landscape Character and clarifies that the assessment on Landscape Fabric is an independent and separate assessment to that undertaken on the effects of the Scheme on Landscape Character.
Negative impacts – operational Landscape Impact Landscape Character: The baseline landscape character will be changed from agricultural farmland located within an existing highly rural and relatively tranquil and sensitive part of the 'Limestone Lowland'	**ES Volume 1, Chapter 8: Landscape and Visual Impact Assessment [APP-060]** takes into account the effects on landscape character and visual amenity in detail, and acknowledges that there would be there would be an immediate change to the character of the Sites themselves and their immediate surroundings as they change from an area of arable farmland to solar infrastructure. However, the

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landscape character type to the east and south of the CNL boundary, which currently functions as important separating rural countryside surrounding and separating distinctive limestone village, hamlet and farmstead settlement patterns and which also currently provides accessible countryside for associated rural communities. The baseline character will be changed to a new highly uncharacteristic scale of utilitarian industrialising energy land use, impacting upon important existing perceptual rural characteristics and functions of the landscape, including for the wider landscape setting of the CNL designation and for users of the Fosse Way.	introduction of the solar arrays and other associated infrastructure would not become a defining feature on the landscape once operational (e.g. at year 1 and year 15). The effects on the CNL and its Special Qualities are set out in a standalone assessment in **ES Volume 3, Appendix 8-6: Assessment of Effects on the Cotswolds National Landscape and its Special Qualities [APP-197]**. The standalone assessment provides a robust assessment of views to and from the Scheme. The applicant considers that the effect of existing and proposed vegetation to screen views from and towards the CNL has been robustly assessed. The non-visual aesthetic and perceptual effects on character are appropriately considered and are also assessed within the assessment of effects on the Special Qualities of the CNL is Section 3 of **ES Volume 3, Appendix 8-6: Assessment of Effects on the Cotswolds National Landscape and its Special Qualities [APP-197]**. In respect of visual amenity, the assessment recorded some short-term adverse effects which would be experienced by a small number of visual receptors with views to and from the CNL. The landscape implications of the traffic routes and Indivisible Abnormal Loads are assessed in **ES Volume 3, Appendix 8-6: Assessment of Effects on the Cotswolds National Landscape and its Special Qualities [APP-197]**. The assessment notes a number of works required including

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	widening and passing bays to accommodate the AILs which have been assessed for any landscape and visual effects. There are three small sections on the route within the CNL where works to trees are required. This includes cutting back or trimming of hedgerows rather than removing/loss and the effect on Landscape and Visual Receptors would be temporary and would be Negligible (Not Significant). A **Tranquillity Technical Note [PDA-010]** has been submitted by the Applicant. This Technical Note provides a summary of where tranquillity is considered within the landscape and visual, cultural heritage, transport and access, noise and vibration, and socio-economics, tourism and recreation chapters and appendices of the ES for the Scheme.
Negative impacts – operational Operational/Maintenance -Replacement The necessary replacement of 100s of BESS battery units (likely 2-3 times) and more than a million solar PV panels (likely 1-2 times) during the operational lifespan of the project will result in intense periods of maintenance/replacement and transport of individual component parts which is likely to result in increased noise and disruption and visual disturbance, impacting local residents and rural communities, rural road and PRoW users.	The Applicant makes note of this comment. **ES Volume 1, Chapter 13: Transport and Access [REP1-019]** set out and assessed the likely effects of the Scheme in relation to transport and access. Likely effects have been assessed for the operation and maintenance phase of the Scheme. It was concluded that the Scheme is not likely to result in any significant residual Transport and Access effects during the operation and maintenance phase. Mitigation measures to manage vehicle movements during the operation and maintenance phase are detailed in Section 3.8 of the **Outline OEMP [REP1-098]**. A Final OEMP will be prepared in substantial accord with the **Outline OEMP [REP1-098]** and, for

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Adverse landscape character impacts will remain for the operational life of development.	the scheduled replacement periods, incorporate necessary measures from the **Outline CTMP [REP1-112]**. The anticipated number of HGV trips for replacement shown in **ES Volume 1, Chapter 13: Transport and Access [REP1-019]** demonstrate they are well below the number of HGV trips associated with the construction phase. **ES Volume 1, Chapter 8: Landscape and Visual Impact Assessment [APP-060]** takes into account the effects on landscape character and visual amenity in detail, and acknowledges that there would be there would be an immediate change to the character of the Sites themselves and their immediate surroundings as they change from an area of arable farmland to solar infrastructure. However, the introduction of the solar arrays and other associated infrastructure would not become a defining feature on the landscape once operational (e.g. at year 1 and year 15).
Negative impacts – decommissioning phase Visual Impacts The dismantling of substations and fenced compounds, solar PV array systems, and BESS facilities, construction plant movement, excavation and removal of highway access points, internal maintenance tracks, soil replacement/restoration operations, alongside AIL and HGV traffic movements to dispose of scheme components including substation	**ES Volume 1, Chapter 8: Landscape and Visual Impact [APP-060]** undertakes an assessment of the effects of the Scheme at decommissioning on both landscape character and visual amenity. At decommissioning, other than the buried cabling, all infrastructure would be removed. Although an adverse effect will be experienced during the process of decommissioning, once decommissioning is completed, the adverse effect would

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components, over a million solar PV panels, and likely thousands of tonnes of aggregates, will all combine to create short term (estimated 2 years) of high-intensity noise and visual disruption across multiple sites (Lime Down areas A to E) which will impact upon local residents and rural communities, Public Rights of Way and local road network users. This will be compounded by programmed multi-site working at the same time, extending the visual impact over a large area for multiple visual receptors.	be ceased. The reinforced landscape would have ability to absorb short term decommissioning activities. At decommissioning, land within the Scheme would be returned back to landowner's control. It is assumed at decommissioning the equivalent of the current day landscape protection policies/regulations will exist to ensure retention of the hedgerows and trees. Therefore, as infrastructure is removed, there would be an overall benefit to the character of the area with landscape mitigation retained providing long term benefit towards the legacy landscape. With respect to the noise impact, this is expected to be less intrusive than during the construction phase which, with reference to Table 14-18 in **ES Volume 1, Chapter 14 Noise and Vibration [REP1-021]**, would give rise to average levels of 50-60 dB at residential receptors. While some activity will be audible, this is not expected to amount to a significant effect on the health and quality of life of the local community.
Negative impacts – decommissioning phase Visual Impacts Noise and visual disturbance including artificial light, impacting the relative rural tranquillity adjoining the setting to the eastern edge of the CNL, for users of the Public Rights of Way and rural road network leading into the CNL and which provides	Temporary site lighting during decommissioning will be required to enable safe working during construction and decommissioning during hours of darkness and will be designed as far as reasonably practicable to minimise potential for light spillage outside the Scheme and Cable Corridor, particularly towards houses, traffic and ecological habitats.

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visual separation between rural settlements and visual settings and accessible recreation functions around settlements. The impact along the Cable Route Corridor(s) during decommissioning are likely to be much less than for Lime Down Areas A to E, as it is understood the applicant currently plans to leave the buried cable/s in-situ following decommissioning of energy generation and transfer. It is likely that only operational maintenance access to the CRC would be required to be removed, the details of which are not designed or provided at this stage.	Standard good practice measures would be employed to minimise light spill, including glare during construction, operation and decommissioning. Temporary lighting is to be used for construction in exceptional circumstances and very likely for construction compounds, particularly for site offices and stores. As set out in the **Outline CEMP [REP1-096]** the use of lighting would be minimised to that required for safe site operations: • 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); and • Lighting would be directed towards the middle of the Order limits rather than towards the boundaries. Any effects would be temporary in nature and confined to the decommissioning phase and would have a Very Low magnitude of change. Lighting is not required within the Solar PV Sites during the operation and maintenance phase of the Scheme. All routine maintenance activities would be scheduled for daylight hours as far as is practicable. Focussed task specific lighting would only be required in the event of emergency works or equipment failure requiring night-time working.

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	The effects on the CNL and its Special Qualities including tranquillity are set out in a standalone assessment in **ES Volume 3, Appendix 8-6: Assessment of Effects on the Cotswolds National Landscape and its Special Qualities [APP-197]**. The standalone assessment provides a robust assessment of views to and from the Scheme from local roads and the PRoW network. The landscape and visual effects of the Cable Route Corridor are set out in Section 8 of **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]**. For the decommissioning phase, following backfilling and ground reinstatement at the end of the construction phase, the ducts/pipes at each location would remain in situ and not be removed. Alternatively, the cables can be removed by opening up the ground at regular interval and pulling the cable through to the extraction point, leaving the ducting and jointing bays in place, avoiding the need to open up the entire length of the cable route. Following installation, the land is returned to its original use, and this would remain throughout and beyond the decommissioning phase. Given the above, the decommissioning phase of the Cable Route Corridor is considered to result in Minor/Negligible Neutral (Not Significant) landscape effects.
Negative impacts – decommissioning phase Landscape Impacts	At decommissioning, other than the buried cabling, all infrastructure would be removed. Although an adverse effect will be experienced during the process of decommissioning,

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Landscape fabric: Within Lime Down Areas A to E, the removal of renewable energy generation and storage infrastructure is likely to result in some potential for negative impacts for certain fabric components, such as removal of pastoral grassland land cover back to arable use, and possibly some hedgerows and trees during construction and restoration activities associated with dismantling and removal of solar PV panel field areas, potential creation of construction (decommissioning) compounds, and additional or widened access points to facilitate removal of solar arrays, substations and BESS and the maintenance tracks.	once decommissioning is completed, the adverse effect would be ceased. The reinforced landscape would have ability to absorb short term decommissioning activities. At decommissioning, land within the Scheme would be returned back to landowner's control. It is assumed at decommissioning, the equivalent of the current day landscape protection policies/regulations will exist to ensure retention of the landscape features. Therefore, as infrastructure is removed, there would be an overall benefit to the character of the area with landscape mitigation retained providing long term benefit towards the legacy landscape. The defining legacy of the landscape would be the robust framework of features that have improved through the mitigation and landscape enhancements. This mitigation in turn would give rise to long-term wider benefits, including maintaining and enhancing biodiversity and in promoting the resilience of ecosystems.
Ranking the Landscape and Visual impacts in importance All the local impacts identified are considered material to the ExA, but in accordance with the national guidance[4] the council would indicate the following as the most significant in relation to this theme:	**ES Volume 1, Chapter 8: Landscape and Visual Impact [APP-060]** takes into account the effects on landscape character and visual amenity in detail, and acknowledges that there would be there would be an immediate change to the character of the Sites themselves and their immediate

[4] National Guidance published in 2024, 'Nationally Significant Infrastructure Projects: Advice for Local Authorities'

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1) The significant negative impacts on the elements and components, which combine to form the intrinsic and unique character of the receiving 'Limestone Lowland' landscape, through construction, operation and decommissioning across the project area and which are unable to be mitigated.	surroundings as they change from an area of arable farmland to solar infrastructure. However, the introduction of the solar arrays and other associated infrastructure would not become a defining feature on the landscape once operational (e.g. at year 1 and year 15). The LVIA recognises that there are Significant effects to the character of the landscape and visual amenity of the area. However, the landscape led approach to the development has utilised the mitigation hierarchy to minimise adverse effects. Avoidance measures include avoiding development adjacent to the National Landscape where it would affect its setting and avoiding development where it would be visually intrusive and affect the character and visual experience of the landscape. Embedded mitigation measures principally comprise a range of offsets and buffers and specific landscape design parameters outlined in Tables 7 and 8 of **ES Volume 3, Appendix 8-6: Assessment of Effects on the Cotswolds National Landscape and its Special Qualities [APP-197]**. These include retention and enhancement of the existing landscape framework to gap up existing hedgerows and provide new tree lines to increase age and species diversity. The embedded mitigation also includes new planting to both mitigate the visual effects of the Scheme and provide landscape benefits including the re-establishment of historic hedgerows within the setting of the CNL, new areas of native woodland, trees, scrub and

Wiltshire Council Comments	Applicant's Response
	grassland, new planting within riparian corridors to enhance rivers and wetland, as well the restoration of dry-stone walls and creation of new/reestablishment of historic ponds. The benefits of the proposed mitigation are recorded within the separate assessment on Landscape Fabric and have been informed by Wiltshire's and the Cotswold Nature Recovery strategy/plan.
Ranking the Landscape and Visual impacts in importance 2) In terms of the setting of the Cotswolds National Landscape (CNL), the Landscape and Visual Impact Assessment (LVIA) hasn't given due regard to the locational sensitivity of Lime Down Areas A to C for development of this very large scale project and the contrasting nature to its receiving landscape baseline context which provides the setting to the CNL, including important PRoW and road links to and from the CNL and that experienced along the Fosse Way. The proposals therefore result in a significant negative impact on the landscape setting of the CNL.	The Cotswolds National Landscape is an important material planning consideration. It has been assessed as its own standalone receptor in **ES Volume 3, Appendix 8.6: Assessment of Effects on the Cotswolds National Landscape and its Special Qualities [APP-197].** The impacts of the Scheme upon landscape character and visual amenity within the CNL draw upon the findings of the LVIA. **ES Volume 3, Appendix 8-6: Assessment of Effects on the Cotswolds National Landscape and its Special Qualities [APP-197]** also assesses the effects of the proposals on the special qualities of the CNL and considers the enhancement measures incorporated into the Scheme to further the purposes of the CNL. The landscape and visual effects of the Scheme on the CNL and its Special Qualities have been mitigated throughout the landscape led, iterative design process and has been informed by the Cotswold Nature Recovery Plan in conjunction with

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	liaison with the project Ecologist and consultation with officers at the CNL Board and Wiltshire Council. Embedded mitigation includes: • Avoidance - Avoidance measures to avoid harm to the CNL through the use of significant buffers to the CNL boundary where Sites A, B and C are within its setting and to maintain views to and from the CNL such as Alderton and Sherston Church; • Protection – Buffers and offsets have been embedded into the design of the Scheme to protect the existing landscape fabric of the Sites within the setting of the CNL (and throughout the wider Scheme); • Retention and Enhancement - Retention and enhancement of the existing landscape framework to gap up existing hedgerows and provide new tree lines to increase age and species diversity. The embedded mitigation also includes new planting to both mitigate the visual effects of the Scheme and provide landscape benefits, This includes the re-establishment of historic hedgerows within the setting of the CNL, new areas of native woodland, trees, scrub and grassland, new planting within riparian corridors to enhance rivers and wetland, as well the restoration of dry-stone walls and creation of new ponds; and

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	• Positive Enhancements – Positive enhancements to further the purpose of the CNL are incorporated into the Scheme, particularly within avoidance areas. This includes: ○ The creation of wildflower meadows on the edge of the CNL within the northern part of A1, C1, C6, C8, the southwestern part of C9 and B12. ○ The creation of wildflower meadow verges on the edge of set aside land in A11, A12 and C10 to provide attractive buffers in views from public roads on the edge of the CNL; and − Maintaining hedgerows at their current height of c1.5m (or as existing if greater) bordering the CNL within Site C (including the northern boundary of C1 to maintain open views of the landscape within the setting of the CNL. As a result of the above mitigation embedded within the Scheme and shown on **ES Volume 2, Figure 3-4: Landscape and Ecology Mitigation Plan [REP1-029 to REP1-032]**. Moderate Significant Beneficial effects on the Landscape Fabric of the Site have been recorded within the setting of the CNL. Although significant landscape effects have been recorded within the 1 km Local Study Area of the Lime Down Sites, these effects are primarily related to the change in land use from agriculture to the solar infrastructure. This change

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	does not directly affect the CNL as the buffers to the development provided by the avoidance measures and layers of proposed mitigation planting would contain the development away from the edge of the CNL. As such, the development would be barely discernible from within the CNL. The Visual assessment of effects recorded some short term Moderate Adverse effects during Construction and Operation Year 1 on some receptors which have a visual relationship with the CNL (including views to and from the CNL). 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 effects identified during decommissioning. As such, there would be no significant long-term visual effects on the CNL. The assessment of effects on the Special Qualities of the CNL scoped out 3 SQs as there is no association with the Site. The assessment has found that there are no direct effects on the remaining SQs. There are some Minor/Negligible short-term effects on a small number of visual receptors within the setting of the CNL which effect SQ7 -Tranquillity and SQ13 Archaeology and historic associations. However, these effects are mitigated by Year 15 when proposed vegetation has matured. The assessment also found that there would be beneficial effects on SQ 6 – Biodiversity and nature recovery as a result of the delivery of approximately 119.7 hectares of

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	flower-rich neutral grassland (as defined in the BNG assessment) and SQ 12 - An accessible landscape as a result of the delivery of approximately 12.8km of new permissive paths within the setting of the CNL. The remaining SQs would remain entirely intact. As set out above the Scheme has avoided harm to the CNL, maintained views to and from the CNL, protected the features of the landscape within the setting of the CNL, retained and enhanced the character of the landscape through the proposed embedded mitigation and provided positive enhancements to further the purpose of the CNL. In conclusion, this standalone assessment of effects on the CNL and its Special Qualities has found that there are no significant direct effects on the CNL or its Special Qualities. Harm to the CNL itself would be minimal with beneficial landscape effects within the setting of the CNL in the long term which would further the purposes of the designation.
Ranking the Landscape and Visual impacts in importance 3) The significant negative impacts on visual receptors across the project area, whether they be residential or people passing through or using the landscape for business or recreation, and which in many cases cannot be adequately or appropriately mitigated.	The LVIA presented in **ES Volume 1, Chapter 8: Landscape and Visual Impact Assessment [APP-060]** recognises that there are some Significant long term visual effects as a result of the Scheme, however, there are no long term Significant adverse effects on residential properties.

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Ranking the Landscape and Visual impacts in importance 4) The value, susceptibility and sensitivity of the CNL's setting haven't been fully considered in respect of the landscape or visual impacts arising from construction traffic and works to rural road network to facilitate construction, maintenance replacement of infrastructure components or decommissioning phases. These are significant negative impacts upon rural character and relative tranquillity in areas considered to be complementary to the character of the CNL. There will be significant negative impacts on the rural character and relative tranquillity of the setting of the CNL because of traffic and works to facilitate construction, maintenance replacement during operation, and decommissioning.	Ongoing consultation with the CNL Board has been undertaken throughout the design process and the ongoing Examination. The effects on the Cotswolds National Landscape and its Special Qualities are set out in a standalone assessment in **ES Volume 3, Appendix 8-6: Assessment of Effects on the Cotswolds National Landscape and its Special Qualities [APP-197].** The standalone assessment provides a robust assessment of views to and from the Scheme. The applicant considers that the effect of existing and proposed vegetation to screen views from and towards the CNL has been robustly assessed and considered in the layout of the Scheme. The non-visual aesthetic and perceptual effects on character are appropriately considered and are also assessed within the assessment of effects on the Special Qualities of the CNL in Section 3 of **ES Volume 3, Appendix 8-6: Assessment of Effects on the Cotswolds National Landscape and its Special Qualities [APP-197].** The Scheme has been designed sensitively to avoid harm to the CNL. Following the mitigation hierarchy, avoidance measures have been the primary way of avoiding harm. These measures are set out in Section 8.9 of the LVIA as presented in **ES Volume 1, Chapter 8: Landscape and Visual Impact Assessment [APP-060]** and include: • the avoidance of panels within the setting of the CNL in Sites A, B and C where there is a strong visual

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	relationship between the CNL and the Scheme. This includes: ○ Site A: The northern part of fields A1, A11 and A12; ○ Site B: B12; and ○ Site C: C1, C6, C8, part of C9 and the majority of C10. • Panels in C2, C3 and C4 which are not on the boundary of the CNL but are where significant visual effects on receptors within the CNL were recorded at PEIR were subsequently removed from the Scheme following Statutory Consultation. A Technical Note on **Construction Routes in the Cotswold National Landscape [REP1-131]** has been submitted by the Applicant at Deadline 1. The Technical Note was prepared in response to ongoing engagement with the CNL Board and provides clarity regarding the justification for selecting the proposed construction routes through the CNL to access Lime Down A, B and C, as well as access locations 101 to 108 serving the Cable Route Corridor.
Ranking the Landscape and Visual impacts in importance 5) There will be significant negative impacts upon the important existing role and function of the landscape which surrounds	**ES Volume 1, Chapter 8: Landscape and Visual Impact Assessment [APP-060]** takes into account the effects on landscape character and visual amenity in detail, and acknowledges that there would be there would be an

Wiltshire Council Comments	Applicant's Response
and separates the highly distinctive and deeply rural limestone village, hamlet and farmstead settlement pattern, and which also provides accessible countryside recreation opportunities for associated rural communities across a large area. The loss and reduction of perceptual rural character and relative rural tranquillity of countryside arising from the very large-scale land use change in combination with the deeply contrasting utilitarian nature of development will harm landscape character and experiential recreational quality.	immediate change to the character of the Sites themselves and their immediate surroundings as they change from an area of arable farmland to solar infrastructure. However, the introduction of the solar arrays and other associated infrastructure would not become a defining feature on the landscape once operational (e.g. at year 1 and year 15). The LVIA in **ES Volume 1, Chapter 8: Landscape and Visual Impact Assessment [APP-060]** recognises that there are Significant effects to the character of the landscape and visual amenity of the area. However, the landscape led approach to the development has utilised the mitigation hierarchy to minimise adverse effects. Avoidance measures include avoiding development adjacent to the National Landscape where it would affect its setting and avoiding development where it would be visually intrusive and affect the character and visual experience of the landscape. Embedded mitigation measures principally comprise a range of offsets and buffers and specific landscape design parameters outlined in Tables 7 and 8 of **ES Volume 3, Appendix 8-6: Assessment of Effects on the Cotswolds National Landscape and its Special Qualities [APP-197]**. These include retention and enhancement of the existing landscape framework to gap up existing hedgerows and provide new tree lines to increase age and species diversity. The embedded mitigation also includes new planting to both mitigate the visual

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	effects of the Scheme and provide landscape benefits including the re-establishment of historic hedgerows within the setting of the CNL, new areas of native woodland, trees, scrub and grassland, new planting within riparian corridors to enhance rivers and wetland, as well the restoration of dry-stone walls and creation of new/reestablishment of historic ponds.

7 Built Heritage

Table 7-1 - Built Heritage

Wiltshire Council Comments	Applicant's Response
Overview and commentary The most significant impact of the Lime Down Solar Park proposal is identified as being on the Grade I listed Bradfield Manor Farmhouse, where the erosion of its rural setting, particularly designed views from the 17th-century parlour wing, is unlikely to be fully mitigated until landscaping matures. The council's Built Heritage and Conservation Officer considers this harm to be less than substantial but at a medium level due to the asset's exceptional significance. Additional concerns include harm to Rodbourne Conservation Area from highway improvement works, which were not addressed in the applicant's assessment; mitigation could be achieved through careful design or reinstatement.	**ES Volume 1, Chapter 12: Cultural Heritage [APP-064]**, supported by **ES Volume 3, Appendix 12-1: Heritage Statement [APP-219]**, identified that there was a potential for a moderate/minor adverse effect on Bradfield Manor Farmhouse, which is not significant (less than substantial harm at the lower end in NPPF (Ref 6) terms). The Applicant submitted the **ES Technical Addendum to Chapter 12 Cultural Heritage - Bradfield Manor Visualisations [REP1A-014]** at Deadline 1A, which included the visualisations as requested by Wiltshire Council and Historic England, which support the results of the assessment of harm on Bradfield Manor Farmhouse. There are ongoing discussions between the Applicant and Wiltshire Council regarding highway improvement works to the access track (Works Number 8b) to Lime Down E, which is located to the south of Rodbourne Conservation Area. The Applicant has updated the **Outline CEMP [REP1-096]** at Deadline 1 to include provision that the Wiltshire Council Conservation Officer should be consulted on the approval of design for the access Works Number 8b.
Overview and commentary Other impacts on designated and non-designated heritage assets, such as farmhouses, barns, and outfarms, are	The Applicant notes the agreement to the assessment as provided in **ES Volume 1, Chapter 12: Cultural Heritage**

Wiltshire Council Comments	Applicant's Response
assessed as less than substantial harm (lower end), primarily through the erosion of wider agricultural settings. These effects are expected to diminish over time as landscape mitigation matures and will be reversible upon decommissioning. The officer does not object outright but recommends requirements to secure robust mitigation measures, including detailed design approval for access works and landscape enhancements.	**[APP-064],** supported by **ES Volume 3, Appendix 12-1: Heritage Statement [APP-219].** Landscape mitigation and enhancement measures are detailed in the **Outline LEMP [APP-283]**. The preparation, approval and implementation of the detailed LEMP, substantially in accordance with the **Outline LEMP [APP-283]**, is secured through Requirement 7 in Schedule 2 of the **Draft DCO [REP1-007]**. These requirements ensure that landscape enhancement measures are delivered and maintained throughout construction and operation of the Scheme.
Positive impacts – construction phase None identified.	The Applicant notes this comment.
Positive impacts – operational No specific benefits identified but, generally, there may be potential minor benefits from some areas of the proposed 'embedded' landscape mitigation where this is implemented within the wider setting of some of the historic farmsteads and comprises the reinstatement of field boundaries on historic alignments and/or appropriate and in character 'repair' to existing degraded historic hedgerows and woodlands.	The Applicant notes this comment and agrees that there is the potential for positive impacts where landscape mitigation works will enhance elements of the landscape that contribute to the overall historic landscape character.
Positive impacts – decommissioning phase	The Applicant notes this comment and agrees that there is the potential for positive impacts where landscape mitigation works

Wiltshire Council Comments	Applicant's Response
No specific benefits identified but potential minor benefit from embedded mitigation as above, assuming this is retained at decommissioning stage.	will enhance elements of the landscape that contribute to the overall historic landscape character.
Neutral impacts Largely as summarised within the submitted Impact Assessment tables in 6.3 Environmental Statement Volume 3, Appendix 12-8 Cultural Heritage Impact Assessment Tables [APP-232] and the more detailed significance and impact assessment contained within the 6.3 Environmental Statement Volume 3, Appendix 12-1 Heritage Statement [APP-219]. These conclude that, with the embedded mitigation, there will be a neutral or no impact on the heritage significance of the majority of heritage assets within the Study Area. Differences in opinion are noted below under 'Negative Impacts' sections.	The Applicant notes the general agreement to the assessment as provided in **ES Volume 1, Chapter 12: Cultural Heritage [APP-064],** supported by **ES Volume 3, Appendix 12-1: Heritage Statement [APP-219]** and **ES Appendix 12-8: Cultural Heritage Impact Assessment Tables [APP-232].**
Negative impacts – construction phase The types of impacts would generally include harm to the significance of heritage assets due to change within their settings, such that the contribution made by setting to significance is reduced, resulting from noise, vibration, dust etc. and loss of tranquillity or visual impact from site construction, cable route construction, temporary compounds and lay-down areas. In addition, there is the slight possibility of direct adverse	The Applicant notes this comment. **ES Volume 1, Chapter 12: Cultural Heritage [APP-064]**, supported by **ES Volume 3, Appendix 12-1: Heritage Statement [APP-219]**, has assessed the potential impact of the Scheme on built heritage assets, and where required appropriate mitigation has been proposed (see Section 12.9 of **ES Volume 1, Chapter 12: Cultural Heritage [APP-064]** for embedded mitigation). As stated in Section 3.7 of the **Outline CEMP [REP1-096]**, construction traffic routes have been identified to avoid large

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effects to heritage assets due to swipes and strikes or through vibration as a result of HGV movement and construction traffic.	increases in HGV movements near to heritage assets which would cause noise, vibration, dust etc. and loss of tranquillity. Highway improvement works would cause at most temporary construction effects. While the Scheme will comprise temporary and localised construction activity as part of the installation of cabling, the assessment identified that will be no impact to the character and appearance of heritage assets. Annex 1 of **ES Volume 3, Appendix 12-1: Heritage Statement [APP-219]** details assets scoped in for assessment and was used during consultation with Historic England and Wiltshire Council. Scoped in assets are considered to be agreed with both stakeholders.
Negative impacts – construction phase These impacts are largely as summarised within the submitted Impact Assessment tables in 6.3 Environmental Statement Volume 3, Appendix 12-8 Cultural Heritage Impact Assessment Tables [APP-232] and the more detailed significance and impact assessment contained within the 6.3 Environmental Statement Volume 3, Appendix 12-1 Heritage Statement [APP-219]. Setting impacts are largely as noted below for the Operational Phase with the additional impact which can be ascribed specifically to the construction phase likely to be temporary and short-lived during construction at each site and for the cable route. These impacts should be mitigated by good working practices and provisions for making good accidental	The Applicant notes this comment. Any impacts will be mitigated and secured through the **Outline CEMP [REP1-096], Outline OEMP [REP1-098]**, and **Outline Decommissioning Strategy [REP1-100].**

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damage which should be secured through the 7.12 Outline CEMP [REP1-096], 7.13 Outline OEMP [REP1-098], and 7.14 Outline Decommissioning Strategy [REP1-100].	
Negative impacts – construction phase Specific assets (in addition to those where there will also be impact during the 'Operational Phase', which are noted below) identified where there may be potential short-lived impacts related to the construction of the cable corridor, include Grittleton, Rodbourne and Easton Conservation Areas, Whitley House, Easton House and Westlands Farmhouse. These impacts are expected to be short-lived and temporary resulting in a largely neutral impact on heritage significance subject to appropriate management.	The Applicant welcomes the comment that impacts would be largely neutral. The **ES Volume 1, Chapter 12: Cultural Heritage [APP-064]**, supported by **ES Appendix 12-1: Heritage Statement [APP-219]**, has assessed the potential impact of the Scheme on built heritage assets, and where required appropriate mitigation has been proposed (see Section 12.9 of **ES Volume 1, Chapter 12: Cultural Heritage [APP-064]** for embedded mitigation).
Negative impacts – construction phase In addition, it is considered that there will be a negative impact which has not been identified to the following asset: There is potential for impact on the setting of the Grade II* listed Grittleton House which may affect its significance to a greater extent, from the construction compound and cabling route to the east of the house. As the house is in use as a hotel which makes use of the designed landscape surrounding the building, including the east lawns, there is also potential for impact on the viability of the business which may have an impact on the building's future. Appropriate mitigation in the	The Applicant notes this comment. Grittleton House (NHLE 1022310) is considered within **ES Volume 3, Appendix 12-1: Heritage Statement [APP-219]**, which assesses its significance, setting and historic relationship with parts of the wider Grittleton Estate. The assessment concludes that, whilst the asset has a historic association with some land within the Scheme, it no longer maintains a relationship with those lands and there would be no harm to its significance or setting arising from the operational Scheme. The Applicant notes that any effects associated with construction activity in the vicinity of Grittleton House would be

Wiltshire Council Comments	Applicant's Response
form of construction timing and remediation would be required to limit these impacts.	temporary and localised in nature and would occur during the construction phase only. Measures relating to construction timing, working practices, remediation and reinstatement are secured through the **Outline CEMP [REP1-096]**.
Negative impacts – construction phase Rodbourne Conservation Area is a small agricultural village set within a wider agrarian landscape. The track leading into Site E from the south-west corner of the conservation area, close to Trinity Farm, is due for upgrading as a highway improvement area to facilitate the construction and the works to the currently rural trackway and engineering of the junction with the highway which runs into Rodbourne are likely to be at odds with the rural character of the village, resulting in a level of harm.	The Applicant notes the comment. **ES Volume 1, Chapter 12: Cultural Heritage [APP-064]**, supported by **Appendix 12-1: Heritage Statement [APP-219],** has assessed the potential impact of the scheme on Rodbourne Conservation Area, and where required appropriate mitigation has been proposed (see Section 12.9 of **ES Volume 1, Chapter 12: Cultural Heritage [APP-064]** for embedded mitigation). There are ongoing discussions between the Applicant and Wiltshire Council regarding highway improvement works to the access track (Works Number 8b) to Lime Down E, which is located to the south of Rodbourne Conservation Area. The Applicant has updated the **Outline CEMP [REP1-096]** (submitted at Deadline 1 to include provision that the Wiltshire Council Conservation Officer should be consulted on the approval of design for the access Works Number 8b.
Negative impacts – construction phase Mitigation could include careful design of the highway improvement works to maintain the rural character of the track and junction and/or commitment to reinstatement following construction.	The Applicant notes this comment. As set out above, there are ongoing discussions between the Applicant and Wiltshire Council regarding the highway improvement works to the access track, including consideration of measures to minimise effects on the rural character of the area.

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Negative impacts – construction phase In summary, the additional (above that of the installation itself) harm to the significance of heritage assets from the construction phase should be limited and largely neutral provided that appropriate and robust management provisions are secured via the CEMP and LEMP	The Applicant welcomes this comment and agrees that appropriate and robust management provisions will be secured via the **Outline CEMP [REP1-096]** and **Outline LEMP [APP-283].**
Negative impacts – operational Negative impacts will include the residual visual impact of the panels in situ once construction is completed. Harm to the significance of heritage assets would occur where change within their settings reduces the contribution that the setting makes to the significance of the asset. This most often occurs in the case of a solar installation via the 'urbanisation' of the rural landscape within which an asset is set, leading to a general erosion of the ability to understand the asset in its context. Harm will be reduced over a period as the landscaping proposed as mitigation matures and the impacts are largely limited reversible following decommissioning of the installations, resulting in a neutral impact on the significance in the case of most heritage assets within the study area. However, where the site makes a more specific contribution to the significance of the asset – usually through being in the immediate setting within which the asset is experienced or where there is a functional or historic association between the site and the asset (often in these cases between a farmstead	The Applicant notes this comment. **ES Volume 1, Chapter 12: Cultural Heritage [APP-064]**, supported by **ES Volume 3, Appendix 12-1: Heritage Statement [APP-219]**, assesses the potential operational effects of the Scheme on heritage assets, including effects arising from changes to their setting, and where required appropriate mitigation has been proposed (see Section 12.9 of **ES Volume 1, Chapter 12: Cultural Heritage [APP-064]** for embedded mitigation). The Applicant recognises that the introduction of solar infrastructure may result in changes to the rural character of the landscape and, in some instances, affect the contribution setting makes to the significance of heritage assets. The Applicant also notes that the Scheme is reversible in nature following decommissioning.

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and its agricultural holding or a country house and designed landscape), the harm may be greater even though of limited (generation) duration.	
Negative impacts – operational It is agreed that the impacts are largely adequately set out within the submitted Impact Assessment tables in 6.3 Environmental Statement Volume 3, Appendix 12-8 Cultural Heritage Impact Assessment Tables [APP-232] and the more detailed significance and impact assessment contained within the 6.3 Environmental Statement Volume 3, Appendix 12-1 Heritage Statement [APP-219].	The Applicant welcomes the agreement that the likely impacts on heritage assets are appropriately assessed.
Negative impacts – operational Locations where a low-level of harm to significance is noted in a number of cases by the Applicant include: Designated Heritage Assets Bradfield Manor Farmhouse (Grade I), Hullavington Significance: The core of the property comprises a medieval hall house with 15th-century origins, later extended in the 17th and 19th centuries and including a 17th-century parlour block designed to take advantage of views over the surrounding estate. The property has high architectural and historic interest as one of the most important rural manor houses in Wiltshire. The proposed solar farm would be sited on land formerly within	The Applicant notes this comment. **ES Volume 1, Chapter 12: Cultural Heritage [APP-064]**, supported by **ES Volume 3, Appendix 12-1: Heritage Statement [APP-219]**, identified that there was a potential for a moderate/minor adverse effect on Bradfield Manor Farmhouse, which is not significant (less than substantial harm at the lower end in NPPF (Ref 6) terms). The assessment considered the contribution made by the surrounding rural landscape to the significance of the asset, including views from the upper floors of the parlour block, and acknowledged the potential for some visibility of the proposed substation, BESS and Solar PV Panels prior to the maturation of mitigation planting.

Wiltshire Council Comments	Applicant's Response
the manor's ownership and whilst some southern views have already been interrupted by later development, the open rural landscape to the north remains visually and physically connected to the building and forms part of its historic setting. Mitigation: Removal of panels from nearest fields, creation of woodland belts and wildflower meadow, and enhancement of hedgerows. Impact: The impact will be via the erosion of the building's rural setting by the appearance of the solar panels BESS and substation to the north. Enhanced hedgerows and a woodland belt are proposed to mitigate the impact of the panels, BESS and substation, but sections suggest that, while the hedgerows may screen views of the panels from ground level, from the upper floors of the parlour block the substation and BESS and potentially also the panels will remain visible and will only be filtered in views as the woodland belt reaches maturity. There will also be some temporary harm from compound and cable works, including noise and plant movement. The Applicant's Heritage Team conclude that less than substantial harm (lower end) will result.	The assessment also considered temporary construction-related effects associated with compound activities, cable installation, plant movement and construction noise. Mitigation embedded within the Scheme design includes the removal of panels from nearby fields, enhancement of hedgerows, and the creation of woodland belts and wildflower meadow planting, with effects anticipated to reduce as planting matures. The Applicant submitted the **ES Technical Addendum to Chapter 12: Cultural Heritage - Bradfield Manor Visualisations [REP1A-014]** at Deadline 1A**,** which included the visualisations as requested by Wiltshire Council and Historic England, which support the results of the assessment of harm on Bradfield Manor Farmhouse.
Negative impacts – operational Whilst the council's Built Heritage and Conservation Officer agrees that the harm will be less than substantial given that there will be no direct harm to the asset and its immediate	The Applicant notes this comment but maintains the assessment conclusions set out within **ES Volume 1, Chapter 12: Cultural Heritage [APP-064]** and **ES Volume 3, Appendix 12-1: Heritage Statement [APP-219]**. The assessment concludes that the operational effects on Bradfield

Wiltshire Council Comments	Applicant's Response
setting will be unchanged, it is considered that the level of harm during the operational phases should probably be considered to be at a medium level taking into account the high significance of the asset, the designed nature of the views affected and the likelihood that the proposed woodland belt mitigation will take some time to mature and provide effective screening.	Manor Farmhouse would result in less than substantial harm at the lower end of the scale. Whilst the Applicant acknowledges the high significance of the asset and the designed nature of views associated with the manor house, the Scheme would not result in direct physical harm to the asset during the operational phase and its immediate setting would remain largely unchanged. The assessment also identified that the effects on setting would principally arise through partial views of the Solar PV Panels, substation and BESS within the wider landscape context, with existing and proposed vegetation reducing the extent of visibility over time. The wider rural and agricultural character surrounding the asset would also be retained. The Applicant acknowledges that mitigation planting will take time to mature; however, the submitted assessment and accompanying visualisations provided at Deadline 1A in the **ES Technical Addendum to Chapter 12 Cultural Heritage - Bradfield Manor Visualisations [REP1A-014]** take this into account, including consideration of views from the upper floors of the asset and the designed nature of views associated with the manor house.
Negative impacts – operational Surrendell Farmhouse (Grade II), Grittleton –	The Applicant notes the Council's agreement that any residual harm to Surrendell Farmhouse would amount to less than substantial harm at the lower end of the scale. **ES Volume 1, Chapter 12: Cultural Heritage [APP-064]**, supported by **ES**

Wiltshire Council Comments	Applicant's Response
Significance: A 17th-century farmhouse retaining original features such as mullioned windows and inglenook fireplace, representing historic rural settlement. Areas of Site C were historically part of the agricultural landholding of the farmstead. This is no longer the case but the site still contributes to the wider agricultural setting of the farmhouse in a positive way. Mitigation: Removal of panels from nearby fields, hedgerow enhancement, and new scrub planting. Impact: Despite the removal of panels from the closest fields there may still be some limited intervisibility which leads to erosion of the wider agricultural setting of the farmstead. Temporary harm anticipated due to cable works and compound activities, including movement of plant and construction noise. Harm from the installation will be mitigated further once the proposed landscape measures are mature and the residual impact will be limited and cause less than substantial harm (lower end).	**Volume 3, Appendix 12-1: Heritage Statement [APP-219]**, assessed the potential impacts of the Scheme on the asset and identified that while there is potential for indirect setting impacts, these would be reduced through mitigation including panel removal from nearby fields, hedgerow enhancement and scrub planting. The Applicant also notes Wiltshire Council's agreement that effects would reduce further as the proposed landscape mitigation matures.
Negative impacts – operational Barn to the East of Surrendell Farmhouse (Grade II) Significance: A 17th-century barn forming part of the historic farmstead, valued for its group association with the farmhouse. Mitigation: Removal of panels from nearby fields, hedgerow enhancement, and new scrub planting.	The Applicant notes the Council's agreement that any residual harm to Barn to the East of Surrendell Farmhouse would amount to less than substantial harm at the lower end of the scale. **ES Volume 1, Chapter 12: Cultural Heritage [APP-064]**, supported by **ES Volume 3, Appendix 12-1: Heritage Statement [APP-219]**, assessed the potential impacts of the Scheme on the asset and identified that while there is potential for indirect setting impacts, these would be reduced through

Wiltshire Council Comments	Applicant's Response
Impact: Despite the removal of panels from the closest fields there may still be some limited intervisibility which leads to erosion of the wider agricultural setting of the farmstead. Temporary harm anticipated due to cable works and compound activities, including movement of plant and construction noise. Harm from the installation will be mitigated further once the proposed landscape measures are mature and the residual impact will be limited and cause less than substantial harm (lower end).	mitigation including panel removal from nearby fields, hedgerow enhancement and scrub planting. The Applicant also notes Wiltshire Council's agreement that effects would reduce further as the proposed landscape mitigation matures.
Negative impacts – operational Shelter Barn to the South East of Surrendell Farmhouse (Grade II) Significance: A 17th-century agricultural building, listed for its group value with Surrendell Farmhouse. Mitigation: Removal of panels from nearby fields, hedgerow enhancement, and new scrub planting. Impact: Despite the removal of panels from the closest fields there may still be some limited intervisibility which leads to erosion of the wider agricultural setting of the farmstead. Temporary harm anticipated due to cable works and compound activities, including movement of plant and construction noise. Harm from the installation will be mitigated further once the proposed landscape measures are mature and the residual	The Applicant notes the Council's agreement that any residual harm to Shelter Barn to the South East of Surrendell Farmhouse would amount to less than substantial harm at the lower end of the scale. **ES Volume 1, Chapter 12: Cultural Heritage [APP-064]**, supported by **ES Volume 3, Appendix 12-1: Heritage Statement [APP-219]**, assessed the potential impacts of the Scheme on the asset and identified that while there is potential for indirect setting impacts, these would be reduced through mitigation including panel removal from nearby fields, hedgerow enhancement and scrub planting. The Applicant also notes Wiltshire Council's agreement that effects would reduce further as the proposed landscape mitigation matures.

Wiltshire Council Comments	Applicant's Response
impact will be limited and cause less than substantial harm (lower end).	
Negative impacts – operational Fosse Lodge (Grade II), Grittleton Significance: A picturesque 19th-century lodge built for the Grittleton Estate, notable for its octagonal tower and architectural detailing. The lodge was occupied and used in connection with the hunt and may have been specifically designed for this purpose, with the tower providing long views across the countryside (including Site C) of the hunt in progress. There is therefore a specific visual relationship between the land within the site and this asset which contributes to its significance. Mitigation: Panels have been removed from several fields and there are offsets along Fosse Way. In addition, hedgerow enhancement and creation of a native woodland block are proposed. Impact: Panels have been removed from the closest fields and those remaining will be in distant views such that any harm from erosion of the rural setting will be less than substantial harm (lower end). There is also potential impact from construction noise and plant movement as a temporary construction compound is close by. Once the proposed	The Applicant notes the Council's agreement that any residual harm to Fosse Lodge would amount to less than substantial harm at the lower end of the scale. **ES Volume 1, Chapter 12: Cultural Heritage [APP-064]**, supported by **ES Volume 3, Appendix 12-1: Heritage Statement [APP-219]**, assessed the potential impacts of the Scheme on the asset, including the contribution of views across the surrounding landscape to its significance. The assessment identified that impacts would be reduced through mitigation measures including the removal of panels from nearby fields, hedgerow enhancement and the creation of native woodland planting. The Applicant also notes Wiltshire Council's agreement that effects would reduce further as the proposed landscape mitigation matures. With respect to construction noise at Fosse Lodge, this is expected to be equivalent to the existing ambient sound level in the area as shown at receptor R17 in Table 14-18 of **ES Volume 1, Chapter 14: Noise and Vibration [REP1-021]**. As such, significant effects from construction noise at Fosse Lodge are not expected. Nevertheless, appropriate mitigation measures, a noise monitoring programme and prior warning of noisy works are all committed to in the **Outline CEMP [REP1-096]** secured through Requirement 13 in Schedule 2 of the **Draft DCO [REP1-007]**.

Wiltshire Council Comments	Applicant's Response
mitigation has matured, the impact should be further reduced to a low level of residual harm.	
Negative impacts – operational Widley's Farmhouse (Grade II), Sherston Significance: A 18th-century farmhouse with later additions, contributing to the historic character of the rural landscape. The farmhouse faces east towards Site A which shares a visual and spatial relationship with the farmhouse and forms part of the wider agricultural setting which contributes to the experience of the farmhouse and its significance in a positive way. Mitigation: Hedgerow enhancement. Impact: The panels are at some distance but, despite the enhancement of intervening hedgerows, there may still be some limited intervisibility which leads to erosion of the wider agricultural setting of the farmstead. The conclusion is that the solar installation will cause less than substantial harm (lower end).	The Applicant notes the Council's agreement that any residual harm to Widley's Farmhouse would amount to less than substantial harm at the lower end of the scale. **ES Volume 1, Chapter 12: Cultural Heritage [APP-064]**, supported by **ES Volume 3, Appendix 12-1: Heritage Statement [APP-219]**, assessed the potential impacts of the Scheme on the asset, including the contribution of the wider agricultural landscape to its setting and significance. The assessment identified that impacts would be reduced through mitigation measures including hedgerow enhancement.
Negative impacts – operational New Barn at Widley's Farmhouse (Grade II), Sherston Significance: A late 18th-century barn associated with Widley's Farm, contributing to the historic farmstead character. Mitigation: Hedgerow enhancement.	The Applicant notes the Council's agreement that any residual harm to New Barn at Widley's Farmhouse would amount to less than substantial harm at the lower end of the scale. **ES Volume 1, Chapter 12: Cultural Heritage [APP-064]**, supported by **ES Volume 3, Appendix 12-1: Heritage Statement [APP-219]**, assessed the potential impacts of the Scheme on the asset, including the contribution of the wider

Wiltshire Council Comments	Applicant's Response
Impact: The panels are at some distance but, despite the enhancement of intervening hedgerows, there may still be some limited intervisibility which leads to erosion of the wider agricultural setting of the farmstead. The conclusion is that the solar installation will cause less than substantial harm (lower end).	agricultural landscape to its setting and significance. The assessment identified that impacts would be reduced through mitigation measures including hedgerow enhancement.
Negative impacts – operational Non-Designated Heritage Assets Outfarm, East of Lords Wood Cottage, Commonwood Lane, Sherston Significance: A 19th-century outfarm representing historic agricultural practices in the rural hinterland. The building lies within the cable route and close to panels in Sites A and C. Mitigation: Hedgerow enhancement. Impact: The Applicant's team have identified less than substantial harm (lower end), including temporary harm from cable installation and associated plant movement given that the buildings lies within the cable route itself. However, the asset is non-designated and of lower significance. It will also remain in situ with the impacts being reversible once decommissioning is reached and the council's Built Heritage and Conservation Officer agrees with the assessment that there will be only less than substantial harm (lower end).	The Applicant welcomes the Council's agreement that effects on the non-designated Outfarm east of Lords Wood Cottage would result in less than substantial harm at the lower end of the scale. **ES Volume 1, Chapter 12: Cultural Heritage [APP-064]**, supported by **ES Volume 3, Appendix 12-1: Heritage Statement [APP-219]**, assessed the potential impacts of the Scheme on the asset, including temporary construction-related effects associated with the Cable Route Corridor. The assessment identified that effects would be mitigated through measures including hedgerow enhancement and notes that impacts would be reversible following decommissioning.

Wiltshire Council Comments	Applicant's Response
Negative impacts – operational Non-Designated Heritage Assets Lords Wood Cottage, Commonwood Lane, Sherston Significance: A well-preserved example of a former farmhouse dating to the 19th-Century with associative value to surrounding farmland. Mitigation: Hedgerow enhancement. Impact: The Applicant's team have identified less than substantial harm (lower end), including temporary harm from cable installation and associated plant movement. However, the asset is already screened from much of the site via the existing mature Lords Wood. It is also non designated and of lower significance. The council's Built Heritage and Conservation Officer agrees with the assessment that there will be only be less than substantial harm (lower end).	The Applicant welcomes the Council's agreement that effects on the non-designated Lords Wood Cottage, Commonwood Lane, Sherston would result in less than substantial harm at the lower end of the scale. **ES Volume 1, Chapter 12: Cultural Heritage [APP-064]**, supported by **ES Volume 3, Appendix 12-1: Heritage Statement [APP-219]**, assessed the potential impacts of the Scheme on the asset, including temporary construction-related effects associated with the Cable Route Corridor. The assessment identified that effects would be mitigated through measures including hedgerow enhancement and notes that impacts would be reversible following decommissioning.
Negative impacts – operational Non-Designated Heritage Assets Outfarm, East-northeast of Widley's Farm, Sherston Significance: A 19th-century farm building contributing to the historic agricultural landscape. Mitigation: Screening and offsets to maintain agrarian setting.	The Applicant welcomes the Council's agreement that effects on the non-designated Outfarm, East-northeast of Widley's Farm, Sherston would result in less than substantial harm at the lower end of the scale. **ES Volume 1, Chapter 12: Cultural Heritage [APP-064]**, supported by **ES Volume 3, Appendix 12-1: Heritage Statement [APP-219]**, assessed the potential impacts of the Scheme on the asset, including installation of Solar PV Panels within Lime Down A. The assessment identified that effects would be mitigated through measures

Wiltshire Council Comments	Applicant's Response
Impact: The building will be surrounded by the proposed solar panels in Site A which will result in the loss of the ability to experience this asset as an agricultural building within its wider agricultural landscape. However, the asset is non-designated and of lower significance. It will also remain in situ with the impacts being reversible once decommissioning is reached and the council's Built Heritage and Conservation Officer agrees with the assessment that there will be only be less than substantial harm (lower end).	including screening and offsets to maintain agrarian setting and notes that impacts would be reversible following decommissioning.
Negative impacts – operational Non-Designated Heritage Assets Outfarm, North-northwest of Avil's Farm Significance: A small historic outfarm linked to Avil's Farm, illustrating dispersed farmstead patterns. Mitigation: Screening and offsets to maintain agrarian setting. Impact: The building will be surrounded by the proposed solar panels in Site E which will result in the loss of the ability to experience this asset as an agricultural building within its wider agricultural landscape. However, the asset is non-designated and of lower significance. It will also remain in situ with the impacts being reversible once decommissioning is reached and the council's Built Heritage and Conservation Officer agrees	The Applicant welcomes the Council's agreement that effects on the non-designated Outfarm, North-northwest of Avil's Farm would result in less than substantial harm at the lower end of the scale. **ES Volume 1, Chapter 12: Cultural Heritage [APP-064]**, supported by **ES Volume 3, Appendix 12-1: Heritage Statement [APP-219]**, assessed the potential impacts of the Scheme on the asset, including installation of Solar PV Panels within Lime Down E. The assessment identified that effects would be mitigated through measures including screening and offsets to maintain agrarian setting and notes that impacts would be reversible following decommissioning.

Wiltshire Council Comments	Applicant's Response
with the assessment that there will be only be less than substantial harm (lower end).	
Negative impacts – operational Non-Designated Heritage Assets Townleaze Barn, Norton, Malmesbury Significance: A 19th-century barn, altered but retaining some historic character as part of a former outfarm. The surrounding farm is now modern. Mitigation: Hedgerow enhancement and woodland planting near the proposed substation. Impact: The Applicant's team have identified less than substantial harm (lower end), including temporary harm from cable installation and associated plant movement. However, in the council's Built Heritage and Conservation Officer's view, taking into account the location of the asset within the farmstead and the nature of the asset as an ancillary part of a wider group, it is considered that there will be a largely neutral impact on this asset.	The Applicant notes and welcomes the Council's conclusion that effects would be largely neutral. **ES Volume 1, Chapter 12: Cultural Heritage [APP-064]**, supported by **ES Volume 3, Appendix 12-1: Heritage Statement [APP-219]**, assessed the potential impacts of the Scheme on the asset and identified mitigation measures including hedgerow enhancement and woodland planting in the vicinity of the proposed substation.
Negative impacts – operational In addition, it is considered that there will be a negative impact which has not been identified to the following asset:	The Applicant notes the comment. The **ES Volume 1, Chapter 12: Cultural Heritage [APP-064]**, supported by **Appendix 12-1: Heritage Statement [APP-219],** has assessed the potential impact of the scheme on Rodbourne Conservation Area, and where required appropriate mitigation has been proposed (see

Wiltshire Council Comments	Applicant's Response
Rodbourne Conservation Area is a small agricultural village set within a wider agrarian landscape. The verdant, tree-lined character of the village itself, and the survival of a number of farmsteads within the village itself, contribute to its appreciation as a rural and agricultural-based village. The presence of the Bristol and South Wales Direct railway to the south of the village impacts adversely on the village via the noise impact. Rodbourne Conservation Area has a historic connection to the land within Lime Down E, with a number of these fields were worked by various properties within the village of Rodbourne. The impacts of the solar installation and a substation have been mitigated by the removal of panels from the closest fields, the enhancement of hedgerows and establishment of a new native woodland block and these measures are largely successful such that the actual installation will have a neutral impact. However, the track leading into the site from the south-west corner of the Conservation Area, close to Trinity Farm, is due for upgrading as a highway improvement area and the works to the currently rural trackway and engineering of the junction with the highway which runs into Rodbourne are likely to be at odds with the rural character of the village, resulting in a level of harm. Mitigation could include careful design of the highway improvement works to maintain the rural character of the track	Section 12.9 of **ES Volume 1, Chapter 12: Cultural Heritage [APP-064]** for embedded mitigation). There are ongoing discussions between the Applicant and Wiltshire Council regarding highway improvement works to the access track (Works Number 8b) to Lime Down E, which is located to the south of Rodbourne Conservation Area. The Applicant has updated the **Outline CEMP [REP1-096]** submitted at Deadline 1 to include provision that the Wiltshire Council Conservation Officer should be consulted on the approval of design for the access Works Number 8b.

Wiltshire Council Comments	Applicant's Response
and junction and/or commitment to reinstatement following construction.	
Negative impacts – decommissioning phase There are limited specific details for decommissioning as methodologies may be subject to change within the intervening period. However, it is assumed that the impacts will largely mirror those identified for the construction phase and will be largely temporary and short lived in so far as additional harm over and above that of the installation is concerned. In this case, any impacts specifically relating to the decommissioning should be short lived and reversible and mitigated via good management.	The Applicant notes and welcomes the Council's comment that impacts will be largely minor. As stated in Section 12.4 of **ES Volume 1, Chapter 12: Cultural Heritage [APP-064]**, the Applicant notes that there may be some uncertainty regarding decommissioning as engineering approaches and technologies are likely to change over the operational life of the Scheme. However, it is not envisaged that there would be any further impacts beyond that experienced during the construction phase.
Ranking the Built Heritage impacts in importance All the local impacts identified are considered material to the ExA, but in accordance with the national guidance[5] the council would indicate the following as the most significant in relation to this theme: The most significant impact is likely to be that on the Grade I listed Bradfield Manor via the erosion of its rural setting, taking into account the status of the building and the fact that the	The Applicant notes this comment. **ES Volume 1, Chapter 12 Cultural Heritage [APP-064]**, supported by **ES Volume 3, Appendix 12-1: Heritage Statement [APP-219]**, identified that there was a potential for a moderate/minor adverse effect on Bradfield Manor Farmhouse, which is not significant (less than substantial harm at the lower end in NPPF (Ref 6) terms). The Applicant submitted the **ES Technical Addendum to Chapter 12 Cultural Heritage - Bradfield Manor Visualisations' [REP1A-014]** at Deadline 1A which included the visualisations

[5] National Guidance published in 2024, 'Nationally Significant Infrastructure Projects: Advice for Local Authorities'

Wiltshire Council Comments	Applicant's Response
17th- Century parlour wing appears to have been designed to enjoy views across the landscape from its upper floors, making it difficult to provide effective landscape mitigation. Also exacerbated by the siting of the BESS and substation within the setting.	as requested by Wiltshire Council and Historic England, which support the results of the assessment of harm on Bradfield Manor Farmhouse.
The potential for harm to Grittleton House during construction via the siting of the works compound and cable route has currently not been identified and assessed and no mitigation is therefore proposed. Harm to Rodbourne Conservation Area through the highway improvement works to the track leading to Site E has currently not been identified and no mitigation is therefore proposed. Other identified impacts are largely similar in severity but none will result in significant harm from the point of view of the EIA.	The Applicant notes this comment. Rodbourne Conservation Area is assessed in **ES Volume 1, Chapter 12: Cultural Heritage [APP-064]**, supported by **ES Volume 3, Appendix 12-1: Heritage Statement [APP-219]**, which considers the significance of the Conservation Area and the contribution made by its setting. The assessment concludes that the operation and maintenance of the Scheme would not give rise to significant effects on Rodbourne Conservation Area in EIA terms. The Applicant notes that any effects associated with highway improvement works would be temporary and localised in nature and would occur during the construction phase only. Measures relating to construction timing, working practices, remediation and reinstatement are secured through the **Outline CEMP [REP1-096].** In relation to Grittleton House, the Applicant notes the Council's comments regarding potential temporary construction-related effects associated with nearby construction activities. Construction impacts across the Scheme, including those

Wiltshire Council Comments	Applicant's Response
	associated with temporary compounds and cable installation works, are managed through the **Outline CEMP [REP1-096]**. The Applicant notes that any such effects would be temporary and reversible in nature and would not result in permanent harm to the significance or setting of Grittleton House.

8 Public Health and Public Protection

Table 8-1 - Public Health and Public Protection

Wiltshire Council Comments	Applicant's Response
Overview and commentary The proposed development raises notable concerns for public health and community wellbeing. The most significant issue identified is the potential impact on community identity and culture, which could lead to frustration, stress, anxiety, and associated mental health challenges for residents. These risks are particularly linked to poor community engagement during the construction phase, with similar concerns persisting through operational and decommissioning stages. While no positive or neutral impacts were recorded, the negative effects on mental health and social cohesion are considered material and significant. To mitigate these impacts, Wiltshire Council recommends enforceable requirements, including a comprehensive communication strategy with measurable outcomes and an Outline Decommissioning Strategy addressing community identity and resilience. These measures aim to safeguard wellbeing and ensure effective engagement throughout the project lifecycle. It should be noted that the proposals will significantly impact the amenity of the countryside including public rights of way, recreational space, general environmental change and	The Applicant has sought to provide a robust and comprehensive assessment of human health effects in **ES Volume 1, Chapter 18: Human Health [APP-070]**, covering aspects of physical and mental health and wellbeing. As part of this, the Applicant has directly assessed the impacts on community culture and identity as a result of changes to the visual rural character of the affected communities, and the extent to which these communities connect to their surroundings, sense of place, and each other. Additionally, the Applicant has assessment impacts on community resilience and influence, in respect of their ability to shape and respond to changes in their physical environment. The Applicant recognises that these impacts can lead to frustration, stress, anxiety, and associated mental health challenges for residents where unaddressed. For community identity and culture, the Applicant has therefore included embedded design measures to remove Solar PV Site areas and offset from PRoW and highways, provide landscape screening and enhancement measures, and locate construction compounds away from the most sensitive receptors. These are secured through the **Design Principles and Parameters [REP1A-008]**, **Outline LEMP [APP-283]**, and **Outline CEMP**

Wiltshire Council Comments	Applicant's Response
interferences with character of the area. There are also numerous concerns about other environmental issues such as noise, vibration, pollution, fire risks, flooding, construction traffic, and the mental impact from the detriment caused. Public Health recognise and share the concerns about the mental health impact from the range of stressors from the proposals. Although the mitigations are primarily sought by environmental controls and adjustments from other departments, the council's Public Health team strongly support all protections and mitigations to protect the mental health of the local population.	**[REP1-096]** by Requirements 5, 7, and 13 of Schedule 2 to the **Draft DCO [REP1-007]**. To ensure communities are able to remain engaged at all phases of the Scheme, the Applicant is committed to the creation of a Community Liaison Group, headed by a Community Liaison Manager, who would be responsible for ensuring community interaction and engagement with the Scheme is undertaken at all major development phases, acting as a direct link between community voices and the Applicant team or site operators. The provision and establishment of the Community Liaison Group is secured through Requirement 4 of Schedule 2 to the **Draft DCO [REP1-007]**. The specific role and responsibilities of the Community Liaison Manager are defined in the **Outline CEMP [REP1-096]**, **Outline OEMP [REP1-098]** and **Outline Decommissioning Strategy [REP1-100]**, secured respectively by Requirements 13, 14, and 20 of Schedule 2 to the **Draft DCO [REP1-007]**. These measures have been developed in response to consultation undertaken with Wiltshire Council's Public Health Team prior to DCO submission (as recorded in **ES Volume 3, Appendix 18-3: Human Health Consultation [APP-244]** and **Consultation Report Appendix G-5: Statutory Consultation under Section 42 [APP-045]**) to ensure that these mitigation measures can be secured delivered through the DCO process.

Wiltshire Council Comments	Applicant's Response
	With these measures in place, the Applicant is confident in the assessment outcomes, as set out in in **ES Volume 1, Chapter 18: Human Health [APP-070]**, that there are no significant adverse effects to community identity, culture, resilience and influence at any phase of the Scheme. The assessment in **ES Volume 1, Chapter 18: Human Health [APP-070]**, covers a comprehensive set of receptors to identify effects to physical and mental health and wellbeing, including those derived from other technical matters assessed in the ES. This therefore includes housing; transport modes, access and connections; health and social care services; climate change mitigation and adaptation; open space, leisure and play; community identity, culture, resilience and influence; education and training; employment and income; air quality; water quality or availability; land quality; noise and vibration. The assessment concludes that no significant adverse effects to physical or mental health and wellbeing are anticipated at any phase of the Schemed in respect of these types of effects. The Applicant confirms that mitigation measures at each major phase of development are secured through the **Outline CEMP [REP1-096]**, **Outline OEMP [REP1-098]** and **Outline Decommissioning Strategy [REP1-100]**, secured respectively by Requirements 13, 14, and 20 of Schedule 2 to the **Draft DCO [REP1-007]**.

Wiltshire Council Comments	Applicant's Response
Positive impacts – construction phase None identified.	The Applicant seeks to highlight the potential medium-term beneficial effects determined as likely to occur as a result of improved access to education and training, and employment and income benefits as a result of the Scheme's construction, and the supporting enhancement measures set out in the **Outline SSCEP [REP1-108]** secured by Requirement 18 of Schedule 2 to the **Draft DCO [REP1-007]**.
Positive impacts – operational None identified.	The Applicant seeks to highlight the potential long-term beneficial effects determined as likely to occur as a result of improved access to education and training as a result of the Scheme's support for local skills and training enhancement measures during its operational lifetime, as set out in the **Outline SSCEP [REP1-108]** and secured by Requirement 18 of Schedule 2 to the **Draft DCO [REP1-007]**. The assessment of human health effects in **ES Volume 1, Chapter 18: Human Health [APP-070]** furthermore identified long-term beneficial effects on human health as a result of the Scheme's beneficial contribution to reducing global warming and the associated effects of climate change, and the social benefit of living in a location that is actively contributing to reduced physical health impacts such as from extreme weather events.
Positive impacts – decommissioning phase None identified.	The Applicant seeks to highlight the potential medium-term beneficial effects determined as likely to occur as a result of improved access to education and training, and employment

Wiltshire Council Comments	Applicant's Response
	and income benefits as a result of the Scheme's decommissioning, and the supporting enhancement measures set out in the **Outline SSCEP [REP1-108]** and **Outline Decommissioning Strategy [REP1-100]** secured by Requirements 18 and 20 of Schedule 2 to the **Draft DCO [REP1-007]**.
Neutral impacts None identified.	The Applicant acknowledges that the experience for PRoW users within or adjacent to the Solar PV Sites will be substantially different than current conditions due to the visual and auditory changes associated with the Solar PV infrastructure. That notwithstanding, the Applicant has sought to enhance the experience for users of these routes through the provision of landscape planting and screening to minimise visual impacts, while ecology and biodiversity enhancement planting at ground-level in the 15 m buffer zones between PRoWs and nearby onsite infrastructure should go some way to improve the immediate surroundings for PRoW users. These measures are shown on **ES Volume 2, Figure 3-4: Landscape and Ecology Mitigation Plan [REP1-029 to REP1-032]** and are secured through the **Outline LEMP [APP-283]** by Requirement 7 of Schedule 2 to the **Draft DCO [REP1-007]**.
Negative impacts – construction phase	The Applicant has sought to provide a robust and comprehensive assessment of human health effects in **ES Volume 1, Chapter 18: Human Health [APP-070]**, including

Wiltshire Council Comments	Applicant's Response
Impact on community identity and culture in surrounding areas. Risk of poor community engagement leading to frustration, stress and anxiety and mental health issues for residents.	directly assessing the impacts on community identity, culture, resilience and influence during construction. To ensure communities are adequately engaged with, the Applicant is committed to the creation of a Community Liaison Group, headed by a Community Liaison Manager, who would be responsible for ensuring community interaction and engagement with the Scheme is undertaken ahead of and during construction, acting as a direct link between community voices and the Applicant team or site operators. The provision and establishment of the Community Liaison Group is secured through Requirement 4 of Schedule 2 to the **Draft DCO [REP1-007]**. The specific role and responsibilities of the Community Liaison Manager are defined in the **Outline CEMP [REP1-096]**, secured by Requirement 13 of Schedule 2 to the **Draft DCO [REP1-007]**. These measures have been developed in response to consultation undertaken with Wiltshire Council's Public Health Team prior to DCO submission (as recorded in **ES Volume 3, Appendix 18-3: Human Health Consultation [APP-244]** and **Consultation Report Appendix G-5: Statutory Consultation under Section 42 [APP-045]**) to ensure that these mitigation measures can be secured delivered through the DCO process. With these measures in place, the Applicant is confident in the assessment outcomes, as set out in in **ES Volume 1, Chapter 18: Human Health [APP-070]**, that there are no significant

Wiltshire Council Comments	Applicant's Response
	adverse effects to community identity, culture, resilience and influence during the construction of the Scheme.
Negative impacts – operational Communities are likely to experience impacts on mental health and wellbeing, due to changes in community identity, culture and amenity of the area.	The Applicant has sought to provide a robust and comprehensive assessment of human health effects in **ES Volume 1, Chapter 18: Human Health [APP-070]**, including mental health and social wellbeing effects through directly assessing the impacts on community identity, culture, resilience and influence during construction. To ensure communities are adequately engaged with, the Applicant is committed to maintaining a long-term community contact point within the Applicant's operational team. A dedicated Community Liaison Manager would also be appointed ahead of infrastructure replacement works. The specific role and responsibilities of the community contact point and Community Liaison Manager are defined in the **Outline OEMP [REP1-098]**, secured by Requirement 14 of Schedule 2 to the **Draft DCO [REP1-007]**. These measures have been developed in response to consultation undertaken with Wiltshire Council's Public Health Team prior to DCO submission (as recorded in **ES Volume 3, Appendix 18-3: Human Health Consultation [APP-244]** and **Consultation Report Appendix G-5: Statutory Consultation under Section 42 [APP-045]**) to ensure that these mitigation measures can be secured delivered through the DCO process.

Wiltshire Council Comments	Applicant's Response
	To ensure adverse effects as a result of changes to visual amenity and rural character, the Applicant has included embedded design measures to remove Solar PV Site areas, screen Solar PV Panels, BESS and substation infrastructure, offset from PRoW and highways, and provide landscape screening and enhancement measures, to reduce amenity impacts on the most sensitive receptors. These are secured through the **Design Principles and Parameters [REP1A-008]**, **Outline LEMP [APP-283]** by Requirements 5 and 7 of Schedule 2 to the **Draft DCO [REP1-007]**. With these measures in place, the Applicant is confident in the assessment outcomes, as set out in in **ES Volume 1, Chapter 18: Human Health [APP-070]**, that there are no significant adverse effects to community identity, culture, resilience and influence during the operational lifetime of the Scheme.
Negative impacts – decommissioning phase Communities are likely to experience impacts on mental health and wellbeing, due to changes in community identity, culture and amenity of the area.	The Applicant has sought to provide a robust and comprehensive assessment of human health effects in **ES Volume 1, Chapter 18: Human Health [APP-070]**, including mental health and social wellbeing effects through directly assessing the impacts on community identity, culture, resilience and influence during construction. To ensure communities are adequately engaged with, the Applicant is committed to the creation of a Community Liaison Group, headed by a Community Liaison Manager, who would be responsible for ensuring community interaction and

Wiltshire Council Comments	Applicant's Response
	engagement with the Scheme is undertaken ahead of and during decommissioning, acting as a direct link between community voices and the Applicant team or site operators. The provision and establishment of the Community Liaison Group is secured through Requirement 4 of Schedule 2 to the **Draft DCO [REP1-007]**. The specific role and responsibilities of the Community Liaison Manager are defined in the **Outline Decommissioning Strategy [REP1-100]**, secured by Requirement 20 of Schedule 2 to the **Draft DCO [REP1-007]**. These measures have been developed in response to consultation undertaken with Wiltshire Council's Public Health Team prior to DCO submission (as recorded in **ES Volume 3, Appendix 18-3: Human Health Consultation [APP-244]** and **Consultation Report Appendix G-5: Statutory Consultation under Section 42 [APP-045]**) to ensure that these mitigation measures can be secured delivered through the DCO process. With these measures in place, the Applicant is confident in the assessment outcomes, as set out in in **ES Volume 1, Chapter 18: Human Health [APP-070]**, that there are no significant adverse effects to community identity, culture, resilience and influence during the decommissioning of the Scheme.
Ranking the Public Health impacts in importance	The Applicant agrees that impacts on community culture, identity and thus on community wellbeing are a material consideration in the determination of the Scheme.

Wiltshire Council Comments	Applicant's Response
All the local impacts identified are considered material to the ExA, but in accordance with the national guidance[6] the council would indicate the following as the most significant in relation to this theme: Impact on community identity and culture in surrounding areas. Risk of poor community engagement leading to frustration, stress and anxiety and mental health issues for residents.	The Applicant therefore directs attention to the mitigation measures set out to minimise these impacts. To ensure communities are able to remain engaged at all phases of the Scheme, the Applicant is committed to the creation of a Community Liaison Group, headed by a Community Liaison Manager, who would be responsible for ensuring community interaction and engagement with the Scheme is undertaken at all major development phases, acting as a direct link between community voices and the Applicant team or site operators. The provision and establishment of the Community Liaison Group is secured through Requirement 4 of Schedule 2 to the **Draft DCO [REP1-007]**. The specific role and responsibilities of the Community Liaison Manager are defined in the **Outline CEMP [REP1-096]**, **Outline OEMP [REP1-098]** and **Outline Decommissioning Strategy [REP1-100]**, secured respectively by Requirements 13, 14, and 20 of Schedule 2 to the **Draft DCO [REP1-007]**. These measures have been developed in response to consultation undertaken with Wiltshire Council's Public Health Team prior to DCO submission (as recorded in **ES Volume 3, Appendix 18-3: Human Health Consultation [APP-244]** and **Consultation Report Appendix G-5: Statutory Consultation**

[6] National Guidance published in 2024, 'Nationally Significant Infrastructure Projects: Advice for Local Authorities'

Wiltshire Council Comments	Applicant's Response
	under Section 42 [APP-045]) to ensure that these mitigation measures can be secured delivered through the DCO process. With these measures in place, the Applicant is confident in the assessment outcomes, as set out in in **ES Volume 1, Chapter 18: Human Health [APP-070]**, that there are no significant adverse effects to community identity, culture, resilience and influence (and therefore on community wellbeing) at any phase of the Scheme.

Table 8-2 - Public Protection

Summary	Applicant's Response
Overview and commentary The proposed development presents several public protection concerns, primarily related to environmental and amenity impacts during construction, operation, and decommissioning. Please refer to Section 16 (pages 86 to 90) of Wiltshire Council's Relevant Representation [RR-4934] for further technical details and evidence of these specific noise concerns. The headline issues include noise and vibration from site preparation, plant installation, and vehicle movements, as well as dust and air quality impacts from construction activities and emissions from non-road mobile machinery. During operation, noise from plant equipment and glint/glare effects from solar reflections pose risks to residential amenity. While mitigation measures are proposed through the 7.12 Outline CEMP [REP1-096] and 7.13 Outline OEMP [REP1-098], there are noted inconsistencies between these plans and the Environmental Statement, particularly regarding noise and vibration controls. The most significant concerns identified by the council are noise impacts, dust and air quality, and glint/glare. These are considered material to the examination process, and while mitigation is referenced in the draft DCO schedules, clarity and alignment between documents are essential before conditions can be finalised.	The Applicant notes Wiltshire's Council's concerns regarding noise and vibration and, in particular, the comments around the mitigation measures committed to in the **Outline CEMP [REP1-096]** and the **Outline OEMP [REP1-098]**. These concerns have been addressed in the Applicant's response to Wiltshire Council's Relevant Representation **[RR-4934]**, a meeting with Wiltshire Council on the 20 February 2026 and updated **Outline CEMP [REP1-096]** and **Outline OEMP [REP1-098]** submitted at Deadline 1. The updated management plans contain further clarity and detail over the mitigation committed to by the Applicant during both the construction and operational phases of the Scheme. The current position on these matters is summarised in the **Statement of Common Ground with Wiltshire Council [EN010168/EXAM/8.2]**. **ES Volume 1, Chapter 15: Air Quality [REP1-023]** assesses likely significant effects on air quality arising from the construction, operation and maintenance and decommissioning of the Scheme. The assessment includes consideration of construction-phase dust emissions, exhaust emissions from Non-Road Mobile Machinery (NRMM) and construction traffic emissions, as well as emissions relating to the operational and maintenance phase and decommissioning phase. The assessment adopts a precautionary approach, including the use of worst-case assumptions for emissions and

Summary	Applicant's Response
	meteorological conditions, and considers impacts at the worst affected receptors as a result of the Scheme. With the implementation of the embedded mitigation measures (which include industry standard best practice measures for dust management and emission control), as set out in **ES Volume 1, Chapter 15: Air Quality [REP1-023]**, no significant effects on air quality are predicted. All proposed measures are secured within the **Outline CEMP [REP1-096]**, the **Outline CTMP [REP1-112]**, the **Outline BSMP [REP1-110]**, the **Outline OEMP [REP1-098]**, and the **Outline Decommissioning Strategy [REP1-100]**, which are secured through relevant requirements in Schedule 2 of the **Draft DCO [REP1-007]**. **ES Volume 3, Appendix 20-4: Solar Photovoltaic Glint and Glare Study [APP-261]** assesses potential glint and glare impacts upon residential amenity, which are also summarised in **ES Volume 3, Chapter 20: Other Environmental Matters [APP-072]**. The assessment concludes that no significant impacts are predicted upon residential amenity following consideration of embedded mitigation. A low impact is predicted upon 13 dwelling receptors for fixed south facing panels and towards 17 dwellings for single axis tracking panels.
Positive impacts – construction phase None identified.	The Applicant notes this comment.
Positive impacts – operational	The Applicant notes this comment.

Summary	Applicant's Response
None identified.	
Positive impacts – decommissioning phase None identified.	The Applicant notes this comment.
Neutral impacts None identified.	The Applicant notes this comment.
Negative impacts – construction phase Noise impacts • The potential noise and vibration effects arising from Construction and Decommissioning phase activities (e.g. site preparation, installation of plant, construction of substations and structures, laying of cables and vehicle movements).	The Applicant notes this comment, albeit that with the mitigation measures committed to in the **Outline CEMP [REP1-096]** significant adverse effects are not anticipated.
Negative impacts – construction phase Dust/Air Quality impacts • Dust generated during the construction, operation and maintenance and decommissioning phases; • Vehicle emissions during the construction and decommissioning phases; • Emissions from Non-Road Mobile Machinery (NRMM) (onsite plant)	The Applicant notes this comment. Measures to minimise air quality impacts during the construction phase are outlined in the **Outline CEMP [REP1-096]**.

Summary	Applicant's Response
Negative impacts – operational Noise impacts • The potential noise effects arising from the operational plant over the lifetime of the scheme Glint/glare impacts	The Applicant notes this point and is in agreement, albeit that with the mitigation measures committed to in the updated **Outline OEMP [REP1-098]** significant adverse effects are not anticipated.
Negative impacts – operational • Solar reflections causing harm to residential amenity	The **ES Volume 3, Appendix 20-4: Solar Photovoltaic Glint and Glare Study [APP-261]** assesses potential glint and glare impacts upon residential amenity, which are also summarised in **ES Volume 1, Chapter 20: Other Environmental Matters [APP-072]**. A low impact is predicted upon 13 dwelling receptors for fixed south facing panels and towards 17 dwellings for single axis tracking panels. The assessment concludes that no significant impacts are predicted upon residential amenity following consideration of embedded mitigation.
Negative impacts – decommissioning phase Noise impacts • The potential noise and vibration effects arising from decommissioning phase activities Dust/Air Quality impacts • Dust generated during the decommissioning phase • Vehicle emissions during the decommissioning phase	The Applicant notes this comment. Measures to minimise noise and vibration, such as temporary screens and avoiding noisy activities occurring simultaneously, and air quality impacts, such as implementing a wheel washing system and covering stockpiles, during the decommissioning phase are outlined in the **Outline Decommissioning Strategy [REP1-100].**

Summary	Applicant's Response
Ranking the Public Protection impacts in importance All the local impacts identified are considered material to the ExA, but in accordance with the national guidance[7] the council would indicate the following as the most significant in relation to this theme: Noise impacts Mitigation is proposed but implemented via the 7.13 Outline OEMP [REP1-098] (OOEMP) and 7.12 Outline CEMP [REP1-096] (OCEMP), which are secured under requirement 13 and 14 of Schedule 2 within the DCO [APP-016]. However, there are disparities between the mitigation set out in 6.1 Environmental Statement Volume 1, Chapter 14 Noise and Vibration [APP-066] and the mitigation contained within 7.13 Outline OEMP [REP1-098] (OOEMP).	As described above in this table, in response to the overall summary, the disparities between **ES Volume 1, Chapter 14: Noise and Vibration [REP1-021]** and the **Outline CEMP [REP1-096]** and **Outline OEMP [REP1-098]** have been addressed following a meeting with Wiltshire Council and updated construction and operational management plans submitted at Deadline 1.
Ranking the Public Protection impacts in importance Dust/air quality Mitigation is proposed and implemented via 7.12 Outline CEMP [REP1-096] (OCEMP), which is secured under Requirement 13 of Schedule 2 within 3.1 Draft DCO [REP1-007].	The Applicant notes this comment.

[7] National Guidance published in 2024, 'Nationally Significant Infrastructure Projects: Advice for Local Authorities'

Summary	Applicant's Response
Ranking the Public Protection impacts in importance Glint/glare Mitigation is proposed and implemented via 7.12 Outline CEMP [REP1-096] (OCEMP), which is secured under Requirement 13 of Schedule 2 within 3.1 Draft DCO [REP1-007].	The Applicant notes this comment.

9 Flood Risk and Drainage

Table 9-1 - Flood Risk and Drainage

Wiltshire Council Comments	Applicant's Response
Overview and commentary As Lead Local Flood Authority (LLFA), Wiltshire Council has a number of duties and powers to manage flood risk arising from new development, as set out in the National Planning Policy Framework (MHCLG, 2023), the Town and Country Planning (Development Management Procedure) (England) Order 2015 (UK Government, 2015), the Flood and Water Management Act 2010 (UK Government, 2010), the Land Drainage Act 1991 (UK Government, 1991), and the Land Drainage Byelaws 2014 (Environment Agency, 2014). Wiltshire Council Core Policy 67 states that development proposed in Flood Zones 2 and 3, as identified within the Strategic Flood Risk Assessment, should include measures to reduce the rate of rainwater run-off and improve rainwater infiltration to soil and ground. Policy 95 of the draft Wiltshire Local Plan (2023) requires all development proposals to consider the effect of the proposed development on flood risk from all sources, both on and off-site, commensurate with the scale and impact of the development. In addition, major development is expected to demonstrate at least 30% betterment relative to greenfield runoff rates, manage runoff as close to source as possible in accordance with the discharge	The Applicant notes Wiltshire Council's role as LLFA and the summary of relevant policy. The Applicant does not agree that the submitted information leaves material uncertainty on flood risk or drainage. The matters identified by Wiltshire Council are addressed through **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [REP1-017]**, **ES Volume 3, Appendices 11-1 to 11-9: Flood Risk Assessment and Drainage Strategy [REP1-037 to REP1-054]**, the **Outline CEMP [REP1-096]**, the **Outline OEMP [REP1-098]** and the **Outline Decommissioning Strategy [REP1-100]**. Construction runoff, sediment, hydrocarbon, HDD and water quality risks are controlled through the detailed CEMP. Operational drainage for formal infrastructure areas, including substations, BESS, access tracks where required and other impermeable or engineered infrastructure, is attenuated, maintained and controlled where a formal drainage discharge is created. Decommissioning drainage, SuDS management, soil handling and water quality controls are secured through the **Outline Decommissioning Strategy [REP1-100]** and will be confirmed in the detailed Decommissioning Strategy before works begin. Flood Zone 3b has been considered where the Scheme

Wiltshire Council Comments	Applicant's Response
hierarchy, and demonstrate that exceedance can be safely managed for the 1 in 100-year plus climate change event. The main flood risk and drainage impacts of the Lime Down Solar Park proposal are summarised in the table below. The development incorporates a number of embedded mitigation measures which, if implemented as proposed, would limit the likelihood and severity of adverse flood risk and water quality effects relative to uncontrolled construction or operation. These include construction-phase drainage controls, operational drainage associated with substations and battery energy storage systems (BESS), and the use of SuDS-based features and sealed drainage with automatic isolation to limit uncontrolled discharges during abnormal events. The scheme would also remove agricultural fertiliser application across the site, reducing nutrient runoff pressures relative to the pre-development baseline. However, notwithstanding these measures, the information submitted does not yet demonstrate that flood risk and drainage effects can be adequately managed across all phases of development. In particular, there remains uncertainty regarding the management of sediment-laden or hydrocarbon-contaminated runoff during construction, the absence of a defined SuDS retirement strategy at decommissioning, and unresolved matters relating to exceedance routing and long-term drainage performance.	materially interacts with mapped fluvial flood extents, namely Lime Down D and Lime Down E2. The BESS and substations are located in Flood Zone 1. Panelled areas remain permeable and vegetated. They may influence local rainfall distribution at panel edges, but they are not positively drained, do not form connected impermeable catchments and do not create a new controlled discharge to watercourses. The relevant risks in those areas are soil compaction, vegetation condition, overland flow connectivity and sediment mobilisation, which are controlled through the **Outline CEMP [REP1-096]**, the **Outline OEMP [REP1-098]** and the **Outline Decommissioning Strategy [REP1-100]**. The Applicant therefore does not agree that further scheme-wide modelling, engineered drainage of panelled areas, or additional hydrology Requirements are necessary. No significant residual hydrology, flood risk or drainage effects are anticipated.

Wiltshire Council Comments	Applicant's Response
Additional evidence gaps relate to the absence of a defined Flood Zone 3b, the potential implications of introducing additional impermeable areas, and the need to demonstrate that controlled discharges would not increase flood risk to receiving watercourses downstream. These matters are therefore considered further within the impact assessment and underpin the requirements identified in this section.	
Relationship with the Draft DCO In preparing this Local Impact Report, Wiltshire Council has had full regard to the 3.1 Draft DCO [REP1-007] submitted by the Applicant. The flood risk and drainage Requirements identified in this section do not seek to introduce parallel controls or to redesign the authorised development. Instead, they are intended to clarify, strengthen or secure evidential certainty where the draft DCO relies on high-level commitments, assumptions, or the submission of further details at a later stage. The council considers that these matters can be appropriately addressed through targeted amendments or additions to existing DCO Requirements, rather than through additional planning obligations, and that the approach set out remains proportionate and consistent with the Applicant's consenting framework.	The Applicant agrees that flood risk and drainage controls should be secured through the DCO framework. The Applicant does not agree that additional or amended Requirements are necessary where the matter is already secured through existing Requirements and the certified outline management plans. Where Wiltshire Council has suggested changes to Requirements, these are addressed in the consolidated Requirements section of this document.

Wiltshire Council Comments	Applicant's Response
Positive impacts – construction phase For clarity, the following are described as positive impacts in that they represent embedded mitigation measures which reduce the likelihood or severity of adverse flood risk and water quality effects compared with an unmanaged construction scenario or less sensitive construction methods. These measures do not result in hydrological enhancement or a reduction in baseline flood risk. • 7.12 Outline Construction Environmental Management Plan (CEMP) [APP-277] includes temporary drainage and pollution control measures. • Proposed HDD is predominantly positive relative to open-cut excavation, as it reduces surface disruption and limit direct disturbance to drainage systems, subject to effective controls for breakout and groundwater risks. • The ES commits to implementing temporary drainage infrastructure (e.g., swales, settlement tanks, silt fences, straw bales) before and during works to manage runoff and prevent sediment-laden water entering watercourses. • Measures such as buffer zones, silt fencing, and staged excavation are embedded to control sediment at source, protecting water quality in adjacent ditches and streams.	The Applicant agrees that the matters listed are embedded mitigation rather than hydrological enhancement. Construction-phase water management are set out in **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [REP1-017]** (Paragraphs 11.9.2 to 11.9.4) and are secured through, **Outline CEMP [REP1-096]** (Section 3.6, Table 5 and Section 3.14, Table 13), and **7.11 Water Framework Directive (WFD) Assessment [REP1-094]** (Section 7.1). These controls include temporary drainage, sediment management, pollution prevention, staged works, watercourse buffers, permeable access routes and HDD breakout controls. HDD at Main River and sensitive crossings reduces direct disturbance relative to open-cut methods.

Wiltshire Council Comments	Applicant's Response
• Access tracks and working areas use permeable materials, reducing the extent of additional temporary impermeable area during construction compared to conventional hard-surfaced access. • Minimum 8 m development-free buffers around watercourses are maintained, reducing direct disturbance and runoff risk compared with uncontrollable encroachment.	
Positive impacts – operational For clarity, the following are described as positive operational impacts in that they represent embedded design and management measures intended to limit adverse flood risk and water quality effects during operation, relative to a less controlled or unmanaged operational scenario. These measures do not constitute a reduction in baseline flood risk or hydrological enhancement beyond existing conditions. • 7.13 Outline Operational Environmental Management Plan (OEMP) [APP-278] commits, in principle, to maintaining the performance of drainage infrastructure during operation. • Inclusion of Flood Risk Assessment and Drainage Strategy [APP-210], providing an overarching framework	The Applicant agrees that the matters listed are embedded operational controls, not a claim of reduced baseline flood risk. Operational drainage is addressed in **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [REP1-017]** (Paragraphs 11.10.33 to 11.10.58), **ES Volume 3, Appendix 11-1: Flood Risk Assessment and Drainage Strategy Covering Report [REP1-037]**, and secured through the **Outline OEMP [REP1-098]** (Paragraphs 2.14.1 to 2.14.3 and Section 3.6, Table 5). Formal drainage is provided for infrastructure areas where required, with SuDS-based drainage, attenuation, controlled discharge and pollution control. Incident containment for BESS and substation areas is addressed through the standalone **Firewater Containment and Drainage Strategy – Lime Down D Battery Energy Storage System [REP1-124]** and **Firewater Containment and Drainage Strategy - Lime Down Substation [REP1-125]** submitted at Deadline 1. Panelled areas remain permeable and

Wiltshire Council Comments	Applicant's Response
for managing surface water and drainage during the operational phase. • The solar panel arrays are designed to remain permeable, with grass or wildflower cover beneath and between rows. This preserves infiltration characteristics relative to existing land use and limits changes to surface water flow patterns compared to a fully impermeable layout. • Operational infrastructure such as substations and BESS areas incorporate SuDS-based drainage features, including permeable sub-bases, gravel-filled trenches, and French drains. These features attenuate runoff close to source and reduce the extent of concentrated discharge compared to conventional hardstanding drainage arrangements. • Sealed and lined drainage systems with automatically actuating isolation valves with periodic auto-test and alarm are provided at BESS and substation areas. These prevent uncontrolled discharge during abnormal (e.g. fire or spill) by providing containment and controlled release mechanisms. • Access routes use permeable surfacing (e.g., compacted gravel) and vegetated margins to reduce the extent of additional impermeable surfaces and	vegetated, with runoff managed through soil protection, grassland and wildflower establishment, and retention of existing overland flow routes.

Wiltshire Council Comments	Applicant's Response
associated runoff compared to conventional highway construction. • Drainage design is intended to control discharge from formal hardstanding areas to greenfield runoff rates, subject to confirmation through detailed design and modelling, even under 1 in 100-year storm plus 45% climate change uplift. • The scheme reduces nutrient runoff relative to the pre-development agricultural baseline, representing a relative improvement in water quality pressure.	
Positive impacts – decommissioning phase • The ES explicitly states that hydrology, flood risk, and drainage impacts during decommissioning will be similar to or lower than those during construction. • All controls secured for construction—such as temporary drainage systems, silt fences, straw bales, pollution prevention, bunded storage, and HDD breakout contingency—will also apply during decommissioning. • The ES commits to installing temporary drainage networks and robust maintenance plans during decommissioning to prevent mud/debris blockages and manage runoff effectively.	The Applicant agrees that decommissioning effects are expected to be similar to or less than construction effects. This is addressed in **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [REP1-017]** (Paragraph 11.10.67) and mitigation set out in the **Outline Decommissioning Strategy [REP1-100]** (Paragraph 1.1.7, Section 3.6, Table 5, Section 3.12, Table 11 and Section 3.16, Table 15). Temporary drainage, sediment control, pollution prevention, soil handling, reinstatement, welfare drainage and licensed waste management will be confirmed through the detailed DS before works begin.

Wiltshire Council Comments	Applicant's Response
• Bunded fuel storage, designated refuelling zones, spill kits, and emergency response plans will remain in force during decommissioning, reducing contamination risk to watercourses and groundwater. • The ES notes that soil handling and reinstatement protocols will be applied during decommissioning to restore ground conditions and maintain greenfield runoff characteristics. • After embedded mitigation, all decommissioning-related effects on flood risk and water quality are predicted to be Minor Adverse and not significant in EIA terms, giving confidence in the robustness of the approach. • Water for construction (dust suppression, welfare) will be sourced from licensed suppliers or mains, avoiding stress on local watercourses or aquifers.	
Neutral impacts • Instances where the scheme would not change the morphology of existing watercourses. • Restoration of vegetation to existing baseline levels.	The Applicant notes the comment. The Scheme has been designed to avoid unnecessary changes to watercourse morphology. Where crossings or works near watercourses are required, these will be controlled through the crossing schedule, detailed method statements, the detailed CEMP and any necessary permits or consents where these are not disapplied by the DCO. Vegetation reinstatement and long-term land management are secured through the relevant outline management plans.

Wiltshire Council Comments	Applicant's Response
Negative impacts – construction phase • Additional details needed in 7.12 Outline Construction Environmental Management Plan [APP 277] and potential 2D modelling to minimise changes to surface types increasing the risk of flooding and changes to the run-off response in the catchment.	The Applicant does not agree that site-wide 2D modelling is required as per the position set out in the **Applicant's Response to Lead Local Flood Authority on Hydraulic Modelling Requirements [EN010168/EXAM/9.28]** submitted at Deadline 2. The assessment uses methods proportionate to the source and pathway of risk. Watercourse flood risk has been assessed using published mapping, site-specific hydraulic modelling where justified and Manning's-based calculations where appropriate. Formal drainage from impermeable infrastructure has been assessed quantitatively, with attenuation and restricted discharge where required. Construction-phase runoff risks are managed through the detailed CEMP, including temporary drainage, sediment controls, erosion controls and pollution prevention. This is secured through the **Outline CEMP [REP1-096]** (Section 3.6, Table 5). Field-scale modelling of panelled areas would rely on assumed future soil and vegetation parameters and is not necessary to demonstrate that construction runoff risks can be managed.
Negative impacts – construction phase • Overland flow management during construction not provided which could cause surface water runoff onto roads and increase pollution flows to watercourses, harming aquatic ecology.	The Applicant does not agree that overland flow management has been omitted. Existing topography, drainage features and overland flow routes have informed **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [REP1-017]**, **ES Volume 3, Appendices 11-1 to 11-9: Flood Risk Assessment and Drainage Strategy [REP1-037 to REP1-054]** and the mitigation secured through the **Outline CEMP**

Wiltshire Council Comments	Applicant's Response
Negative impacts – construction phase • Prevention of debris getting to the road due to insufficient run off management, leading to safety implications for traffic due to the increased risk of accidents.	**[REP1-096]**. **Chapter 11: Hydrology, Flood Risk and Drainage [REP1-017]** (Paragraph 11.6.9) confirms that the Flood Risk Assessment and Drainage Strategies include hydrological assessment to establish local drainage catchments and overland flow routes. Table 11-2 confirms that existing overland flow paths will be preserved, no bunding or obstruction is proposed, and tracks will be constructed at existing levels using granular permeable materials in areas with flow paths. Paragraphs 11.10.5 to 11.10.12 assess the temporary construction-phase risks from hardstanding, compacted ground and overland flow, and confirm the embedded controls, including temporary drainage infrastructure, vegetated buffer strips, designated construction routes, soil handling and reinstatement protocols. Debris and mud tracking risks are secured through the **Outline CEMP [REP1-096]** (Section 3.6, Table 5), **Outline CTMP [REP1-112], Outline SRMP [APP-280],** and the air quality trackout controls within the **Outline CEMP [REP1-096]** (Section 3.10, Table 9). Wheel washing, road sweeping, temporary drainage, sediment control, soil handling controls and site housekeeping measures will be implemented to prevent mud, sediment and debris entering roads, drains or watercourses. Road safety matters associated with construction traffic are addressed separately in the transport responses.

Wiltshire Council Comments	Applicant's Response
Negative impacts – construction phase • Risk of soil compaction during haulage and working platform installation is not fully addressed. Without robust prevention and remediation measures, infiltration capacity could be reduced, increasing surface water runoff and flood risk.	The Applicant agrees that soil compaction is a key construction-phase drainage risk. It is addressed through construction traffic control, designated routes, soil handling measures, use of existing tracks where available, low ground pressure plant, reinstatement and vegetation establishment. These controls are set out in **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [REP1-017]** (Paragraph 11.9.2 and 11.10.8 to 11.10.12) and are secured through **Outline CEMP [REP1-096]**, **Outline SRMP [APP-280]** and **Outline LEMP [APP-283]**. Soil compaction is therefore a managed construction risk, not an unresolved drainage evidence gap.
Negative impacts – construction phase • No evidence of pre and post-construction exceedance flow routing for the 1 in 100-year + climate change event. Temporary works could alter overland flow paths, concentrating runoff and elevating pluvial flood risk.	The Applicant does not agree that a separate pre- and post-construction exceedance model is necessary. **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [REP1-017]** (Paragraph 11.6.9) confirms that the **ES Volume 3, Appendices 11-1 to 11-9: Flood Risk Assessment and Drainage Strategy [REP1-037 to REP1-054]** includes a hydrological assessment to establish local drainage catchments and overland flow routes. Existing flood risk, topography, drainage features and surface water flow routes have therefore informed the assessment and design. The Scheme avoids unnecessary obstruction of flow paths, uses permeable access tracks at existing ground levels, and does not propose bunding in areas with flow paths. **ES Volume**

Wiltshire Council Comments	Applicant's Response
	1, Chapter 11: Hydrology, Flood Risk and Drainage [REP1-017] (Paragraphs 11.10.5 to 11.10.12) assess the temporary construction-phase risks from hardstanding, compacted ground and overland flow, and confirm embedded controls including temporary drainage infrastructure, vegetated buffer strips, designated construction routes, soil handling and reinstatement protocols. The detailed control of temporary drainage, sequencing and erosion measures will be set out in the Water Management Plan forming part of the detailed CEMP, as secured through the **Outline CEMP [REP1-096]** (Section 3.6, Table 5) by Requirement 13 of Schedule 2 of the **Draft DCO [REP1-007]**. The Applicant considers this proportionate to the nature of the temporary works and the assessed level of risk.
Negative impacts – construction phase • Potential for sediment-laden or hydrocarbon-contaminated runoff during construction remains unless wheel washes, bunded refuelling zones, and monitoring protocols are implemented and enforced.	This risk is addressed in the Deadline 1 submissions. Wheel washing, washdown controls, bunded storage, designated refuelling, spill kits, emergency response, water quality monitoring and no uncontrolled discharge are detailed in **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [REP1-017]** (Paragraphs 11.9.2 to 11.9.4) and the **Commitments Register [REP1-114]** and secured by the **Outline CEMP [REP1-096]** (Section 3.6, Table 5) through Requirement 13 of Schedule 2 of the **Draft DCO [REP1-007]**. The Applicant does not agree that this remains an unresolved matter.

Wiltshire Council Comments	Applicant's Response
Negative impacts – construction phase • HDD and temporary crossings near ordinary watercourses pose a risk of pollution and flow disruption if LLFA principles for works without Ordinary Watercourse Consent under the DCO are not agreed and applied.	HDD and temporary watercourse crossings will be controlled through detailed crossing designs, method statements, trenchless drilling controls and breakout contingency procedures. This is addressed in **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [REP1-017]** (Paragraphs 11.9.2 and 11.9.4), **ES Volume 3, Appendix 11-9: Flood Risk Assessment and Drainage Strategy - Cable Route Corridor [REP1-053]**, **WFD Assessment [REP1-094]** (Section 7.1) and secured in the **Outline CEMP [REP1-096]** (Section 3.14, Table 13) through Requirement 13 of Schedule 2 of the **Draft DCO [REP1-007]**. Where works require separate permits or consents and these are not disapplied by the DCO, these will be obtained before the relevant works are undertaken. DCO protective provisions and any disapplication matters are being addressed through the DCO process.
Negative impacts – construction phase • Site gradients (e.g. 128m to 102m across C1/C2) could accelerate runoff downslope during construction unless flow routing and erosion controls are actively managed.	The Applicant notes that gradients vary across the Sites, including Lime Down C1 and C2. This has been accounted for through review of topography, local catchments, overland flow routes and drainage features in informed **ES Volume 3, Appendices 11-1 to 11-9: Flood Risk Assessment and Drainage Strategy – Lime Down C1 and C2 [REP1-043 to REP1-045]**. Construction controls for temporary runoff, erosion and sediment mobilisation are set out in **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [REP1-**

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	017] (Paragraphs 11.9.2 to 11.9.3) and secured through **Outline CEMP [REP1-096]** (Section 3.6, Table 5). Site gradient is therefore addressed through design and construction-phase controls, rather than representing an unmanaged flood risk.
Negative impacts – operational • Flood zone 3B. Flood Zone 3b needs to be defined for effective planning, design and operation of site.	The Applicant does not agree that the absence of a Scheme-wide Flood Zone 3b definition represents an evidence gap. Flood Zone 3b forms part of Flood Zone 3 and sits within the wider mapped Flood Zone 2 extent. Land outside the mapped Flood Zone 2 extent cannot, by definition, be Flood Zone 3b. The only locations where the proposed development materially interacts with mapped fluvial flood extents are Lime Down D and Lime Down E2. At Lime Down D, the relevant flood extent is associated with Gauze Brook and the Unnamed Main River, both of which are Main Rivers. Detailed hydraulic modelling has been undertaken at Lime Down D, including consideration of flood depths, climate change and functional floodplain storage. At Lime Down E2, the relevant flood extent is associated with Gabriel's Well, also a Main River, and further hydraulic modelling is being progressed to define local flood behaviour, including Flood Zone 3b where relevant. These matters are being discussed with the Environment Agency as the relevant consultee for Main River flood risk as

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	set out in the **Statement of Common Ground with Environment Agency [EN010168/EXAM/8.6]** submitted at Deadline 2. Where watercourses are not represented in the mapped Flood Zone 2 or 3 extents, the assessment has used proportionate methods, including surface water flood mapping, site-specific review of topography and drainage features, watercourse buffers and Manning's-based open channel calculations where appropriate. The BESS and substations are located in Flood Zone 1. No built infrastructure that would be inappropriate in Flood Zone 3b will be located within functional floodplain.
Negative impacts – operational • Insufficient detail about land drainage issues can result in risk to road safety or increased flood risk for buildings and electrical infrastructure.	Land drainage and surface water flood risk have been assessed in the site-specific informed **ES Volume 3, Appendices 11-1 to 11-9: Flood Risk Assessment and Drainage Strategy [REP1-037 to REP1-054]**. The Scheme retains existing overland flow routes, avoids unnecessary obstruction of drainage features, uses permeable access tracks, and incorporates passive drainage or SuDS around infrastructure where required. Temporary construction impacts to existing drainage features will be avoided where practicable, or reinstated where disturbance is unavoidable, as secured through the **Outline CEMP [REP1-096]**. No significant residual flood risk effects are anticipated.
Negative impacts – operational	The Applicant agrees that substations, BESS and some access tracks introduce limited areas of hardstanding. These

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• Increase in impermeable areas. Infrastructure such as substations, BESS areas, and access tracks introduce permanent hardstanding. Without mitigation, this could lead to localised surface water flooding and increased runoff to downstream receptors.	impermeable and engineered areas have been assessed separately from the panelled areas and are mitigated through formal drainage design. Where hardstanding or engineered infrastructure creates a formal runoff pathway, drainage is controlled through SuDS-based drainage, attenuation and controlled discharge where required. This is addressed in **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [REP1-017]** (Paragraphs 11.10.33 to 11.10.39) and **ES Volume 3, Appendix 11-1: Flood Risk Assessment and Drainage Strategy Covering Report [REP1-037]** (Section 6.4 and Section 6.5). By contrast, panelled areas are not impermeable hardstanding, do not create a formal discharge point and do not require engineered attenuation. They will remain vegetated and permeable, with runoff managed through soil protection, grassland and wildflower establishment, and retention of existing overland flow routes.
Negative impacts – operational • Potential increases in discharge of watercourses. Areas requiring controlled discharge (e.g. BESS and substations) could increase flow volumes to local ditches or watercourses, elevating flood risk downstream if not properly attenuated.	Controlled discharge is limited to formal drainage areas. These areas will be attenuated and restricted before discharge. **ES Volume 3, Appendices 11-1 to 11-9: Flood Risk Assessment and Drainage Strategy [REP1-037 to REP1-054]** controls post-development runoff from formal infrastructure areas to 70% of the equivalent greenfield rate where required, including the 1 in 1-year and 1 in 2-year events, and provides attenuation for the 1 in 100-year plus

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	climate change event. Panelled areas will not be positively drained and will not introduce a new point discharge to watercourses. They will remain permeable and vegetated, with existing overland flow routes retained. The Applicant does not agree that the Scheme would increase downstream flood risk.
Negative impacts – operational • Blockage of drainage networks. Operational drainage systems (SuDS, sealed systems) may become blocked by debris or sediment over time, causing localised flooding and potentially increasing flood risk off-site.	Operational drainage inspection and maintenance is secured through **Outline OEMP [REP1-098]** (Paragraphs 2.14.1 to 2.14.3 and Section 3.6, Table 5). Drainage systems, including SuDS, sealed drainage systems and outfalls, will be inspected and maintained so that they continue to perform as designed. With those measures in place, blockage risk is not significant.
Negative impacts – operational • Runoff from hardstanding areas can contain hydrocarbons, heavy metals, and silt, posing a risk to surface water and groundwater quality if not intercepted.	Runoff from formal infrastructure areas has been assessed and will be managed through SuDS, sealed or lined drainage where required, and pollution control measures. BESS and substation incident drainage is addressed through the standalone **Firewater Containment and Drainage Strategy – Lime Down D Battery Energy Storage System [REP1-124]** and **Firewater Containment and Drainage Strategy – Lime Down Substations [REP1-125]** submitted at Deadline 1. These provide containment, isolation, controlled release and testing principles for abnormal events. With those measures in place, operational water quality effects are assessed as not significant.
Negative impacts – operational	Operational traffic as described in **ES Volume 1, Chapter 13: Transport and Access [REP1-019]** will be limited and

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• Highway runoff and accidental spills. Even with low traffic volumes, maintenance vehicles and occasional heavy plant introduce risks of oil and fuel spills, which could migrate to watercourses during rainfall events.	infrequent. Access tracks will be permeable and pollution prevention procedures will apply during maintenance and equipment replacement activities. This is addressed in **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [REP1-017]** (Paragraphs 11.10.55 to 11.10.58) and secured through the **Outline OEMP [REP1-098]**. The Applicant does not agree that highway runoff from operational access creates a significant residual risk.
Negative impacts – decommissioning phase • No site-specific decommissioning runoff plan. The ES assumes decommissioning is "less than or equal to construction" without setting the temporary drainage layout, capacities, and sequencing for panel removal, track removal, compound locations, haul routes, and reinstatement timing. That raises a risk of short-term runoff spikes, silt mobilisation, and pathway changes during panel/track uplift.	The detailed decommissioning methodology cannot sensibly be fixed 60 years in advance. The control framework is secured by the **Draft DCO [REP1-007]**. The **Outline Decommissioning Strategy [REP1-100]** (Section 3.6, Table 5) requires decommissioning water management controls, including temporary drainage, sediment control, SuDS management and pollution prevention. The detailed DS will confirm the phase-specific layout, sequencing, haul routes, temporary drainage and reinstatement controls before decommissioning works begin.
Negative impacts – decommissioning phase • No SuDS retirement plan. It's unclear which SuDS are removed, retained, or backfilled, and how sealed systems (BESS/substations) will be drained, sampled, and disposed of to licensed facilities before physical decommissioning. Lack of a plan can create pollution	The Applicant does not agree that a separate SuDS retirement requirement is necessary. The future treatment of drainage features will be addressed through the detailed Decommissioning Strategy, secured by the **Draft DCO [REP1-007]**. The **Outline Decommissioning Strategy [REP1-100]** (Section 3.6, Table 5 and Section 3.16, Table 15) already secures the principles for drainage management, pollution

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pathways or leave orphaned drainage structures altering greenfield hydrology.	prevention, waste handling and licensed disposal. Any residual fluids, liners, contaminated materials or drainage components will be sampled, removed or managed through appropriate licensed routes where required.
Negative impacts – decommissioning phase • Soil Handling. Although soil compaction controls exist for construction, the ES does not describe decommissioning reinstatement targets (bulk density, infiltration rates, ground roughness/vegetation cover) nor post works verification to demonstrate predevelopment greenfield runoff equivalence.	Soil handling and reinstatement are addressed through the **Outline Decommissioning Strategy [REP1-100]** (Section 3.12, Table 11). This requires a record of condition, soil handling controls, measures to remove compaction where required, and restoration measures. The Applicant does not consider fixed bulk density or infiltration targets to be necessary or proportionate at this stage. Appropriate restoration criteria will be defined in the detailed Decommissioning Strategy having regard to the condition of the land and regulatory requirements at that time.
Negative impacts – decommissioning phase • No decommissioning phase monitoring regime. There's reference to water quality monitoring in 7.12 Outline CEMP [REP1-096]/7.13 Outline OEMP [REP1-098], but no specific decommissioning monitoring plan (trigger levels, locations, frequencies, reporting) to evidence that sediment/pollution are controlled during removal and restoration.	Decommissioning water quality monitoring is now addressed in the **Outline Decommissioning Strategy [REP1-100]** (Section 3.6, Table 5). Monitoring will include visual inspections and risk-based on-site measurements and sampling where appropriate. Frequency, locations, parameters, trigger levels and methods will be defined in the detailed Water Management Plan, proportionate to the sensitivity of the receiving environment and the works being undertaken. The Applicant does not agree that this remains an evidence gap.
Negative impacts – decommissioning phase	Works affecting watercourses or watercourse buffers during decommissioning will be controlled through the detailed

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• The ES intends to disapply permitting via DCO with protective provisions. For decommissioning, there is no schedule for consents, notifications, or method statements where works touch ordinary watercourses or main river buffers during asset removal/backfill.	Decommissioning Strategy, method statements and the DCO protective provisions where relevant. This is secured through the **Outline Decommissioning Strategy [REP1-100]** (Section 3.6, Table 5 and Section 3.16, Table 15) and Requirement 20 of the **Draft DCO [REP1-007]**. Where works require separate permits or consents and these are not disapplied by the DCO, these will be obtained before the relevant works are undertaken. The Applicant does not agree that a separate decommissioning consent schedule is required at this stage, and a list of other consents and licences likely to be required by the Applicant has already been provided in the **Consents and Agreements Position Statement [APP-272]**. The detailed methodology and regulatory context will be confirmed closer to decommissioning, when the works, receptors and applicable regulatory regime are known.
Negative impacts – decommissioning phase • Firewater containment and spill response are described for operation; decommissioning abnormal events (e.g. tank removal spills, residual fluid release, HDD backream extraction fluids) are not tailored to end of life activities with tested isolation/valving and contingency storage volumes.	Decommissioning pollution risks will be managed through the detailed Decommissioning Strategy, including spill response, drainage isolation, testing and licensed disposal where required. This is secured through the **Outline Decommissioning Strategy [REP1-100]** (Section 3.6, Table 5 and Section 3.16, Table 15) and Requirement 20 of the **Draft DCO [REP1-007]**. BESS and substation equipment removal will be planned before decommissioning works commence. Residual fluid and contaminant risks associated with plant

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	removal will be managed through decommissioning method statements and waste procedures.
Ranking the Flood Risk and Drainage impacts in importance All the local impacts identified are considered material to the ExA, but in accordance with the national guidance[8] the council would indicate the following as the most significant in relation to this theme: Construction phase 1) Lack of demonstrated pre- and post-construction exceedance flow routing for 1 in 100-year plus Climate Change event. 2) Risk of sediment-laden or hydrocarbon-contaminated runoff unless wheel washes and bunded refuelling zones are enforced. 3) HDD near watercourses without agreed LLFA principles.	The Applicant notes Wiltshire Council's ranking but does not agree that these matters remain unresolved. Pre- and post-construction exceedance flow routing has been considered proportionately through **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [REP1-017]** (Paragraphs 11.9.2 to 11.9.4), **ES Volume 3, Appendices 11-1 to 11-9: Flood Risk Assessment and Drainage Strategy [REP1-037 to REP1-054],** and the mitigation measures secured through the **Outline CEMP [REP1-096]** (Section 3.6, Table 5). The Scheme retains existing overland flow routes, uses permeable access tracks at existing ground levels and controls temporary drainage, sequencing and erosion risk through the detailed CEMP. Sediment-laden and hydrocarbon-contaminated runoff is controlled through wheel washing, bunded storage, designated refuelling, spill response, pollution prevention, water quality monitoring and no uncontrolled discharge. These measures are secured through the **Outline CEMP [REP1-096]** (Section 3.6, Table 5).

[8] National Guidance published in 2024, 'Nationally Significant Infrastructure Projects: Advice for Local Authorities'

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	The Applicant agrees that HDD and temporary crossing methodologies will be controlled through the DCO and detailed CEMP. **ES Volume 3, Appendix 11-1: Flood Risk Assessment and Drainage Strategy Covering Report [REP1-037]** (Section 4.1 and Table 5) identifies the watercourse crossings, preferred crossing methodology and relevant regulatory authority. **ES Volume 3, Appendix 11-9: Flood Risk Assessment and Drainage Strategy - Cable Route Corridor [REP1-053]** (Paragraphs 2.3.5 to 2.3.6 and 2.11.1 to 2.11.2) confirms that the Watercourse Crossing Schedule has been shared with the LLFA and that detailed HDD design, crossing methods, drilling fluid management, pollution prevention and construction controls will be through the DCO and detailed CEMP, with any separate permits or consents obtained where required and not disapplied by the DCO. HDD risks are further controlled through the **Outline CEMP [REP1-096]** (Section 3.14, Table 13) and 7.11 **WFD Assessment [REP1-094]** (Section 7.1). Where works require separate permits or consents and these are not disapplied by the DCO, these will be obtained before the relevant works are undertaken. The Applicant does not agree that further modelling or additional standalone hydrology Requirements are necessary to resolve these matters.

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Ranking the Flood Risk and Drainage impacts in importance Operational phase 1) Flood Zone 3b has not yet been defined, meaning compliance with functional floodplain policy cannot current be confirmed. 2) Increase in impermeable areas (substations, BESS). Without mitigation, this could lead to localised flood risk. 3) Without mitigation, potential increases in discharge to watercourses elevating downstream flood risk.	The Applicant notes Wiltshire Council's ranking but does not agree that operational flood risk remains uncertain. Flood Zone 3b forms part of Flood Zone 3 and sits within the wider mapped Flood Zone 2 extent, so land outside the mapped Flood Zone 2 extent cannot, by definition, be Flood Zone 3b. The only material interactions with mapped fluvial flood extents are at Lime Down D and Lime Down E2. Detailed hydraulic modelling has been undertaken at Lime Down D, as reported in **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [REP1-017]** (Paragraphs 11.7.40 to 11.7.43) and **ES Volume 3, Appendix 11-6: Flood Risk Assessment and Drainage Strategy - Lime Down D/BESS [REP1-047]**. Further modelling is being progressed at Lime Down E2 to define local flood behaviour, including Flood Zone 3b where relevant. These matters relate to Main River flood risk and will be agreed with the Environment Agency as the relevant consultee. Minor and unmapped watercourses are addressed through surface water flood mapping, topographic review, watercourse buffers and Manning's calculations where appropriate, as set out in **ES Volume 3, Appendices 11-1 to 11-9: Flood Risk Assessment and Drainage Strategy [REP1-037 to REP1-054]**. The BESS and substations are located in Flood Zone 1. Impermeable areas are limited and drained through controlled SuDS-based systems, as set out in **ES Volume 1, Chapter 11:**

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	Hydrology, Flood Risk and Drainage [REP1-017] (Paragraphs 11.10.33 to 11.10.39), **ES Volume 3, Appendix 11-1: Flood Risk Assessment and Drainage Strategy Covering Report [REP1-037]** (Sections 6.4 and 6.5), and mitigation measures secured through **Outline OEMP [REP1-098]** (Paragraphs 2.14.1 to 2.14.3 and Section 3.6, Table 5). Formal drainage areas are attenuated and controlled, including restriction to 70% of equivalent greenfield rates where required for the 1 in 1-year and 1 in 2-year events, with attenuation for the 1 in 100-year plus climate change event. Panelled areas remain permeable and vegetated, do not create a formal discharge point and do not require engineered attenuation. **ES Volume 3, Appendices 11-1 to 11-9: Flood Risk Assessment and Drainage Strategy [REP1-037 to REP1-054]** confirms that the Scheme will not increase downstream flood risk.
Ranking the Flood Risk and Drainage impacts in importance Decommissioning phase 1) No site-specific decommissioning runoff management plan has been provided, including details of temporary drainage layouts, capacities and sequencing during infrastructure removal. 2) No SuDS retirement strategy has been defined, meaning it is currently unclear how drainage features would be retained,	The Applicant notes Wiltshire Council's ranking but does not agree that these matters remain unresolved. The detailed decommissioning methodology cannot sensibly be fixed 60 years in advance, but the control framework is secured now through the **Outline Decommissioning Strategy [REP1-100]** under Requirement 20 of the **Draft DCO [REP1-007]**. Decommissioning runoff management, including temporary drainage layouts, sequencing, haul routes, sediment control

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removed or backfilled at end of life, with a consequent risk of residual or orphaned drainage pathways. 3) Soil reinstatement performance targets and post-works verification criteria have not been defined, limiting the ability to confirm restoration of greenfield runoff and infiltration characteristics following decommissioning.	and reinstatement, will be confirmed in the detailed Decommissioning Strategy before works begin. SuDS retirement does not require a separate standalone strategy at this stage. The future treatment of drainage features, including whether they are retained, removed, backfilled or otherwise managed, will be confirmed through the detailed Decommissioning Strategy. Waste handling and licensed disposal are controlled through **Outline Decommissioning Strategy [REP1-100]** (Section 3.16, Table 15). Soil handling and reinstatement are secured through **Outline Decommissioning Strategy [REP1-100]** (Section 3.12, Table 11), which requires a record of condition, soil handling controls, measures to remove compaction where required and restoration measures. The Applicant does not consider fixed bulk density, infiltration targets or post-works verification criteria to be necessary or proportionate at this stage. Appropriate restoration criteria will be defined in the detailed Decommissioning Strategy, having regard to the condition of the land and regulatory requirements at that time. The Applicant does not agree that additional standalone Requirements are necessary beyond the existing DCO control framework.

10 Climate Change

Table 10-1 - Climate Change

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Overview and commentary The Wiltshire Core Strategy Policy 42 states that proposals for standalone renewable energy schemes will be supported subject to satisfactory resolution of all site-specific constraints. Applicants will not be required to justify the overall need for renewable energy development, either in a national or local context. The South Gloucestershire Local Plan Core Strategy 3 (CS3) also states that proposals for the generation of energy from renewable or low carbon sources will be supported, provided that the installation would not cause significant demonstrable harm to residential amenity. However, CS3 continues to say that renewable or low carbon energy installations will not be supported in areas covered by national designations and areas of local landscape value unless they do not individually or cumulatively compromise the objectives of the designations especially with regard to landscape character, visual impact and residential amenity. Under the draft South Gloucestershire Local Plan (2025) LP25, proposals for major development will need to be supported by an Embodied Carbon Assessment that demonstrates a score of	Regarding need, the Applicant notes the council's position that the overall need for renewable energy development is not required to be justified, either locally or nationally. Compliance with Core Policy 42, including further details of how the specific factors listed in Core Policy 42 have been assessed (e.g. landscape, biodiversity, historic environment, transport etc), is set out in Annex B: Local Policy Accordance Tables of the **Planning Statement [REP1-087]** (see p668). The Applicant welcomes the support for renewable sources of energy generation provided for in the South Gloucestershire Local Plan Core Strategy (CS3) (Ref 10) subject to a demonstration that, for schemes in areas covered by national designations and areas of local landscape value, no individual or cumulative effects compromise the objectives of any relevant designations in particular relating to landscape character, visual impact and residential amenity. The Applicant notes that only two small sections of the Highway Improvement Areas fall within the administrative boundary of South Gloucestershire Council. The remainder of the Order Limits are within the administrative boundary of Wiltshire Council. The Scheme's compliance with Policy CS3 more generally is set out in Annex

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less than 900kg/sqm of carbon can be achieved within the development of the substructure, superstructure, and finishes. The Lime Down Solar Park proposal will provide clean, renewable energy into the electricity grid, which supports the objectives of the Wiltshire Climate Strategy. The Scheme appears to have a very long Carbon Pay Back Time at a project level. Whilst it is acknowledged that in principle renewables (including utility-scale solar) will contribute to a net benefit in terms of decarbonisation at a national level, the submitted figures and narrative in the Environmental Statement do not support this perspective in terms of overall benefit. The main impacts of the Lime Down Solar Park proposal are summarised in the following table.	B: Local Policy Accordance Tables of the **Planning Statement [REP1-087]** (see page 735). Regarding Policy CS3, The Solar PV Sites are not located within the designated Cotswold National Landscape (CNL). However, it is recognised that Site's A, B and C are within the setting of the CNL. The landscape led approach to the development has utilised the mitigation hierarchy to minimise adverse effects. Avoidance measures include avoiding development adjacent to the National Landscape where it would affect its setting. The effects of the Scheme on landscape character, visual impact and residential amenity within the CNL are fully assessed as its own standalone receptor in **ES Vol 3, Appendix 8.6 – Assessment of Effects on the Cotswolds National Landscape and its Special Qualities [APP-197].** The Solar PV Sites are not within the CNL. All land parcels adjacent to the CNL are proposed to deliver habitat enhancement, informed by the CNL Management Plan and the Cotswolds National Landscape Strategy and Guidelines, to further the purposes of the designation. The main solar PV areas associated with the Scheme are not identified as being within any areas of local landscape value. The draft South Gloucestershire Local Plan (Ref 10) LP25 states that major developments will need to be supported by an Embodied Carbon Assessment that demonstrates a score of

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	less than 900kg/sqm of carbon (presumably this would be 'CO_2e') can be achieved within the development of the substructure, superstructure, and finishes. As the development is demonstrated to reduce carbon emissions compared to a baseline scenario in which it is not developed, it is considered that this criterion is met. With regards to the Carbon Pay Back Time, a separate detailed Technical Note is being prepared and will be submitted at Deadline 3. To summarise the findings of the Climate Change assessment and subsequent reporting, precautionary assumptions have been used throughout the climate change greenhouse gas assessment and then compared to a baseline which already accounts for the provision of other forecast solar schemes. Should a less stringent methodology be applied, i.e. comparing the scheme against other methods of energy generation such as Combined Cycle Gas Turbine (CCGT), it is predicted that the scheme would 'pay back' the carbon within 3 years.
Positive impacts – construction phase None identified.	The Applicant notes this comment.
Positive impacts – operational The development will provide clean, renewable energy into the electricity grid. This supports Wiltshire Climate Strategy objectives	The Applicant notes this comment relating to the support the Scheme will provide to the Wiltshire Climate Strategy objectives of providing clean, renewable energy into the electricity grid. The Applicant's **Statement of Need [REP1-085]**

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	describes how and why the Scheme addresses all relevant aspects of government policy including achieving its energy objective to ensure the supply of energy to the national energy system always remains secure (Section 8.5), reliable (Section 8.5), affordable (Chapter 9), and consistent with meeting legally binding climate change targets (Section 5.10).
Positive impacts – decommissioning phase None identified.	The Applicant notes this comment.
Neutral impacts None identified.	The Applicant notes this comment.
Negative impacts – construction phase As submitted, the figures provided by the Applicant for greenhouse gas emissions (6.1 Environmental Statement Volume 1, Chapter 7 Climate Change [APP-059]) show that the Scheme has a very long Carbon Pay Back Time (CPBT), and may not recover the greenhouse gas emissions during the lifetime of the project. This is so different from the CPBT for similar developments as per literature/research (1-7 years), that it has raised concerns and the ExA may wish to request further detail. However, it is understood that national policy has established support for this kind of development: despite significant levels of carbon emissions at project level, the wider decarbonisation benefits of these projects are considered to be substantial and supportive of national policy. A similar	With regards to the Carbon Pay Back Time, a separate detailed Technical Note is being prepared and will be submitted at Deadline 3. To summarise the findings of the Climate Change assessment and subsequent reporting, precautionary assumptions have been used throughout the climate change greenhouse gas assessment and then compared to a baseline which already accounts for the provision of other forecast solar schemes. Should a less stringent methodology be applied, i.e. comparing the scheme against other methods of energy generation such as Combined Cycle Gas Turbine (CCGT), it is predicted that the scheme would 'pay back' the carbon within 3 years. The overall effect of the scheme is shown to result in a net reduction of emissions even in the conservative assessment

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development in another location would provide the same benefits as this Scheme in terms of energy generation and decarbonisation.	scenario presented within the **ES Volume 1, Chapter 7: Climate Change [APP-059]**.
Negative impacts – construction phase The Environmental Statement chapter on Climate Change should provide a transparent assessment of greenhouse gas emissions and assessment of significance, using an approach aligned with Institute of Environmental Management and Assessment (IEMA) as requested by the Inspectorate in its Scoping Opinion (Table 7-1. ES Chapter 7 [APP-059]). The assessment of significance used by the Applicant is limited. It is accepted that it is appropriate to consider the national Carbon Budgets, however IEMA guidance also recommends drawing on multiple sources of evidence to come to view about significance in relation to a range of contexts, for example local carbon emissions and targets, national policy and sector-based emissions. The focus of this Environmental Statement report is somewhat narrower and considers the calculation of the project emissions and the potential for emissions reduction. This approach leads to a narrow assessment of significance, but also a narrow consideration of the benefits, leading to questioning whether the project pays back in terms of carbon. Whilst it is the council's understanding that the national policy to accelerate the deployment of renewables (including utility-scale solar) may have already considered the substantial GHG	**ES Volume 1, Chapter 7: Climate Change [APP-059]** has used the methodology stated within the ISEP guidance (Ref 11) recommended by Wiltshire Council; i.e., "Assessing Greenhouse Gas Emissions and Evaluating their Significance', February 2022. In order to reach the conclusions for the significance of effect for emissions during the construction phase, contrary to the points raised, several sources are considered within the ES chapter. A comparison against the overall UK carbon budget has been undertaken and also a review of energy sector carbon budgets to provide additional context. It should be noted that there is a limitation in the assessment method. The ES assessment compares UK carbon budgets against global scheme emissions (e.g. shipping from China/embodied carbon from material produced worldwide). This provides a precautionary assessment, with results demonstrating <0.1% of the relevant carbon budgets. The assessment has compared against a 2029 forecast baseline in line with the predicted development operational year. This 2029 forecast accounts for around 23% of UK energy generation by Solar PV arrays with 6% coming from

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emissions involved, against the contribution of renewables infrastructure projects to wider decarbonisation, this does not come across on the figures and narrative submitted by the Applicant in their Environmental Statement. Therefore, the council requests clarification of emissions and net benefit, as part of transparent decision-making.	storage. This figure is reliant on schemes such as Lime Down coming forward to meet this target. It should be noted that IEMA was rebranded to ISEP (Institute of Sustainability and Environmental Professionals) in July 2025.
Negative impacts – construction phase The timing of emissions is also significant, linked to the absence of a national strategic steer on location of renewables deployment: The GHG emissions during construction will occur during the UK Carbon Budget 4 and 5. The individual development is of course a small part of the emissions within the national budget, however since the Carbon Budget 4 and 5 are predicted to be exceeded by the increase in renewables called for by the Clean Power 2030 and Carbon Budgets and Growth Delivery Plan, any decision must be clear whether this particular development is a useful contribution to, or an appropriate use of those budgets. The council is aware that a Strategic Spatial Energy Plan is currently being developed by NESO, to effectively provide a strategic steer on how the power sector will utilise the carbon budgets, i.e. where and when renewables should be deployed. The council's view is that a decision on such a large renewables development should not be taken without such a plan, because without it there is no	The assessment presented in **ES Volume 1, Chapter 7: Climate Change [APP-059]** has shown that the emissions generated during Construction will make up 0.03% of the Carbon budget 4 and 0.03% of Budget 5. This should be viewed in the above context of conservative assumptions being used for the purpose of the assessment to account for global emissions against this UK only budget. Please see the answer to the section below entitled 'Ranking the Climate Change impacts in Importance' for explanation of the Strategic Spatial Energy Plan.

Wiltshire Council Comments	Applicant's Response
strategic steer on whether this is an appropriate location for a utility-scale solar farm.	
Negative impacts – construction phase For comparison of the scale of emissions, the GHG emissions caused during each year of the construction phase will be at a scale that is equivalent to approx. 4% of Wiltshire's current annual GHG emissions (based on 2023 total emissions, DESNZ), albeit not all of these emissions will be produced within Wiltshire. Significant levels of emissions continue throughout the operational phase as inverters and battery containers are planned to be replaced every 10 years, and transformers and panels at the 30-year point, all contributing to greenhouse gas emissions.	As recognised by the Council, the majority of these emissions will occur outside of Wiltshire. In line with the ISEP guidance (Ref 11), the receptor assessed within **ES Volume 1, Chapter 7: Climate Change [APP-059]** is the global climate as emissions will have a global impact. It is the case that emissions will occur during the operational phase of the scheme with the primary contributor being replacement parts, particularly BESS and Solar panels. It should be noted that a conservative approach to emissions from these sources has been used for the purpose of the assessment assuming that emissions in future years will be the same as the baseline year. In reality, it is anticipated that these emissions would drop drastically in future as global efforts move towards decarbonisation.
Negative impacts – construction phase There are significant GHG emissions during the lifetime of the project, and particularly during construction phase which is at a time when the county and the country should be approaching net zero emissions, therefore the management plans must be required to minimise emissions as much as possible, if the development is permitted. The proposed GHG mitigation measures in 7.12 Outline CEMP [REP1-096], 7.13 Outline	These measures set out will be considered as far as reasonably possible for inclusion within the relevant management plans with updates submitted at later deadlines of Examination, where required.

Wiltshire Council Comments	Applicant's Response
OEMP [REP1-098] and 7.14 Outline Decommissioning Strategy [REP1-100] are welcomed, but could be further enhanced by using low emissions vehicles and equipment e.g. consider electric, Hydrotreated Vegetable Oil (HVO) or other alternative fuels; Construction of any roads or tracks should consider measures to reduce emissions from use of asphalt; maximise circularity of materials use through innovative recycling practices. Minimise water use e.g. by using rainwater for vehicle and equipment washdown. Since the main proportion of GHG gases being emitted in the county of Wiltshire are attributed to worker transport, this is a particular area for emissions mitigation, for example by using buses to transport workers, similar to the Hinkley power station scheme, and that these are Ultra Low Emission buses.	
Negative impacts – operational As submitted, the figures provided by the Applicant for greenhouse gas emissions (6.1 Environmental Statement Volume 1, Chapter 7 Climate Change [APP-059]) show that the Scheme has a very long Carbon Pay Back Time (CPBT) , and may not recover the greenhouse gas emissions during the lifetime of the project. This is so different from the CPBT for similar developments as per literature/research (1-7 years), that it has raised concerns and the ExA may wish to request further detail. However, it is understood that national policy has established support for this kind of development: despite	With regards to the Carbon Pay Back Time, a separate detailed Technical Note is being prepared and will be submitted at Deadline 3. As stated above, the 'CPBT' is not specifically presented within the **ES Volume 1, Chapter 7: Climate Change [APP-059]**, and any payback time being put forward is based on Wiltshire's own calculations and methodologies. The overall effect of the scheme is shown to result in a net reduction of emissions even in a conservative assessment scenario presented within **ES Volume 1, Chapter 7: Climate Change [APP-059]**.

Wiltshire Council Comments	Applicant's Response
significant levels of carbon emissions at project level, the wider decarbonisation benefits of these projects are considered to be substantial and supportive of national policy. This issue would apply to a similar project in another location.	
Negative impacts – operational For comparison of the scale of emissions, the GHG emissions caused during each year of the construction phase will be at a scale that is equivalent to approx. 4% of Wiltshire's current annual GHG emissions (based on 2023 total emissions, DESNZ), albeit not all of these emissions will be produced within Wiltshire. Significant levels of emissions continue throughout the operational phase as inverters and battery containers are planned to be replaced every 10 years, and transformers and panels at the 30-year point, all contributing to greenhouse gas emissions.	As recognised by the Council, the majority of these emissions will occur outside of Wiltshire. In line with the ISEP guidance (Ref 11), the receptor assessed within **ES Volume 1, Chapter 7: Climate Change [APP-059]** is the global climate as emissions will have a global impact. It is the case that emissions will occur during the operational phase of the scheme with the primary contributor being replacement parts, particularly BESS and Solar panels. Within the assessment, replacement of parts been considered within Table 7-4 of **ES Volume 1, Chapter 7: Climate Change [APP-059]**. It should be noted that a conservative approach to emissions from these sources has been used for the purpose of the assessment assuming that emissions in future years will be the same as the baseline year. In reality, it is anticipated that these emissions would drop drastically in future as global efforts move towards decarbonisation.
Negative impacts – operational The Environmental Statement chapter on Climate Change should provide a transparent assessment of greenhouse gas	**ES Volume 1, Chapter 7: Climate Change [APP-059]** has used the methodology stated within the inspectorate's guidance. It should be noted that IEMA was rebranded to ISEP

Wiltshire Council Comments	Applicant's Response
emissions and assessment of significance, using an approached aligned with Institute of Environmental Management and Assessment (IEMA) as requested by the Inspectorate in its Scoping Opinion (Table 7-1. ES Chapter 7 [APP-059]). The assessment of significance used by the Applicant is limited. It is accepted that it is appropriate to consider the national Carbon Budgets, however IEMA guidance also recommends drawing on a evidence to come to view about significance in relation to a range of contexts, for example local carbon emissions and targets, national policy and sector-based emissions. The scale of the carbon emissions of the project is large, at approximately 4% of Wiltshire's annual emissions, albeit not all the emissions would be originating within the county. The focus of this Environmental Statement report is somewhat narrower and considers the calculation of the project emissions and the potential for emissions reduction. This approach leads to questioning whether the project pays back in terms of carbon. Whilst it is the council's understanding that the national policy to accelerate the deployment of renewables (including utility-scale solar) may have already considered the substantial GHG emissions involved, against the contribution of renewables infrastructure projects to wider decarbonisation, this does not come across on the figures and narrative submitted by the Applicant in their Environmental Statement. Therefore, the	(Institute of Sustainability and Environmental Professionals) in July 2025 (Ref 11). In order to reach the conclusions for the significance of effect for emissions during the construction phase, several sources are considered within the ES chapter. A comparison against the overall UK carbon budget has been undertaken but also a review of energy sector carbon budgets to provide additional context. It should be noted that there is a limitation in the assessment method with comparing against UK carbon budgets as global emissions (e.g. shipping from China/embodied carbon from material produced worldwide) have been considered within the assessment. The assessment has compared against a 2029 forecast baseline in line with the predicted development operational year. This 2029 forecast accounts for around 23% of UK energy generation by Solar PV arrays with 6% coming from storage. This figure is reliant on schemes such as Lime Down coming forward to meet this target.

Wiltshire Council Comments	Applicant's Response
council requests clarification of emissions and net benefit, as part of transparent decision-making.	
Negative impacts – operational There are significant GHG emissions during the lifetime of the project, and particularly during construction phase which is at a time when the county and the country should be approaching net zero emissions, therefore the management plans must be required to minimise emissions as much as possible, if the development is permitted. The proposed GHG mitigation measures in 7.12 Outline CEMP [REP1-096], 7.13 Outline OEMP [REP1-098] and 7.14 Outline Decommissioning Strategy [REP1-100] are welcomed, but could be further enhanced by using low emissions vehicles and equipment e.g. consider electric, HVO or other alternative fuels; Construction of any roads or tracks should consider measures to reduce emissions from use of asphalt; maximise circularity of materials use through innovative recycling practices. Minimise water use e.g. by using rainwater for vehicle and panel washdown. Since the main proportion of GHG gases being emitted in the county of Wiltshire are attributed to worker transport, this is a particular area for emissions mitigation, for example by using buses to transport workers, similar to the Hinkley power station scheme, and that these are Ultra Low Emission buses.	The measures set out are largely related to construction phase rather than the operational phase. The measures will be considered for inclusion within the relevant management plans where possible with updates submitted at later deadlines of Examination, where required.
Negative impacts – decommissioning phase	With regards to the Carbon Pay Back Time, a separate detailed Technical Note is being prepared and will be submitted at

Wiltshire Council Comments	Applicant's Response
As submitted, the figures provided by the Applicant for greenhouse gas emissions (6.1 Environmental Statement Volume 1, Chapter 7 Climate Change [APP-059]) show that the Scheme has a very long Carbon Pay Back Time (CPBT), and may not recover the greenhouse gas emissions during the lifetime of the project. This is so different from the CPBT for similar developments as per literature/research (1-7 years), that it has raised concerns and the ExA may wish to request further detail. However, it is understood that national policy has established support for this kind of development: despite significant levels of carbon emissions at project level, the wider decarbonisation benefits of these projects are considered to be substantial and supportive of national policy. This issue would apply to a similar project in another location.	Deadline 3. As stated above the 'CPBT' is not specifically presented within the ES chapter, and any payback time being put forward is based on Wiltshire's own calculations and methodologies. The overall effect of the scheme is shown to result in a net reduction of emissions even in a conservative assessment scenario presented within the **ES Volume 1, Chapter 7: Climate Change [APP-059]**.
Negative impacts – decommissioning phase The Environmental Statement chapter on Climate Change should provide a transparent assessment of greenhouse gas emissions and assessment of significance, using an approach aligned with Institute of Environmental Management and Assessment (IEMA) as requested by the Inspectorate in its Scoping Opinion (Table 7-1. ES Chapter 7 [APP-059]). The assessment of significance used by the Applicant is limited. It is accepted that it is appropriate to consider the national Carbon Budgets, however IEMA guidance also recommends drawing on evidence to come to view about significance in relation to a	**ES Volume 1, Chapter 7: Climate Change [APP-059]** has used the methodology stated within the inspectorate's guidance. It should be noted that IEMA was rebranded to ISEP (Institute of Sustainability and Environmental Professionals) in July 2025 (Ref 11). In order to reach the conclusions for the significance of effect for emissions during the decommissioning phase, several sources are considered within **ES Volume 1, Chapter 7: Climate Change [APP-059]**. It should be noted that the effects of decommissioning are difficult to predict at the time of writing given the potential

Wiltshire Council Comments	Applicant's Response
range of contexts, for example local carbon emissions and targets, national policy and sector-based emissions. The scale of the carbon emissions of the project is large, at approximately 4% of Wiltshire's annual emissions, albeit not all the emissions would be originating within the county. The focus of this Environmental Statement report is somewhat narrower and considers the calculation of the project emissions and the potential for emissions reduction. This approach leads to questioning whether the project pays back in terms of carbon. Whilst it is the council's understanding that the national policy to accelerate the deployment of renewables (including utility-scale solar) may have already considered the substantial GHG emissions involved, against the contribution of renewables infrastructure projects to wider decarbonisation, this does not come across on the figures and narrative submitted by the Applicant in their Environmental Statement. Therefore, the council requests clarification of emissions and net benefit, as part of transparent decision-making.	changes to greenhouse gas predictions between now and the decommissioning years. A conservative approach assuming that emissions would be the same in the future year as 2025 has been used.
Negative impacts – decommissioning phase There are significant GHG emissions during the lifetime of the project, continuing through to decommissioning, therefore the management plans must be required to minimise emissions as much as possible, if the development is permitted. The proposed GHG mitigation measures in the draft Construction Environmental Management Plan, Operational Environmental	**ES Volume 1, Chapter 7: Climate Change [APP-059]** has used the methodology stated within the inspectorate's guidance. It should be noted that IEMA was rebranded to ISEP (Institute of Sustainability and Environmental Professionals) in July 2025 (Ref 11). In order to reach the conclusions for the significance of effect for emissions during the construction phase, several sources

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Management Plan and Decommissioning Strategy are welcomed, but could be further enhanced by using low emissions vehicles and equipment e.g. consider electric, HVO or other alternative fuels; end of life treatment of equipment and materials is especially important during replacement and decommissioning phases, so the management plans should include practices to maximise circularity of materials use through innovative recycling practices, and developing the recycling industry locally or regionally. Minimise water use e.g. by using rainwater for vehicle and panel washdown. Since the main proportion of GHG gases being emitted in the county of Wiltshire are attributed to worker transport, this is a particular area for emissions mitigation, for example by using buses to transport workers, similar to the Hinkley power station scheme, and that these are Ultra Low Emission buses.	are considered within **ES Volume 1, Chapter 7: Climate Change [APP-059]**. A comparison against the overall UK carbon budget has been undertaken but also a review of energy sector carbon budgets to provide additional context. It should be noted that there is a limitation in the assessment method with comparing against UK carbon budgets as global emissions (e.g. shipping from China/embodied carbon from material produced worldwide) have been considered within the assessment. The assessment has compared against a 2029 forecast baseline in line with the predicted development operational year. This 2029 forecast accounts for around 23% of UK energy generation by Solar PV arrays with 6% coming from storage. This figure is reliant on schemes such as Lime Down coming forward to meet this target. The measures proposed will be considered for inclusion within the relevant management plans with updates submitted at later deadlines of Examination, where required.
Ranking the Climate Change impacts in importance All the local impacts identified are considered material to the ExA, but in accordance with the national guidance[9] the council	1) This is accepted and mitigation measures will be included within relevant management plans

[9] National Guidance published in 2024, 'Nationally Significant Infrastructure Projects: Advice for Local Authorities'

Wiltshire Council Comments	Applicant's Response
would indicate the following as the most significant in relation to this theme: 1) Greenhouse gas emissions must be minimised as much as possible, through further measures included in 7.12 Outline CEMP [REP1-096], Outline OEMP [REP1-098] and 7.14 Outline Decommissioning Strategy [REP1-100]. 2) Greenhouse emissions assessment and significance: the figures and report submitted (Environmental Statement) do not seem to support the accepted view that that renewables deployment contributes to carbon emissions reduction. 3) Lack of Strategic Spatial Energy Plan makes it unclear whether a scheme of this scale is appropriate in this area or location.	2) As stated above, **ES Volume 1, Chapter 7: Climate Change [APP-059]** has presented a conservative assessment of emissions. With this conservative approach, the findings still show that there would be a net positive effect in terms of Greenhouse Gas emissions over the lifetime of the scheme of 253,839 tonnes of CO_2e. Therefore, it is not accepted that the Environmental Statement shows that the development would not contribute a carbon emissions reduction. 3) The Clean Power 2030 Action Plan paves the way for new strategic plans for development of the GB energy system. NESO has been tasked with developing national and regional spatial energy plans. Ofgem approved NESO's methodology for developing the Strategic Spatial Energy Plan (SSEP) in May 2025. Page 62 of the Government's Connections Action Plan (see Section 2.7 of the **Statement of Need [REP1-085]** for more details) is clear that the ongoing Connections Reform process and NESO's longer-term strategic network and system planning processes must be aligned to ensure the overall network remains optimally planned. It is therefore expected that NESO's strategic plans build upon their own connections queue prioritisations to deliver coherent and consistent recommendations to deliver the Clean Power target on the way to achieving net zero.

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	The **Written Summary of the Applicant's Oral Submissions and Responses at Issue Specific Hearing 1 and Responses to Action Points [REP1A-012]** confirms that as part of NESO's connection reform activities, the solar element of the Scheme has been re-prioritised as Gate 2 Phase 1 (in 2030 or earlier). The BESS element of the Scheme has been re-prioritised as Gate 1 (as yet unconfirmed indicative connection date). Projects already prioritised by NESO (such as the Scheme) are not likely to be revised to a lower priority through any future (and as yet unpublished) strategic planning exercise.

11 Soils and Agriculture

Table 11-1 - Soils and Agriculture

Wiltshire Council Comments	Applicant's Response
Overview and commentary Wiltshire has a proud farming tradition going back for thousands of years. Around 78% of the county is currently farmed (273,555 ha of Wiltshire's total 348,500 ha) and farming continues to be an essential determinant of landscape character in all areas of the county. Wiltshire Council has regulatory responsibility for managing Wiltshire's natural environment and landscape. Policy LP26 in the Draft South Gloucestershire Local Plan (2025) states that proposals for the generation of renewable energy and associated infrastructure must include measures to enhance and enable nature and biodiversity in scheme design for the lifetime of the development. Policy 2 in the Joint Melksham Neighbourhood Plan 2 (2025) states that local renewable and low carbon energy generation proposals, along with associated infrastructure, will be supported where it can be demonstrated that the siting and scale of the proposal is appropriate to its setting. Furthermore, ground mounted solar photovoltaic development should demonstrate, where possible, that some form of agricultural activity will continue and/or there are biodiversity improvements around arrays. Policy 13 seeks for field based solar farms to	The Scheme's compliance with Policy LP26 of the Draft South Gloucestershire Local Plan (Ref 10) is set out in Annex B: Local Policy Accordance Tables of the **Planning Statement [REP1-087]** (see page 843). It is noted that only the Highway Improvement Areas fall within the area covered by the Draft South Gloucestershire Local Plan (Ref 10). None of the Highway Improvement Areas in South Gloucestershire are located on BMV agricultural land so this is not a relevant consideration for the design of the Scheme. With regard more generally to enhancing and enabling nature and biodiversity in scheme design for the lifetime of the development (in line with policy LP26), nature and biodiversity enhancements are proposed through the Scheme and are set out in the **Biodiversity Net Gain (BNG) Assessment Report [REP1-089]** secured by the **Outline LEMP [APP-283**] under Requirement 7 of Schedule 2 of the **Draft DCO [REP1-007]**. The Scheme has been designed to retain the most valuable habitats and protect these with undeveloped buffer zones. The selection of access locations has been carefully considered to utilise existing field entrances and gaps in hedgerows wherever possible. This, combined with a number of enhancements, means that the Scheme will deliver as a minimum, 10%

Wiltshire Council Comments	Applicant's Response
deliver at least a 10% improvement in biodiversity value within and where appropriate beyond the site in order to deliver tangible benefits for biodiversity. The main impacts of the Lime Down Solar Park proposal are summarised in the following table.	biodiversity net gain, which is secured via Requirement 9 in Schedule 2 to the **Draft DCO [REP1-007]**. The **BNG Assessment Report [REP1-089]** indicates that BNG in excess of 10% will be achieved, with a total net gain of 63.80% for area habitat units, 19.35% for hedgerow units and 25.30% for watercourse units in relation to the Solar PV Sites. The total net gain for the whole Scheme (i.e. Solar PV Sites and Cable Route Corridor combined) is 36.10% for area habitat units, 12.74% for hedgerow units and 19.89% for watercourse units. The Scheme's compliance with Policy 2 of the Joint Melksham Neighbourhood Plan 2 (Ref 12) is set out in Annex B: Local Policy Accordance Tables of the **Planning Statement [REP1-087]** (see page 879). With regard to siting and scale and whether this is appropriate to its setting , **ES Volume 3, Appendix 4-1: Site Selection Assessment Report [APP-185]** sets out the alternative locations considered for the Scheme and concludes that there are not more suitable and available locations within the 20 km search area than the proposed location for the Scheme and the Scheme's location is therefore assessed to be suitable for the scale of solar development proposed. Regarding the scale of the development, the **Statement of Need [REP1-085]** demonstrates that the Scheme is urgently needed at the scale proposed in order to meet national energy policy aims. Given the urgent need for renewable energy to be deployed at scale,

Wiltshire Council Comments	Applicant's Response
	the size of the Scheme is considered to be appropriate to the grid connection offer for the Scheme. With regard to the setting, Section 3.5 of the **Design Approach Document [APP-268]** sets out how the local landscape context and historic context were considered from an early stage in the design process to inform the adoption of design principles that result in a Scheme sympathetic to the landscape and historic setting of the area. Design Principle 1 sets out how the Scheme is 'landscape led' and gives due weight to the intrinsic character and beauty of the surrounding countryside, while Design Principle 7 sets out that the design of the Scheme will be sensitive to above and below ground heritage assets and their setting, by locating infrastructure at a suitable distance and through appropriate landscape screening. The design principles have informed the parameters, as set out in **Design Principles and Parameters [REP1A-008]**. The parameters contained within the **Design Principles and Parameters [REP1A-008]** are secured under Requirement 5 (detailed design approval) in the **Draft DCO [REP1-007]** and apply to the detailed design of the Scheme, post consent. With regard to the policy requirement in Policy 2 for ground mounted solar proposals to demonstrate, where possible, that some form of agricultural activity will continue and/or there are biodiversity improvements around arrays, the Scheme will deliver a minimum of 10% BNG as set out above. Regarding

Wiltshire Council Comments	Applicant's Response
	continued agricultural activity, the crop output and primary agricultural use of the Solar PV Sites will cease, however reversion of the arable land within the Solar PV Sites to permanent grassland is anticipated to result in other benefits to the land and soil, as detailed in **ES Volume 1, Chapter 17: Soils and Agriculture [REP1-025]**. The **Outline LEMP [APP-283]** confirms in Section 1.3 that reversion to grassland is also expected to benefit surrounding agricultural land by increasing populations of pollinator species. As noted in **ES Volume 1, Chapter 3: The Scheme [APP-055]**, there is potential that some agricultural use will continue throughout the operation phase of the Scheme, should livestock be grazed beneath the panels, although this has not been relied on in any of the assessments of effects. The Scheme's compliance with Policy 13 of the Joint Melksham Neighbourhood Plan 2 (Ref 12) is set out in Annex B: Local Policy Accordance Tables of the **Planning Statement [REP1-087]** (see page 892). As noted above the Scheme will deliver at least 10% BNG.
Positive impacts – construction phase Payments to landowners start	The Applicant notes this comment.
Positive impacts – operational	The Applicant notes this comment. The **BNG Assessment Report [REP1-089]** indicates that BNG in excess of 10% will be achieved, with a total net gain of 63.80% for area habitat

Wiltshire Council Comments	Applicant's Response
Possible increase in carbon capture – would need to be evaluated Increase in BNG	units, 19.35% for hedgerow units and 25.30% for watercourse units in relation to the Solar PV Sites. The total net gain for the whole Scheme (i.e. Solar PV Sites and Cable Route Corridor combined) is 36.10% for area habitat units, 12.74% for hedgerow units and 19.89% for watercourse units. The Applicant has not quantified the anticipated increase in soil carbon/organic matter that would be expected to occur upon reversion of arable land to long-term grassland. However, the laboratory used for the analysis of soil samples taken during the agricultural land and soil surveys publishes an Annual Soil Summary (Ref 13) in order to track trends in soil nutrients, pH and organic matter. The reported statistics for 2024-2025 are based on the analysis of more than 350,000 samples analysed between June 2024 and May 2025. The report notes that soil organic matter averaged 5.87% for arable topsoils and 9.95% for grassland topsoils, a difference of around 40%, indicating that the potential increase in carbon sequestration in the soil resulting from the Scheme could be significantly beneficial.
Positive impacts – decommissioning phase None identified.	The Applicant notes this comment.
Neutral impacts None identified.	The Applicant notes this comment.
Negative impacts – construction phase	The Applicant agrees that the construction of the Scheme will result in a reduction to the agricultural output of the land in

Wiltshire Council Comments	Applicant's Response
Reduction in agricultural production 5000t combinable crops, unable to quantify loss from livestock sector	terms of loss of combinable arable crops. While the effect will be realised in the construction phase, it will continue throughout operation. In a wider context, the UK produced just over 20 million tonnes of combinable crops in 2024, lower than normal due to the challenging weather conditions experienced in the growing season. The loss of 5,000t of combinable crop from the Site therefore represents a reduction of approximately 0.025% of UK production. A majority of the agricultural land within the Solar PV Sites is in arable use, with grassland mainly in the north, in Lime Down B. The land was not being grazed at the time of the agricultural survey so it is not reported whether this is primarily used for sheep, cattle or horse grazing, or mowing. The Applicant also acknowledges that food and biomass production is one of several ecological functions of land and soil. Whilst the crop output and primary agricultural use of the Solar PV Sites will cease, reversion of the arable land within the Solar PV Sites to grassland for the duration of 60 years is anticipated to result in other benefits to the land and soil, as detailed in **ES Volume 1, Chapter 17: Soils and Agriculture [REP1-025]**. The **Outline LEMP [APP-283]** confirms in Section 1.3 that reversion to grassland is also expected to benefit surrounding agricultural land by increasing populations of pollinator species.

Wiltshire Council Comments	Applicant's Response
	As noted in **ES Volume 1, Chapter 3: The Scheme [APP-055]**, there is potential that some agricultural use will continue throughout the operation phase of the Scheme, should livestock be grazed beneath the panels.
Negative impacts – construction phase Loss of 20 farming related jobs as predicted by the applicant	Estimates for losses to agricultural employment (~20 FTE jobs) in **ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]** were based on a reasonable worst-case scenario that the nine affected farm businesses covered by the Solar PV and BESS Sites (Lime Down A-E) would each lose 1.5 full-time equivalent workers, while a further 1.5 times multiplier was used to estimate indirect employment impacts to suppliers or downstream processors. The Applicant is confident that this assumption covers where owner-occupier farm businesses are diversifying intentionally and where tenant farm businesses would be required to cease or relocate. The Applicant confirms that land agreements have been made with landowners who have their own contractual arrangements with tenant farmers. Whilst a worst case could therefore involve the termination of an agricultural tenancy or contract in its current form, alternative operational and management opportunities are available connected to the Scheme should consent be granted. These opportunities are to be offered to existing tenants and contractors as a primary alternative. Additionally, where available, and at the discretion of the landowner, alternative land would be sought for tenants to

Wiltshire Council Comments	Applicant's Response
	continue their agricultural practices. This has been considered in the understanding that Wiltshire Council have identified a labour shortage in the local agriculture sector (section 18.6 in their Relevant Representation **[RR-4934]**), and that workers displaced by the Scheme may have opportunities to be supported in finding alternative employment in the sector. The Applicant is cognisant of the impact the Scheme could have on wider agricultural employment associated with tenancies and contracts and so seeks to source ways of retaining agricultural workers, providing reskilling opportunities, or providing re-employment as supported by the measures secured in the **Outline SSCEP [REP1-108]** by Requirement 18 of Schedule 2 to the **Draft DCO [REP1-007]**.
Negative impacts – construction phase Soil compaction	A detailed Soil Resource Management Plan (SRMP) will be prepared post-consent and will be required to be in substantial accordance with the **Outline SRMP [APP-280]** which is secured by Requirement 17 of the **Draft DCO [REP1-007].** The best practice principles for soil handling and management contained within the SRMP will apply throughout the duration of the Scheme, across all phases. Measures such as only handling soil under appropriate moisture conditions and utilising access tracks and designated haul routes rather than tracking machinery across the land will minimise the opportunities for soil compaction to occur.

Wiltshire Council Comments	Applicant's Response
	Section 1.8 of the Outline SRMP describes how the Solar PV Sites will be continuously monitored for signs of soil compaction during construction, and notes that any necessary remedial action must be taken before panels are fixed.
Negative impacts – construction phase Potential for pollution incidents	The Applicant agrees and acknowledges there is potential for pollution incidents to occur during the construction phase. Measures to minimise the risk of pollution incidents during construction are set out in the **Outline CEMP [REP1-096],** which is secured through Requirement 2 of the **Draft DCO [REP1-007].** The Outline CEMP includes precautionary actions to be taken to prevent accidental spillages and pollution incidents. Measures include staff training, ensuring appropriate measures for storage and containment of construction materials, regular vehicle inspections and development of an Emergency Spillage Plan and an Emergency Response Plan.
Negative impacts – construction phase Reduction in bio-diversity	The Applicant acknowledges there is potential impacts on ecology and biodiversity as a result of construction phase impacts, which are fully assessed in **ES Volume 1, Chapter 9: Ecology and Biodiversity [REP1-015]**. Embedded and additional mitigation measures are set out in order to avoid and minimise adverse impacts as far as possible. Such measures include the implementation of protective buffer zones, sensitive timing and methods of working, controls on lighting and habitat reinstatement measures. These measures are set out within the **Outline EPMS [REP1-106].** The assessment concludes

Wiltshire Council Comments	Applicant's Response
	that no significant adverse effects on ecology and biodiversity are anticipated during construction or operation, with the exception of skylark and hedgerows. Residual significant adverse effects on these receptors are anticipated at a local level of geographical importance only.
Negative impacts – operational Reduction in agricultural production	The crop output and primary agricultural use of the Solar PV Sites will cease, however reversion of the arable land within the Solar PV Sites to permanent grassland is anticipated to result in other benefits to the land and soil, as detailed in **ES Volume 1, Chapter 17: Soils and Agriculture [REP1-025]**. The **Outline LEMP [APP-283]** confirms in Section 1.3 that reversion to grassland is also expected to benefit surrounding agricultural land by increasing populations of pollinator species. As noted in **ES Volume 1, Chapter 3: The Scheme [APP-055]**, there is potential that some agricultural use will continue throughout the operation phase of the Scheme, should livestock be grazed beneath the panels, although this has not been relied on in any of the assessments of effects.
Negative impacts – operational Loss of farming related jobs	Estimates for losses to agricultural employment (~20 FTE jobs) in **ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]** were based on a reasonable worst-case scenario that is consistent across construction operation and decommissioning.

Wiltshire Council Comments	Applicant's Response
	The Applicant confirms that land agreements have been made with landowners who have their own contractual arrangements with tenant farmers. Whilst a worst case could therefore involve the termination of an agricultural tenancy or contract in its current form, alternative operational and management opportunities are available connected to the Scheme should consent be granted. The Applicant is cognisant of the impact the Scheme could have on wider agricultural employment associated with tenancies and contracts and so seeks to source ways of retaining agricultural workers, providing reskilling opportunities, or providing re-employment as supported by the measures secured in the **Outline SSCEP [REP1-108]** by Requirement 18 of Schedule 2 to the **Draft DCO [REP1-007]**.
Negative impacts – decommissioning phase Reduction in agricultural production 5000t combinable crops, though this does not take into account potential yield increases with new varieties over the operational life of the scheme. Unable to quantify losses from the livestock sector	In the national context, the UK produced just over 20 million tonnes of combinable crops in 2024, lower than normal due to the challenging weather conditions experienced in the growing season. The loss of 5,000t of combinable crop from the Site therefore represents a reduction of approximately 0.025% of UK production. A majority of the agricultural land within the Solar PV Sites is in arable use, with grassland mainly in the north, in Lime Down B. The land was not being grazed at the time of the agricultural survey so it is not reported whether this is primarily used for sheep, cattle or horse grazing, or mowing. These losses of output are applicable to the construction and operational phases only; the land use at decommissioning is

Wiltshire Council Comments	Applicant's Response
	not yet known. The land may continue to be managed under grass or may be brought back into arable production, but this will be a choice for the landowner to make. Therefore, crop losses and livestock effects at decommissioning cannot be quantified or assessed. Estimates for losses to agricultural employment (~20 FTE jobs) in **ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]** were based on a reasonable worst-case scenario that is consistent across construction operation and decommissioning. Reduction in arable crop production has not been assessed separately at any phase of the Scheme, and losses to livestock have not been assessed as the land under the Solar PV and BESS Sites (Lime Down A-E) is predominantly used for arable crop use rather than livestock grazing. The Applicant confirms that land agreements have been made with landowners who have their own contractual arrangements with tenant farmers. Whilst a worst case could therefore involve the termination of an agricultural tenancy or contract in its current form, alternative operational and management opportunities are available connected to the Scheme should consent be granted. The Applicant is cognisant of the impact the Scheme could have on wider agricultural employment associated with tenancies and contracts and so seeks to source ways of retaining agricultural workers, providing

Wiltshire Council Comments	Applicant's Response
	reskilling opportunities, or providing re-employment as supported by the measures secured in the **Outline SSCEP [REP1-108]** by Requirement 18 of Schedule 2 to the **Draft DCO [REP1-007]**. **ES Volume 1, Chapter 3: The Scheme [APP-055]** notes under Section 3.6 that at decommissioning, the land in the Solar PV Sites will be returned to its original use and condition, as far as is practicable, but that ultimately the landowners would choose how they wanted to use and manage the land. Arable agricultural output may be restored across the Solar PV Sites, however the Applicant acknowledges that some may continue to be managed as ecological habitat.
Negative impacts – decommissioning phase Soil compaction	A detailed SRMP will be prepared post-consent and will be required to be in substantial accordance with the **Outline SRMP [APP-280]** which is secured by Requirement 17 of the **Draft DCO [REP1-007].** The best practice principles for soil handling and management contained within the SRMP will apply throughout the duration of the Scheme, across all phases. Measures such as only handling soil under appropriate moisture conditions and utilising access tracks and designated haul routes rather than tracking machinery across the land will minimise the opportunities for soil compaction to occur. The detailed SRMP will include further details on how soil conditions will be assessed and established at the time of decommissioning, such as through site inspections involving

Wiltshire Council Comments	Applicant's Response
	the observation of soil boreholes and pits, and will set out how any requirement for remedial works will be identified. As best-practice measures may evolve over the lifetime of the Scheme, the **Outline SRMP [APP-280]** does not prescribe detailed remediation measures at this stage.
Negative impacts – decommissioning phase Potential for pollution incidents	The **Outline Decommissioning Strategy [REP1-100],** secured through Requirement 20 of the **Draft DCO [REP1-007]**, provides the overarching measures and mitigation to prevent pollution incidents at decommissioning, including restrictions on the use and storage of chemicals, fuels and oils, use of sediment barriers to prevent sediment run-off, and appropriate vehicle maintenance.
Negative impacts – decommissioning phase Reduction in bio-diversity	The Applicant acknowledges there are potential impacts on ecology and biodiversity as a result of decommissioning phase impacts which are likely to be similar to those identified for the construction phase, as assessed in **ES Volume 1, Chapter 9: Ecology and Biodiversity [REP1-015]**. The **Outline Decommissioning Strategy [REP1-100],** secured through Requirement 20 of the **Draft DCO [REP1-007]**, provides the overarching measures designed to avoid impacts on ecological feature, including the requirement for updated ecological surveys to inform all required mitigation measures in accordance with the relevant policy and legislative framework present at the time of decommissioning.

Wiltshire Council Comments	Applicant's Response
Ranking the Soils and Agriculture impacts in importance All the local impacts identified are considered material to the ExA, but in accordance with the national guidance[10] the council would indicate the following as the most significant in relation to this theme: • Loss of jobs and expertise related to food production	Estimates for losses to agricultural employment (~20 FTE jobs) in **ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]** are material to the consideration of the impacts of the Scheme. The Applicant does not agree that these are significant, accounting for less than 0.3% of agricultural employment in Wiltshire, or 0.08% in the Study Area. The agreements made with landowners to support tenants displaced by the Scheme as supported by the measures in the **Outline SSCEP [REP1-108]** should also be given adequate consideration as these demonstrate the Applicant's commitments to minimising adverse effects on the local agricultural industry.
Ranking the Soils and Agriculture impacts in importance • Reduced food production for consumption in the UK	The Applicant notes Wiltshire Council's high ranking of the effect of reduced domestic food production as a result of the Scheme but considers that the importance has been overestimated. The Applicant acknowledges that the construction of the Scheme will remove the land in the Solar PV Sites from primary agricultural use for the duration of approximately 60 years. **ES Volume 3, Appendix 17-1: Agricultural Land Classification**

[10] National Guidance published in 2024, 'Nationally Significant Infrastructure Projects: Advice for Local Authorities'

Wiltshire Council Comments	Applicant's Response
	and Soil Resource Survey Report [REP1-063] assessed that approximately 240 hectares, or 33%, of the agricultural land within the Solar PV Sites is of Best and Most Versatile (BMV) quality, which is considered the most productive agricultural land. A majority of the land in the Solar PV Sites is in Subgrade 3b or Grade 4, which is not BMV and not considered among the most productive agricultural land. The Local Impact Report notes that 273,555 ha of land in Wiltshire is currently farmed. The Solar PV Sites therefore represent 0.26% of the county's agricultural land resource, with the area of the most productive, BMV quality land, within the Solar PV Sites representing only 0.09%. The long-term but temporary removal of land from a standard arable rotation would not have a significant impact on regional or national food production. The possibility of some agricultural use and food production through livestock grazing remains a possibility, although has not been relied upon in any assessments.
Ranking the Soils and Agriculture impacts in importance • Potential for tenanted farms to become unviable	The Applicant confirms that land agreements have been made with landowners who have their own contractual arrangements with tenant farmers. Whilst a worst case could therefore involve the termination of an agricultural tenancy or contract in its current form, alternative operational and management opportunities are available connected to the Scheme should consent be granted. These opportunities are to be offered to existing tenants and contractors as a primary alternative.

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	Additionally, where available, and at the discretion of the landowner, alternative land would be sought for tenants to continue their agricultural practices. This has been considered in the understanding that Wiltshire Council have identified a labour shortage in the local agriculture sector (section 18.6 in their Relevant Representation **[RR-4934]**), and that workers displaced by the Scheme may have opportunities to be supported in finding alternative employment in the sector The Applicant is cognisant of the impact the Scheme could have on wider agricultural employment associated with tenancies and contracts and so seeks to source ways of retaining agricultural workers, providing reskilling opportunities, or providing re-employment as supported by the measures secured in the **Outline SSCEP [REP1-108]** by Requirement 18 of Schedule 2 to the **Draft DCO [REP1-007]**.
Ranking the Soils and Agriculture impacts in importance • Potential for pollution to occur – e.g. fuel spills	The Applicant acknowledges there is potential for pollution incidents to occur. Details of how risks of pollution incidents will be minimised, including control points and response plans, are set out for each phase of the Scheme, respectively in the **Outline CEMP [REP1-096],** which is secured through Requirement 2 of the **Draft DCO [REP1-007],** the **Outline OEMP [REP1-098]**, secured through Requirement 14 of the **Draft DCO [REP1-007]**, and the **Outline Decommissioning Strategy [REP1-100],** secured through Requirement 20 of the **Draft DCO [REP1-007]**.

Wiltshire Council Comments	Applicant's Response
	Each Detailed Management Plan will be subject to approval with the Local Planning Authority prior to the associated phase commencing and must be in substantial accordance with the Outline counterpart. With these controls in place throughout the Scheme, the risk of pollution is considered to be very low.
Ranking the Soils and Agriculture impacts in importance • Soil compaction – should only be an issue during the decommissioning phase	The Applicant agrees with Wiltshire Council's ranking of soil compaction as low. All soil handling and movements throughout the Order Limits (including the Solar PV Sites and Cable Route Corridor) will be managed according to best practice principles set out in the **Outline SRMP [APP-280]**. Section 1.8 of the Outline SRMP makes provisions for remediation of any soil compaction identified during installation of the solar arrays within the Solar PV Sites. In this way, there should be no outstanding soil compaction throughout the operational phase of the Scheme in the Solar PV Sites. The Detailed SRMP will contain prescriptions for determining the soil condition at the point of decommissioning, including investigation of compaction in soil pits, such that compaction issues can be remediated before handing back to the landowner.

12 Development Management and Strategic Planning

Table 12-1 - Development Management and Strategic Planning

Wiltshire Council Comments	Applicant's Response
Overview and commentary The Lime Down Solar Park proposal would make a major contribution to both national and local climate change objectives, and its overall strategic direction is strongly supported by national planning policy and Wiltshire's Climate Strategy. However, despite this, the council is currently unable to confirm full policy compliance because several areas of required evidence and mitigation have not yet been provided. A principal concern is the significant loss of agricultural land that would result from the development, with 878 hectares, around 30 percent of which is Best and Most Versatile (BMV) land, being taken out of food production for at least 60 years. This would equate to an estimated loss of approximately 5,000 tonnes of crops annually, and the council still awaits essential information regarding alternative land availability, long-term soil remediation, pollution protocols, and whether grazing beneath the panels is genuinely feasible.	The Applicant notes the comment that the Scheme would make a major contribution to both national and local climate change objectives, in line with national planning policy and Wiltshire's Climate Strategy. With regard to the loss of agricultural land, the use of agricultural land is considered to be justified and in line with planning policy, particularly NPS EN-3 (Ref 4) Paragraph 2.10.31 which recognises that, at this scale, it is likely that solar development will use some agricultural land, and NPS 5.11.34 which provides that use of BMV land must be justified. **ES Volume 3, Appendix 4-1: Site Selection Assessment Report [APP-185]** explains the six-stage process that has been carried out when assessing alternative sites for the Scheme, with brownfield sites and non-BMV agricultural land being considered in the earlier stages of assessment, before the consideration of BMV agricultural land. The **Planning Statement [REP1-087]** (see from Paragraph 8.3.241) provides further details on why the use of BMV agricultural land is considered to be justified, including through site selection (and the sequential approach adopted to the inclusion of BMV land), through the design evolution of the Scheme (which sought to limit the use of BMV land wherever practicable), and details of

Wiltshire Council Comments	Applicant's Response
	why the inclusion of BMV land is necessary (for instance, due to its location in the Scheme amongst non-BMV land, or in order to offset the loss of other locations for Solar PV which have been removed in areas close to the Cotswolds National Landscape). With regard to details on alternative land availability, long-term soil remediation, pollution protocols, and whether grazing beneath the panels is genuinely feasible, these specific points are addressed where raised below in **Table 12-1**.
Cumulative landscape and visual impacts also remain a major unresolved issue. North Wiltshire has already experienced a concentration of solar and battery infrastructure, and the assessments provided by the applicant do not yet fully address the cumulative or sequential effects, particularly along the Fosse Way and key transport corridors. These omissions mean the overall landscape impact of the scheme cannot yet be properly understood.	The LVIA recognises that there are Moderate Adverse (Significant) effects to Landscape Character as a result of the Lime Down Scheme at Year 1 of operation, with effects reducing as a result of the maturing embedded mitigation measures by Year 15. A **Technical Note on Landscape Fabric and Landscape Character [REP1-121]** was submitted by the Applicant in response to Relevant Representation response **[RR-4934].** Although the Methodology of the assessment is agreed, the application of the Methodology is not and there appears to be a degree of misunderstanding of the findings of the LVIA especially relating to Landscape Fabric and land use change. The Technical Note provides clarification on the Methodology used in the LVIA to assess the effects of the Scheme on Landscape Fabric and Landscape Character and clarifies that the assessment on Landscape Fabric is an independent and

Wiltshire Council Comments	Applicant's Response
	separate assessment to that undertaken on the effects of the Scheme on Landscape Character. **ES Volume 1, Chapter 8: Landscape and Visual Impact Assessment [APP-060]** takes into account the effects on landscape character and visual amenity in detail and acknowledges that there would be an immediate change to the character of the Sites themselves and their immediate surroundings as they change from an area of arable farmland to solar infrastructure. However, the introduction of the solar arrays and other associated infrastructure would not become a defining feature on the landscape once operational (e.g. at year 1 and year 15). The combined or Intra project cumulative effects were assessed in **ES Volume 1, Chapter 8: Landscape and Visual Impact Assessment [APP-060]** and a **Technical Note on Intra Project Cumulative Visual Effects [REP1-122]** was submitted at Deadline 1 to explain the assessment undertaken in the LVIA and to summarise the significant effects. The Technical Note concluded that the Intra Project Cumulative Visual Effects were robustly assessed in the LVIA. It concluded that there is 1 Private Receptor; 4 Public Receptors and 1 Transport Receptor where Significant effects were recorded. In all cases, the effect of the secondary site is less than the primary Site. This is predominantly due to the distance to the Sites or the fact that they are seen from a different location

Wiltshire Council Comments	Applicant's Response
	from the route (referred to a sequential visibility). As such, this would not increase the level of effects above those described for the primary Site. Therefore, the Intra Project Cumulative Visual Effects are as identified for the primary Site. This is due to the "disaggregated/disparate nature of the Lime Down Sites A to E" combined with rolling character of the Hullavington Lowlands. As such, the assessment does not consider there to be a greater Cumulative Visual Effect for these receptors than for the assessment of the level of harm identified from the individual sites themselves.
In addition, the proposed Battery Energy Storage System raises a point of uncertainty, as the submitted documents contain an inconsistency regarding whether the fire suppression system is an integral component or merely an "optional" feature. This inconsistency requires clarification before the council can be satisfied that appropriate fire-safety measures are embedded in the design. Overall, while the project aligns well with national and local ambitions for climate change, its acceptability in planning terms depends on resolving the significant issues relating to agricultural land loss, cumulative landscape effects, and BESS safety, as well as providing the outstanding information necessary to demonstrate full policy compliance.	The Applicant has provided a comprehensive response in the Summary Point heading "Fire Safety of Battery Energy Storage System (BESS)".

Wiltshire Council Comments	Applicant's Response
Positive impacts – construction phase None identified.	The Applicant seeks to clarify that beneficial construction phase impacts are identified in **ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]**. Employment generated by the Scheme in high-paying roles and in an industry with a wide supply chain and indirect economic influence are likely to have a medium-term temporary minor beneficial effect on economic activity and employment, and on local economy and economic prosperity in the 20 km Study Area. Benefits to local supply chains have not been directly quantified beyond the use of multipliers for indirect and induced economic effects. That notwithstanding, the Applicant is committed to maximising and enhancing local economic benefit through the measures set out in the **Outline SSCEP [REP1-108]**. This document also sets out enhancement measures to promote local education and skills uplifting, and apprenticeship and training schemes to benefit local skills and qualification attainment. This is secured by Requirement 18 in Schedule 2 to the **Draft DCO [REP1-007]**.
Positive impacts – operational National and Local Policy Context for Low Carbon Energy Developments The applicant sets out the legislative and planning policy context for the project in Section 6 of 7.2 Planning Statement	The Applicant notes this comment.

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[APP-267]. Section 8 sets out the Applicant's appraisal of the project's compliance with the main relevant policy and legislative requirements. 'Annex A: National Policy Accordance Tables' and 'Annex B: Local Policy Accordance Tables' appended to the Planning Statement provide a more detailed assessment of how the project accords with relevant policies. Paragraph 165 of the National Planning Policy Framework (NPPF) requires local plans to help increase the use and supply of renewable and low-carbon energy whilst ensuring that adverse impacts are addressed appropriately. The scheme is also aligned with the NPPF's requirement for the planning system to support the transition to a low carbon future, with recent revisions advising at NPPF paragraph 168(a): 'When determining planning applications for all forms of renewable and low carbon energy developments and their associated infrastructure, local planning authorities should: a) not require applicants to demonstrate the overall need for renewable or low carbon energy, and give significant weight to the benefits associated with renewable and low carbon energy generation and the proposal's contribution to a net zero future.' National Policy Statements for Energy EN-1, EN-3 and EN-5, offer significant support for NSIP renewable energy development. Furthermore, both the last and the current government have issued Written Ministerial Statements (WMS) confirming the importance of renewable energy development.	

Wiltshire Council Comments	Applicant's Response
Positive impacts – operational National and Local Policy Context for Low Carbon Energy Developments In line with national legislation and guidance, Wiltshire Council has made a firm commitment to becoming a carbon neutral council by 2030. The Wiltshire Climate Strategy reiterates this commitment and expresses objectives that include renewable energy generation as part of the efficient and environmentally sensitive use of land, providing for the needs of an increasing population and nature. Policies CP1 and CP2 of the Wiltshire Core Strategy relate to the spatial strategy for Wilshire, setting the policy foundations for the promotion of sustainable development within the county. The scheme is for a standalone renewable energy installation and will not directly impact existing housing or employment sites. The scheme will result in some employment provision in the form of construction jobs but does not relate explicitly to employment development. Policy CP42 of the Wiltshire Core Strategy expresses that proposals for standalone renewable energy schemes will be supported where it has been demonstrated that impacts (both individual and cumulative) specific to following factors (relevant to this scheme) have been satisfactorily considered:	The Applicant notes this comment. The Applicant acknowledges Core Policy CP1 and CP2 which set out the settlement strategy and delivery strategy for Wiltshire and that the Scheme will not directly impact existing housing or employment sites. The Scheme's compliance with Core Policy 42 is set out in Annex B: Local Policy Accordance Tables of the **Planning Statement [REP1-087].**

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(i) The landscape, particularly in and around Areas of Outstanding National Beauty (AONBs) (iv) Biodiversity (v) The historic environment […] (vi) Use of the local transport network (vii) Residential amenity, including noise, odour, visual amenity and safety (viii) Best and most versatile agricultural land	
Positive impacts – operational National and Local Policy Context for Low Carbon Energy Developments The cable connection search corridor passes through the Chippenham Neighbourhood Plan area. Policy SCC3 of the Chippenham Neighbourhood Plan reiterates the aims of CP42 expressing that proposals for standalone renewable energy development will be supported where all the following factors have been robustly demonstrated: a. the costs and benefits compare favourably with potentially less intrusive options, such as large scale building mounted renewable energy b. a comprehensive landscape impact assessment has been undertaken which has informed the proposals for the location of	The Scheme's compliance with Core Policy 42 of the Wiltshire Core Strategy (Ref 9) is set out in Annex B: Local Policy Accordance Tables of the **Planning Statement [REP1-087]** (see page 668). The Cable Route Corridor for the Scheme does not pass through the Chippenham Neighbourhood Plan area.

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new infrastructure and all mitigation measures identified in that are implemented c. the wider benefits of providing energy from renewable sources, including contributions to national carbon reduction objectives and targets, outweigh any adverse impacts on the local environment or amenity, including any cumulative adverse impacts from existing or planned renewable energy developments; and d. additional social, economic or environmental benefits which benefit the local community over the lifetime of the project are provided. Policy SCC3 further expresses that any proposal for a community energy project, where there is full or partial community ownership involvement, will be strongly supported.	
Positive impacts – operational National and Local Policy Context for Low Carbon Energy Developments Wiltshire Council's Climate Strategy and delivery plans are supportive of measures to reduce the effects of climate change, subject to assessment of impacts. In particular, the council is supportive of community energy, and there are community energy organisations operating within Wiltshire which would be	The Applicant notes this comment.

Wiltshire Council Comments	Applicant's Response
able to support a shared ownership model of delivery, enabling the community to benefit financially from the scheme.	
Positive impacts – operational National and Local Policy Context for Low Carbon Energy Developments In summary, the proposal will offer a significant contribution to reducing the effects of climate change, including contributions to national carbon reduction objectives and targets. In that context, the principle of proposals for renewable energy development receives broad support from local planning policies CP42 to the Wiltshire Core Strategy and policy SCC3 to the Chippenham Neighbourhood Plan, as well as supporting Wiltshire's Green and Blue Infrastructure and Climate strategies, provided that they are suitably located and sufficiently mitigate any adverse development specific and cumulative environmental effects. However, compliance with local and national planning policy cannot yet be demonstrated due to outstanding information and insufficient mitigation proposals.	The Applicant notes this comment. The Cable Route Corridor does not pass through the Chippenham Neighbourhood Plan area. With regard to Wiltshire Council's comment on outstanding information and mitigation proposals, this has been addressed separately in this document where specifically raised in Table 12-1, Table 17-3 and Table 18-1.
Positive impacts – decommissioning phase None identified.	The Applicant confirms that decommissioning phase impacts, as set out in **ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]**, are anticipated to be similar to those during construction, based on the labour

Wiltshire Council Comments	Applicant's Response
	requirement for decommissioning being approximately 75-80% that of construction. Therefore, the Applicant considers it likely that employment generated by the Scheme in high-paying roles and in an industry with a wide supply chain and indirect economic influence are likely to have a medium-term temporary minor beneficial effect on economic activity and employment, and on local economy and economic prosperity in the 20 km Study Area. Benefits to local supply chains have not been directly quantified beyond the use of multipliers for indirect and induced economic effects. That notwithstanding, the Applicant is committed to maximising and enhancing local economic benefit through the measures set out in the **Outline SSCEP [REP1-108]** and supported for decommissioning through the **Outline Decommissioning Strategy [REP1-100]**. Where practicable or suitable at the time of decommissioning, these documents also set out enhancement measures to promote local education and skills uplifting, and apprenticeship and training schemes to benefit local skills and qualification attainment. These measures are secured by Requirements 18 and 20 in Schedule 2 to the **Draft DCO [REP1-007]**.

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Neutral impacts None identified.	The **Planning Statement [REP1-087]** sets out in Paragraph 9.4.11 that the following topics have been assessed in the ES to have no significant effects from the Scheme, demonstrate general compliance with the relevant planning policies and are therefore considered to have neutral weight in the planning balance: • Air Quality (**ES Volume 1, Chapter 15: Air Quality [REP1-023]**); • Woodland (**ES Volume 1, Chapter 10: Arboriculture [APP-062]**); • Flood Risk and Drainage (**ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [REP1-017]**); • Historic Environment (**ES Volume 1, Chapter 12: Cultural Heritage [APP-064]**); • Soils (**ES Volume 1, Chapter 17: Soils and Agriculture [REP1-025]**); • Noise and Vibration (**ES Volume 1, Chapter 14: Noise and Vibration [REP1-021]**); • Traffic and Transport (**ES Volume 1, Chapter 13: Transport and Access [REP1-019]**);

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	• Resource and Waste Management (**ES Volume 1, Chapter 20: Other Environmental Matters [APP-072]**); • Water Quality and Resources (**ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [REP1-017]**); • Ground Conditions (**ES Volume 1, Chapter 19: Ground Conditions [REP1-027]**); • Glint and Glare (**ES Volume 1, Chapter 20: Other Environmental Matters [APP-072]**); • Civil Aviation and Defence Interests (**ES Volume 1, Chapter 20: Other Environmental Matters [APP-072]**); • Battery Safety (**ES Volume 1, Chapter 20: Other Environmental Matters [APP-072]**); and • Human Health (**ES Volume 1, Chapter 18: Human Health [APP-070]**).
Negative impacts – construction phase Best and Most Versatile (BMV) agricultural land The Overarching NPS For Energy which was published in January 2024 is a material consideration in determining applications under the Town and Country Planning Act 1990	The Applicant's appraisal of the Scheme's compliance with relevant planning policy regarding best and most versatile agricultural land is detailed in the **Planning Statement [REP1-087]** (see from Paragraph 8.3.241), including NPS EN-1 (Ref 3) Paragraph 5.11.34 which provides that the Secretary of State should *"ensure applicants do not site their scheme on the best*

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(TCPA) – the NPS is relevant for both NSIPs and small-scale development determined at a local level. Following its publication, in May 2024, a Written Ministerial Statement (WMS) was made by the Secretary of State for Energy Security and Net Zero. The WMS sets out further detail on balancing the competing priorities of energy security and food production including the following point: 'Due weight needs to be given to the proposed use of Best and Most Versatile land when considering whether planning consent should be granted for solar developments. For all applicants the highest quality agricultural land is least appropriate for solar development and as the land grade increases, there is a greater onus on developers to show that the use of higher quality land is necessary.' The NPS and NPPF defines best and most versatile (BMV) agricultural land as *land in grades 1, 2 and 3a of the Agricultural Land Classification* Footnote 65 of the NPPF expresses the following: 'Where significant development of agricultural land is demonstrated to be necessary, areas of poorer quality land should be preferred to those of a higher quality.' Paragraph 013 (ID: 5-013-20150327) of the Planning Practice Guidance (PPG) includes the following summarised guidance:	*and most versatile agricultural land without justification. Where schemes are to be sites on best and most versatile agricultural land, the Secretary of State should take into account the economic benefits of that land. Where development of agricultural land is demonstrated to be necessary, areas of poorer quality land should be preferred to those of higher quality".* The inclusion of BMV land is considered justified for the reasons set out in the **Planning Statement [REP1-087]**. To briefly summarise: 1. The applicant adopted a sequential approach to considering agricultural land in its site selection assessment, initially excluding ALC Grades 1, 2 and 3 from the area of search and additionally considering previously developed land for inclusion within the Scheme. Having not identified any suitable alternative areas for the Scheme on lower grade land or previously developed land, Grade 3 agricultural land (which includes Grade 3a, as BMV) and some small areas of Grade 2 land were considered in the later stages of the site selection assessment. Further details are provided in **ES Volume 3, Appendix 4:1 Site Selection Assessment Report [APP-185]**. 2. Through the design evolution of the Scheme, the Applicant has sought to limit the amount of BMV land

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'The LPA should encourage the effective use of land by focusing large scale solar farms on previously development and non-agricultural land.' 'Solar farms are normally temporary structures and planning conditions can be used to ensure that the installations are removed when no longer in use and that the land is restored to its previous use.' Policy CP42, criteria (viii) of the Wiltshire Core Strategy expresses the need for proposals for standalone renewable energy schemes to satisfactorily consider best and most versatile agricultural land. The Wiltshire Climate strategy (2022-2027) includes the following objective relevant to the natural environment, food and farming: 'Efficient and environmentally sensitive use of land, providing for the needs of an increasing population and nature; food production, renewable energy generation, housing and transport alongside woodland creation and nature recovery.'	used wherever practicable, and reductions in the Order Limits for other reasons has led to a reduction in the amount of BMV land required. 3. The majority of the Grade 3a BMV land (and some smaller pockets of Grade 2 land) located within the Solar PV Sites is intermingled with sections of non-BMV land, and designing the Scheme to remove those areas would not be practicable and would adversely affect the Scheme's overall viability. 4. Farming circumstances have been considered. The inclusion of the BMV land is necessary for the operation of the Scheme, particularly in light of other removals from the Order Limits which required a reduction in the areas identified for Solar PV Panels (for instance, to move the Scheme away from the Cotswolds National Landscape). Further, regarding the economic productivity of the land, the Applicant is aware that the tenant farmers affected by the loss of BMV land from their farm businesses are in discussions with the relevant landowners about alternative land that could be utilised for farming in place of the BMV land proposed to be used for the Scheme. 5. The parcels of Grade 2 land in Lime Down E are optimal for siting Solar PV Panels due to being south facing and in close proximity to the rest of the Scheme, and their

Wiltshire Council Comments	Applicant's Response
	inclusion is required to offset the loss of locations for Solar PV Panels in other locations, such as close to the CNL. 6. The Scheme is temporary and reversible in nature. 7. The design of the Scheme is compliant with certain farming practices, such as sheep grazing. The substantial benefits of the Scheme justify the inclusion of the BMV land, namely the Scheme's contribution to meeting the established and urgent need for renewable energy infrastructure, together with the wider economic and environmental benefits. With regard to impacts on food production more generally, analysis in the Land Use Framework (Ref 14) confirms that there is enough land to deliver the government's objectives for nature restoration and development without reduce domestic food production or compromising on these objectives. In relation to renewable energy infrastructure, the Land Use Framework (Ref 14) estimates that the amount of land in England required to meet renewable energy objectives in 2050 would be around 1% of England's total land and about 2% of the Utilised Agricultural Area. Whilst these figures are dependant on the actual electricity infrastructure consented and built, this still represents a very small proportion of the total

Wiltshire Council Comments	Applicant's Response
	Utilised Agricultural Area. On that basis, it is not considered that the Scheme will compromise the nation's food security.
Negative impacts – construction phase Best and Most Versatile (BMV) agricultural land In this case the solar park will take 878 Ha (2,171 acres) of land out of agricultural production. This land is predominantly used for arable uses, with the poorer land used for grass production. Under the UK soil classification system, the site is graded as follows: Grade 2 – 6% Grade 3a – 24% Grade 3b – 44% Grade 4 – 26% The council has sought further evidence from the Applicant that a full and comprehensive assessment of land, at a lower level than BMV, has been conducted. On the assumption that the arable production takes place on land other than Grade 4 that would equate to the loss of approximately 5,000 tonnes of combinable crops, worth in the region of £750,000 per year. To put this in context, the UK produced 20 million tonnes of combinable crops in 2024, lower	The Applicant acknowledges that the construction of the Scheme will remove the land in the Solar PV Sites from primary agricultural use for the duration of approximately 60 years. **ES Volume 3, Appendix 17-1: Agricultural Land Classification and Soil Resource Survey Report [REP1-063]** assessed that approximately 240 hectares, or 33%, of the agricultural land within the Solar PV Sites is of Best and Most Versatile (BMV) quality, which is considered the most productive agricultural land. A majority of the land in the Solar PV Sites is in Subgrade 3b or Grade 4, which is not BMV and not considered among the most productive agricultural land. The Local Impact Report notes that 273,555 ha of land in Wiltshire is currently farmed. The Solar PV Sites therefore represent 0.26% of the county's agricultural land resource, with the area of the most productive, BMV quality land, within the Solar PV Sites representing only 0.09%. The long-term but temporary removal of land from a standard arable rotation would not have a significant impact on regional or national food production. The possibility of some agricultural use and food production through livestock grazing remains a possibility, although has not been relied upon in any assessments. With regard to impacts on food production more generally, analysis in the Land Use Framework (Ref 14) confirms that

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than normal due to the challenging weather conditions experienced in the growing season. Due to a lack of information, the council is unable to assess the reduction in output from the grassland. However, the challenges currently facing the agricultural sector are acknowledged, although profitability in the beef and sheep sector has improved. The Applicant is suggesting that the land, once the installation is completed, could be used for grazing. Whilst there are examples of solar parks being used for sheep grazing and/or poultry, it does require extra infrastructure, e.g. fencing suitable for sheep, to protect the equipment and the livestock. The council's officers have not been able to find any reference to this. The Applicant states that there may be some grazing opportunities once the solar park is established which may offset the reduction in output from the current grassland, but the council considers this is unlikely. Clarity is therefore required.	there is enough land to deliver the government's objectives for nature restoration and development without reduce domestic food production or compromising on these objectives. In relation to renewable energy infrastructure, the Land Use Framework (Ref 14) estimates that the amount of land in England required to meet renewable energy objectives in 2050 would be around 1% of England's total land and about 2% of the Utilised Agricultural Area. Whilst these figures are dependant on the actual electricity infrastructure consented and built, this still represents a very small proportion of the total Utilised Agricultural Area. On that basis, it is not considered that the Scheme will compromise the nation's food security. The Applicant has not assessed the quantum of arable crop that is currently produced within the Solar PV Sites (Lime Down A to Lime Down E). As such, losses to arable production have not been directly assessed as an economic receptor. However, the potential effects of the Scheme on the agricultural economy have been assessed in economic terms within **ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]**. That assessment considers the likely loss of Gross Value Added (GVA) to the agricultural industry during the operational period of the Scheme and identifies an estimated reduction of approximately £628,000 GVA per annum. This assessment provides an appropriate economic basis for considering the effects of the Scheme on agricultural production at a local and regional scale. Within Wiltshire, this is

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	equivalent to ~0.3% of the annual value of the agricultural industry (in GVA). Across the 20 km Study Area, this is equivalent to ~0.08% of the annual value of the agricultural industry (in GVA). The Applicant therefore does not consider the economic impact to the agricultural industry is significant in Wiltshire or at the 20 km Study Area level.
Negative impacts – construction phase One benefit of taking this land out of agricultural production for at least 60 years will be the improvement to soil health should this land revert to food production again, and the increased carbon sequestration that will occur compared with if it remains in its current use. The council would also anticipate an increase in biodiversity. However, at this moment in time, it is very hard to monetarise these benefits. The outline Soil Resources Management Plan (7.15) [APP-280] the clear guidance restricting the work that can be carried out that would have a negative impact on soil structure during periods of wet weather. Whilst the soil handling directives are comprehensive, and there is reference to the remedial work that might be needed following the decommissioning of the site and prior to the land going back to agricultural use, the council would like to see reference to soil boreholes being dug and analysed by the suitably qualified soil scientist rather than just 'site inspections'.	The baseline condition of soils across the Site has been established through borehole and soil pit investigations undertaken by a suitably qualified soil scientist, as reported in **ES Volume 3, Appendix 17-1: Agricultural Land Classification and Soil Resource Survey Report [REP1-063]**. This information forms the pre-condition baseline against which soil reinstatement following decommissioning will be assessed. A detailed SRMP will be prepared post-consent and will be required to be in substantial accordance with the **Outline SRMP [APP-280]**. The detailed SRMP will incorporate the existing borehole and soil pit data as baseline reference information for reinstatement of the land. The **Outline Decommissioning Strategy [REP1-100]** confirms that measures to mitigate effects on agricultural land and soils during decommissioning will be set out in the detailed SRMP, which will form a component of the detailed Decommissioning Strategy. The detailed SRMP will also set out the scope of site inspections, which will include field

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Another area missing from 7.15 Outline Soil Resources Management Plan [APP-280] is any reference to remedial actions that would be taken in the event of a pollution incident, for instance a fuel spill. To date there is no evidence that well maintained solar panels leach chemicals into the ground, unless they are damaged. The council notes that regular inspections will take place.	observations of soil conditions, such as through the use of auger holes and/or soil pits, to inform the identification of any required remedial works prior to the land being returned to agricultural use
Negative impacts – construction phase In summary, the development will result in approximately 878Ha of land removed from food production, including 30% best and most versatile land. This loss equates to approximately 5,000 tonnes of crops annually. While soil health may improve long-term, grazing under panels is uncertain. In order to assess whether the proposal will meet with local and nation planning policy, the following would need to be provided: • Evidence that a full and comprehensive assessment of availability of land, at lower level than BMV, has been conducted	The Applicant has assessed the availability of non-BMV land as part of **ES Volume 3, Appendix 4-1: Site Selection Assessment Report [APP-185]**. The Applicant adopted a sequential approach to considering agricultural land in its site selection assessment, initially excluding ALC Grades 1, 2 and 3 from the area of search and additionally considering previously developed land for inclusion within the Scheme. Having not identified any suitable alternative areas for the Scheme on lower grade land or previously developed land, Grade 3 agricultural land (which includes Grade 3a, as BMV) and some small areas of Grade 2 land were considered in the later stages of the site selection assessment. Further details on why inclusion of BMV is justified is provided in an earlier section of the response to the Local Impact Report, and full details can be found in the **Planning Statement [REP1-087]** (see Paragraph 8.3.241 onwards).
Negative impacts – construction phase	A detailed SRMP will be prepared post-consent and will be required to be in substantial accordance with the **Outline**

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• Detailed soil remediation plan post-decommissioning	**SRMP [APP-280]** which is secured by Requirement 17 of the **Draft DCO [REP1-007].** The best practice principles for soil handling and management contained within the **Outline SRMP [APP-280]** will apply throughout the duration of the Scheme, across all phases. The detailed SRMP will include further details on how soil conditions will be assessed and established at the time of decommissioning, such as through site inspections involving the observation of soil boreholes and pits and will set out how any requirement for remedial works will be identified. As best-practice measures may evolve over the lifetime of the Scheme, the **Outline SRMP [APP-280]** does not prescribe detailed remediation measures at this stage.
Negative impacts – construction phase • Pollution incident protocols and plan to be prepared and agreed by the council for the construction/decommissioning phases and for any contamination during lifetime of project	The Applicant acknowledges there is potential for pollution incidents to occur. Details of how risks of pollution incidents will be minimised, including control points and response plans, are set out for each phase of the Scheme, respectively in the **Outline CEMP [REP1-096],** which is secured through Requirement 2 of the **Draft DCO [REP1-007],** the **Outline OEMP [REP1-098]**, secured through Requirement 14 of the **Draft DCO [REP1-007]**, and the **Outline Decommissioning Strategy [REP1-100],** secured through Requirement 20 of the **Draft DCO [REP1-007]**. Each Detailed Management Plan will be subject to approval with the Local Planning Authority prior to the associated phase commencing, and must be in substantial

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	accordance with the Outline counterpart. With these controls in place throughout the Scheme, the risk of pollution is considered to be very low.
Negative impacts – construction phase • Clarity on grazing feasibility and responsibilities for protective measures.	Continuation of agricultural use by grazing sheep beneath the solar panels has not been relied upon as a mitigation measure within the assessment of effects on soils, agriculture or agricultural output. Therefore, no specific assessment of grassland output or grazing related mitigation has been undertaken, and grazing has not been assumed to offset any reduction in grassland productivity.
Negative Impacts – Operational Cumulative Impacts Relating primarily to visual and landscape impacts, at its full council meeting on 21 May 2024, Wiltshire Council voted to support a motion calling for further guidance over its strategy for delivering solar farms. The motion (no. 2024-03 – Solar Farms) is summarised below: '[…] this council is increasingly concerned at the concentration of solar farms, battery storage and associated infrastructure in Wiltshire. Some villages are now completely surrounded by solar farms and their continued concentration represents a significant cumulative impact and industrialisation of the countryside.	Regarding the concern around the cumulative loss of countryside, the Applicant confirms cumulative effects have been carefully considered in accordance with Planning Inspectorate Guidance (Ref 15) and the relevant NPS EN-1 (Ref 3), NPS EN-3 (Ref 4) and NPS EN-5 (Ref 5) requirements as set out in **ES Volume 1, Chapter 21 Cumulative and In Combination Effects [APP-074].** The chapter sets out the approach and conclusions of the **ES [APP-052 to APP-074]** technical chapter cumulative assessments. Taking a conservative worse case approach, significant cumulative effects are identified at a limited and discrete number of receptors comprising tourism and recreation impacts during the construction phase on Corsham Park, PRoW

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Wiltshire Council therefore calls on the Secretary of State for the Department of Levelling Up, Housing and Communities to define more closely what is meant by 'cumulative impact' regarding solar farms and to take clear steps to ensure that solar developments are more evenly spread across the UK […]' No response to the motion was provided by the then Government, but revisions to the NPPF were made along with Written Ministerial Statements. Indeed, although not touching upon cumulative impacts, it should be noted that the notes accompanying the Autumn Budget (issued 30 October 2024) repeatedly references the need to invest in clean energy. In this context, this report provides some analysis and consideration of cumulative impacts of solar farms in Wiltshire.	WT|CORM|122, PRoW WT|HULL|29, and Sustrans Cycle Route 403, and on skylark at a District level. **ES Volume 1, Chapter 8: Landscape and Visual Impact Assessment [APP-060]** takes into account the effects on landscape character and visual amenity in detail, and acknowledges that there would be an immediate change to the character of the Sites themselves and their immediate surroundings as they change from an area of arable farmland to solar infrastructure. However, the introduction of the solar arrays and other associated infrastructure would not become a defining feature on the landscape once operational (e.g. at year 1 and year 15). The combined or Intra project cumulative effects where assessed in the LVIA and a **Technical Note on Intra Project Cumulative Visual Effects [REP1-122]** was submitted at Deadline 1 to explain the assessment undertaken in the LVIA and to summarise the significant effects. The Technical Note concluded that the Intra Project Cumulative Visual Effects were robustly assessed in the LVIA. It concluded that there is 1 Private Receptor; 4 Public Receptors and 1 Transport Receptor where Significant effects were recorded. In all cases, the effect of the secondary site is less than the primary Site. This is predominantly due to the distance to the Sites or the fact that they are seen from a different location from the route (referred to a sequential visibility). As such, this

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	would not increase the level of effects above those described for the primary Site. Therefore, the Intra Project Cumulative Visual Effects are as identified for the primary Site. This is due to the "disaggregated/disparate nature of the Lime Down Sites A to E" combined with rolling character of the Hullavington Lowlands. As such, the assessment does not consider there to be a greater Cumulative Visual Effect for these receptors than for the assessment of the level of harm identified from the individual sites themselves.
Negative Impacts – Operational Cumulative Impacts Policy CP42 of the Wiltshire Core Strategy is explicit that assessment of factors relating to standalone renewable energy installations should include assessment of any cumulative effects. The PPG offers the following summarised guidance in relation to assessing consideration of cumulative landscape and visual impacts of renewable energy development: 'The cumulative landscape impacts are the effects of a proposed development on the fabric, character and quality of the landscape; it is concerned with the degree to which a proposed renewable energy development will become a significant or defining characteristic of the landscape.	The Scheme's compliance with Core Policy 42 is detailed in Annex B: Local Policy Accordance Tables of the **Planning Statement [REP1-087]** (see page 668). **ES Volume 1, Chapter 8: Landscape and Visual Impact Assessment [APP-060]** includes a cumulative assessment. The combined or Intra project cumulative effects were assessed in the LVIA and a **Technical Note on Intra Project Cumulative Visual Effects [REP1-122]** was submitted at Deadline 1 to explain the assessment undertaken in the LVIA and to summarise the significant effects. The Technical Note concluded that the Intra Project Cumulative Visual Effects were robustly assessed in the LVIA. It concluded that there is 1 Private Receptor; 4 Public Receptors and 1 Transport Receptor where Significant effects were recorded. In all cases, the effect of the secondary site is less than the

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Cumulative visual impacts concern the degree to which proposed renewable energy development will become a feature in particular views (or sequences of views), and the impact this has upon the people experiencing those views. Cumulative visual impacts may arise where two or more of the same type of renewable energy development will be visible from the same point or will be visible shortly after each other along the same journey. […]' Although 'locality' as specified within the WMS is not defined, Wiltshire Council's motion indicates that separate development proposals for solar farms within, or surrounding, the same village have collectively impacted that setting.	primary Site. This is predominantly due to the distance to the Sites or the fact that they are seen from a different location from the route (referred to a sequential visibility). As such, this would not increase the level of effects above those described for the primary Site. Therefore, the Intra Project Cumulative Visual Effects are as identified for the primary Site. This is due to the "disaggregated/disparate nature of the Lime Down Sites A to E" combined with rolling character of the Hullavington Lowlands. As such, the assessment does not consider there to be a greater Cumulative Visual Effect for these receptors than for the assessment of the level of harm identified from the individual sites themselves.
Negative Impacts – Operational Cumulative Impacts In this case, and as is identified in the council's Landscape Officer comments, for a project of the scale and disparate nature proposed, it is necessary to undertake an intra-project Cumulative Impact Assessment of the potential landscape and visual interactions between the sites A-E and their potential effects on the receiving landscape and visual amenity. The approach which has been adopted within 3.1 Draft DCO [REP1-007] has been assessed by the council's Landscape Officer, with several omissions and inadequacies identified. In particular, it was of concern that the effects on users of the	**ES Volume 1, Chapter 8: Landscape and Visual Impact Assessment [APP-060]** includes a cumulative assessment. The combined or Intra project cumulative effects were assessed in the LVIA and a **Technical Note on Intra Project Cumulative Visual Effects [REP1-122]** was submitted at Deadline 1 to explain the assessment undertaken in the LVIA and to summarise the significant effects. The Technical Note concluded that the Intra Project Cumulative Visual Effects were robustly assessed in the LVIA. It concluded that there is 1 Private Receptor; 4 Public Receptors and 1 Transport Receptor where Significant effects were recorded. In all cases, the effect of the secondary site is less than the

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Fosse Way have not been fully addressed. The sequential assessment should include the Newton Dairy, Long Newton Airfield and Upper Marsh Farm installations, north of Malmesbury before proceeding to Lime Down Sites B and C. Further potential sequential effects should be assessed along the A429/A350 route from west of Charlton Park (north of Malmesbury); passing Rodbourne Rail solar farm; south to Lime Down Sites D and E; then land at Red Barn north east of Kington St Michael. It does not appear that these sequential assessments have been undertaken as part of the ES.	primary Site. This is predominantly due to the distance to the Sites or the fact that they are seen from a different location from the route (referred to a sequential visibility). As such, this would not increase the level of effects above those described for the primary Site. Therefore, the Intra Project Cumulative Visual Effects are as identified for the primary Site. This is due to the "disaggregated/disparate nature of the Lime Down Sites A to E" combined with rolling character of the Hullavington Lowlands. As such, the assessment does not consider there to be a greater Cumulative Visual Effect for these receptors than for the assessment of the level of harm identified from the individual sites themselves. **Volume 1, Chapter 8: Landscape and Visual Impact Assessment [APP-060]** includes a cumulative assessment. This assessment considered the cumulative landscape effects of the Scheme within the 10km Study Area. However, the LVIA used a 2km Study Area to assess visual effects, and so the 10km Cumulative Study Area was restricted to record Cumulative Landscape Effects only. To consider the cumulative sequential visual effects of the scheme within the 10km Study Area as requested, a **Technical Note on Cumulative Sequential Visual Effects [REP1-123]** was prepared and submitted at Deadline 1. Sequential effects on users of the Fosse Way were assessed in relation to the 3 existing installations at Newton Airfield, and

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	sequential effects on users of the A429/A350 in relation to the existing Rodbourne Rail solar farm and three proposed solar schemes including Bishoper Farm Solar Scheme (west of Charlton Park), the proposed scheme to the north of Rodbourne Rail solar Farm, and Red Barn north east of Kington St Michael (to the south of the M4. The assessment concluded there no additional Significant Adverse Sequential Effects on the amenity of users of the Fosse Way. The LVIA accepts that there are Moderate Adverse effects on the visual amenity of users of the Fosse Way as a result of the Scheme as set out within **ES Volume 3, Appendix 8-3-2-2 LVIA Assessment Sheets (Significant) [APP-191].**
Negative Impacts – Operational Fire Safety of Battery Energy Storage System (BESS) The proposal is described as containing approximately 270 BESS containers and associated inverters, transformers mounted on concrete foundations, along with other ancillary equipment. The BESS area is shown as being located north of the line of the railway and the existing solar farm at Hill Hayes Lane, Hullavington and extending to a site area of 5.5Ha.	The Applicant notes this comment.
Negative Impacts – Operational Fire Safety of Battery Energy Storage System (BESS)	The Applicant has provided a comprehensive response in the Summary Point below headed "Fire Safety of Battery Energy Storage System (BESS)". The Applicant does not agree with

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Within the submitted 6.3 Environmental Statement Volume 3, Appendix 3-1 Substations and Battery Energy Storage System Description [APP-182], the "containers" are described as a proprietary product of typical appearance, but this document also notes that other products may be used, with the product referenced providing a maximum envelope for the purposes of landscape and visual assessment and represents a reasonable worse case for the purposes of the noise assessment. The submitted design parameters set out in the Environmental Statement suggest the containers will scale at some 4.5m in height with a foundation at 4.0m depth. The submission also confirms that the containers are to be laid out with 3.5m between blocks and 0.9m between adjacent and back-to-back containers.	this weighting and expects that this should be amended to "neutral" now that clarification has been provided.
Negative Impacts – Operational Fire Safety of Battery Energy Storage System (BESS) The submission acknowledges that there may be some potential for fire(s) as a result of the BESS elements of the development. Although rare, fires and associated explosions have the potential to cause safety concerns to human health, including anyone working on site, or within the area of fire spread/associated contamination fall out. Fires also have the potential to have an impact on the natural environment	The Applicant amended **ES Volume 3, Appendix 3-1 Substations and Battery Energy Storage System Description [REP1-081]** Deadline 1 to clarify the requirement for internal BESS fire suppression systems, which are optional and not embedded in the design. A Revised **Outline BSMP [REP1-110]** was submitted at Deadline 1 to fully accommodate the latest BESS safety requirements contained in NFPA 855 (2026) (Ref 16) ensuring that any credible risks associated with battery storage are either prevented or fully mitigated if a BESS failure occurs. The **Outline BSMP [REP1-110]** has been prepared for the Scheme

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including the habitats and species on site and surrounding area. 6.3 Environmental Statement Volume 3, Appendix 3-1 Substations and Battery Energy Storage System Description [APP-182] confirms that each BESS container will be fitted with a Thermal Management System so as to keep the internal battery temperature in an operational range, as well as a Fire Suppression System, which ventilates smoke and water based fire/explosion suppression.	using guidance from Dorset and Wiltshire Fire and Rescue Service (D&WFRS) and incorporating recommendations of the National Fire Chiefs Council (NFCC) (Ref 17). The **Outline BSMP [REP1-110]** very clearly documents the fire and explosion protection requirements for the BESS system that is selected at the detailed design stage. Most current BESS systems are designed to safely burn out without internal fire suppression systems (to remove the risk of stranded energy in the battery systems), Large Scale Fire Testing (LSFT) must be conducted to demonstrate that loss will be safely limited to one container without the intervention of fire fighters. Most of these BESS enclosures integrate LFP prismatic cells and have demonstrated fire propagation does not occur to other BESS enclosures at distances ranging from 15cm – 100cm to adjacent or back-to-back BESS enclosures with spacing of 3-3.5 metres across from the next row/block of BESS enclosures. These BESS designs integrate high levels of thermal insulation to prevent a fire from spreading to adjacent BESS enclosures. The insulation is designed to ensure that external heat from a BESS fire does not increase internal temperatures of adjacent BESS to critical levels i.e. <100C. As now mandated under NFPA 855 (2026) (Ref 16), the Applicant will only be able to select a BESS system that has undertaken Large Scale Fire Testing (LSFT). At the detailed

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	design stage, the selected BESS LSFT data will be leveraged to fully inform inputs for risk assessment tools which will be utilised together with detailed consequence modelling to provide a comprehensive site operations and emergency response safety audit, this is stipulated in the **Outline BSMP [REP1-110]** pre-construction requirements (Section 6). The objective of the test is to evaluate the thermal exposure impacts from a developed BESS enclosure, to determine propagation risk to adjacent BESS or equipment. Testing also defines the length of burn, duration of Peak Heat Release Rate, maximum burn temperatures, etc. Sections 6.1.3 and 6.1.4 of the **Outline BSMP [REP1-110]** mandate the key risk analysis reports which consider how to prevent and mitigate a multi-BESS failure incident. These reports must be provided at the detailed design stage and are BESS system and site layout specific. The Applicant will also commission site specific heat flux and flame tilt consequence modelling to account for site topography and wind conditions to establish final equipment spacing distances for the Scheme. Section 2.4.2 of the **Outline BSMP [REP1-110]** stipulates: *"Final BESS design and site layout will have been validated through mandatory Large Scale Fire Testing (LSFT) and rigorous consequence modelling to minimise the requirement for any D&WFRS intervention in a thermal runaway incident. LSFT must establish minimum equipment spacing distances*

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	that demonstrate there is no fire propagation to adjacent BESS enclosures or ESS equipment. D&WFRS intervention in worst case scenarios would typically be limited to boundary cooling of adjacent BESS and Energy Storage System (ESS) units to prevent the fire from spreading. This strategy will be finalised with D&WFRS and be clearly communicated in the Emergency Response Plan (ERP); • *To ensure that fire, smoke, and any release of toxic gases does not significantly impact site operatives, first responders, and the local community; and* • *To ensure that firewater run-off is contained and tested before release or, if necessary, removed by tanker and treated offsite."* Sections 4.1.30 – 4.1.33 covers all requisite internal BESS fire detection and suppression requirements for the Scheme. Section 5 of the **Outline BSMP [REP1-110]** covers all requisite firefighting requirements for the Scheme including fire service access, firefighting water supply, and emergency planning requirements and is fully compliant with NFCC guidance (Ref 17). Section 5.3.2 of the **Outline BSMP [REP1-110]** stipulates that: • *"The firefighting water requirement will be fully assessed at the detailed design stage based upon analysis of*

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

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	path between BESS enclosures to transmit flaming or radiant heat." Boundary cooling typically involves firefighters directing water fog or spray pattern discharge to ensure the incident does not spread to adjacent BESS enclosures. NFCC guidance (Ref 17) states: *"If it can be confirmed that the recommended firefighting tactic for the BESS is to defensively fire fight and boundary cool whilst allowing the BESS to consume itself, this will reduce the water requirements, and thus the drainage/environmental protection requirements significantly."* The Applicant has submitted a working draft of the **Statement of Common Ground with the Environment Agency (EA) (Rev 1) [EN010168/EXAM/8.6]** at Deadline 2 on Scheme environmental protection issues including the BESS area drainage strategy. The agreed strategy document **(Firewater Containment and Drainage Strategy – Lime Down D Battery Energy Storage System [REP1-124]**) was submitted at Deadline 1, to provide further assurance that all water pollution risks from a BESS fire are fully mitigated. The EA is a statutory consultee for the **Outline BSMP [REP1-110]** and drainage strategies and must approve the final BSMP and drainage design at detailed design before construction of the BESS commences. If firefighters are applying water fog or spray patterns to adjacent BESS enclosures or deploying defensive spray plates

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	that form a water curtain between the affected enclosure and adjacent BESS these "boundary cooling" tactics would likely be applied intermittently in 15-minute application periods with temperature changes measured between application periods. All risk assessments to be conducted at detailed design for BESS projects required by the Health and Safety Executive (HSE) to assess fire and explosion risk are stipulated in Section 6.1.5 of the **Outline BSMP [REP1-110]**. NFPA 855 (2026) (Ref 16) defines a safe BESS exclusion zone as follows: *"Potential debris impact radius is defined as 100 feet (ft) or 30.5 metres (m) i.e. this is a typical explosion risk safe exclusion zone radius as modelling and previous BESS incidents typically show 25 m to be maximum radius."* Further explosion prevention, mitigation, and safety requirements for the Scheme are stipulated in the **Outline BSMP [REP1-110]** Sections: 1.1.6 – 1.1.7, 4.1.3 – 4.1.10, 4.1.18, 4.1.27, 4.1.30 - 4.1.33, 4.1.36 – 4.1.39, 5.1.3, and 5.1.6. The **Outline BSMP [REP1-110]** is secured through Requirement 6 (Battery safety management) in Schedule 2 of the **Draft DCO [REP1-007]**, which provides that Work No. 2 must not commence until a BSMP has been submitted to and approved by the relevant planning authority. The approved plan must be substantially in accordance with the **Outline BSMP [REP1-110]**. The **Draft DCO [REP1-007]** also requires the relevant planning authority to consult with Dorset and Wiltshire

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	Fire and Rescue Service and the EA before determining the application, and that the BSMP must be implemented as approved.
Negative Impacts – Operational Fire Safety of Battery Energy Storage System (BESS) Separately, 3.1 Draft DCO [REP1-007] commits to the submission and agreement of a Battery Safety Management Plan prior to the commencement of development. The draft DCO also commits the Local Planning Authority to consultation with the Dorset and Wiltshire Fire and Rescue Service along with the Environment Agency.	The Applicant has provided a comprehensive response in the Summary Point above headed "Fire Safety of Battery Energy Storage System (BESS)". The Applicant does not agree with this weighting and expects that this should be amended to "neutral" now that clarification has been provided. The Applicant notes this comment; this is secured through the **Draft DCO [REP1-007].** Section 7.1.4 of the **Outline BSMP [REP1-110]** stipulates: "*The implementation of the Outline BSMP is secured through a Requirement in Schedule 2 of the Draft DCO [EN010168/APP/3.1]. This will stipulate that a detailed Battery Safety Management Plan will be submitted to and approved in consultation with D&WFRS, the Environment Agency (EA), and by the relevant planning authorities prior to the commencement of the works for the BESS. This plan will be substantially in accordance with the Outline BSMP.*"
Negative Impacts – Operational Fire Safety of Battery Energy Storage System (BESS) Wiltshire Council does not retain in-house expertise to comment on the adequacy of the approach to minimise and mitigate the risk and effect of fire. However, there is no	The Applicant has provided a comprehensive response in the Summary Point above headed "Fire Safety of Battery Energy Storage System (BESS)". The Applicant does not agree with this weighting and expects that this should be amended to "neutral" now that clarification has been provided.

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evidence to suggest that the Applicant has not developed the layout and proposed safety systems in line with the National Fire Chiefs Council (NFCC) Guidance and NFPA 855 (2023) standards, as is stated in 6.3 Environmental Statement Volume 3, Appendix 3-1 Substations and Battery Energy Storage System Description [APP-182]. Equally, there is no reason to believe that the proposed systems will not operate correctly and to render the development as safe as it can be. (as is referenced in the PPG). The council is, however, confused by the apparent insertion of the word "optional" placed in brackets after Fire Suppression System as it is listed in paragraph 1.2.1 in 6.3 Environmental Statement Volume 3, Appendix 3-1 Substations and Battery Energy Storage System Description [APP-182]. This appears to run contrary to later paragraphs where the Fire Suppression System appears to be embedded in the proposed design of the BESS. The Applicant will need to explain this apparent conflict prior to any decision.	
Negative impacts – decommissioning phase None identified.	The Applicant notes this comment.
Ranking the Development Management and Strategic Planning impacts in importance The development is known as Lime Down Solar Park and is described within the Applicant's submission to comprise a solar	The Applicant notes the description of the Scheme.

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photovoltaic (PV) electricity generating station of approximately 50 megawatts (MW) and associated development comprising Battery Energy Storage System (BESS) Area, substations, grid connection infrastructure and other infrastructure integral to the construction, operation and maintenance, and decommissioning phases. The design life of the scheme is 60 years with decommissioning expected to take place 60 years after final commissioning (the design life is stated to be 2029-2089).	
The application site is stated as extending to some 1,237 Ha and is largely situated within the administrative area of Wiltshire north of the M4 corridor, albeit with the grid connection route extending south to the substation at Melksham town. A small area of the application site is within areas of highway administered by South Gloucestershire Council. The site comprises predominantly agricultural fields and rural villages, including Sherston, Luckington, Corston, Hullavington, Rodbourne, as well as the town of Malmesbury. The cable route corridor is described as running for approximately 22km from the body of the solar panel development to the existing sub-station at Melksham. The application states that the area of the solar PV extends to some 749.3Ha, with the cable route corridor described as extending to some 463.2Ha.	The Applicant notes the description of the Scheme.
The land identified as accommodating the solar PV primarily comprise agricultural fields with gently undulating topography,	The Applicant notes the description of the Scheme.

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delineated by hedgerows, hedgerow trees, scattered woodland and woodland blocks. The Fosse Way, a Roman road built between Exeter and Lincoln (now part road and part PRoW), runs through the solar PV site. Watercourses within the solar PV site include Gauze Brook and Gabriel Well River running through the eastern extent of the site, as well as various unnamed drains. The landscape is described as fields, woodland and nearby rural villages, including Sherston, Luckington, Corston, Hullavington, Rodbourne and the town of Malmesbury. There are also several individual farm holdings, rural dwellings and small commercial business properties in the vicinity of the Solar PV. The Great Western Railway South Wales Main Line runs east to west through the body of the Solar PV site. The River Avon is located approximately 240m north.	
The cable route corridor element of the application site is described as having a variable width from 50m, up to 665m in some locations to provide space for what is described as "trenchless construction techniques" and temporary construction compounds, or to provide a wider area to allow space to avoid features such as trees, hedgerows and field boundaries.	The Applicant notes the description of the Scheme.
The land within the Cable Route Corridor predominantly comprises agricultural fields, bordering hedgerows and short sections of road and railway line where crossings are required	The Applicant notes the description of the Scheme.

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(including a crossing of the M4 motorway). The Cable Route Corridor is intersected by various tributaries associated with the River Avon.	
The landscape surrounding the Cable Route Corridor comprises further agricultural fields, hedgerows, woodland and villages such as Grittleton (bordering to the west), Yatton Keynell (approximately 220m to the west) and the towns of Chippenham, Corsham and Melksham towards the southern section of the cable route corridor.	The Applicant notes the description of the Scheme.
The application site is not within any landscape designation, but the Order Limits extend up to the boundary of the Cotswolds National Landscape (CNL) and Lime Down Sites A, B and C are considered to fall within the setting of the CNL. However, minor highway improvement works would be undertaken within the CNL. Similarly, whilst the application site is not within any ecological designation, there are four statutory internationally designated ecological sites located within 30km. These include the Bath and Bradford on Avon Bats Special Area of Conservation (SAC), Severn Estuary Special Protection Area (SPA) and Ramsar, and Salisbury Plain SPA. There are four statutory nationally designated ecological sites located outside of, but within 5km of the application site. These are Harries Ground, Rodbourne Site of Special Scientific Interest (SSSI); Corston Quarry and Pond Local Nature Reserve (LNR); Sutton Lane Meadows SSSI; and Conygre Mead LNR. There	The Applicant notes the description of the Scheme.

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are 37 non-statutory locally designated sites located outside of, but within 2km of, the application site. These comprise 36 Local Wildlife Sites (LWS) and one Protected Road Verge. There are no World Heritage Sites, Registered Battlefields, or Protected Wrecks within 2km of the solar PV and 250m of the cable route corridor. No designated heritage assets are located within the solar PV site, however, various Listed Buildings, Scheduled Monuments, Conservation Areas are located within 2km of the Solar PV Sites.	
All the local impacts identified are considered material to the ExA, but in accordance with the national guidance[11] the council would indicate the following as the most significant in relation to this theme: • The proposal will offer a significant contribution towards reducing the impacts of climate change, including contributions to national carbon reduction objectives and targets. In that context, the principle of proposals for renewable energy development receives broad support from local planning policies CP42 to the Wiltshire Core Strategy and policy SCC3 to the Chippenham Neighbourhood Plan, as well as supporting Wiltshire's	The Applicant notes the comment made relating to the significant contribution the Scheme will offer towards "national carbon reduction objectives and targets". The Applicant's **Statement of Need [REP1-085]** describes how and why the Scheme addresses all relevant aspects of government policy including achieving its energy objective to ensure the supply of energy to the national energy system always remains secure (Section 8.5), reliable (Section 8.5), affordable (Chapter 9), and consistent with meeting legally binding climate change targets (Section 5.10). The Applicant's **Planning Statement [REP1-087]** sets out the Applicant's assessment of the planning balance associated

[11] National Guidance published in 2024, 'Nationally Significant Infrastructure Projects: Advice for Local Authorities'

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Green and Blue Infrastructure and Climate strategies, provided that they are suitably located and sufficiently mitigate any adverse development specific and cumulative environmental effects.	with the Scheme including the suitability of the site (detailed further in **ES Volume 3, Appendix 4-1: Site Selection Assessment Report [APP-185]**) and the sufficiency of mitigations to any adverse effects identified arising from the Scheme.
• The development will result in approximately 878Ha of land removed from food production, including 30% Best and Most Versatile Land. This loss equates to approximately 5,000 tonnes of crops annually. While soil health may improve long-term, grazing under panels is uncertain. In order to assess whether the proposal will meet with local and national planning policy, the following would need to be provided: ○ Evidence that a full and comprehensive assessment of availability of land, at lower level than BMV, has been conducted. ○ Detailed soil remediation plan post-decommissioning. ○ Pollution incident protocols and plan to be prepared and agreed by the council for the construction/decommissioning phases and for any contamination during lifetime of project. ○ Clarity on grazing feasibility and responsibilities for protective measures.	With regard to evidence that a full and comprehensive assessment of availability of land, at lower level than BMV, has been conducted, the Applicant's assessment of alternatives is set out in **ES Volume 1, Chapter 4: Alternatives and Design Evolution [APP-056] and ES Volume 3, Appendix 4-1: Site Selection Assessment Report [APP-185]**. This explains the six stage site selection assessment that has been carried out, including the sequential approach adopted when considering BMV land within the 20 km search area for inclusion within the Scheme. In the initial stages of site selection, the Applicant identified and assessed potential development areas (PDAs) on grade 4, 5 and non-agricultural land. The Applicant also considered brownfield sites within the 20 km search area. None of the initial PDAs or brownfield sites were considered suitable for the Scheme due to constraints unrelated to agricultural land classification (such as site size and existing development uses), therefore it was necessary to reintroduce BMV land into the search criteria. The search was therefore expanded to include Grade 3 and some Grade 2 agricultural land. The **Planning Statement [REP1-087] (**see from Paragraph 8.3.241) provides further details of why the inclusion of BMV

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	land is considered to be justified and in line with planning policy, which is set out in further detail in the above responses. In relation to soil remediation post decommissioning, a detailed Soil Resource Management Plan (SRMP) will be prepared post-consent and will be required to be in substantial accordance with the **Outline SRMP [APP-280]** which is secured by Requirement 17 of the **Draft DCO [REP1-007].** The best practice principles for soil handling and management, including soil reinstatement and land restoration, contained within the **Outline SRMP [APP-280]** will apply throughout the duration of the Scheme, across all phases. As best-practice measures may evolve over the lifetime of the Scheme, the **Outline SRMP [APP-280]** does not prescribe detailed remediation measures at this stage. With regards to measures to prevent and respond to pollution incidents during construction, these are set out in the **Outline CEMP [REP1-096].** This includes construction-related mitigation measures to protect soils from contamination, such as procedures for dealing with fuel spills and ground contamination, including the provision of spill kits on site and the implementation of an Emergency Spillage Plan. Further detail on measures to protect soils from contamination will be provided within the detailed CEMP, which will be prepared post-consent and will be required to be in substantial accordance with the **Outline CEMP [REP1-096]**.

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	In terms of grazing and protective infrastructure, continuation of agricultural use through grazing has not been relied upon as mitigation within the assessment. The Scheme description in **ES Volume 1, Chapter 3: The Scheme [APP-055]** confirms that perimeter fencing will be installed around each Solar PV site, comprising deer mesh and wooden post security fencing to a height of up to 2.5 metres, which would be adequate for containing livestock should grazing occur. As grazing is not assumed within the assessment, no further grazing-specific infrastructure or allocation of responsibility has been proposed or assessed
Ranking the Development Management and Strategic Planning impacts in importance Cumulative impact on landscape In the recent past, Wiltshire has been subject to multiple applications and developments of solar array, battery storage and associated infrastructure, with a concentration in the north of the county where the Lime Down development would take place. A consideration of the cumulative impacts of such development is therefore required.	Cumulative effects have been carefully considered in accordance with Planning Inspectorate guidance (Ref 15) and the relevant NPS EN-1 (Ref 3), NPS EN-3 (Ref 4) and NPS EN-5 (Ref 5) requirements as set out in **ES Volume 1, Chapter 21 Cumulative and In-Combination Effects [APP-073].** It should also be noted that existing schemes, including those aforementioned in the north of Wiltshire, are considered within each of the technical assessments of the **ES [APP-052 to APP-072]** and form part of the baseline environment. Cumulative schemes are considered in addition to the reported baseline environment. Cumulative effects (baseline plus the additional short-listed proposed schemes) are therefore then reported separately within each of the technical assessments of the **ES [APP-052 to APP 072].**

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	ES Volume 1, Chapter 8: Landscape and Visual Impact Assessment [APP-060] includes a cumulative assessment. The combined or Intra project cumulative effects were assessed in the LVIA and a **Technical Note on Intra Project Cumulative Visual Effects [REP1-122]** was submitted at Deadline 1 to explain the assessment undertaken in the LVIA and to summarise the significant effects. The **Technical Note on Intra Project Cumulative Visual Effects [REP1-122]** concluded that the Intra Project Cumulative Visual Effects were robustly assessed in the LVIA. It concluded that there is 1 Private Receptor; 4 Public Receptors and 1 Transport Receptor where Significant effects were recorded. In all cases, the effect of the secondary site is less than the primary Site. This is predominantly due to the distance to the Sites or the fact that they are seen from a different location from the route (referred to a sequential visibility). As such, this would not increase the level of effects above those described for the primary Site. Therefore, the Intra Project Cumulative Visual Effects are as identified for the primary Site. This is due to the "disaggregated/disparate nature of the Lime Down Sites A to E" combined with rolling character of the Hullavington Lowlands. As such, the assessment does not consider there to be a greater Cumulative Visual Effect for

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	these receptors than for the assessment of the level of harm identified from the individual sites themselves.
In this case, the submitted Cumulative Impact Assessment has been assessed, with several omissions and inadequacies identified. In particular, it was of concern that the effects on users of the Fosse Way have not been fully addressed. The sequential assessment should include the Newton Dairy, Long Newton Airfield and Upper Marsh Farm installations, north of Malmesbury before proceeding to Lime Down Sites B and C. Further potential sequential effects should be assessed along the A429/A350 route from west of Charlton Park (north of Malmesbury); passing Rodbourne Rail solar farm; south to Lime Down Sites D and E; then land at Red Barn north east of Kington St Michael. It does not appear that these sequential assessments have been undertaken as part of the ES.	**ES Volume 1, Chapter 8: Landscape and Visual Impact Assessment [APP-060]** includes a cumulative assessment. This assessment considered the cumulative landscape effects of the Scheme within the 10km Study Area. However, the LVIA used a 2km Study Area to assess visual effects, and so the 10km Cumulative Study Area was restricted to record Cumulative Landscape Effects only. To consider the cumulative sequential visual effects of the scheme within the 10km Study Area as requested, a **Technical Note on Cumulative Sequential Visual Effects [REP1-123]** was prepared and submitted at Deadline 1. Sequential effects on users of the Fosse Way were assessed in relation to the 3 existing installations at Newton Airfield, and sequential effects on users of the A429/A350 in relation to the existing Rodbourne Rail solar farm and three proposed solar schemes including Bishoper Farm Solar Scheme (west of Charlton Park), the proposed scheme to the north of Rodbourne Rail solar Farm, and Red Barn north east of Kington St Michael (to the south of the M4. The assessment concluded there no additional Significant Adverse Sequential Effects on the amenity of users of the Fosse Way. The LVIA accepts that there are Moderate Adverse

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	effects on the visual amenity of users of the Fosse Way as a result of the Scheme as set out within **ES Volume 3, Appendix 8-3-2-2 LVIA Assessment Sheets (Significant) [APP-191]**. With regards to the A429/350, the assessment concluded The LVIA that there are Minor Adverse effects on the visual amenity of users of the A429 as a result of the Scheme during Construction and Year 1 which would reduce to Negligible once proposed mitigation has matured as set out within **ES Volume 3, Appendix 8-3-2-2 LVIA Assessment Sheets (Significant) [APP-191]**. It is recognised that the individual CD Sites could result in adverse effects in localised views from the A429/A350. However, given the limited visibility of the Scheme in views from the A429, its separation to the A350 by the M4 motorway and the distances between the CD sites and Lime Down, the sequential visual effects associated with the Scheme on the users of the A429/A350 (Receptor TR004-TR007) are no greater than those identified in the LVIA.
Ranking the Development Management and Strategic Planning impacts in importance Fire Safety of Battery Energy Storage System (BESS) Wiltshire Council does not retain in-house expertise to comment on the adequacy of the approach to minimise and mitigate the risk and effect of fire. However, there is no evidence to suggest that the Applicant has not developed the	The Applicant has provided a comprehensive response in the Summary Point above headed "Fire Safety of Battery Energy Storage System (BESS)." The Applicant does not agree with this weighting and expects that this should be amended to "neutral" now that clarification has been provided.

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layout and proposed safety systems in line with the National Fire Chiefs Council (NFCC) Guidance and NFPA 855 (2023) standards, as is stated in 6.3 Environmental Statement Volume 3, Appendix 3-1 Substations and Battery Energy Storage System Description [APP-182]. Equally, there is no reason to believe that the proposed systems will not operate correctly and to render the development as safe as it can be. (as is referenced in the PPG).	
The council is, however, confused by the apparent insertion of the word "optional" placed in brackets after Fire Suppression System as it is listed in paragraph 1.2.1 in 6.3 Environmental Statement Volume 3, Appendix 3-1 Substations and Battery Energy Storage System Description [APP-182]. This appears to run contrary to later paragraphs where the Fire Suppression System appears to be embedded in the proposed design of the BESS. The Applicant will need to explain this apparent conflict prior to any decision.	NFCC revised guidance (2026) (Ref 17) recognises that BESS designs often do not incorporate an automatic fire suppression system because they are designed to safely burn out to remove the risk of stranded energy in the battery systems. However, the Applicant has amended Section 1.2.6 of **ES Volume 3, Appendix 3-1 Substations and Battery Energy Storage System Description [APP-182]** at Deadline 1 to integrate NFPA 855 (2026) (Ref 16) amendments and to clarify fire suppression system requirements. The requirement for a fire suppression system will only be decided at the detailed design stage when the BESS system is selected, compulsory Large Scale Fire Testing (LSFT) of the BESS design will determine the requirement for an integrated fire suppression system.

13 Arboriculture

Table 13-1 - Arboriculture

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Impacts on ancient woodland, including incursions into the 15m buffer around Surrendell Wood and North Bincombe Wood, further highlight the sensitivity of the affected landscape. A central concern is that the Arboricultural Impact Assessment and Outline Arboricultural Method Statement are indicative, incomplete and non-compliant with BS 5837:2012. Key construction details, trenching locations, access points and easements will only be finalised post-DCO, meaning the true scale of tree loss and root damage cannot currently be understood. Supporting plans also lack clarity, fail to show essential buffers, and provide insufficient information on risks associated with construction methods, BESS foundations and potential soil contamination.	The Applicant notes this comment and recognises the sensitivity of ancient woodland and associated buffer zones. Any incursion within the 15m buffers would be limited, unavoidable, and restricted to the use of existing access tracks, or undertaken only where appropriate ground protection measures are installed in advance of works. These measures are intended to prevent soil compaction, root damage and changes to site levels, and will be implemented in accordance with the principles set out within **ES Volume 3, Appendix 10-1 Arboricultural Impact Assessment and Outline Arboricultural Method Statement [APP-206]** and the **Outline CEMP [REP1-096].** Due to the scale of the project and the parameters-based nature of the DCO process, there are inherent limitations in defining detailed construction impacts at this stage. Detailed design, including final trench alignments, easements and access arrangements, will be progressed post-consent. In response to this, arboricultural effects have been assessed using a reasonable worst-case scenario, consistent with the Rochdale Envelope approach, to ensure that potential impacts on trees, hedgerows and woodland are not underestimated.

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	Commitments to avoidance, minimisation and protection of trees are secured through Section 3.5 and Table 4 of the **Outline CEMP [REP1-096],** which sets out mandatory measures to control construction activities in proximity to retained trees and woodland. These commitments will apply throughout detailed design and construction, ensuring that impacts are reduced wherever reasonably practicable. The Applicant considers that the survey methodology and assessment framework are consistent with the principles and guidance of BS 5837:2012, as far as is reasonably applicable at the DCO stage. **ES Volume 3, Appendix 10-1 Arboricultural Impact Assessment and Outline Arboricultural Method Statement [APP-206]** provides a proportionate and robust assessment of effects, supported by mitigation and control measures that will govern subsequent detailed design. On this basis, the Applicant does not agree that arboricultural impacts have been inadequately assessed.
Given these limitations, the proposals presently do not demonstrate that arboricultural impacts have been properly assessed or mitigated. The uncertainty surrounding tree and hedgerow loss, combined with the inadequacy of supporting technical documents, represents a major issue for determination. Substantial revision, clearer commitments, and compliant arboricultural documentation will be required to	The Applicant does not agree that the proposals fail to demonstrate that arboricultural impacts have been properly assessed or mitigated. While some uncertainty is inherent at the DCO stage, arboricultural effects have been assessed using a precautionary reasonable worst-case approach consistent with the parameters-based nature of the application. Mitigation is secured through the **ES Volume 3, Appendix 10-1 Arboricultural Impact Assessment and Outline**

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ensure that harm to trees, hedgerows and ancient woodland is avoided or minimised.	**Arboricultural Method Statement [APP-206]** and the **Outline CEMP [REP1-096]**, which include clear commitments to avoidance, impact minimisation, tree protection and construction controls. These measures will govern detailed design and construction works, ensuring that impacts to trees, hedgerows and ancient woodland are avoided where reasonably practicable and appropriately managed where unavoidable. Further refinement of arboricultural details at the detailed design stage is an expected and accepted feature of the DCO process and does not indicate inadequacy in the assessment. On this basis, the Applicant considers that the information submitted is proportionate, policy-compliant and sufficient to support determination of the Application, and that substantial revision of the arboricultural documentation is not required.
Core Policy 50 – Biodiversity requires that all development should seek opportunities to enhance biodiversity. Major development in particular must include measures to deliver biodiversity gains through opportunities to restore, enhance and create valuable habitats, ecological networks and ecosystem services. Such enhancement measures will contribute to the objectives and targets of the Biodiversity Action Plan (BAP) or River Basin/Catchment Management Plan, particularly through landscape scale projects, and be relevant to the local landscape character.	The Scheme's compliance with Core Policy 50 is detailed in Annex B: Local Policy Accordance Tables of the **Planning Statement [REP1-087]** (see page 683). The Scheme delivers a number of enhancements, resulting in a number of significant beneficial effects including (but not limited to): 1. Overall significant beneficial effects at local level on grassland and various species as a result of the reversion of the arable fields which currently dominate

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	the Solar PV Sites to grassland for the lifetime of the Scheme; 2. Significant long term beneficial effects at a local level in relation to hedgerow and woodland habitats as a result of the proposed hedgerow, woodland and tree planting outlined in the **Outline LEMP [APP-283]**; 3. A significant beneficial effect at site-to-local level on the extent of standing water habitat as a result of the creation of new ponds. Details of the proposed ponds are set out in **ES Volume 2, Figure 3-4: Landscape and Ecology Mitigation Plan [REP1-029 to REP1-032]** and measures for their creation are set out in the **Outline LEMP [APP-283]**; and 4. A significant beneficial effect at site level on the quality of the local ditch and watercourse network. The Applicant is committed to delivering BNG. The Scheme will deliver, as a minimum, 10% BNG, which is secured via Requirement 9 in Schedule 2 to the **Draft DCO [REP1-007]**. The **BNG Assessment Report [REP1-089]** indicates that BNG in excess of 10% will be achieved, with a total net gain of 63.80% for area habitat units, 19.35% for hedgerow units and 25.30% for watercourse units in relation to the Solar PV Sites only. The total net gain for the whole Scheme (i.e. Solar PV Sites and Cable Route Corridor combined) is 36.10% for area habitat units, 12.74% for hedgerow units and 19.89% for

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	watercourse units, as set out in the **BNG Assessment Report [REP1-089]**. This is aligned with the proposals in the **Outline LEMP [APP-283]**. The **BNG Assessment Report [REP1-089]** demonstrates that the Scheme has the potential to achieve significant biodiversity net gain on site.
Core Policy 51 – Landscape requires that development should protect, conserve and where possible enhance landscape character and must not have a harmful impact upon landscape character, while any negative impacts must be mitigated as far as possible through sensitive design and landscape measures. Proposals should be informed by and sympathetic to the distinctive character areas identified in the relevant Landscape Character Assessment(s) and any other relevant assessments and studies. In particular, proposals will need to demonstrate that aspects of landscape character have been conserved and where possible enhanced through sensitive design, landscape mitigation and enhancement measures.	The Scheme's compliance with Core Policy 51 is detailed in Annex B: Local Policy Accordance Tables of the **Planning Statement [REP1-087]** (see page 687). In summary, the Applicant has adopted a landscape led approach to design, giving due weight to the intrinsic character and beauty of the surrounding countryside. The iterative design process has minimised landscape and visual effects including having regard to the special qualities of the Cotswolds National Landscape (CNL), with avoidance of panels close to the CNL, incorporation of offsets and buffers, enhancement measures to further the purposes of the CNL, and specific management regimes with respect to Lime Down A, B and C including wildflower meadow verges and maintaining hedgerows at their current height bordering the CNL within Lime Down C. Embedded mitigation and enhancement measures are incorporated into the Scheme as shown within **ES Volume 2, Figure 3-4: Landscape and Ecology Mitigation Plan [REP1-029 to REP1-032],** which forms part of the **Outline LEMP [APP-283].** Requirement 7 of the **Draft DCO [REP1-007]** requires the submission and approval of a landscape and

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	ecological management plan to be substantially in accordance with the Outline LEMP [APP-283] and for the landscape and ecological management plan to be implemented as approved. These measures and controls will ensure that the detailed design of the Scheme incorporates the landscape mitigation and enhancements included within the Outline LEMP [APP-283].
Core Policy 52 - Green infrastructure requires that development shall make provision for the retention and enhancement of Wiltshire's green infrastructure network and shall ensure that suitable links to the network are provided and maintained. If damage or loss of existing green infrastructure is unavoidable, the creation of new or replacement green infrastructure equal to or above its current value and quality, that maintains the integrity and functionality of the green infrastructure network, will be required. Proposals for major development should be accompanied by an audit of the existing green infrastructure within and around the site and a statement demonstrating how this will be retained and enhanced through the development process.	The Scheme's compliance with Core Policy 52 is detailed in Annex B: Local Policy Accordance Tables of the **Planning Statement [REP1-087]** (see page 692). Section 4.2 of the **Design Approach Document [APP-268]** sets out the positive design outcomes of the Scheme to ensure it is sustainable and sensitive to place, including green infrastructure considerations. The Scheme design integrates with the landscape, and where practicable, enhances the landscape and local green infrastructure network, to improve biodiversity and ecological connectivity across the Solar PV Sites. Enhancement measures will contribute to and strengthen the connectivity between a number of the Local Wildlife Sites located close to the Solar PV Sites and the local landscape, through the provision of new hedgerows, tree and woodland planting in the vicinity of the sites, and through the creation of areas of species rich grassland and scrub planting within the Solar PV Sites, which may provide ecological 'stepping stones' for various species within the local, largely arable landscape.

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	The **Design Principles and Parameters [REP1A-008]** sets out the design principles and parameters by which the Scheme has been designed, and the Environmental Impact Assessment has been undertaken. The design principles have informed the parameters which are secured by Requirement 5 in Schedule 2 of the **Draft DCO [REP1-007]** and apply to the detailed design of the Scheme post consent. The Landscape Strategy set out in the **Outline LEMP [APP-283]** aims to set out the approach to habitat creation and management in order to provide ecological enhancements, strengthen the green infrastructure within the local area, and to provide landscape and visual mitigation through screening of the Scheme. The **Outline LEMP [APP-283]** draws upon the Draft Wiltshire Local Nature Recovery Strategy (Ref 2) and sets out that the Scheme as designed will broadly contribute to these priorities. The **Outline LEMP [APP-283]** will be secured by Requirement 7 in Schedule 2 of the **Draft DCO [REP1-007].** Further, significant tree and woodland planting is proposed within the Order Limits as outlined in the **Outline LEMP [APP-283]**, which will result in the creation of 11.37 ha of new native broadleaved woodland. Locations for planting have been directed by the need for landscaping and visual impact mitigation, but opportunities have also been taken to connect habitat parcels. Once established, this level of woodland planting will result in a significant beneficial effect on the extent

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	of woodland within the Order Limits, which would, by extension, contribute to the connectivity of woodland stands and green infrastructure across the local landscape.
Development will not adversely affect the integrity and value of the green infrastructure network, prejudice the delivery of the Wiltshire Green Infrastructure Strategy, or provide inadequate green infrastructure mitigation.	Please see Applicant's response above. It is considered that the Scheme will strengthen Green Infrastructure within the local area and not prejudice delivery of the Wiltshire Green Infrastructure Strategy.
Green infrastructure projects and initiatives that contribute to the delivery of a high quality and highly valued multi-functional green infrastructure network in accordance with the Wiltshire Green Infrastructure Strategy will be supported. Contributions (financial or other) to support such projects and initiatives will be required where appropriate from developers.	Please see Applicant's response above. It is considered that the Scheme will strengthen Green Infrastructure within the local area.
Positive impacts – Construction Phase Considering the current status of the trees within the natural environment of the proposed solar park, there are no positive impacts relating to construction or operational.	The Applicant notes this comment.
Positive impacts – Operational None identified.	The Applicant notes this comment.
Positive impacts – Decommissioning Phase None identified.	The Applicant notes this comment.
Neutral impacts	The Applicant notes this comment.

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None identified.	
Negative impacts – Construction Phase The construction phase is going to result in a significant loss of both trees and hedgerows, and the impacts will differ between the construction of the Solar PV sites, the cable route corridor and BESS. Whilst tracks are being installed to make the sites accessible during operation, the construction traffic will require a more substantial area of ground for movement due to the size of some of the machinery, resulting in the loss of well-established hedgerows and trees, and subsequently canopy cover and wildlife habitat, as well as potential for loss of parts of ancient woodland.	The Applicant notes this response. Indicative widths for access points, internal tracks, passing places and the cable route corridor are set out within the application and have informed the assessment presented in **ES Volume 1, Chapter 10: Arboriculture [APP 062]** and the **ES Volume 3, Appendix 10-1 Arboricultural Impact Assessment and Outline Arboricultural Method Statement [APP-206]**. As set out in the **Outline CEMP [REP1-096]**, a detailed Arboricultural Method Statement (AMS) will be prepared following the grant of the DCO and prior to construction commencing. The detailed AMS will include more precise measurements of access routes and details of any tree removal or protection measures informed by post consent detailed design.
Negative impacts – Construction Phase Despite creating a 15m buffer zone to protect the boundaries of trees and woodland, intrusion into this area will be required to accommodate construction traffic. This has potential to cause permanent damage to ancient woodland.	The Applicant notes this comment. Where encroachment into unprotected RPAs occurs, or where the construction traffic would constitute a change of use from its normal traffic, precautionary methods of protection such as ground protection will be installed to protect RPAs. This is set out in **ES Volume 3, Appendix 10-1 Arboricultural Impact Assessment and Outline Arboricultural Method Statement [APP-206]** Section 6.11 and ground protection discussed in detail in Section 6.9 of the same document.

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Negative impacts – Construction Phase Although hedgerows are discussed within the ecology section, and the Arboricultural section of the application covers impacts on trees and woodlands only, it does not go unnoticed that there are 32 pages within the Draft DCO Schedule 12, Part 1 and Part 2, of 3.1 Draft DCO [REP1-007] that identifies parts of hedgerows for removal to facilitate the construction and ongoing operational requirements of the Solar Park. No measurements of removal have been provided, therefore the removal of part of a hedgerow, for example Part 2 Ancient Hedgerow Removal CRH24 "Removal of part of approximately 694m of hedgerow within the area identified by an orange line on sheet 16 of the hedgerows plan" could potentially result in the removal of 690m of ancient hedgerow as drafted. It should be noted that under the Hedgerow Regulations 1997, most hedgerows likely to be removed within Schedule 12, Part 1 to Part 2 of 3.1 Draft DCO [REP1-007] would require consent from the Local Planning Authority, with sufficient reasoning and reinstatement/replacement plans provided.	The assessment of effects of hedgerows presented in **ES Volume 1, Chapter 9: Ecology and Biodiversity [REP1-015]** has been undertaken using precautionary worst-case assumptions, including the reasonably anticipated maximum extent of temporary and permanent hedgerow removal. A reasonable estimate of calculated permanent and temporary hedgerow removal requirements are set out in **ES Volume 1, Chapter 9: Ecology and Biodiversity [REP1-015]** (Paragraphs 9.10.137 to 9.10.138). As described, the proportion of hedgerow loss relative to the total extent of existing hedgerows listed is relatively small for both the Solar PV Sites (less than 1% of hedgerows to be removed) and the Cable Route Corridor (approximately 3.5% of hedgerows to be removed). The reasonably anticipated maximum extent of temporary and permanent hedgerow removal is shown on a plan ('Hedgerow Removal Plan') within Annex A of the **Outline EPMS [REP1-106].** The Applicant acknowledges the final extent of permanent and temporary hedgerow removal cannot be determined until the detailed design stage, hence the wording of Schedule 12 of the **Draft DCO [REP1-007]** has sought to retain necessary flexibility. The estimates provided in **ES Volume 1, Chapter 9; Ecology and Biodiversity [REP1-015]** and shown within Annex A of the **Outline EPMS [REP1-106]** are however

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	considered reasonable precautionary, and a likely worst-case scenario.
Negative impacts – Construction Phase The 6.3 Environmental Statement Volume 3, Appendix 10-1 Arboricultural Impact Assessment and Outline Arboricultural Method Statement [APP-206] is not currently listed within Schedule 13 of 3.1 Draft DCO [REP1-007] but should be included in its own right for clarity. The Arboricultural Impact Assessment (AIA) highlights that arboricultural impacts remain uncertain because plans for trenching, permanent easements, temporary access points and visibility splays are only indicative until finalised post-DCO by the engineering team. As a result, tree removal may be required to achieve necessary working widths, trenching space, easements and construction access, with further root and canopy impacts possible where access tracks need widening or resurfacing. These effects could extend to ancient woodland, category A–C trees and potentially hedgerows along the Cable Route Corridor.	The Applicant notes the comment regarding Schedule 13 of the **Draft DCO [REP1-007].** Schedule 13 secures the ES as a certified document. **ES Volume 3, Appendix 10-1 Arboricultural Impact Assessment and Outline Arboricultural Method Statement [APP-206]** are therefore already secured through this mechanism. As appendices to the ES, they do not require separate listing in Schedule 13 in order to be legally effective or enforceable. In relation to arboricultural impacts at the detailed design stage, the Applicant confirms that the assessment presented within the AIA has been undertaken on a reasonable worst-case basis in accordance with the Rochdale Envelope principles. Indicative layouts for trenching, easements, access and visibility requirements reflect the maximum reasonably foreseeable spatial requirements, ensuring that the potential for effects on trees and woodland, including ancient woodland and Category A–C trees is not underestimated. Whilst detailed engineering design will be progressed post-DCO, any refinement will be undertaken within the parameters assessed and in accordance with the principles, avoidance measures and protection requirements set out in the Outline Arboricultural Method Statement. As such, actual

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	impacts are anticipated to be equal to or less than those assessed within the Environmental Statement. Should any future detailed design proposals give rise to effects that would materially exceed the assessed worst-case envelope, the Applicant acknowledges that these would need to be considered through the appropriate consent mechanisms. However, the Applicant considers that the assessment and control frameworks secured through the ES and **Appendix 10-1 Arboricultural Impact Assessment and Outline Arboricultural Method Statement [APP-206]** provide sufficient certainty that unacceptable arboricultural impacts will be avoided.
Negative impacts – Construction Phase The Outline Arboricultural Method Statement (OAMS) is not written in accordance with BS5837:2012 and leaves all processes open to misinterpretation. The use of hand dig in areas where roots are likely to be present, such as within the Root Protection Area (RPA), is ambiguous and undefined, as is the methods and materials proposed for construction of every part on infrastructure that could have potential negative impacts on trees and their roots. It should be noted that the RPA is a guideline by BS5837:2012 for the prevention of the destruction of roots during excavation, and the subsequent loss of trees, however soil contamination can result outside of the RPA when using chemicals, such as concrete or bitumen, and therefore	The Applicant notes this comment and does not agree that **ES Volume 3, Appendix 10-1 Arboricultural Impact Assessment and Outline Arboricultural Method Statement (OAMS) [APP-206]** is non-compliant with BS 5837:2012. The OAMS has been prepared in accordance with the principles and intent of the Standard, recognising that it is an outline document appropriate to the DCO stage rather than a fully detailed, site-specific method statement. The OAMS sets out clear high-level methodologies and controls for working in proximity to trees, including works within or adjacent to Root Protection Areas (RPAs). References to hand-digging within RPAs are intentionally precautionary and reflect accepted good practice under BS 5837, with the precise

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additional methods are required to prevent leaching and uptake from fibrous roots.	techniques, sequencing and supervision arrangements to be confirmed within the Detailed Arboricultural Method Statement. Preparation and approval of the Detailed AMS is secured through the **Outline CEMP [REP1-096]**, ensuring compliance prior to construction. The Applicant acknowledges that RPAs are not absolute limits of root influence and that risks such as soil contamination can extend beyond RPAs. Accordingly, the OAMS and Outline CEMP include measures to control material handling, surface treatments and construction activities to prevent contamination, compaction and adverse changes to soil conditions. These measures will be further refined where necessary at the detailed design stage. The Applicant therefore considers that the OAMS provides an appropriate and robust framework to manage arboricultural risks, with sufficient flexibility to accommodate detailed design while ensuring that tree protection, root preservation and pollution prevention measures are implemented in line with BS 5837:2012. On this basis, the Applicant does not agree that the OAMS leaves processes open to misinterpretation or that arboricultural impacts are inadequately controlled.
Negative impacts – Construction Phase A temporary construction compound for the Cable Route Corridor is proposed within the 15m wide ancient woodland	The Applicant notes this comment. The proposed use of the existing track within the ancient woodland buffer has been assessed on a precautionary basis. Where the track is insufficient to accommodate heavy, wide or abnormal loads,

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buffer zone of W0001 - Surrendell Wood. Whilst the existing gravel track may be compacted from use of heavy machinery, it may not be wide enough for the unusual wide and tall loads required to facilitate the construction of the cable route.	works will be undertaken only in accordance with bespoke mitigation such as no-dig construction and ground protection measures designed to prevent compaction, rutting and damage to both above- and below-ground tree components. Details of specific mitigation methods are to be addressed within the Detailed AMS. Any temporary widening, load distribution or surface enhancement required to facilitate construction will be subject to arboricultural input and implemented in accordance with the **ES Volume 3, Appendix 10-1 Arboricultural Impact Assessment and Outline Arboricultural Method Statement [APP-206]** and **Outline CEMP [REP1-096].** Measures may include the use of temporary ground protection systems, load-spreading solutions and restricted vehicle movements, ensuring that construction activities do not result in harm to retained trees or the adjacent ancient woodland. On this basis, the Applicant considers that potential impacts associated with construction access within the buffer zone can be effectively managed and do not represent an unacceptable risk to Surrendell Wood.
Negative impacts – Construction Phase It is also noted that the 6.2 Environmental Statement Volume 2, Figure 3-4-1 to 3-4-5.2 Landscape and Ecology Mitigation Plan [APP-084] does not demonstrate Surrendell Wood in its	The Applicant notes this comment. **ES Volume 2, Figure 3-4: Landscape and Ecology Mitigation Plan [REP1-029 to REP1-032]** show only the proposed permanent (i.e. for the lifespan of the Scheme) elements of the Scheme at the Solar PV Sites, including Solar PV Infrastructure, BESS components,

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entirety, nor the proposed adjacent temporary construction compound. There are no mitigated measures shown for this area, as suggested for the rest of the plans.	access, and all habitat creation and enhancement measures. The Landscape and Ecology Mitigation Plans do not show temporary elements of the Scheme such as construction compounds or works associated with cable installation. Surrendell Wood is not shown in its entirety as it lies south of Lime Down C and does not fall within the area covered by the Solar PV Sites and no permanent (for the lifespan of the Scheme) habitat creation measures are proposed within the Cable Route Corridor south of Lime Down C, as all land will be returned to the landowner on completion of works.
Negative impacts – Construction Phase The 6.2 Environmental Statement Volume 2, Figure 10-2-1 to 10-2-23 Tree Impacts Plans [APP-134] fail to clearly identify the 15m buffer zone. The plans show proposed location of the tracks (identified on the plans as a brown line) and the field accesses and cross over points in relation to retained trees, woodlands and hedgerows. The tracks, accesses and crossover points are clearly within proximity to the RPA of many trees and hedgerows, increasing the possibility of damage to the roots during excavation and installation. By moving the tracks and access away from the trees and towards the fields by metres, it will reduce the impact on these trees and hedgerows, resulting in the possible retention of the A, B and C category trees mentioned in the Arboricultural Impact Assessment [APP-206], and reduce the amount of hedgerow	The Applicant notes this comment. The extent of ancient woodland buffer zones has been clearly identified within the ES, including **Figure 9-1-5 (Priority Habitats and Ancient Woodland within 2km of the Solar PV Sites)** and **Figures 9-1-6 to 9-1-7 (Priority Habitats and Ancient Woodland within the Cable Route Corridor) [APP-111/APP-112].** These figures provide the appropriate environmental context for understanding constraints associated with ancient woodland. **ES Volume 2, Figures 10-2-1 to 10-2-23: Tree Impact Plans [APP-134]** are intended to illustrate the maximum potential extent of works in relation to trees, hedgerows and woodlands and are therefore deliberately indicative. They do not represent final engineering layouts. This precautionary approach ensures that impacts to Root Protection Areas (RPAs) have not been underestimated at this stage.

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removal mentioned in Schedule 12, Part 1 to Part 2, of 3.1 Draft DCO [REP1-007].	The Applicant acknowledges that refinement of access tracks, crossing points and field accesses at the detailed design stage may present opportunities to further reduce impacts on individual trees, hedgerows and RPAs. Such refinements are anticipated and encouraged through the secured mitigation framework but cannot be fixed at this stage due to the parameters-based nature of the DCO application. Commitments to avoidance, minimisation and protection of retained trees and hedgerows are secured through Section 3.5 and Table 4 of the **Outline CEMP [REP1-096].** RPAs will be protected through a combination of appropriate tree protection fencing, ground protection measures and controlled working methods, with all site-specific requirements to be detailed and agreed within the Detailed Arboricultural Method Statement prior to construction. On this basis, the Applicant considers that the submitted plans and secured mitigation provide sufficient certainty that impacts to Category A, B and C trees, hedgerows and woodland will be appropriately managed, and that opportunities to reduce impacts through detailed design will be realised without undermining the conclusions of the Environmental Statement.
Negative impacts – Construction Phase The potential loss of trees and hedgerows due to the impacts of the proposed location of the tracks and accesses is not	The Applicant notes this comment but does not agree that the inclusion of construction-phase arboricultural impacts within the Rochdale Envelope approach is inappropriate. The Rochdale Envelope is an established and accepted methodology for DCO

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considered appropriate to be included within The Rochdale Envelope due to the irreversible reduction of the overall arboricultural footprint. The Tree Impacts Plans [APP-134] need to be revised to show that this has been achieved, and these need to be submitted prior to determination of the DCO, with sufficient time to ensure that all arboricultural features have been given consideration. Justification for the inclusion into the RPA of each tree or hedgerow should be provided in the event that this is not achievable.	applications and is regularly applied to construction activities, including those that may give rise to permanent environmental effects, provided that those effects are properly assessed on a reasonable worst-case basis. **ES Volume 2, Figures 10-2-1 to 10-2-23: Tree Impact Plans [APP-134]** have been prepared to illustrate the maximum potential extent of track alignments and access locations in relation to trees and hedgerows, thereby ensuring that the potential for arboricultural impacts has not been underestimated. This precautionary approach does not preclude further design refinement; rather, it ensures that the Environmental Statement robustly accounts for the greatest reasonably foreseeable effects. The Applicant acknowledges that detailed design refinement may present opportunities to reduce impacts on individual trees, hedgerows and RPAs. However, the DCO application does not seek approval for fixed final layouts, and it would not be proportionate or appropriate to require finalised track and access positions prior to determination, given the parameters-based nature of the consent being sought. Where works within RPAs are currently identified, these reflect worst-case assumptions. Any such works will be justified at the detailed design stage and managed in accordance with the secured mitigation framework, including **ES Volume 3, Appendix 10-1 Arboricultural Impact Assessment and**

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	Outline Arboricultural Method Statement [APP-206] and **Outline CEMP [REP1-096].** The Detailed Arboricultural Method Statement will provide site-specific justification, methodology and protection measures where incursion into RPAs cannot reasonably be avoided. On this basis, the Applicant considers that the information submitted provides sufficient certainty that arboricultural impacts have been properly assessed and that further refinement can be achieved through secured post-consent mechanisms. The Applicant does not therefore consider that revision of the Tree Impact Plans to fix layouts prior to determination is necessary to support a robust and lawful decision on the Application.
Negative impacts – Construction Phase The Tree Impacts Plans [APP-134] should provide precise details of proposed Solar PV sites, associated infrastructure, the cable route, and access tracks in relation to trees, groups and woodlands. It has plotted the trees, groups, and woodlands with the Solar PV area and tree survey reference number. The category of the trees, groups, and woodlands are also identified on the plans as a small centre colour indicating the stem location, however due to the poor resolution it is not always possible to determine the colour. This requires constant relaying between the Tree Impacts Plans and the Tree Survey	The Applicant notes this comment. **ES Volume 2, Figures 10-2-1 to 10-2-23: Tree Impact Plans [APP-134] (TIP)** have been prepared using the most up-to-date design information available at the time of submission and are intended to illustrate the relationship between the proposed works and arboricultural features on a reasonable worst-case basis. The TIP clearly identify all surveyed trees, groups and woodlands, including tree survey reference numbers and BS 5837:2012 Quality Categories, which are shown on the plans as central coloured symbols in line with BS 5837:2012 guidance. The Applicant considers that the plans are presented at an appropriate scale and resolution for the purposes of a

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Schedule [APP-208], and the category should be clearly shown next to the tree survey reference number.	parameters-based DCO application and that the information is legible when viewed as intended. The BS 5837:2012 quality subcategories (e.g. A1, A2, A3) are not repeated on the Tree Impact Plans, as these subcategories are afforded equal weight within the Standard and do not alter the assessment of constraint or impact. Full category and subcategory information for each arboricultural feature is provided within **ES Volume 3, Appendix 10-3: Tree Survey Schedule [APP-208],** which is clearly cross-referenced from the plans. When read together, the Tree Impact Plans, Tree Survey Schedule and Arboricultural Impact Assessment provide sufficient and proportionate information to understand the nature, value and sensitivity of affected arboricultural features. The Applicant therefore does not agree that additional labelling is necessary to support determination of the Application.
Negative impacts – Construction Phase There is no information regarding the foundations of the BESS other than a small paragraph within 7.4 Design Principles and Parameters [REP1A-008] which relies on soil type for the type and depth of foundations possibly required. As these sites are limited in number, it would be hoped that the soil type and investigations would have determined the extent of the foundations and subsequently the proposed methods and	The Applicant notes this comment. Where required, for excavations within the RPAs of retained trees, mitigation measures will be implemented to ensure minimal harm to trees. Detailed working methods for within and around RPAs as well as bespoke mitigation measures for working within RPAs will be contained within the Detailed AMS which will be produced and is secured in the **Outline CEMP [REP1-096]** Section 3.5, Table 4.

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materials to be used for installation. It should be noted that sufficient and appropriate impermeable membrane root barriers will be required prior to installing any type of pile and/or strip foundation.	
Negative impacts – Operational The presence of the Solar PV Sites will require constant monitoring and maintenance of trees and hedgerows to ensure that they do not create a hazard to the operation of the panels, or a safety risk to those attending the site. Redirection of footpaths and bridleways will also result in long term management and subsequently works to trees.	The Applicant notes this response.
Negative impacts – decommissioning phase None identified.	The Applicant notes this comment.
Ranking the Arboriculture Impacts in Importance All the local impacts identified are considered material to the ExA, but in accordance with the national guidance[12] the council would indicate the following as the most significant in relation to this theme:	The Applicant responds to specific comments regarding arboriculture below.

[12] Planning Inspectorate Advice Note 1, Local Impact Reports, Version 2, April 2012

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1. Whilst predominately addressed within Ecology, 6.1 Environmental Statement Volume 1, Chapter 9 Ecology and Biodiversity [APP-061], the biggest impact on the whole site, including Solar PV sites and the cable route corridor is the potential loss of important hedgerows, the amount of which is indeterminate due to lack of information within Schedule 12 of the Draft DCO [REP1-007]. Whilst loss of trees is also inevitable, the loss of wildlife habitat, visual and sound screening, and soil disruption comprises of the eradication of important features of the Wiltshire countryside. As mentioned above, these important hedgerows are protected by the Hedgerow Regulations 1997. It is not considered appropriate for the removal of important hedgerows to be associated with the Rochdale Envelope as their removal should be defined.	The assessment of effects of hedgerows presented in **ES Volume 1, Chapter 9: Ecology and Biodiversity [REP1-015]** has been undertaken using precautionary worst-case assumptions, including the reasonably anticipated maximum extent of temporary and permanent hedgerow removal. A reasonable estimate of calculated permanent and temporary hedgerow removal requirements are set out in **ES Volume 1, Chapter 9: Ecology and Biodiversity [REP1-015]** (Paragraphs 9.10.137 to 9.10.138). As described, the proportion of hedgerow loss relative to the total extent of existing hedgerows listed is relatively small for both the Solar PV Sites (less than 1% of hedgerows to be removed) and the Cable Route Corridor (approximately 3.5% of hedgerows to be removed). The reasonably anticipated maximum extent of temporary and permanent hedgerow removal is shown on a plan ('Hedgerow Removal Plan') within Annex A of the **Outline EPMS [REP1-106].** The Applicant acknowledges the final extent of permanent and temporary hedgerow removal cannot be determined until the detailed design stage, hence the wording of Schedule 12 of the **Draft DCO [REP1-007]** has sought to retain necessary flexibility. The estimates provided in **ES Volume 1, Chapter 9; Ecology and Biodiversity [REP1-015]** and shown within Annex A of the **Outline EPMS [REP1-106]** are however

Wiltshire Council Comments	Applicant's Response
	considered reasonable precautionary, and a likely worst-case scenario.
2. The Arboricultural Impact Assessment and Outline Arboricultural Method Statement Ref [APP 206] is not included in Schedule 13 of the 3.1 Draft DCO [REP1-007] – Documents and Plans to be certified Part 1. This document should be added for its own merits for clarity, rather than its contents redistributed across other sections of the DCO.	The Applicant notes this comment. **ES Volume 3, Appendix 10-1 Arboricultural Impact Assessment and Outline Arboricultural Method Statement [APP-206]** form an appendix to the ES, which is itself listed as a certified document within Schedule 13 of the **Draft DCO [REP1-007].** As part of the Environmental Statement, the AIA and OAMS are therefore already certified and secured through the DCO and do not require separate listing in Schedule 13 in order to be legally effective or enforceable. The Applicant considers that this approach is consistent with standard DCO practice and provides sufficient clarity, as the document is clearly identified, publicly available and relied upon within the Environmental Statement and associated mitigation framework. On this basis, the Applicant does not agree that separate certification of the AIA and OAMS is necessary.
3. Arboricultural impacts discussed within the AIA are ambiguous as the plans and statements provided are indicative. Given that the exact location of the trenching and permanent easement of the cable route corridor will be determined post-DCO by the engineering team, the temporary access points and visibility splays are indicative only at this stage.	The Applicant notes this comment. While the precise locations of trenching, permanent easements, access points and visibility splays will be confirmed at the detailed design stage, this reflects the parameters-based nature of the DCO application and is an accepted feature of nationally significant infrastructure projects. **ES Volume 3, Appendix 10-1 Arboricultural Impact Assessment and Outline Arboricultural Method Statement [APP-206]** addresses this

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As stated in the AIA, ES Volume 3, Appendix 10-1: Arboricultural Impact Assessment and Outline Arboricultural Method Statement [APP-206] removal of trees could be required to achieve the required working corridor widths, space for trenching and permanent easements around the cable to ensure no long-term interference from tree roots. Removal may also be required to achieve temporary access points and visibility splays into the Cable Route Corridor for construction machinery. Root and canopy impacts along the Cable Route Corridor may occur should the existing access track need to be widened or resurfaced, resulting in potential RPA incursions for open cut sections of the cable route. This will affect ancient woodland, A, B and C category trees, and potentially hedgerows.	uncertainty through a precautionary reasonable worst-case assessment, ensuring that the potential for tree removal, RPA incursion and canopy impacts along the Cable Route Corridor has not been underestimated. References within the AIA to possible tree removal or root disturbance reflect this conservative approach rather than an expectation that all such impacts will occur. Potential impacts associated with access track widening or resurfacing have likewise been assessed on a worst-case basis and will be controlled through the mitigation secured within **ES Volume 3, Appendix 10-1 Arboricultural Impact Assessment and Outline Arboricultural Method Statement [APP-206]** and the **Outline CEMP [REP1-096],** with detailed design progressed within the assessed parameters and informed by arboricultural constraints to avoid and minimise effects on ancient woodland and Category A,B and C trees wherever reasonably practicable.

14 Ecology and Biodiversity

Table 14-1 - Ecology and Biodiversity

Wiltshire Council Comments	Applicant's Response
Note for Examining Authority and Secretary of State This explanatory note seeks to provide a rationale for the attention and consideration of the Examining Authority (ExA) and Secretary of State (SoS) as to why there is an inconsistency between the impacts discussed within Section 16 of the LIR and the issues discussed within the council's Written Representation, both of which are for submission at Deadline 1 (1 May 2026).	The Applicant notes this comment,
As part of the Applicant's response to Procedural Deadline A on 9 March 2026, a Statutory Biodiversity Net Gain (BNG) Metric [PDA-008] was submitted to the Planning Inspectorate (PINS) as an unlocked excel spreadsheet given that this had not been provided as part of the application for a Development Consent Order (DCO) submitted to the PINS on Friday 19 September 2025. The submitted Statutory BNG Metric was published on the PINS website on 11 March 2026.	The Applicant confirms the unlocked version of the **Biodiversity Net Gain Assessment (BNG) Appendix Statutory Biodiversity Metric Calculation [PDA-008]** was submitted at Procedural Deadline A on 9 March 2026 and has since been updated at Deadline 1, **BNG Appendix Statutory Biodiversity Metric Calculation [REP1-091].**
The omission of the Statutory BNG Metric as an unlocked excel spreadsheet from the DCO application and the implications in terms of this preventing a full and proper review of the DCO application, was raised in Wiltshire Council's Relevant Representation [RR-4934] submitted to PINS on 9 January	The Applicant notes this comment,

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2026. The council's Ecology Officer has therefore reviewed this substantive and important recent submission provided at Procedural Deadline A, alongside the extant 7.8 Biodiversity Net Gain Assessment Report [APP-273] and the remainder of the DCO application to ensure any resulting comments necessary have been incorporated within the council's Written Representation.	
Given the substantive new submission at Procedural Deadline A requiring the Ecology Officer's attention and the requirement for any observations arising from this review to be reported in the council's Written Representation within a short timeframe, this has resulted in an unavoidable inconsistency between the content of Section 16 of the LIR and the council's Written Representation. Moreover, it has impeded the council's ability to provide fully comprehensive comments and conclusions within the required timeframes.	The Applicant apologises for the **BNG Appendix Statutory Biodiversity Metric Calculation [REP1-091]** not originally being provided in the unlocked format in addition to the PDF. This omission has now been rectified as noted by Wiltshire Council.
This situation has ultimately arisen on account of the late submission of the Statutory BNG Metric in the correct format, which should have been provided at the point of submission of the application for the DCO.	The Applicant notes the identified difference between the Written Representation and the LIR and thanks Wiltshire Council for drawing this to our attention. Where discrepancies are identified between the two documents the Applicant will assume the Written Representation represents the latest position of the Ecology Officer in any aspects relating to the **BNG Appendix Statutory Biodiversity Metric Calculation [REP1-091].**

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It is anticipated that the discrepancy between the council's LIR and Written Representation will comprise a matter that can be resolved through the Examination process. The council therefore trusts that this note serves as satisfactory explanation for the unavoidable discrepancy between the two documents in light of the short timeframes involved, and that this will not prejudice the ExA's or SoS's consideration of these documents.	The Applicant notes this comment,
Overview and commentary Wiltshire Council has regulatory responsibility for managing Wiltshire's natural environment. In the Wiltshire Core Strategy (Jan 2015) Policy 50 states development proposals must demonstrate how they protect features of nature conservation as part of the design rationale. There is an expectation that such features shall be retained, sufficiently buffered, and managed favourably to maintain their ecological value, connectivity and functionality in perpetuity. Where it has been demonstrated that such features cannot be retained, removal or damage shall only be acceptable in circumstances where the anticipated ecological impacts have been mitigated as far as possible and appropriate compensatory measures can be secured to ensure no net loss of the local biodiversity resource, and secure the integrity of local ecological networks and provision of ecosystem services.	The Applicant notes the Council's role. The Scheme's compliance with Core Policy 50 is detailed in Annex B: Local Policy Accordance Tables of the **Planning Statement [REP1-087]** (see page 683).
Whilst it is recognised that BNG is not yet mandatory for nationally significant infrastructure projects (NSIPs) and that	The Applicant notes this comment. The Scheme is expected to deliver an overall net gain for biodiversity. This is quantified

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the Department for Environment, Food and Rural Affairs (DEFRA) announced on 15 April 2026 that it will implement a mandatory BNG framework for NSIPs from November 2026, the applicant has committed to delivering at least 10% BNG for the Lime Down Solar Park project. Furthermore, it is assumed that the applicant has used the on-site BNG post intervention projections presented in the Biodiversity Net Gain Assessment Report [APP-273] to substantiate and evidence the habitat mitigation, enhancement and creation proposals discussed and relied upon in the DCO application.	through the use of the DEFRA published **BNG Appendix Statutory Biodiversity Metric Calculation [REP1-091]** with further details provided with the **BNG Assessment Report [REP1-089]**. These two documents demonstrate how the Scheme will deliver in excess of 10% BNG. The total net gain for the whole Scheme (i.e. Solar PV Sites and Cable Route Corridor combined) is anticipated to be 36.10% for area habitat units, 12.74% for hedgerow units and 19.89% for watercourse units. Requirement 9 (Biodiversity net gain) of Schedule 2 (Requirements) to the **Draft DCO [REP1-007]** also provides that no part of the authorised development may commence until a biodiversity net gain strategy has been submitted to and approved by Wiltshire Council in consultation with the relevant statutory nature conservation body. Requirement 9 requires that the biodiversity net gain strategy must include details of how the Scheme will secure a minimum of 10% biodiversity net gain in habitat units, hedgerow units and river units during operation.
The overall impact from habitat loss, fragmentation, severance and land use change of the Lime Down Solar Park proposal is considered to be significantly negative across all phases of the project. Due to the scale of the development, there are concerns regarding substantial loss of, damage to and fragmentation of the established and important network of	The Applicant notes this comment summarising the Council's view, on overall impacts, and responses to each of the detailed comments on these matters are provided below.

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hedgerows across the Solar PV Sites and the extensive Cable Route Corridor (CRC), where the cabling is to be laid close to field boundaries impacting proposed buffer zones according to 6.1 Environmental Statement Volume 1, Chapter 2 The Order Limits [APP-054]. This would result in the loss of habitats of high intrinsic biodiversity value and of value to protected species, Species of Principal Importance (SPI) and Birds of Conservation Concern (BoCC). The loss of hedgerows and hedgerow trees, as well as other neutral grassland and cattle-grazed pasture within the Solar PV Sites and CRC will result in the long-term loss and fragmentation of habitat used by bats for foraging, commuting and likely for roosting. Loss of farmland and land use change within Solar PV Sites will also lead to substantive loss of breeding bird habitat and displacement of large numbers of birds during the breeding season. The main impacts of the scheme are summarised in the table below.	
Positive impacts – Construction Phase None identified for the Solar PV Sites at Lime Down Areas A to E or for the Cable Route Corridor (CRC).	The Applicant notes this comment.
Positive impacts – Operational None identified. The applicant may suggest that the Scheme will deliver biodiversity net gain (BNG) during the operational phase and that this will comprise a positive impact. It is	The Applicant notes this comment and a copy of the **Statutory Biodiversity Net Gain Metric [PDA-008]** in excel form was submitted at Procedural Deadline A, with an updated version of the **BNG Appendix Statutory Biodiversity Metric**

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acknowledged that BNG is not yet mandatory for NSIPs and that DEFRA postponed the commencement date from November 2025 to May 2026, and then on 15 April 2026 a further update was published, which specified that DEFRA will implement a mandatory BNG framework for NSIPs from November 2026. This proposed commencement date will be post the Examination of the DCO application. Nevertheless, the applicant has committed to ensuring that the Lime Down Solar Park project attains at least 10% BNG. A BNG Assessment Report [APP-273] and Biodiversity Net Gain Assessment Appendix Statutory Biodiversity Metric Calculation [APP-274] was submitted as part of the DCO application. However, APP-274 was not submitted in the requisite form which constitutes an unlocked excel version of the Statutory Biodiversity Metric but instead was submitted as a pdf document with screenshots of pages from the metric. Therefore, the council's more detailed comments on the BNG submission in the correct format [PDA-008], are contained within the council's Written Representation, which will also be submitted at Deadline 1. In summary, there are a number of queries and concerns raised by the council is respect of the submitted Statutory BNG metric and as a result, the council is unable to thoroughly review or verify the metric calculations.	**Calculation [REP1-091]** and **BNG Assessment Report [REP1-089]** submitted at Deadline 1 to reflect completed ecological baseline surveys within the Cable Route Corridor. The Applicant strongly disagrees with the Council's view that the Scheme will deliver no positive impacts during the Operation and Maintenance Phase. The Scheme is expected to deliver an overall net gain for biodiversity as a result of the cessation of agricultural practices combined with delivery of considerable habitat creation and enhancement measures across the Solar PV Sites. This is quantified through the use of the DEFRA published **BNG Appendix Statutory Biodiversity Metric Calculation [REP1-091]** with further details provided with the **BNG Assessment Report [REP1-089]** which demonstrates in excess of 10% BNG will result from the Scheme. Requirement 9 (Biodiversity net gain) of Schedule 2 (Requirements) to the **Draft DCO [REP1-007]** also provides that no part of the authorised development may commence until a biodiversity net gain strategy has been submitted to and approved by Wiltshire Council in consultation with the relevant statutory nature conservation body. Requirement 9 requires that the biodiversity net gain strategy must include details of how the Scheme will secure a minimum of 10% biodiversity net gain in habitat units, hedgerow units and river units during operation.

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	Notwithstanding the quantified Biodiversity Net Gain calculations, the assessment of effects contained within **ES Volume 1, Chapter 9: Ecology and Biodiversity [REP1-015]** describes how positive impacts on a number of ecological features are anticipated for the Operation and Maintenance Phase of the Scheme, including other neutral grassland, woodland, ponds, hedgerows, ditches and watercourses, badgers, foraging/commuting bats, dormice, brown hare, harvest mice, hedgehogs, polecats, amphibians, reptiles, breeding bird assemblages, overwintering bird assemblages, and terrestrial invertebrates. Positive impacts on these features are anticipated primarily as a result of the cessation of arable farming practices and increased extent and/or quality of habitats expected to be delivered and managed during the Operation and Maintenance Phase. Creation of habitats of value to wildlife, such as woodlands, trees, hedgerows, ponds and low agricultural input grassland across the Solar PV Sites can be unequivocally expected to result in positive impacts for a number of ecological features in comparison to the existing primarily arable habitats present. The expected positive impacts are described in detail within **ES Volume 1, Chapter 9: Ecology and Biodiversity [REP1-015]** and are summarised in Section 9.13 of the Chapter.
Positive impacts – decommissioning phase None identified.	The Applicant notes this comment.

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Neutral impacts None identified.	The Applicant notes this comment.
Negative impacts – Construction Phase Habitat Loss, Damage and Fragmentation Hedgerows, Trees and Woodland Section 9.9 of the 6.1 Environmental Statement Volume 1, Chapter 9 Ecology and Biodiversity [APP-061] details 'embedded' design measures. Under the heading of 'Construction Phase Embedded Mitigation' it is detailed that buffers from field boundary habitats and other ecological features will be implemented and that buffers will not contain any array structures, hard standing or electrical hardware. Paragraph 3.3.65 of 6.1 Environmental Statement Volume 1, Chapter 3 The Scheme [APP-055] states: *'Wherever practicable, existing field accesses will be utilised for access to the Order Limits. If a suitable field access does not exist, for example due to poor highway visibility, new accesses would be constructed. Accesses would be designed to ensure there are no impacts on veteran or protected trees as a result of vehicle movements, however, there may be localised removal of sections of hedgerows as required, e.g. for visibility splays.'*	The Applicant notes this comment regarding embedded mitigation and Scheme design principles.
Negative impacts – Construction Phase Habitat Loss, Damage and Fragmentation	The Applicant notes this comment.

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Hedgerows, Trees and Woodland Nonetheless, Schedule 12 ('Hedgerows to be Removed') Part 1 of the 3.1 Draft DCO [REP1-007] comprises a table that lists hedgerows which will be subject to removal work according to the title of Schedule 12 and the 'Extent of removal' descriptions specified in column (2) against each of the hedgerows; and Schedule 12 Part 2 comprises a table that extends over numerous pages and lists the important hedgerows which will be subject to removal work according to the title of Schedule 12 and the 'Extent of removal' descriptions specified in column (2) against each of the hedgerows.	
Negative impacts – Construction Phase Habitat Loss, Damage and Fragmentation Hedgerows, Trees and Woodland It is recognised that Part 6 (Miscellaneous and General) of the Draft DCO stipulates in paragraph (4) of Article 40: 'The undertaker may, for the purposes of the authorised development or in connection with the authorised development and subject to paragraph (2), remove the hedgerows specified in the table in Part 1 and the table in Part 2 of Schedule 12 (hedgerows to be removed) to the extent set out in the landscape and ecological management plan approved pursuant to requirement 7 in Schedule 2 (requirements).'	The Applicant notes this comment on the wording contained within the **Draft DCO [REP1-007]**.

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Negative impacts – Construction Phase Habitat Loss, Damage and Fragmentation Hedgerows, Trees and Woodland Nonetheless, the council is concerned that Schedule 12 Part 1 and 2 appears to list every hedgerow within the Order Limits and that this affords the applicant too much flexibility regardless of the aforementioned stipulation in Part 6. It is therefore possible that the proposed buffers may in actuality afford less protection to the established network of native hedgerows and semi-mature and mature in-hedgerow trees throughout the Solar PV Sites and the CRC than is suggested within the DCO application if the many kilometres of hedgerows, including 'important hedgerows' and species-rich hedgerows, listed in Schedule 12 of the Draft DCO are subject to partial removal as is suggested by column (2) of the tables in Part 1 and 2 of Schedule 12. Removal of substantive extents of hedgerow and 'important hedgerow', the latter being legally protected by means of the Hedgerow Regulations 1997, has not been wholly assessed in 6.1 Environmental Statement Volume 1, Chapter 9 Ecology and Biodiversity [APP-061]. Instead, the ES has assumed that such removal and tree felling would be minimised with such habitats being largely retained and protected by means of buffers.	The assessment of effects of hedgerows presented in **ES Volume 1, Chapter 9: Ecology and Biodiversity [REP1-015]** has been undertaken using precautionary worst-case assumptions, including the reasonably anticipated maximum extent of temporary and permanent hedgerow removal. A reasonable estimate of calculated permanent and temporary hedgerow removal requirements are set out in **ES Volume 1, Chapter 9: Ecology and Biodiversity [REP1-015]** (Paragraphs 9.10.137 to 9.10.138). As described, the proportion of hedgerow loss relative to the total extent of existing hedgerows listed is relatively small for both the Solar PV Sites (less than 1% of hedgerows to be removed) and the Cable Route Corridor (approximately 3.5% of hedgerows to be removed). While Schedule 12 (Hedgerows to be removed) to the **Draft DCO [REP1-007]** does list every hedgerow where removal may be required, this is subject to Article 40(4) which provides that the undertaker may only remove the hedgerows listed to the extent set out in the Ecological Protection and Mitigation Strategy. The **Outline EPMS [REP1-106]** is in turn secured by Requirement 8 within Schedule 2 (Requirements) of the **Draft DCO [REP1-007]** and, as such, breach of these measures would be an offence. This approach is required in advance of detailed design in order to allow the Applicant flexibility within the parameters set by the **Outline EPMS [REP1-106].** The final **Outline EPMS [REP1-106]** and, by extension, the extent of removal in respect of the hedgerows

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	listed in Schedule 12 of the **Draft DCO [REP1-007]**, will be subject to the approval of Wiltshire Council in consultation with the relevant statutory nature conservation body. The Applicant intends to include a clarificatory footnote within Schedule 12 in the next iteration of the **Draft DCO [REP1-007].**
Negative impacts – Construction Phase Habitat Loss, Damage and Fragmentation Hedgerows, Trees and Woodland The network of hedgerows throughout the Order Limits have intrinsic ecological value and comprise priority habitats/habitats of principal importance (HPI) listed under Section 41 of the Natural Environment and Rural Communities (NERC) Act 2006. The hedgerows and hedgerow trees are also important ecological networks and wildlife corridors that serve a vital function within the landscape for wildlife, including a range of protected species and species of conservation concern (SoCC). Removal of such a considerable extent of hedgerow will therefore have substantive adverse effects on numerous species of fauna that rely on these wildlife corridors for foraging, commuting, roosting, nesting, refuge and hibernation, and will result in habitat fragmentation and loss/reduction of functional habitat connectivity. As such, in accordance with the mitigation hierarchy, hedgerows and hedgerow trees should be retained and protected in accordance with Section 40 of the	The Applicant agrees that negative impacts on hedgerows will occur during the Construction Phase. The assessment of effects on hedgerows presented in **ES Volume 1, Chapter 9: Ecology and Biodiversity [REP1-015]** recognises the intrinsic ecological value of hedgerows and describes how Scheme design and embedded mitigation have sought to minimise hedgerow losses as far as possible, including through the retention of the vast majority of the hedgerow network within the Order Limits and through the use of existing field accesses wherever possible. However, it is acknowledged that hedgerow losses in order to facilitate new access and infrastructure for a project of this scale are unavoidable. **ES Volume 1, Chapter 9: Ecology and Biodiversity [REP1-015]** also describes how the total length of compensatory planting of hedgerows will far exceed anticipated losses. However, as acknowledged within **ES Volume 1, Chapter 9: Ecology and Biodiversity [REP1-015]**, there will be a time lag between removal of hedgerows and the subsequent establishment and development of hedgerows to achieve comparable functionality and value for wildlife that rely on them. As such there will be a recognised

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NERC Act 2006, paragraph 192 clauses (a) and (b) of the National Planning Policy Framework (NPPF) and Core Policy 50 (CP50) of the Wiltshire Core Strategy (WCS).	consequent reduction in quality and integrity of hedgerows during the short to medium term.
Negative impacts – Construction Phase Habitat Loss, Damage and Fragmentation Hedgerows, Trees and Woodland It is assumed that the proposal to implement buffers from field boundary habitats and other ecological features which is detailed in Section 9.9 of the 6.1 Environmental Statement Volume 1, Chapter 9 Ecology and Biodiversity [APP-061], as aforementioned, also applies to the CRC. However, it is stated in ES Chapter 2: The Order Limits [APP-054] that within the CRC, where practicable, cable routing would be to the edge of fields to minimise impacts. This approach would fail to accord with the embedded mitigation measures put forward in APP-061, given that to undertake the works in this way would not permit the implementation of buffers to important ecological features along field boundaries. Routing cables along field boundaries will likely increase the potential for ecological and arboricultural impacts due to adverse effects on sensitive field boundary habitat including hedgerows, hedgerow trees and arable field margin flora as well as the fauna that use these habitats.	The Applicant notes the comments regarding the application of embedded mitigation measures within the Cable Route Corridor (CRC) and the relationship between **ES Volume 1, Chapter 9: Ecology and Biodiversity [REP1-015]** and **ES Volume 1, Chapter 2: The Order Limits [APP-054]**. The reference in Chapter 2 to routing cables towards the edge of fields reflects an indicative design principle intended to reduce land take and disruption to agricultural operations where practicable. It does not override or negate the embedded mitigation measures set out elsewhere within the Environmental Statement. Within the CRC, the ecological buffers described in **ES Volume 1, Chapter 9: Ecology and Biodiversity [REP1-015]** will be implemented where practicable, informed by detailed design and local site conditions. Notwithstanding this, all tree and hedgerow Root Protection Areas (RPAs) will be respected, and works will be designed to avoid encroachment into RPAs in accordance with best practice arboricultural guidance. Hedgerows, hedgerow trees and associated field boundary habitats are therefore afforded protection irrespective of the final cable alignment.

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	Where routing adjacent to field boundaries is proposed, this will be subject to detailed assessment at the construction stage to ensure that unacceptable ecological or arboricultural effects are avoided. This will be secured through the **Outline EPMS [REP1-106]** and **ES Volume 3, Appendix 10-1 Arboricultural Impact Assessment and Outline Arboricultural Method Statement [APP-206]**, which will define working methods, exclusion zones and protection measures as appropriate. A risk-based approach to micrositing of the final cable route will take into account the presence of priority habitats and habitat of suitability for various protected species and species of conservation concern. Accordingly, the Applicant does not agree that routing cables towards field edges inherently increases ecological impacts, nor that there is a conflict between **ES Volume 1, Chapter 2: The Order Limits [APP-054]** and **ES Volume 1, Chapter 9: Ecology and Biodiversity [REP1-015]**. The final alignment within the CRC will be determined through detailed design, applying the mitigation hierarchy and ensuring protection of sensitive ecological and arboricultural features.
Negative impacts – Construction Phase Habitat Loss, Damage and Fragmentation Hedgerows, Trees and Woodland	The Applicant notes this comment regarding cable installation methodology.

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In addition, paragraph 3.3.58 of 6.1 Environmental Statement Volume 1, Chapter 3 The Scheme [APP-055] states: 'Fibre communication chambers will be installed typically every 500 to 750m but can be up to 2,000 m apart along the cable route. These are generally located at field boundaries. The final locations would be determined at detailed design. The excavation for this type of chamber would be approximately 1.5 m length, 1 m wide and 1.5 m deep.'	
Negative impacts – Construction Phase Habitat Loss, Damage and Fragmentation Hedgerows, Trees and Woodland This further suggests that there will be works within proximity to sensitive field boundary habitats including hedgerows and trees, and that the implementation of a buffer zone at these locations will not be possible contrary to the indication in ES Chapter 9 Ecology and Biodiversity [APP-061]. If so, Wiltshire Council considers that the approach to the cable routing works detailed in ES Chapter 2 The Order Limits [APP-054] would constitute unacceptable works within buffer zones to important field boundary habitats, including hedgerows and trees and will conflict with the applicant's own proposed avoidance and mitigation measures as set out in Chapter 9 of the ES.	The Applicant notes the comments regarding the application of embedded mitigation measures within the Cable Route Corridor (CRC) and the relationship between **ES Volume 1, Chapter 9: Ecology and Biodiversity [REP1-015]** and **ES Volume 1, Chapter 2: The Order Limits [APP-054]**. The reference in **ES Volume 1, Chapter 2: The Order Limits [APP-054]** to routing cables towards the edge of fields reflects an indicative design principle intended to reduce land take and disruption to agricultural operations where practicable. It does not override or negate the embedded mitigation measures set out elsewhere within the Environmental Statement. Within the CRC, the ecological buffers described in **ES Volume 1, Chapter 9: Ecology and Biodiversity [REP1-015]** will be implemented where practicable, informed by detailed design and local site conditions. Notwithstanding this, all tree and hedgerow Root Protection Areas (RPAs) will be respected, and

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	works will be designed to avoid encroachment into RPAs in accordance with best practice arboricultural guidance. Hedgerows, hedgerow trees and associated field boundary habitats are therefore afforded protection irrespective of the final cable alignment. Where installation of fibre communication is proposed close to field boundaries, this will be subject to detailed assessment at the construction stage to ensure that unacceptable ecological or arboricultural effects are avoided. This will be secured through the **Outline EPMS [REP1-106]** and **ES Volume 3, Appendix 10-1 Arboricultural Impact Assessment and Outline Arboricultural Method Statement [APP-206]**, which will define working methods, exclusion zones and protection measures as appropriate. A risk-based approach to micrositing of the final cable route will take into account the presence of priority habitats and habitat of suitability for various protected species and species of conservation concern. Accordingly, the Applicant does not agree that routing cables and installing fibre communication chambers towards field edges inherently increases ecological impacts, nor that there is a conflict between **ES Volume 1, Chapter 2: The Order Limits [APP-054]** and **ES Volume 1, Chapter 9: Ecology and Biodiversity [REP1-015]**. The final alignment within the CRC will be determined through detailed design, applying the

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	mitigation hierarchy and ensuring protection of sensitive ecological and arboricultural features.
Negative impacts – Construction Phase Habitat Loss, Damage and Fragmentation Hedgerows, Trees and Woodland During construction, even with proposed avoidance and mitigation measures in place, there is potential for adverse impacts to ancient woodland which lie directly adjacent to the boundary of the Order Limits, e.g. ancient woodland that is surrounded by Lime Down E and Bincombe Wood bordering Lime Down E and woodland to the immediate north of Lime Down D.	The assessment of effects on woodlands (including ancient woodland) is presented in **ES Volume 1, Chapter 9: Ecology and Biodiversity [REP1-015].** This concludes that, with embedded mitigation in place no significant adverse effects on woodland are anticipated as a result of construction works. Embedded mitigation includes the adoption of a minimum 15 m protective buffer from all woodland edges. However, both **ES Volume 1, Chapter 9: Ecology and Biodiversity [REP1-015]** and **ES Volume 1, Chapter 10: Arboriculture [APP-062]** acknowledge some incursion into the 15 m buffer may be required in a limited number of places, including at North Bincombe Wood (also known as Rodbourne Plantation Local Wildlife Site) at Lime Down E to make use of an existing farm track. Any incursion within the woodland 15 m buffers would be limited, unavoidable, and restricted to the use of existing access tracks, or undertaken only where appropriate ground protection measures are installed in advance of works. These measures are intended to prevent soil compaction, root damage and changes to site levels, and will be implemented in accordance with the principles set out within **ES Volume 3, Appendix 10-1 Arboricultural Impact Assessment and Outline Arboricultural Method Statement [APP-206]** and the **Outline CEMP [REP1-096].**

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Negative impacts – Construction Phase Habitat Loss, Damage and Fragmentation Hedgerows, Trees and Woodland In June 2025, the applicant consulted on fifteen proposed changes to the Scheme via a targeted consultation. It is noted that the proposed changes have been taken forward and incorporated within the Scheme proposals as detailed in the DCO application submission documentation and figures. The council raised concerns regarding a couple of the proposed locations and remains concerned, particularly in regard to Change 7: South West of Rodbourne, Lime Down E where works have potential to impact the edge of an ancient broadleaved woodland/priority habitat/HPI that is known as North Bincombe Wood and is also designated as a CWS named Rodbourne Plantation; and Change Location 10: A429/B4014 Roundabout where the potential for impacts to traditional orchard priority habitat/HPI should be determined and addressed, where necessary.	The Applicant notes these comments. The Traditional Orchard referred to with reference to Change Location 10 lies within a private residential property and is outside of the Order Limits, beyond an existing road verge. Change Location 10 refers to a Highway Improvement Area, which as stated in Paragraph 3.2.5 of **ES Volume 1, Chapter 3: The Scheme [APP-055]** comprises a section of the highway network which will be subject to localised improvements. Any such works at this location would not extend into the curtilage of the private property and thus no impacts to the Traditional Orchard within are anticipated. Within **ES Volume 1, Chapter 9: Ecology and Biodiversity [REP1-015]**, any potential impacts on North Bincombe Wood (also known as Rodbourne Plantation Local Wildlife Site), relevant to Change Location 7, as a result of the Scheme are assessed at Paragraphs 9.10.70 to 9.10.81. Regarding Change Location 7 at North Bincombe wood, there is an existing farm track and impacts to North Bincombe Wood are identified as an incursion into ancient woodland buffer and the likely requirement for a crown raise of overhanging branches if required to facilitate construction traffic. Within **ES Volume 3, Appendix 10-1 Arboricultural Impact Assessment and Outline Arboricultural Method Statement [APP-206]** any potential impacts on North Bincombe Wood (relevant to Change Location 7) as a result of the Scheme are identified in Table 7 and explored in Paragraph 4.1.10. The

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	overall impacts to North Bincombe Wood as a result of the access track installation are expected to be negligible.
Negative Impacts – Construction Phase Habitat Loss, Damage and Fragmentation Lowland Calcareous Grassland In terms of the Solar PV Sites, the council awaits corrected BNG submissions and condition assessments to be able to corroborate Chapter 9 of the ES (please see comments in Written Representation), which indicates that there are no areas of lowland calcareous grassland that qualify as priority habitat/HPI within the Sites. However, there are areas of lowland calcareous grassland priority habitat/HPI immediately adjacent to the Order Limits bordering Lime Down A and Lime Down E. It is possible, given the close proximity of these habitats to the works footprint, that even with mitigation measures in place, the habitats could be adversely affected during the construction phase.	The Applicant notes this comment and a copy of the **Statutory Biodiversity Net Gain Metric [PDA-008]** in excel form has been submitted at Procedural Deadline A, with an updated version of the **BNG Appendix Statutory Biodiversity Metric Calculation [REP1-091]** and **BNG Assessment Report [REP1-089]** submitted at Deadline 1 to reflect completed ecological baseline surveys within the Cable Route Corridor. The Applicant can confirm that no area of lowland calcareous grassland or other neutral grassland habitat within the Solar PV Sites or Cable Route Corridor constituted HPI/priority habitat. Areas of known lowland calcareous grassland priority habitat/HPI within 2 km of the Solar PV Sites (including Lime Down A and Lime Down E) as revealed by desk studies are shown in **ES Volume 2, Figure 9-1-5 Priority Habitats and Ancient Woodland within 2km of the Solar PV Sites [APP-111]**. Considering proposed embedded measures, including the implementation of buffer zones and adoption of pollution prevention measures, no significant adverse effects on off-site lowland calcareous grassland priority habitat/HPI are anticipated as a result of the Scheme, at any phase.

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	Embedded mitigation measures are set out within the **Outline CEMP [REP1-096]** and **Outline EPMS [REP1-106]** and secured via DCO Requirements.
Negative Impacts – Construction Phase Habitat Loss, Damage and Fragmentation Other Neutral Grassland The council is concerned about the potential for adverse impacts upon other neutral grassland within the CRC because it is not clear from the ES and baseline report, whether any of the areas of this habitat which will be affected during construction, qualify as priority habitat/HPI. In respect of the CRC, paragraph 3.2.45 of 6.3 Environmental Statement Volume 3, Appendix 9-1 Ecological Baseline Report [APP-198] specifies that there is over 15.44 ha of other neutral grassland which equates to 3.34% of the CRC. It then goes on to state: *'The vast majority of other neutral grassland was considered to represent a good example of this habitat type and was diverse in botanical species composition.'* Nonetheless, there is no further detail provided regarding the species composition of the other neutral grassland within the CRC or discussion in terms of whether any of the areas could qualify as HPI/priority.	The Applicant notes the Council's comment. The Applicant can confirm that no area of other neutral grassland habitat within the Cable Route Corridor constituted HPI/priority habitat. Any such habitats would have been recorded as such and mapped accordingly. The text in **ES Volume 3 Appendix 9-1: Ecological Baseline Report [REP1-083]** has been updated with further details and confirmation that no grassland within the Cable Route Corridor comprised HPI/priority habitat, and the revised version was submitted at Deadline 1.
Negative Impacts – Construction Phase Habitat Loss, Damage and Fragmentation	The Applicant notes the Council's comment.

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Other Neutral Grassland Paragraph 3.2.46 of 6.3 Environmental Statement Volume 3, Appendix 9-1 Ecological Baseline Report [APP-198] states: 'When combined as a whole, the other neutral grassland is of moderate botanical interest and likely to support a diverse range of wildlife, more so than other agricultural land across the Order Limits. Overall, this habitat is considered to be of Local Importance.'	
Negative Impacts – Construction Phase Habitat Loss, Damage and Fragmentation Other Neutral Grassland The council considers that the omission of further detail and analysis of the other neutral grassland habitat within the CRC and whether any areas of this habitat could constitute HPI/priority habitat must be addressed to enable a suitably informed and robust assessment of the whole Scheme. Therefore, at present the council cannot corroborate the evaluation of this habitat type as being of local importance and must assume that construction could result in loss off and/or degradation to other neutral grassland priority habitat/HPI especially considering that the CRC will be up to approximately 665m wide at some locations along its circa 22km extent.	The Applicant notes the Council's comment. The Applicant can confirm that no area of other neutral grassland habitat within the Cable Route Corridor constituted HPI/priority habitat. Any such habitats would have been recorded as such and mapped accordingly. The text in **ES Volume 3 Appendix 9-1: Ecological Baseline Report [REP1-083]** has been updated with further details and confirmation that no grassland within the Cable Route Corridor comprised HPI/priority habitat, and the revised version was submitted at Deadline 1. No loss of other neutral grassland priority habitat/HPI is therefore anticipated as a result of the Scheme, within the Solar PV Sites or Cable Route Corridor.

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Negative Impacts – Construction Phase Habitat Loss, Damage and Fragmentation Arable and Pasture The loss of farmland within the Solar PV Sites and within the CRC, notably areas of arable, during the construction phase will have an adverse effect on lowland farmland breeding birds, especially ground nesting species such as skylark. Significant areas of breeding habitat equating to a considerable number of territories, will be lost during construction. As the construction progresses, depending on the time of year, ground nesting birds and other species will be subject to disturbance through in increase in noise, human activity and artificial lighting at night and will be displaced as the work progresses and nesting habitat is no longer available. The CRC is up to 665m in some locations and there is insufficient certainty in terms of the potential for adverse effects on breeding birds as no survey has been undertaken and there has been no habitat survey of 17ha of the CRC area.	An assessment of likely impacts and effects on breeding birds, including ground nesting species such as skylark, is provided in **ES Volume 1: Chapter 9: Ecology and Biodiversity [REP1-015]**. The Applicant acknowledges that a significant adverse effect on ground nesting birds of open farmland is anticipated at a local level during the construction phase as a result of territory displacement, and temporary loss of foraging habitat. Construction phase impacts on breeding birds (both ground nesting or other species) resulting from disturbance are also considered in this assessment. In terms of impacts to breeding birds within the Cable Route Corridor, the Applicant considers that a precautionary and reasonable worst-case scenario has been assumed for the assessment of impacts for breeding birds pertaining to the CRC within **ES Volume 1, Chapter 9: Ecology and Biodiversity [REP1-015]**, given the short-term and temporary nature of the works associated with this element of the Scheme. The evaluation of the breeding bird assemblage with respect to the Cable Route Corridor was based on professional judgement with consideration to the likely assemblage of birds given the findings of the desk study and detailed surveys conducted at the Solar PV Sites, and the recorded habitats present (particularly the similarity of habitats within the both the Cable Route Corridor and the Solar PV Sites). It is the

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	Applicant's view that a suitably precautionary approach to the evaluation of the breeding bi d assemblage within the Order Limits has been made. The Applicant acknowledges that some areas within the Cable Route Corridor had not been subject to ecological survey at the point of finalising the **ES Volume 1, Chapter 9: Ecology and Biodiversity [REP1-015]**. Since the preparation of **ES Volume 1, Chapter 9: Ecology and Biodiversity [REP1-015]**, additional habitat surveys of previously un-surveyed land have been conducted, and all baseline ecological surveys within the Cable Route Corridor have now been completed. The survey methodology applied was consistent with that reported in the **ES Volume 3, Appendix 9-1: Ecological Baseline Report [REP1-084]** for the rest of the Cable Route Corridor. The Applicant has updated **ES Volume 1, Chapter 9: Ecology and Biodiversity [REP1-015]** and **ES Volume 3, Appendix 9-1: Ecological Baseline Report [REP1-084]** and revised versions have been submitted at Deadline 1 with the findings of these surveys. It is considered these do not materially change the assessment of likely significant effects presented in the chapter.
Negative Impacts – Construction Phase Habitat Loss, Damage and Fragmentation	An assessment of likely impacts and effects on overwintering birds is provided in **ES Volume 1: Chapter 9: Ecology and**

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Arable and Pasture Loss and fragmentation of agricultural land within the Solar PV Sites and CRC will also likely have adverse effects on overwintering birds. In respect of the Solar PV Sites, 6.3 Environmental Statement Volume 3, Appendix 9-1 Ecological Baseline Report [APP-198] details that wintering bird surveys have recorded a diverse assemblage of birds, including a moderate diversity of 36 SoCC. However, no wintering bird surveys have been conducted within the CRC and so the potential for effects cannot be fully known.	**Biodiversity [REP1-015]**. The assessment concludes that no significant adverse residual effects on overwintering birds are anticipated during construction, and a significant beneficial residual effect at a local level is anticipated on overwintering birds during the operation phase owing to increased foraging and sheltering opportunities due to enhanced and newly created habitats at the Solar PV Sites. The evaluation of the overwintering bird assemblage with respect to the Cable Route Corridor was based on professional judgement with consideration to the likely assemblage of birds given the findings of the desk study and detailed surveys conducted at the Solar PV Sites, and the recorded habitats present (particularly the similarity of habitats within the both the Cable Route Corridor and the Solar PV Sites). It is the Applicant's view that a suitably precautionary approach to the evaluation of the overwintering bird assemblage within the Order Limits has been made.
Negative Impacts – Construction Phase Habitat Loss, Damage and Fragmentation Arable and Pasture Areas of cattle-grazed pasture within the Solar PV Sites and the CRC afford foraging habitat for horseshoe bat species, particularly greater horseshoe bats. The installation of solar	The Applicant recognises the value of cattle-grazed pasture for horseshoe bat species, particularly greater horseshoe bats, due to dung flies associated with cattle dung forming an important part of the diet of greater horseshoe bats. It is assumed that cattle would be removed from any fields where Solar PV infrastructure is installed at the Solar PV Sites, resulting in a reduction in foraging suitability. However, as described within Paragraph 9.10.4 of **ES Volume 1: Chapter**

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arrays in areas of this habitat within the Solar PV Sites will reduce suitability for horseshoe bats.	**9: Ecology and Biodiversity [REP1-015],** permanent pasture coverage at the Solar PV Sites is relatively small, accounting for approximately 16.2 ha or 2.2% of the total area of land covered by the Solar PV Sites. It is also noted very low activity by foraging greater horseshoes was recorded at the Solar PV Sites during bat activity surveys, indicating the Solar PV Sites are not of high importance for foraging greater horseshoe bats. The assessment of impacts on foraging/commuting bats presented within **ES Volume 1: Chapter 9: Ecology and Biodiversity [REP1-015]** conclude no significant adverse impacts on foraging/commuting bats as a result of habitat loss during the Construction Phase at the Solar PV Sites.
Negative Impacts – Construction Phase Habitat Loss, Damage and Fragmentation Arable and Pasture Impacts to cattle-grazed pasture within the CRC would likely adversely affect horseshoe bats, especially if proposed construction compounds which will have external artificial lighting, were to be located close to such habitat, as well as hedgerows. The potential for adverse effects within the CRC is especially significant where approximately 10.5ha of the 4km greater horseshoe bat consultation zone around the Box Mine component of the Bath and Bradford-on-Avon Bats Special Area of Conservation (SAC) coincides with the CRC. It should	The Applicant notes this comment and confirms that the 4km greater horseshoe bat consultation zone around the Box Mine component of the Bath and Bradford-on-Avon Bats Special Area of Conservation (SAC) is considered to be functionally-linked land for the SAC where it coincides with the CRC, for the purposes of the assessment of impacts on the SAC presented in both **ES Volume 1: Chapter 9: Ecology and Biodiversity [REP1-015]** and the **Habitat Regulations Assessment (HRA) Report [APP-275].** Both **ES Volume 1, Chapter 9: Ecology and Biodiversity [REP1-015]** and the **HRA Report [APP-275]** conclude that no significant adverse effects on the SAC are anticipated as a result of the Scheme.

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be assumed that this area comprises land that is functionally linked to the SAC and loss and/or degradation of cattle-grazed pasture within this area would need to be assessed under the Habitats Regulations. It is recognised that paragraph 8.2.3 of the 7.10 Habitats Regulations Assessment (HRA) Report [APP 275] states: *"In order to avoid temporary loss of FLL for greater horseshoe bats, all Temporary Construction Compounds will be sited outside of the Wiltshire Impact Zones for Bat Species. This will be secured as part of the Works Plan* ***(ES Volume 2, 2.3 Works Plan [EN010168/APP/2.3])…"***	The Applicant notes that matters relating to the Bath and Bradford-on-Avon Bats SAC and the outcome and conclusions of the **HRA Report [APP-275]** have been discussed and agreed in principle with Natural England, with only minor procedural points of clarification remaining that both parties expect to resolve through ongoing discussions. An updated **HRA Report [APP-275]** will be submitted at Deadline 3. The Applicant also confirms that no Temporary Construction Compounds will be sited within the Wiltshire Impact Zones for Bat Species as secured as part of **Works Plan [REP1-005].** The impacts of artificial lighting associated with the Construction Phase on bats are assessed in Paragraph 9.10.186 of **ES Volume 1: Chapter 9: Ecology and Biodiversity [REP1-015],** which concludes that no significant effects are anticipated. Appropriate limitations and controls for the use of artificial lighting during construction, designed to avoid impacts on bats and other light-sensitive species are detailed within the **Outline EPMS [REP1-106]** as well as the **Outline CEMP [REP1-096]**.
Negative Impacts – Construction Phase Habitat Loss, Damage and Fragmentation Rivers and Streams Potential for adverse effects during the construction phase to the river running through Lime Down D and its riparian habitat.	The river running through Lime Down D is known as Gauze Brook and has been referred to as such within **ES Volume 1: Chapter 9: Ecology and Biodiversity [REP1-015].** A detailed Modular River Physical (MoRPH) survey and species-specific surveys for water voles and otters have been conducted for

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This habitat comprises priority habitat/HPI and likely supports a range of wildlife including protected species and SoCC, although there has been relatively limited dedicated survey.	Gauze Brook where it runs through Lime Down D. The detailed findings of these surveys are present in the **BNG Assessment Report [REP1-089]** and **ES Volume 3, Appendix 9-6 Otter and Water Vole Survey Report [APP-203]** respectively. The assessment of effects on ecological features **ES Volume 1: Chapter 9: Ecology and Biodiversity [REP1-015]** describes how no direct impacts on this watercourse are anticipated as the Scheme will not require any new crossings or any other direct modification of the Gauze Brook in this location. **ES Volume 1: Chapter 9: Ecology and Biodiversity [REP1-015]** identifies the potential for indirect impacts on the watercourse network at the Solar PV Sites as a result of degradation through incidental pollution resulting from construction activities. The Chapter describes how embedded mitigation measures, including the provision of adequately protective buffer zones and the adoption of good practice pollution prevention measures, will ensure such potential impacts are minimised. These measures are detailed within the **Outline EPMS [REP1-106]** as well as the **Outline CEMP [REP1-096]**. The Chapter concludes that no significant adverse impacts on the network of watercourses at the Scheme, including Gauze Brook, are anticipated. With regards to buffer zones, for the Solar PV Sites a minimum buffer of 10 m from all rivers will be adopted, however where watercourses are associated with hedgerows or woodland, this buffer has been extended to a minimum of 15 m. Where Gauze Brook runs

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	through Lime Down D, it is associated with a hedgerow or woodland for the entire length, meaning a minimum buffer zone of 15 m will be maintained between the watercourse and the construction zone.
Negative Impacts – Construction Phase Killing and Injury of Fauna, including Protected Species and SoCC There is potential for wildlife, including legally protected species, to be injured or even killed across both the Solar PV Sites and the CRC during the construction works, such as when hedgerow removal or tree felling takes place, if adequate avoidance and mitigation isn't implemented. This is a concern for the council, particularly in respect of the CRC given the lack of specifies-specific survey within the CRC.	An assessment of likely impacts and effects on faunal species is provided in **ES Volume 1: Chapter 9: Ecology and Biodiversity [REP1-015].** This concludes that no significant adverse effects on ecological features are anticipated as a result of killing or injury to individual animals. It is the Applicant's view that adequate avoidance and protection measures for wildlife, including legally protected species, are detailed within the **Outline EPMS [REP1-106].** This document sets out measures designed to avoid killing and injury to a number of species or species groups during construction, including badgers, bats, dormice, otters, water voles, beavers, brown hares, harvest mice, hedgehog, polecats, reptiles, amphibians, breeding birds, overwintering birds, invertebrates, white-clawed crayfish and freshwater fish. Such protective measures include implementation of fenced biodiversity protection zones, sensitive timing of works, adoption of sensitive methods of working, pre-construction inspections to identify and manage constraints, and requirements for the removal of sheltering/resting places under the correct Natural England licence if these cannot be retained in situ.

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Negative Impacts – Construction Phase Killing and Injury of Fauna, including Protected Species and SoCC The potential for killing of/injury to individuals of the European Protected Species (EPS) great crested newt (GCN) is a particular concern because at present there is no certainty that adequate and appropriate mitigation and compensation will be secured and implemented. In respect of the Solar PV Sites, environmental DNA (eDNA) surveys have identified presence of great crested newts (GCN) in two ponds within Lime Down C and E. GCN have also been recorded within a further 14 ponds located within 250 m of the Solar PV Sites. However, paragraph 3.3.57 of 6.3 Environmental Statement Volume 3, Appendix 9-1 Ecological Baseline Report [APP-198] specifies that it has not been possible to survey a further 41 ponds within 250 of the Solar PV Sites due to a lack of access permission.	An assessment of likely impacts and effects on great created newts is provided in **ES Volume 1: Chapter 9: Ecology and Biodiversity [REP1-015]**. With respect to the Solar PV Sites, the assessment concludes that, with the implementation of embedded and additional mitigation measures, no significant adverse effects on great crested newts are anticipated. Embedded mitigation measures relevant to the Solar PV Sites include the implementation of protective buffers from all ponds. Buffer sizes are set at a minimum of 10 m, increasing to 50 m from any ponds with confirmed presence of newts (as derived from eDNA surveys), as well as any ponds which could not be surveyed for any reason, including off-site ponds where access constraints inhibited surveys. Additional mitigation measures to be adopted for the Solar PV Sites designed to avoid impacts to newts during construction include sympathetic habitat clearance and timing of works, the supervision of an ecologist where necessary, and the appropriate storage of materials to prevent them becoming attractive sheltering features for amphibians. These mitigation measures are detailed within the **Outline EPMS [REP1-106].**
Negative Impacts – Construction Phase Killing and Injury of Fauna, including Protected Species and SoCC	The Applicant notes the Council's comments. The Applicant confirms that works within the Cable Route Corridor will be registered under Natural England's District Level Licensing Scheme.

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In terms of the CRC, Appendix 9-1 Ecological Baseline Report [APP-198] to the ES specifies that 130 'waterbodies have been identified within the CRC and surrounding 250m. These ponds have not been subject to any survey and the DCO application does not put forward a GCN mitigation strategy for the CRC.' Paragraph 3.3.59 goes on to state: 'District Level Licensing (DLL) will be utilised for works within the Cable Route Corridor, which assumes the presence of GCN within local waterbodies and stipulates mitigation and compensation measures to reduce and offset impacts on this species. As such no surveys to determine the presence or likely absence of GCN have been undertaken for ponds within the Cable Route Corridor.'	
Negative Impacts – Construction Phase Killing and Injury of Fauna, including Protected Species and SoCC Although the applicant indicates intention to use Natural England's GCN DLL Scheme in respect of the CRC, the Examining Authority should be aware that to use the GCN DLL Scheme, the applicant will need to have obtained an Impact Assessment and Conservation Payment Certificate (an IACPC) from Natural England, and that this should have been submitted with the DCO application. It is not apparent whether the applicant has obtained an IACPC yet as it has not been submitted with the DCO application in lieu of a GCN mitigation strategy for the extensive CRC. Chapter 9 of the ES [APP-061]	The Applicant confirms that an IACPC countersigned by Natural England **[EN010168/EXAM/9.24]** has been submitted at Deadline 2 as evidence of the Scheme's acceptance into the District Level Licensing Scheme.

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specifies that there is intention to apply to use the DLL but does not appear to stipulate that an application has been submitted to date.	
Negative Impacts – Construction Phase Killing and Injury of Fauna, including Protected Species and SoCC Signalling the intention to use NE's DLL Scheme does not in itself provide evidence that sufficient and adequate mitigation and compensation will be implemented to address potential adverse effects on GCN, including the killing of, and injury to, newts. In the absence of an IACPC from Natural England and a mitigation strategy for the CRC, there cannot be certainty of delivery of mitigation to protect GCN and to also compensate for the loss of and impacts to GCN habitat. The Solar PV Sites and the CRC cover a very large area and so this comprises an important issue which clearly should be resolved prior to the approval of the Scheme.	The Applicant confirms that an IACPC countersigned by Natural England **[EN010168/EXAM/9.24]** has been submitted at Deadline 2 as evidence of the Scheme's acceptance into the District Level Licensing Scheme. This demonstrates adequate compensation for impacts to great crested newts within the Cable Route Corridor will be delivered.
Negative Impacts – Construction Phase Killing and Injury of Fauna, including Protected Species and SoCC As indicated above, the potential for harm to species of fauna within the Solar PV Sites and CRC during the construction	As stated above, an assessment of likely impacts and effects on faunal species is provided in **ES Volume 1: Chapter 9: Ecology and Biodiversity [REP1-015].** This concludes that no significant adverse effects on ecological features are anticipated as a result of killing or injury to individual animals. It is the Applicant's view that adequate avoidance and protection measures for wildlife, including legally protected species, are

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phase is not limited to GCN but this discussion has been provided to serve as a pertinent example.	detailed within the **Outline EPMS [REP1-106].** This document sets out measures designed to avoid killing and injury to a number of species or species groups during construction, as well as to ensure compliance with legislation pertaining to protected species. Such protective measures include implementation of fenced biodiversity protection zones, sensitive timing of works, adoption of sensitive methods of working, pre-construction inspections to identify and manage constraints, and requirements for the removal of sheltering/resting places under the correct Natural England licence if these cannot be retained in situ.
Negative Impacts – Construction Phase Disturbance to and Displacement of Fauna, including Protected Species and SoCC The adverse effects to habitats throughout the Order Limits during the construction phase discussed above will in turn have an adverse effect on species of fauna that utilise and rely on these habitats. Loss, fragmentation and degradation of hedgerows, trees and woodland will have adverse effects on foraging, commuting and roosting bats as well as nesting birds, GCN and other species likely leading to a reduction in use of the habitats by these species, especially when also subject to increased disturbance due to an increase in noise, human activity and artificial lighting. This extends to greater horseshoe	The impacts and effects on faunal species as a result of Construction Phase habitat loss, fragmentation and degradation as well as disturbance via construction activities removal are assessed within **ES Volume 1, Chapter 9: Ecology and Biodiversity [REP1-015].** This acknowledges the potential for adverse impacts via these impact pathways on a number of species, including bats (including greater horseshoe bats), nesting birds and great crested newts. The assessment concludes that, with the implementation of embedded and additional mitigation measures, no significant adverse effects will occur for the majority of species, with exception of certain species of ground nesting birds (in particular skylark) which will be displaced through loss of open field habitats.

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bats associated with the Bath and Bradford-on-Avon Bats SAC in respect of the CRC.	Embedded mitigation measures designed to avoid and reduce impacts include the retention of the vast majority of the hedgerow network and all woodland within the Scheme, which will be protected through the implementation of fenced buffer zones, good practice measures to prevent incidental damage and degradation of habitats during construction, and strict controls on the use of artificial lighting. These are detailed within the **Outline EPMS [REP1-106].**
Negative Impacts – Construction Phase Disturbance to and Displacement of Fauna, including Protected Species and SoCC Buildings within the Solar PV Sites could support roosting bats and nesting birds. These species groups would potentially be adversely affected during the construction phase as a result of an increase in noise, human activity and lighting/light spill and in turn this could result in displacement/buildings being abandoned by these species groups.	An assessment of likely impacts and effects on bats potentially roosting within the four buildings at the Solar PV Sites with suitability for roosting bats is presented in Paragraphs 9.10.170 to 9.10.74 of **ES Volume 1: Chapter 9: Ecology and Biodiversity [REP1-015]**. This sets out how the Scheme has been designed to ensure all buildings are retained and protected, and no development will occur within 15 m of any building with roosting potential, save for a fence and access track passing 10 m away from a building in Field A4 to make use of an existing field entrance. This has been designed to minimise noise and disturbance impacts on protected species potentially present within the buildings, including roosting bats and nesting birds. The Applicant considers this to adequately address potential disturbance impacts, particularly when considering existing baseline disturbance levels resulting from routine agricultural practices taking place in close proximity to the buildings. **ES Volume 1, Chapter 9: Ecology and Biodiversity [REP1-015]** concludes there would be no

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	expected significant adverse effects on roosting bats if present in the buildings. Paragraph 9.10.177 of **ES Volume 1, Chapter 9: Ecology and Biodiversity [REP1-015]** also address potential impacts of construction-phase lighting and describes how embedded mitigation (including buffer zones) and further controls on lighting will be secured as secured by the **Outline EPMS [REP1-106],** ensure no significant effects on roosting bats are anticipated as a result of construction of the Scheme.
Negative Impacts – Construction Phase Disturbance to and Displacement of Fauna, including Protected Species and SoCC Displacement of ground nesting birds, such as skylark, or overwintering birds will likely occur during the construction phase, depending on the timing of the works due to a reduction in available habitat. Over such a large scale, this could have considerable adverse effects on certain bird species.	An assessment of likely impacts and effects on breeding birds, including ground nesting species such as skylark, and overwintering bird species is provided in **ES Volume 1: Chapter 9: Ecology and Biodiversity [REP1-015]**. The Applicant acknowledges that a significant long-term adverse effect on ground nesting birds of open farmland is anticipated at a local level as a result of territory displacement, and temporary loss of foraging habitat. Consequently, population-level impacts on the species conservation status are not anticipated. No residual significant adverse effects are anticipated on other breeding bird or overwintering bird species during construction. Embedded mitigation measures and further controls to minimise impacts to breeding and overwintering birds are set

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	out within the **Outline EPMS [REP1-106]** and secured via DCO Requirements.
Negative Impacts – Construction Phase Disturbance to and Displacement of Fauna, including Protected Species and SoCC Disturbance impacts to riparian protected species of fauna, such as otter, could occur during the construction phase when works take place in proximity to the river that flows through Lime Down D. In respect of otter, adverse effects as a result of disturbance could also occur if otter are using any suitable areas away from but close to the river, for laying up/holts/dens, such as in pockets of woodland in the vicinity of the river. Riparian species that are legally protected and/or comprise SPI could also be adversely affected as a result of works in proximity to other watercourses within the Solar PV Sites and CRC.	An assessment of likely impacts and effects on riparian protected species, including otters, is presented **ES Volume 1: Chapter 9: Ecology and Biodiversity [REP1-015]**. This concludes that, with the implementation of embedded and additional mitigation measures, no significant adverse effects on this species group as a result of disturbance or any other impact pathway will occur. Detailed surveys for otter have been undertaken along the watercourse which flows through Lime Down D (also known as Gauze Brook) as detailed in **ES Volume 3, Appendix 9-6 Otter and Water Vole Survey Report [APP-203].** The surveys identified evidence of otters using this watercourse. No direct impacts on the watercourse are anticipated, and **ES Volume 1, Chapter 9: Ecology and Biodiversity [REP1-015]** sets out how protective buffers of at least 10 m will be implemented from any rivers at the Solar PV Sites, extending to 15 m where watercourses are associated with hedgerows or woodland. This is also detailed within the **Outline EPMS [REP1-106].** The entirety of Gauze Brook in Lime Down D is associated with either a hedgerow or woodland and thus will be protected by a minimum 15 m buffer from any construction works, minimising the potential for any disturbance impacts, particularly in the

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	context of existing routine agricultural operations which currently taken place at this location. Although no holt sites or dens were identified during the otter surveys undertaken, the Applicant acknowledges that holt sites could be present away from the river, including in woodland areas nearby, and these are often hard to detect as they are deliberately made obscure. However, as detailed within **ES Volume 1, Chapter 9: Ecology and Biodiversity [REP1-015]** and set out within the **Outline EPMS [REP1-106]** woodland habitat in this location will be retained and protected via the implementation of protective buffers of at least 15 m, minimising the potential for any disturbance impacts on any otter resting sites present.
Negative impacts – operational Habitat Loss, Damage and Fragmentation Hedgerows, Trees and Woodland Where the removal of hedgerow and trees during the construction phase will not be offset by means of new hedgerow planting, 'gapping up' of existing hedgerows that were subject to works or tree planting, the adverse effects as a result of loss of this habitat will be long-term for the lifetime of the Scheme or possibly even permanent if replacement habitat is not provided as part of the decommissioning phase. Therefore, impacts on the species that use these habitats	The assessment of effects on hedgerows presented in **ES Volume 1, Chapter 9: Ecology and Biodiversity [REP1-015]** recognises the intrinsic ecological value of hedgerows for a range of wildlife and describes how Scheme design and embedded mitigation have sought to minimise hedgerow losses as far as possible, although it is acknowledged hedgerow losses in order to facilitate new access and infrastructure for a project of this scale are unavoidable. Hedgerow removal will occur during the Construction Phase and the effects of this impact are primarily assessed for this phase within **ES Volume 1, Chapter 9: Ecology and Biodiversity [REP1-015].** The impacts of fragmentation on ecological features as a result of

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which comprise important wildlife corridors and ecological networks, will also continue into and throughout the operational phase on account of habitat loss and fragmentation, for example, removal of considerable extents of hedgerow will loss and severance of linear commuting and foraging habitat for bats. Provision of BNG is not a substitute for the loss of important and established species-rich hedgerows, including 'important hedgerows' and hedgerow trees, certainly not in the short to medium term because newly planted hedgerows and trees take considerable time to establish and mature.	hedgerow removal are assessed within **ES Volume 1, Chapter 9: Ecology and Biodiversity [REP1-015].** This concludes that, with the implementation of embedded and additional mitigation measures, no significant adverse effects as a result of fragmentation will occur. This is primarily due to the retention and protection of the vast majority of the hedgerow network within the Scheme, and the relatively narrow gaps within the hedgerow network that will result from discrete sections of hedgerow removal. As described in Paragraph 9.10.182 of **ES Volume 1, Chapter 9: Ecology and Biodiversity [REP1-015],** new gaps are expected to be no greater than 18 m in length, although typical gaps will measure 3.5 to 6 m. Such gaps are considered to be able to be readily crossed by wildlife which utilise hedgerows for dispersal, including foraging and commuting bats. **ES Volume 1, Chapter 9: Ecology and Biodiversity [REP1-015]** also describes how the total length of compensatory planting of hedgerows will far exceed anticipated losses. An approximate total length of 1.81 km of hedgerow is expected to be removed either permanently (for the lifespan of the Scheme) or temporarily (for the Construction Phase only), compared to approximately 25.17 km of anticipated new hedgerow planting. However, as acknowledged within the Chapter, there will be a time lag between removal of hedgerows and the subsequent establishment and development of hedgerows to achieve comparable functionality and value for wildlife that rely on them.

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	However, over the anticipated 60 year lifespan of the Scheme, the considerable new hedgerow planting can be expected to deliver positive impacts on hedgerows and wildlife which use them. New and retained hedgerows will be managed to maximise their ecological and amenity value, as detailed within the **Outline LEMP [APP-283]**.
Negative impacts – operational Habitat Loss, Damage and Fragmentation Hedgerows, Trees and Woodland There could be some further loss of, and/or damage to hedgerows and trees throughout the operational phase if and when removal or cutting back is necessary to provide new or improved accesses into the Solar PV Sites for the purposes of maintenance and to facilitate access of machinery/vehicles needed to undertake solar array and BESS battery unit replacements. These impacts could also occur within the CRC when maintenance works are required to the cabling.	As described in Paragraph 9.10.139 of **ES Volume 1, Chapter 9: Ecology and Biodiversity [REP1-015]**, impacts on hedgerows during the Operation and Maintenance Phase are not anticipated, particularly when considering all ecological buffers which will be implemented for the lifetime of the Scheme. New and retained hedgerows will be managed to maximise their ecological and amenity value, as detailed within the **Outline LEMP [APP-283]**. The Scheme has considered access requirements for both the Construction and Operation and Maintenance Phases, and the Scheme has been designed accordingly. Access for the Operation and Maintenance Phase will utilise Construction Phase access, and no new access are anticipated to be required following construction. Should any future detailed design proposals give rise to effects that would materially exceed those of the assessed Scheme design, these would need to be considered through the appropriate consent mechanisms.

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Negative impacts – Operational Modified Grassland Beneath and Around Solar Panels Throughout the operational phase there will be continued access into and across the whole of the Solar PV Sites for the purposes of maintaining, cleaning and replacing the solar panels and replacing BESS battery units. Given the need to use vehicles and machinery to undertake these works and to traverse alongside the rows of solar panels, this will inevitably disturb the soil, causing compaction, and damage ground flora, especially when the ground is wet. This in turn will reduce the potential for a more diverse assemblage of ground flora to establish and instead species that can survive disturbance are more likely to succeed. For these reasons and on account of shading effects associated with the solar panels, it was specified in the council's Statutory Consultation response to the PEIR that it should be assumed that only modified grassland of poor condition can be achieved underneath and between the solar panels and that the potential adverse effects associated with the operational activities should be reflected in BNG projections.	The Applicant notes the Council's comment, and it is agreed that, taking a precautionary approach, grassland expected to establish underneath and between the solar panels has been assumed to represent modified grassland. This approach is set out within the **BNG Assessment Report [REP1-089]** and reflected in the **BNG Appendix Statutory Biodiversity Metric Calculation [REP1-091]**.
Negative impacts – Operational Modified Grassland Beneath and Around Solar Panels The council is yet to provide detailed comments on the 7.8 BNG Assessment Report [APP-273] and 7.9 Biodiversity Net	The Applicant notes the Council's comments and it is agreed that, taking a precautionary approach, grassland expected to establish within and beneath panels has been assumed to represent the UK Habitat type of Modified Grassland and a consistent approach has been taken between the **BNG**

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Gain Assessment Appendix Statutory Biodiversity Metric Calculation [APP 274] submitted as part of the DCO application because APP-274 has not been submitted in the requisite form (detailed comments are provided in the council's Written Representation). From an initial review, it is apparent, however, that the need to assume only modified grassland can be attained under and between the solar panels is recognised in the BNG Assessment Report whereas the 6.1 ES Chapter 9 Ecology and Biodiversity [APP-061] (notably paragraphs 9.12.31 - 9.12.32 relating to additional mitigation for breeding birds) specifies the intention to deliver *"…large-scale creation of optimal foraging habitat in the form of diverse grassland types under/between Solar PV Panels and within buffer zones."* Refer to the council's Relevant Representation [RR-4934] for further details on this disparity and the implications in terms of the soundness of the assessment conclusions presented in Chapter 9 of the ES.	**Assessment Report [REP1-089]** and **ES Volume 1, Chapter 9 Ecology and Biodiversity [REP1-015]** in this respect. However, it is the Applicant's view that modified grassland can provide valuable foraging habitat for skylarks, particularly in comparison to arable cropland under intensive management which currently comprises the majority of the Solar PV Sites. Once established, the grassland will be subject to a low-intensity management regime during the operation and maintenance phase as secured via the **Outline LEMP [APP-283]** which will be expected to provide a year-round supply of foraging resources (such as seeds, plant and invertebrates) as opposed to those associated with arable cropping regimes which receive pesticides and other chemical inputs, especially since skylarks (and particularly chicks) are heavily dependent on insects and spiders during the summer months. As specified with the **Outline LEMP [APP-283]** use of pesticides will be avoided at the operational scheme. The current arable habitats across the Solar PV Sites are likely to be subject to regular pesticide application, and the cessation of this as a result of the Scheme can be expected to increase invertebrate prey abundance and diversity. Grassland habitats expected to establish within buffer zones are likely to provide even greater foraging resources for skylarks than typical existing habitats. Overall, the Applicant considers that the value of the habitat under/between Solar PV Panels and in buffer zones is highly likely to represent better quality foraging habitat for skylarks

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	than the existing arable fields. The Applicant therefore considers the additional mitigation proposed in Paragraphs 9.12.31 and 9.12.32 of **ES Volume 1, Chapter 9: Ecology and Biodiversity [REP1-015]** to be deliverable.
Negative impacts – Operational Modified Grassland Beneath and Around Solar Panels Regardless of the aforementioned inconsistency between the documents submitted in support of the DCO application, in terms of impacts during the operational phase, it is considered that the maintenance, cleaning and occasional replacement of solar panels will have adverse effects on the diversity, condition and value of the ground flora beneath and around the panels and also potentially upon flora within buffer zones where these are encroached upon by machinery/vehicles as it is deemed likely this will occur to some degree in practice.	The Applicant notes the Council's comments; please refer to the Applicant's above response on this matter.
Negative impacts – Operational Killing and Injury of Fauna, including Protected Species and SoCC There is a risk that cleaning of and maintenance to solar panels, and maintenance/replacement of cabling within the CRC, as well as the replacement of solar panels and BESS battery units could result in injury to, or even the killing of, species of fauna as a result of use of vehicles and machinery, presumably including tracked machinery, and removal of	An assessment of likely impacts and effects on habitats and species during the Operation and Maintenance Phase is presented in **ES Volume 1: Chapter 9: Ecology and Biodiversity [REP1-015].** This concludes there would be no significant adverse effects on any ecological features as a result of cleaning or maintenance of Solar PV panels or cabling, or replacement of Solar PV Panels or BESS components.

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vegetation. Impacts could also include damage to, or destruction of habitat in the form of, for example, nests, refugia and roosts. Although avoidance and mitigation measures should be implemented during such activities throughout the operational phase to reduce the likelihood of adverse effects occurring, the risk cannot be entirely eliminated.	As described in **ES Volume 1, Chapter 9: Ecology and Biodiversity [REP1-015],** vehicle movements will be infrequent and limited and comparable to that of existing routine agricultural practices, although will likely be greater during replacement of Solar PV Panels or BESS components. Embedded mitigation measures designed to protect key habitats for wildlife described for the construction phase, such as implementation of buffer zones, pollution prevention measures, and sensitive timing of vegetation maintenance works, will also apply during the operational phase and are set out in the **Outline LEMP [APP-283]** and the **Outline OEMP [REP1-098].**
Negative impacts – Operational Disturbance to and Displacement of Fauna, including Protected Species and SoCC Breeding and Overwintering Birds Loss of, and changes to habitat across the Solar PV Sites will result in the loss of a large area of breeding habitat for nesting bird species of lowland farmland for the duration of the operational phase. Notwithstanding the comments regarding the breeding bird survey methodology provided in the council's Relevant Representation [RR-4934] on the DCO application, Chapter 9 Ecology and Biodiversity of the ES [APP-061] has attempted to quantify the impacts and estimated the number of	An assessment of likely impacts and effects on breeding birds, including ground nesting species such as skylark, is provided in **ES Volume 1: Chapter 9: Ecology and Biodiversity [REP1-015]**. The Applicant acknowledges that a long term adverse effect on ground nesting birds of open farmland is anticipated, significant at a local level as a result of territory displacement, and temporary loss of foraging habitat. A local scale impact is a low scale at which a significant ecological impact can be felt and consequently, population-level impacts on the species conservation status are not anticipated However, considering the habitat enhancement and creation measures set out within the **Outline LEMP [APP-283]**, a

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skylark territories that will be displaced. Paragraphs 9.12.31 - 9.12.32 states: *'Skylark and yellow wagtail have overlapping nesting requirements, and so skylarks have been used as an umbrella species for this assessment. Of the 164 skylark territories recorded at baseline, 33 are retained in undeveloped fields, leaving 131 likely to be displaced…'*	significant beneficial residual effect on breeding birds is anticipated at a local level during operation and maintenance of the Scheme.
Negative impacts – Operational Disturbance to and Displacement of Fauna, including Protected Species and SoCC Breeding and Overwintering Birds Paragraphs 9.12.31-9.12.32 [APP-061] goes on to propose additional mitigation to address the loss of ground nesting bird habitat and displacement of breeding birds, and as discussed above, suggests that diverse grassland habitat can be created under and between the solar panels and within the buffer zones. The council considers this to be unachievable for the reasons detailed above and the council is concerned that assumption of delivery of the additional mitigation for breeding birds proposed in the Ecology and Biodiversity chapter of the ES [APP-061] has skewed the impact assessment, conferring greater assumed benefits than will be delivered on the ground.	The Applicant notes the Council's comments and it is agreed that, taking a precautionary approach, grassland expected to establish within and beneath panels has been assumed to represent modified grassland and a consistent approach has been taken between the **BNG Assessment Report [REP1-089]** and **ES Volume 1, Chapter 9 Ecology and Biodiversity [REP1-015]** in this respect. However, it is the Applicant's view that modified grassland can provide valuable foraging habitat for skylarks, particularly in comparison to arable cropland under intensive management which currently comprises the majority of the Solar PV Sites. Once established, the grassland will be subject to a low-intensity management regime during the operation and maintenance phase as secured via the **Outline LEMP [APP-283]** which will be expected to provide a year-round supply of foraging resources (such as seeds, plant and invertebrates) as opposed to that associated with arable cropping regimes which receive pesticides and other chemical inputs. Furthermore, skylarks (and particularly chicks) are heavily dependent on

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	insects and spiders during the summer months. As specified with the **Outline LEMP [APP-283]** use of pesticides will be avoided at the operational scheme. The current arable habitats across the Solar PV Sites are likely to be subject to regular pesticide application, and the cessation of this as a result of the Scheme can be abundance and diversity. Grassland habitats expected to establish within buffer zones are likely to provide even greater foraging resources for skylarks than typical existing habitats. Overall, the Applicant considers that the value of the habitat under/between Solar PV Panels and in buffer zones is highly likely to represent better quality foraging habitat for skylarks than the existing arable fields. The Applicant therefore considers the additional mitigation proposed in Paragraphs 9.12.31 and 9.12.32 of **ES Volume 1, Chapter 9: Ecology and Biodiversity [REP1-015]** to be deliverable. Skylarks have been observed gathering food from within operational solar farms and leading young into them, indicating they are valuable foraging resources. Whilst it is assumed that skylarks will typically avoid nesting in solar farms, skylark foraging habitat requirements are less strict. The Applicant disagrees that the impact assessment has been skewed with reference to breeding birds, for the reasons set out above. The Applicant considers that **ES Volume 1, Chapter 9: Ecology and Biodiversity [REP1-015]** provides a robust assessment on which the Examining Authority can rely.

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Negative impacts – Operational Disturbance to and Displacement of Fauna, including Protected Species and SoCC Breeding and Overwintering Birds Furthermore, in terms of breeding birds, the ES primarily focuses on impacts to ground nesting birds and whilst the council concurs that this does merit considerable attention, it also deems the potential for adverse impacts to birds that nest in hedgerows and trees to likewise be important given the potential for substantive removal of hedgerows across the Order Limits. The council considers the loss of breeding bird habitat, displacement of breeding birds and impacts on bird populations, particularly certain species such as skylark and yellow wagtail, throughout the operational phase to be considerable.	The Applicant agrees that due consideration should be given to breeding birds typical of both open and boundary habitats. The Applicant considers that potential impacts on both bird species assemblages during operation of the Scheme have been adequately assessed in **ES Volume 1, Chapter 9: Ecology and Biodiversity [REP1-015]**. Within the assessment, effects of habitat loss and territory displacement are largely considered to be construction-phase impacts and have been considered in the corresponding residual effects anticipated during construction. Embedded and additional mitigation measures for potential impacts to breeding birds arising during operation have been described in **ES Volume 1, Chapter 9: Ecology and Biodiversity [REP1-015]** and detailed in the **Outline LEMP [APP-283]**. These measures include sensitive timing of habitat creation and maintenance works to avoid disturbance to breeding birds. During operation, measures for favourable habitat creation/enhancement and management set out within the **Outline LEMP [APP-283]** and secured via DCO Requirements are anticipated to result in a significant beneficial residual effect on breeding birds at a local level.
Negative impacts – Operational Disturbance to and Displacement of Fauna, including Protected Species and SoCC	Within the assessment provided in **ES Volume 1, Chapter 9: Ecology and Biodiversity [REP1-015]**, effects of habitat loss and territory displacement on overwintering birds are largely considered to be construction-phase impacts and have been

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Breeding and Overwintering Birds The loss of agricultural land and change of land use within the Solar PV Sites will also likely have adverse effects on overwintering birds during the operational phase that will not be entirely mitigated.	considered in the corresponding residual effects anticipated during construction A significant beneficial residual effect on overwintering birds is anticipated at a local level during operation of the Scheme, principally as result of habitat creation/enhancement and favourable management set out within the **Outline LEMP [APP-283]** and secured via DCO Requirements
Negative impacts – Operational Disturbance to and Displacement of Fauna, including Protected Species and SoCC Breeding and Overwintering Birds Breeding and overwintering birds may also be subject to disturbance during the operational phase as a result of an increase in noise, human activity and vehicle and machinery use during maintenance and cleaning activities within the Solar PV Sites and CRC. During such activities birds could be flushed and displaced, and this may be temporary with birds returning once activities cease, but it could also be longer term or permanent in some cases.	Potential impacts of disturbance arising during operational activities to breeding and overwintering birds has been assessed in **ES Volume 1, Chapter 9: Ecology and Biodiversity [REP1-015]**. Embedded and further mitigation measures are set out within the **Outline LEMP [APP-283]**, including sensitive timing of habitat management and maintenance activities to avoid bird nesting season and ensure year-round foraging resources are maintained. No significant adverse residual effects are anticipated on breeding or overwintering birds during operation of the Scheme.
Negative impacts – Operational Bats The loss of hedgerows and hedgerow trees, as well as other neutral grassland and cattle-grazed pasture within the Solar PV	The Applicant refers to the previous comments concerning the estimate of hedgerow removal and again acknowledges the final extent of permanent and temporary hedgerow removal cannot be determined until the detailed design stage, hence the

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Sites and CRC will result in the long-term loss and fragmentation of habitat used by bats for foraging, commuting and roosting. Severance of commuting and foraging habitat will reduce functional habitat connectivity across the Order Limits but also beyond the Order Limits where existing habitats are contiguous with bat habitat offsite throughout the operational phase. This is a significant concern for the council given the vast scale of the Scheme and the many kilometres of hedgerow which could be removed according to Schedule 12 Part 1 and 2 of the 3.1 Draft DCO [REP1-007]. It is also pertinent as approximately 10.5ha of the CRC falls within the 4km greater horseshoe bat consultation zone around the Box Mine component of the Bath and Bradford-on-Avon Bats SAC and this area should be assumed to contain habitat that is functionally linked to the SAC.	wording of Schedule 12 of the **Draft DCO [REP1-007]** has sought to retain necessary flexibility. The estimates provided in **ES Volume 1, Chapter 9; Ecology and Biodiversity [REP1-015]** and shown within Annex A of the **Outline EPMS [REP1-106]** are however considered reasonable precautionary, and a likely worst-case scenario in terms of hedgerow removal, and consequently a worst-case scenario in terms of severance of commuting habitat. Impacts on bats relating to habitat losses are primarily assessed within **ES Volume 1, Chapter 9: Ecology and Biodiversity [REP1-015]** in relation to Construction Phase impacts, as habitat loss is not expected to occur during the Operation and Maintenance phase. Paragraphs 9.10.187 to 9.10.198 of **ES Volume 1, Chapter 9: Ecology and Biodiversity [REP1-015]** describe how extensive planting, habitat creation and enhancement within undeveloped areas and buffer zones within at the Solar PV Sites can be expected to provide optimal habitat for foraging and commuting bats, of likely greater value than existing habitats. Assuming the successful implementation of habitat creation and enhancement measures set out within the **Outline LEMP [APP-283]** and **ES Volume 1, Chapter 9: Ecology and Biodiversity [REP1-015]** identifies a beneficial effect on bats at the Solar PV Sites during the Operation and Maintenance

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	Phase, and therefore the Applicant disagrees with the Council's view on this point. The Applicant confirms that the 4km greater horseshoe bat consultation zone around the Box Mine component of the Bath and Bradford-on-Avon Bats Special Area of Conservation (SAC) is considered to be functionally-linked land for the SAC where it coincides with the CRC, for the purposes of the assessment of impacts on the SAC presented in both **ES Volume 1, Chapter 9: Ecology and Biodiversity [REP1-015]** and the **Habitat Regulations Assessment (HRA) Report [APP-275].** Both **ES Volume 1, Chapter 9: Ecology and Biodiversity [REP1-015]** and the **HRA Report [APP-275]** conclude that no significant adverse effects on the SAC are anticipated as a result of the Scheme. The Applicant notes that matters relating to the Bath and Bradford-on-Avon Bats SAC and the outcome and conclusions of the **HRA Report [APP-275]** have been discussed and agreed in principle with Natural England, with only minor procedural points of clarification remaining that both parties expect to resolve through ongoing discussions. An updated **HRA Report [APP-275]** will be submitted at Deadline 3.
Negative impacts – Operational Bats	The assessment of effects on bats presented in **ES Volume 1, Chapter 9: Ecology and Biodiversity [REP1-015]** acknowledges that there will be a time lag between removal of sections of hedgerow and the subsequent establishment and

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Although the 6.1 Environmental Statement Volume 1, Chapter 9 Ecology and Biodiversity [APP 061] assumes that impacts within the CRC will be largely restricted to the construction phase and therefore temporary, and that any removed hedgerows will be reinstated, in order to be suitably precautionary, it should be assumed that some reinstated habitats could take time to establish and fully recover and that therefore adverse effects could continue to be felt into the operational phase. Furthermore, despite the avoidance and mitigation measures proposed, it is conceivable that there will be longer term adverse effects to some habitats within the CRC due to the scale of works and types of activities proposed, such as at the locations where temporary construction compounds will be sited.	development of hedgerows to achieve comparable functionality and value for bats within the Cable Route Corridor, and the Applicant agrees with the Council on this point. However, the **ES Volume 1, Chapter 9: Ecology and Biodiversity [REP1-015]** also describes how new hedgerow planting will far exceed any hedgerow loss in term of overall length, and following the replanting/reestablishment of temporarily removed sections of hedgerow, no significant adverse effects in relation to loss of hedgerows during the Operation and Maintenance Phase are anticipated. **ES Volume 1, Chapter 9: Ecology and Biodiversity [REP1-015]** also recognises the potential for detrimental impacts on bats as a result of the short-term to reduction in habitat associated with works in the Cable Route Corridor. The locations of Temporary Construction Compounds as shown in the **Works Plan [APP-005]** will sited on either existing arable land or modified agricultural grassland as can be seen within **ES Volume 2, Figures 9-1-13 to 9-1-24: Baseline Habitat Maps – Cable Route Corridor [REP1-036]** Both of these habitat types can be expected to recover to pre-works condition and value for bats relatively quickly on completion of works. As such no significant adverse effects on bats in relation to loss of habitat during the Operation and Maintenance Phase are anticipated.

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Negative impacts – Operational Bats In addition, although Chapter 9 of the ES [APP-061] specifies that buffer zones will be implemented, the council nonetheless, considers that there will be impacts on bat populations throughout the operational phase and that there will likely be a reduction in foraging, commuting and also possibly roosting within the Solar PV Sites.	The Applicant notes this comment. Impacts on bats relating to habitat losses are primarily assessed within **ES Volume 1: Chapter 9: Ecology and Biodiversity [REP1-015]** in relation to Construction Phase impacts, as habitat loss is not expected to occur during the Operation and Maintenance phase. No reduction in roosting site at the Solar PV Sites are anticipated during the Operation and Maintenance Phase as no works to buildings or trees are expected. Paragraphs 9.10.187 to 9.10.198 of **ES Volume 1, Chapter 9: Ecology and Biodiversity [REP1-015]** describe how extensive planting, habitat creation and enhancement within undeveloped areas and buffer zones within at the Solar PV Sites can be expected to provide optimal habitat for foraging and commuting bats, of likely greater value than existing habitats. Assuming the successful implementation of habitat creation and enhancement measures set out within the **Outline LEMP [APP-283]** and **ES Volume 1, Chapter 9: Ecology and Biodiversity [REP1-015]** identifies a beneficial effect on bats during the Operation and Maintenance Phase, at the Solar PV Sites and therefore the Applicant disagrees with the Council's view on this point.
Negative impacts – Operational Other Faunal Species Habitat loss, fragmentation, severance and land use change will likely continue to give rise to adverse effects upon other	An assessment of likely impacts and effects on habitats and species during the Operation and Maintenance Phase is presented in **ES Volume 1: Chapter 9: Ecology and Biodiversity [REP1-015].** This concludes there would be no significant adverse effects on any ecological features as a

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species of fauna, as well as birds and bats, during the operational phase. In addition, increases in human activity, vehicle and machinery use during operational activities as well as any additional vegetation clearance required to facilitate solar panel and BESS battery unit replacement as well as any works to cabling within the CRC will also lead to adverse effects on a number of other species that currently utilise habitats across the Solar PV Sites and CRC such as GCN, reptiles and otter.	result of cleaning or maintenance of Solar PV panels or cabling, or replacement of Solar PV Panels or BESS components. As described in **ES Volume 1, Chapter 9: Ecology and Biodiversity [REP1-015],** vehicle movements will be infrequent and limited and comparable to that of existing routine agricultural practices, although will likely be greater during replacement of Solar PV Panels or BESS components. Embedded mitigation measures designed to protect key habitats for wildlife described for the construction phase, such as implementation of buffer zones, pollution prevention measures, and sensitive timing of vegetation maintenance works, will also apply during the operational phase and are set out in the **Outline LEMP [APP-283]** and the **Outline OEMP [REP1-098].**
Negative impacts – Decommissioning Phase Similar to construction phase, however, insufficient information provided/details known at this stage to facilitate provision of fully informed comments.	The Applicant notes this comment and agrees that activities related to the Decommissioning Phase of the Scheme would be expected to have similar (although no worse) impacts on ecological features as those anticipated for the Construction Phase of the Scheme. This is described in Section 9.11 of **ES Volume 1, Chapter 9: Ecology and Biodiversity [REP1-015]**.
Ranking the Ecology and Biodiversity Impacts in Importance	The Applicant responds to specific comments regarding ecology and biodiversity below.

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All the local impacts identified are considered material to the ExA, but in accordance with the national guidance[13] the council would indicate the following as the most significant in relation to this theme:	
1. According to Schedule 12 Part 1 and 2 of the 3.1 Draft DCO [REP1-007], there could be substantial loss of, damage to and fragmentation of the established and important network of hedgerows across the Solar PV Sites and CRC. Across the Order Limits, kilometres of legally protected 'important hedgerow', species-rich and ancient hedgerow could be removed to facilitate the Scheme. Refer to the council's Relevant Representation [RR-4934] to view further discussion and analysis regarding perceived reasons why the applicant has opted to include such extensive lists of hedgerows for removal and how this relates to the 'Rochdale Envelope' approach. In summary, it is assumed that the applicant has listed all these hedgerows to provide flexibility and to allow for removal of however much hedgerow it transpires is required at the detailed design stage, with a reliance on use of the 'Rochdale Envelope' approach and the need to set out the worst case scenario to justify the content of Schedule 12. This doesn't appear to align with the assessment in 6.1	Article 40 of the **Draft DCO [REP1-007]** provides general powers of hedgerow removal that are constrained by 40(4) by both Schedule 12 and the **Outline EPMS [REP1-106]**. Schedule 12 then identifies the extent within which the hedgerow removal powers can be exercised, noting that the specific locations of hedgerow removal are not known at this stage within those areas. This is reflected in column 2 of Part 1 and 2 of Schedule 12 of the **Draft DCO [REP1-007]**, which specifies "removal of part of…" the specified length of hedgerow. The **Outline EPMS [REP1-106]** then constrains the total amount of hedgerow that can be removed within the extents identified in Schedule 12 at Sections 2.4 and 5.2 of the **Draft DCO [REP1-007]** in line with the hedgerow removal assessed in Paragraphs 9.10.137 to 9.10.138 of **ES Volume 1, Chapter 9: Ecology and Biodiversity [REP1-015]**. Under Requirement 8 of the **Draft DCO [REP1-007]**, Wiltshire Council must

[13] National Guidance published in 2024, 'Nationally Significant Infrastructure Projects: Advice for Local Authorities'

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Environmental Statement Volume 1, Chapter 9 Ecology and Biodiversity [APP 061] however, as the assessment doesn't appear to have been based on the worst-case scenario as represented in Schedule 12, or taken into consideration that such extensive lengths of hedgerow could be removed. As well as much of the hedgerow network across the Order Limits qualifying as 'important hedgerow' under the Hedgerow Regulations 1997, hedgerows comprise priority habitats/HPI. Numerous semi-mature and mature trees also exist within the hedgerows across the Order Limits, a number of which comprise veteran trees and some may also comprise ancient trees. The Scheme could result in loss of these habitats of high intrinsic biodiversity value which also provide important ecological networks and corridors for a range of species including EPS, bats, most likely including Annex II bat species. It is also evident that there will be encroachment into proposed buffer zones along field boundary hedgerows and trees within the CRC to enable the cabling to be laid close to field boundaries. This will likely lead to damage, degradation and loss/removal of hedgerow and hedgerow trees contrary to what is considered in ES Chapter 9 [APP-061] as the assessment therein assumes that these important habitats within the CRC will be retained and protected in the main.	approve the detailed EPMS (including that the proposed hedgerow removal is in substantial accordance with that proposed under the **Outline EPMS [REP1-106]**). These controls should provide comfort to Wiltshire Council that hedgerow removal powers will only be exercised in accordance with what has been assessed within the Environmental Statement. To assist Wiltshire Council and other parties, the Applicant will insert a footnote beneath each table in Schedule 12 of the next version of the of the **Draft DCO [REP1-007]** that explains the hedgerow removal powers with cross reference to Article 40.
2. Loss of farmland and land use change within Solar PV Sites leading to substantive loss of breeding bird habitat and	An assessment of likely impacts and effects on breeding birds, including ground nesting species such as skylark, is provided in

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displacement of large numbers of birds during the breeding season and associated adverse effects on bird populations, including Birds of Conservation Concern (BoCC) and also possibly Schedule 1 species.	**ES Volume 1: Chapter 9: Ecology and Biodiversity [REP1-015]**. The Applicant acknowledges that a significant long term adverse effect on ground nesting birds of open farmland is anticipated at a local level as a result of territory displacement, and temporary loss of foraging habitat. A local scale impact is a low scale at which a significant ecological impact can be felt and consequently, population-level impacts on the species' conservation status are not anticipated. No residual significant adverse effects are anticipated on other breeding bird species during construction. Embedded mitigation measures and further controls to minimise impacts to breeding birds are set out within the **Outline EPMS [REP1-106]** and secured via DCO Requirements. During operation, measures for favourable habitat creation/enhancement and management set out within the **Outline LEMP [APP-283]** and secured via DCO Requirements are anticipated to result in a significant beneficial residual effect on breeding birds at a local level.
3. Adverse impacts to bats, including Annex II bats, notably greater horseshoe bats functionally linked to the Bath and Bradford-on-Avon Bats SAC, due to habitat loss particularly hedgerows and hedgerow trees and cattle-grazed pasture and	The impacts and effects on bats as a result of habitat loss are assessed within **ES Volume 1, Chapter 9: Ecology and Biodiversity [REP1-015]**. This acknowledges the potential for adverse impacts via this impact pathway on bats. The

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siting of temporary construction compounds which will have artificial lighting, throughout the CRC. It is recognised that the HRA [APP-275] specifies that temporary construction compounds will not be located within the section of the CRC that coincides with the 4km greater horseshoe bat consultation around the Box Mine component of the Bath and Bradford-on-Avon Bats SAC. It is expected that the Scheme will probably result in a reduction in bat foraging, commuting and roosting activity within the Solar PV Sites and potentially also within the CRC. Given that no bat survey has been conducted within the CRC despite a section falling within a greater horseshoe bat consultation zone around a SAC component site and 17ha of land within the CRC has not been subject to habitat survey and the need to apply the precautionary principle, the council cannot at present corroborate the conclusion of the submitted Habitats Regulations Assessment (HRA).	assessment concludes that, with the implementation of embedded and additional mitigation measures, no significant adverse effects on bats are anticipated. Embedded mitigation measures designed to avoid and reduce impacts include the retention of the vast majority of the hedgerow network and all woodland within the Scheme, which will be protected through the implementation of buffer zones, good practice measures to prevent incidental damage and degradation of habitats. These are detailed within the **Outline EPMS [REP1-106]**. Furthermore, and with reference to Annex II bats (including greater horseshoe bats) the assessment of impacts on the qualifying features of the Bath and Bradford-on-Avon SAC are presented in both **ES Volume 1, Chapter 9: Ecology and Biodiversity [REP1-015]** and the **HRA Report [APP-275].** The assessment acknowledges the potential for adverse impacts on the SAC via habitat loss and fragmentation where the Scheme coincides with land considered to be functionally-linked to the SAC. Mitigation measures designed to avoid and reduce impacts include restrictions on the size of any hedgerow sections requiring removal (secured within the **Outline EPMS [REP1-106]**, strict controls on lighting, and the sensitive siting of Temporary Construction Compounds. Both **ES Volume 1, Chapter 9: Ecology and Biodiversity [REP1-015]** and the **HRA Report [APP-275]** conclude that, with the adoption of

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	mitigation measures, no significant adverse effects on the SAC are anticipated as a result of the Scheme. The Applicant also confirms that no Temporary Construction Compounds will be sited within any Wiltshire Impact Zones for Bat Species (inclusive of the 4 km greater horseshoe bat consultation around the Box Mine component of the SAC) as secured as part of the **Works Plan [REP1-005].** The impacts of artificial lighting associated with the Construction Phase on bats are assessed in Paragraph 9.10.186 of **ES Volume 1, Chapter 9: Ecology and Biodiversity [REP1-015]**, which concludes that no significant effects are anticipated. Good practice limitations and controls for the use of artificial lighting during construction, designed to avoid impacts on bats and other light-sensitive species are detailed within the **Outline EPMS [REP1-106]** as well as the **Outline CEMP [REP1-096].** The Applicant notes that matters relating to the Bath and Bradford-on-Avon Bats SAC and the outcome and conclusions of the **HRA Report [APP-275]** have been discussed and agreed in principle with Natural England, with only minor procedural points of clarification remaining that both parties expect to resolve through ongoing discussions. An updated **HRA Report [APP-275]** will be submitted at Deadline 3.

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4. Potential for adverse effects upon and damage to ancient woodland within and adjacent to the Order Limits, such as North Bincombe Wood which has been subsumed into the Order Limits boundary since the targeted consultation conducted in June 2025. In turn this would likely lead to adverse effects upon species that use these habitats.	The assessment of effects on woodlands (including ancient woodland) is presented in **ES Volume 1, Chapter 9: Ecology and Biodiversity [REP1-015].** This concludes that, with embedded mitigation in place no significant adverse effects on woodland are anticipated as a result of the Scheme. Embedded mitigation measures include the adoption of a minimum 15 m protective buffer from all woodland edges. However, both **ES Volume 1, Chapter 9: Ecology and Biodiversity [REP1-015]** and **ES Volume 1, Chapter 10: Arboriculture [APP-062]** acknowledge some incursion into the 15 m buffer may be required in a limited number of places, including at North Bincombe Wood (also known as Rodbourne Plantation Local Wildlife Site) at Lime Down E to make use of an existing farm track. Any incursion within the woodland 15 m buffers would be limited, unavoidable, and restricted to the use of existing access tracks, or undertaken only where appropriate ground protection measures are installed in advance of works. These measures are intended to prevent soil compaction, root damage and changes to site levels, and will be implemented in accordance with the principles set out within **ES Volume 3, Appendix 10-1 Arboricultural Impact Assessment and Outline Arboricultural Method Statement [APP-206]** and the **Outline CEMP [REP1-096].**
5. Potential for killing of/injury to a number of species and disturbance to and displacement of a number of species	An assessment of likely impacts and effects on faunal species is provided in **ES Volume 1: Chapter 9: Ecology and**

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including EPS, protected species and SoCC such as GCN and reptiles. In terms of GCN, the DCO application currently lacks a confirmed and demonstrable mitigation strategy for the CRC given that a IACPC from NE has not been submitted alongside the DCO application, and it has not been stipulated whether an IACPC has been attained or whether an application to acquire an IACPC has even been made to date.	**Biodiversity [REP1-015].** This concludes that, with embedded and additional mitigation in place, no significant adverse effects on protected species or species of conservation concern are anticipated as a result of killing or injury to individual animals or through disturbance. In particular, it is the Applicant's view that adequate avoidance and protection measures for wildlife, including legally protected species, are detailed within the **Outline EPMS [REP1-106].** This document sets out measures designed to avoid killing and injury to a number of species or species groups during construction, as well as to ensure compliance with legislation pertaining to protected species. Such protective measures include implementation of fenced biodiversity protection zones, sensitive timing of works, adoption of sensitive methods of working, pre-construction inspections to identify and manage constraints, and requirements for the removal of sheltering/resting places under the correct Natural England licence if these cannot be retained in situ. The Applicant confirms that an IACPC countersigned by Natural England **[EN010168/EXAM/9.24]** has been obtained and has been submitted at Deadline 2 as evidence of the Scheme's acceptance into the District Level Licensing Scheme. This demonstrates adequate compensation for impacts to great crested newts within the Cable Route Corridor will be delivered.

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6. Potential for adverse impacts upon/loss of other neutral grassland within the CRC given that it is not currently evident from the DCO application documentation, whether any areas of this habitat which will be affected during construction, qualify as priority habitat/HPI. The council is particularly concerned that works within the CRC could result in the loss of and/or damage to other neutral grassland that meets the qualifying criteria for priority habitat/HPI. Insufficient baseline information regarding the other neutral grassland within the CRC has accompanied the DCO application. This is pertinent as the CRC will be up to approximately 665m wide at some locations along its circa 22km extent.	The Applicant can confirm that no area of other neutral grassland habitat within the Cable Route Corridor constituted HPI/priority habitat. Any such habitats would have been recorded as such and mapped accordingly. The text in **ES Volume 3, Appendix 9-1: Ecological Baseline Report [REP1-083]** has been updated with further details and confirmation that no grassland within the Cable Route Corridor comprised HPI/priority habitat, and the revised version was submitted at Deadline 1. No loss of other neutral grassland priority habitat/HPI is therefore anticipated as a result of the Scheme, within the Solar PV Sites or Cable Route Corridor. The Applicant acknowledges that some areas within the Cable Route Corridor had not been subject to ecological survey at the point of finalising the **ES Volume 1, Chapter 9: Ecology and Biodiversity [REP1-015]**. Since the preparation of **ES Volume 1, Chapter 9: Ecology and Biodiversity [REP1-015]**, additional habitat surveys of previously un-surveyed land have been conducted, and all baseline ecological surveys within the Cable Route Corridor have now been completed. The survey methodology applied was consistent with that reported in **Appendix 9-1 [REP1-083]** for the rest of the Cable Route Corridor. The Applicant has updated **ES Volume 1, Chapter 9: Ecology and Biodiversity [REP1-015]** and **Appendix 9-1 [REP1-083]** and revised versions have been submitted at Deadline 1

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	with the findings of these surveys. It is considered these do not materially change the assessment of likely significant effects presented in the chapter.
7. Potential for adverse effects upon the river running through Lime Down D and aligning riparian habitat and associated faunal species, such as otter, particularly during the construction phase.	The river running through Lime Down D is known as Gauze Brook and has been referred to as such within **ES Volume 1: Chapter 9: Ecology and Biodiversity [REP1-015].** The assessment of effects on ecological features within **ES Volume 1, Chapter 9: Ecology and Biodiversity [REP1-015]** describes how no direct impacts on this watercourse are anticipated as the Scheme will not require any new crossings or any other direct modification of the Gauze Brook in this location. **ES Volume 1, Chapter 9: Ecology and Biodiversity [REP1-015]** identifies the potential for indirect impacts on the watercourse network at the Solar PV Sites as a result of degradation through incidental pollution resulting from construction activities. The Chapter describes how embedded mitigation measures, including the provision of adequately protective buffer zones and the adoption of good practice pollution prevention measures, will ensure such potential impacts are minimised. These measures are detailed within the **Outline EPMS [REP1-106]** as well as the **Outline CEMP [REP1-096]**. The Chapter concludes that no significant adverse impacts on the network of watercourses at the Scheme, including Gauze

Wiltshire Council Comments	Applicant's Response
	Brook, or any associated riparian species are anticipated. An assessment of likely impacts and effects on riparian protected species, including otters, is presented **ES Volume 1, Chapter 9: Ecology and Biodiversity [REP1-015]**. This concludes that, with the implementation of embedded and additional mitigation measures, no significant adverse effects on this species group as a result of disturbance or any other impact pathway will occur.
8. Potential for adverse impacts upon lowland calcareous grassland priority habitat/HPI immediately adjacent to the order limits e.g. adjacent to Lime Down A and Lime Down E especially during the construction phase. Although the Scheme boundary has been adjusted to exclude these habitats in the main, the removal of field boundary hedgerow proposed by means of Schedule 12 Parts 1 and 2 of the Draft DCO [REP1-007] could leave these adjacent habitats more exposed and vulnerable to damage during construction activities.	The Applicant can confirm that no area of lowland calcareous grassland priority habitat/HPI have been recorded within the Order Limits. Areas of known lowland calcareous grassland within 2 km of the Solar PV Sites (including Lime Down A and Lime Down E) as revealed by desk studies are shown in **ES Volume 2, Figure 9-1-5 Priority Habitats and Ancient Woodland within 2km of the Solar PV Sites [APP-111].** No required hedgerow removal is anticipated for any hedgerow bounding any parcel of lowland calcareous grassland priority habitat/HPI (as shown in the Hedgerow Removal Plan appended to the **Outline EPMS [REP1-106]**) as there is no requirement for access into them, and as such no pathway for impacts on this habitat as a result of hedgerow removal are anticipated. In respect of concerns regarding exposed habitat due to hedgerow removal. Article 40 of the **Draft DCO [REP1-007]** provides general powers of hedgerow removal that are

Wiltshire Council Comments	Applicant's Response
	constrained by 40(4) by both Schedule 12 and the **Outline EPMS [REP1-106]**. Schedule 12 then identifies the extent within which the hedgerow removal powers can be exercised, noting that the specific locations of hedgerow removal are not known at this stage within those areas. This is reflected in column 2 of Part 1 and 2 of Schedule 12, which specifies "removal of part of…" the specified length of hedgerow. The **Outline EPMS [REP1-106]** then constrains the total amount of hedgerow that can be removed within the extents identified in Schedule 12, in line with the hedgerow removal assessed in **ES Volume 1, Chapter 9: Ecology and Biodiversity [REP1-015].** By providing flexibility for how hedgerow removal can be micro sited within the areas identified in Schedule 12 will allow the Applicant to remove hedgerows in locations that avoid or minimise impacts as far as practicable.

15 Minerals and Waste

Table 15-1 - Minerals and Waste

Wiltshire Council Comments	Applicant's Response
Overview and commentary The proposed development has minimal impact on minerals and waste. The cable route crosses safeguarded mineral areas, including Monks Park Mine and a sand and gravel resource zone, but due to shallow trenching and peripheral location, the effect on mineral resources is negligible. No permitted waste sites are affected, and construction waste will be managed through standard practices and the Site Waste Management Plan, with reuse of excavated material under the CL:AIRE DoW CoP framework. Operational waste is negligible, and decommissioning will prioritise reuse and recycling. The headline issues are safeguarding mineral resources and ensuring sustainable waste management. Recommended requirements include a Construction Environmental Management Plan, Operational Environmental Management Plan, Site Waste Management Plan, and Decommissioning Strategy to secure mitigation and compliance throughout the project lifecycle.	The Applicant notes this comment.
Positive impacts – construction phase None identified.	The Applicant notes this comment.

Wiltshire Council Comments	Applicant's Response
Positive impacts – operational None identified.	The Applicant notes this comment.
Positive impacts – decommissioning phase None identified.	The Applicant notes this comment.
Neutral impacts, Minerals: The Cable Route Corridor running south from the Solar PV Sites to the National Grid Melksham Substation crosses a Mineral Safeguarding Area identified in the Wiltshire and Swindon Minerals Core Strategy between Corsham and Whitley. The Cable Route Corridor passes over Monks Park Mine, where building stone is mined below ground. However, with the building stone mined at depths of 20+ metres below the surface and the cable trench being no more than 2 metres deep, the impact on the mineral resource would be negligible.	The Applicant notes this comment.
Neutral impacts, Minerals: The Cable Route Corridor as it approaches the National Grid Melksham Substation affects part of a Mineral Resource Zone identified in the Wiltshire and Swindon Minerals Core Strategy as a suitable area for future sand and gravel supply. However, it is considered that the affected area being small, on the periphery of the mineral deposit and constrained by existing land uses is unlikely to be worked. If in the future the area	The Applicant notes this comment.

Wiltshire Council Comments	Applicant's Response
should be worked for minerals, any remaining cable ducts would not unduly impact on extraction operations.	
Neutral impacts, Minerals: The relevant local planning policies listed in Appendix A (namely, MCS6 of the Minerals Core Strategy and MDC4 of the Minerals Development Control Policies) have been complied with as mineral resources have been safeguarded from unnecessary sterilisation.	The Applicant notes this comment.
Neutral Impacts, Waste: No permitted waste management site is impacted by the project boundary. During the project construction phase standard waste management practices would be implemented to control and manage waste sustainably. The 7.16 Outline Site Waste Management Plan [APP-281] sets out the arrangements that would be employed to reduce waste arisings. Reuse of excavated materials from installation of cabling would be facilitated under the 'CL:AIRE DoW CoP' framework, resulting in less material disposed of by landfill. The submitted assessment of the impact of the waste arising from the project on the capacity of waste management facilities concludes this would be of negligible impact.	The Applicant notes this comment.
Neutral Impacts, Waste:	The Applicant notes this comment.

Wiltshire Council Comments	Applicant's Response
During operation, the impacts of waste generation would be minimal, as solar PV panels do not generate any direct waste as part of the energy production process.	
Neutral Impacts, Waste: The 7.14 Outline Decommissioning Strategy [REP1-100] confirms how at the end of the project's operation phase the components would be re-used or recycled to minimise impacts.	The Applicant notes this comment.
Neutral Impacts, Waste: The relevant local planning policies listed in Appendix A (namely, WCS6 of the Waste Core Strategy) have been complied with as sufficient regard has been had to minimising and managing waste.	The Applicant notes this comment.
Negative impacts – construction phase None identified.	The Applicant notes this comment.
Negative impacts – operational None identified.	The Applicant notes this comment.
Negative impacts – decommissioning phase None identified.	The Applicant notes this comment.
Ranking the Minerals and Waste impacts in importance	The Applicant responds to specific comments regarding minerals and waste below.

Wiltshire Council Comments	Applicant's Response
All the local impacts identified are considered material to the ExA, but in accordance with the national guidance[14] the council would indicate the following as the most significant in relation to this theme:	
Minerals: The impact of the project on identified and safeguarded mineral resources is limited to the Cable Route Corridor which crosses two mineral deposits between Corsham and Whitley. The impact of the grid connection cables on the identified mineral resources is negligible.	The Applicant notes this comment.
Waste: Waste generated during site preparation and construction would be managed in accordance with relevant regulations and code of practice. Operational impacts would be minimal as solar PV panels do not generate any direct waste as part of the energy production process. At the end of the project's operation the components will be decommissioned and the land restored to its original use and condition.	The Applicant notes this comment.

[14] National Guidance published in 2024, 'Nationally Significant Infrastructure Projects: Advice for Local Authorities'

16 Consolidated List of Suggested Requirements with Reasons

Table 16-1 - Socio-Economics, Tourism and Recreation

Requirement	Reason	Requirement to be discharged by:		Applicant's Response
		Secretary of State	Wiltshire Council	
No part of the authorised development may commence until a comprehensive business survey recording both positive and negative impacts of the scheme has been agreed with Wiltshire Council.	To direct targeted business support to the right sectors in the local area, and to produce an evidence base for use with other similar sized schemes going forward.		Yes	The Applicant has assessed the likely economic impacts on affected business sectors in **ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]** and considers the requirement to conduct a comprehensive business survey would be disproportionate to the scale of the Scheme. The Applicant furthermore considers that the measures set out in the **Outline SSCEP [REP1-108]** are already sufficient to safeguard directed business support to sectors most affected by the Scheme. This is secured by Requirement 18 of Schedule 2 to the **Draft DCO [REP1-007]**. However, if Wiltshire Council require additional commitments to be made within the **Outline SSCEP [REP1-108]**, the Applicant is able to discuss any additions or

Requirement	Reason	Requirement to be discharged by:		Applicant's Response
		Secretary of State	Wiltshire Council	
				amended measures through agreement of the Statement of Common Ground, a first draft of which is submitted at Deadline 2 **[EN010168/EXAM/8.2]**.
No part of the authorised development may commence until a business response plan has been submitted to and approved by the relevant planning authority. The business response plan must be implemented as approved.	To ensure agreed plans are in place and ready to be implemented to support local businesses, if needed.		Yes	The Applicant has assessed the likely economic impacts on affected business sectors in **ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]** and considers the requirement to produce a specific business response plan is already suitably covered by the measures set out in the **Outline SSCEP [REP1-108]**. The Applicant is confident that these are already sufficient to safeguard directed business support to sectors most affected by the Scheme. This is secured by Requirement 18 of Schedule 2 to the **Draft DCO [REP1-007]**. However, if Wiltshire Council require additional commitments to be made within the **Outline SSCEP [REP1-108]**, the Applicant is able to discuss any additions or

Requirement	Reason	Requirement to be discharged by:		Applicant's Response
		Secretary of State	Wiltshire Council	
				amended measures through agreement of the Statement of Common Ground, a first draft of which is submitted at Deadline 2 **[EN010168/EXAM/8.2]**.
No battery storage facilities should be installed until Wiltshire Council are satisfied, on advice from Wiltshire and Dorset Fire Service, that fire suppression measures are adequate.	To minimise pollution, minimise impact on businesses and residents should a battery fire occur.		Yes	The Applicant notes this comment; this is secured through the **Draft DCO [REP1-007]**. Section 7.1.4 of the **Outline BSMP [REP1-110]** stipulates: "*The implementation of the Outline BSMP is secured through a Requirement in Schedule 2 of the Draft DCO [EN010168/APP/3.1]. This will stipulate that a detailed Battery Safety Management Plan will be submitted to and approved in consultation with D&WFRS, the Environment Agency (EA), and by the relevant planning authorities prior to the commencement of the works for the BESS. This plan will be substantially in accordance with the Outline BSMP.*" The relevant Requirement referred to is Requirement 6 (Battery safety

Requirement	Reason	Requirement to be discharged by:		Applicant's Response
		Secretary of State	Wiltshire Council	
				management). Breach of a Requirement under a DCO is an offence.
No part of the scheme should be commenced until a visitor centre providing information on the benefits of the various forms of renewable energy has been approved by Wiltshire Council Economic Development and Development Management teams.	To help encourage local acceptance of the project by; de-mystifying renewable technology, increasing awareness of biodiversity, building trust through school visits, and potentially minimising negative impacts of the scheme on local tourism.		Yes	The Applicant considers that opportunity to provide a means of engagement between local people, visitors, and the benefits of renewable energy production may be worth exploring with Wiltshire Council. However, the Applicant does not agree that DCO Requirements is an appropriate means to do so, and instead would look to discuss with Wiltshire Council if this is deliverable through the Community Benefit Fund (if more widely requested by local stakeholders), or an alternative means to the DCO process. For the avoidance of doubt, the Applicant would not be seeking to build a premises or "centre", but would seek the use of local facilities where required. The Applicant is able to discuss these matters through (or in parallel to) agreement of the Statement of Common Ground, a first draft of which is

Requirement	Reason	Requirement to be discharged by:		Applicant's Response
		Secretary of State	Wiltshire Council	
				submitted at Deadline 2 **[EN010168/EXAM/8.2]**.

Table 16-2 - Archaeology

Requirement	Reason	Requirement to be discharged by:		Applicant's Response
		Secretary of State	Wiltshire Council	
No development shall commence within the area indicated by application until: A Detailed Archaeological Management Strategy (DAMS), setting out a methodology for the excavation and recording of archaeological sites during the construction phase of the development, has been submitted to and approved by	To secure an agreed archaeological strategy and methodology in response to impacts upon the archaeological resource from the proposed development.		Yes	The Applicant considers that the current drafting in Requirement 12 and **ES Volume 3, Appendix 12-6: Outline Archaeological Mitigation Strategy [APP-230]** appropriately secures the programme of archaeological mitigation within the Scheme. As stated in Paragraph 1.1.2 of **ES Volume 3 Appendix 12-6: Outline Archaeological Mitigation Strategy [APP-230]** (Outline AMS), the Outline AMS provides an overarching methodology for undertaking a programme of archaeological mitigation

Requirement	Reason	Requirement to be discharged by:		Applicant's Response
		Secretary of State	Wiltshire Council	
the Local Planning Authority. *(If such a document has not already become a certified document as part of the application, as is Wiltshire Council's preferred position).*				within the Scheme. Written Schemes of Investigations (WSIs) that detail site-specific mitigation measures, such as Strip, Map and Record if it is considered a viable option, will be appended to the Outline AMS in advance of each phase of mitigation works. It is intended that these WSIs will be approved by Wiltshire Council prior to their implementation. This approach is a common approach adopted on other consented solar DCO schemes, as evidenced by the consented Cottam and West Burton schemes. It is secured by Requirement 12 of the **Draft DCO [REP1-007]** which states that no part of the Proposed Development can commence until the WSI for that part has been submitted to and approved by Wiltshire Council as the relevant planning authority. The WSIs must be substantially in accordance with the **ES Volume 3 Appendix 12-6: Outline**

Requirement	Reason	Requirement to be discharged by:		Applicant's Response
		Secretary of State	Wiltshire Council	
				Archaeological Mitigation Strategy [APP-230] and must be implemented as approved. As detailed in Table 12-2 of **ES Volume 1, Chapter 12: Cultural Heritage [APP-064]**, the Applicant has undertaken thorough consultation with the Wiltshire Council Archaeological Officer and will look to discuss comments on the Outline AMS with a view to updating **ES Volume 3 Appendix 12-6: Outline Archaeological Mitigation Strategy [APP-230]** where necessary and appropriate.
No development shall commence within the area indicated by the application until: a) A written programme of archaeological investigation, which should include on-site work and off-site work such as the analysis, publishing and archiving of the results, has	To enable the recording of any matters of archaeological significance.		Yes	As stated in Paragraph 1.1.2 of **ES Volume 3 Appendix 12-6: Outline Archaeological Mitigation Strategy [APP-230]** (Outline AMS), the Outline AMS provides an overarching methodology for undertaking a programme of archaeological mitigation within the Scheme. Written Schemes of Investigations (WSIs) that detail site-specific mitigation measures, will be appended to the Outline AMS in advance of each phase of

Requirement	Reason	Requirement to be discharged by:		Applicant's Response
		Secretary of State	Wiltshire Council	
been submitted to and approved by the Local Planning Authority; and b) The approved programme of archaeological work has been carried out in accordance with the approved details. This programme is to be completed within 3 years after the completion of on site archaeological work.				mitigation works. It is intended that these WSIs will include information regarding the programme of archaeological investigation for on-site and off-site work (including analysis, publishing and archiving of the results) as well as public engagement plans, and will be approved by Wiltshire Council prior to their implementation. Archaeological mitigation is secured through Requirement 12 of the **Draft DCO [REP1-007]** which states that no part of the Proposed Development can commence until the WSI for that part has been submitted to and approved by Wiltshire Council as the relevant planning authority. Therefore the Applicant considers that the current drafting in Requirement 12 and **ES Volume 3, Appendix 12-6: Outline Archaeological Mitigation Strategy [APP-230]** appropriately secures the programme of archaeological mitigation within the Scheme. However, the Applicant acknowledges the

Requirement	Reason	Requirement to be discharged by:		Applicant's Response
		Secretary of State	Wiltshire Council	
				comments and is able to discuss the wording of the draft DCO Requirement 12 with Wiltshire Council during examination and the Statement of Common Ground process.
No development shall commence within the area indicated by application until: a) An Archaeological Management Plan, setting out a methodology for protecting archaeological sites that have been scoped out of the development as well as those within the development footprint that need to be protected during the construction phase of the development, has been submitted to and approved by the Local Planning Authority; and	To enable the protection and preservation of sites of archaeological significance.		Yes	The Applicant considers that the current drafting in Requirement 12 and **ES Volume 3, Appendix 12-6: Outline Archaeological Mitigation Strategy [APP-230]** appropriately secures the programme of archaeological mitigation within the Scheme. The Applicant acknowledges the Wiltshire Council requirement of an archaeological management plan for areas of preservation in situ. The Applicant will discuss this with Wiltshire Council and look to update **ES Volume 3, Appendix 12-6: Outline Archaeological Mitigation Strategy [APP-230]** as appropriate.

Requirement	Reason	Requirement to be discharged by:		Applicant's Response
		Secretary of State	Wiltshire Council	
b) The programme of protection has been carried out in accordance with the approved details.				

Table 16-3 -Highways – Development Management

Requirement	Reason	Requirement to be discharged by:		Applicant's Response
		Secretary of State	Wiltshire Council	
CONDITION - CTMP No development shall commence on the specific Lime Down PV sites until detailed Construction Traffic Management Plans (CTMP), together with site plans, have been submitted to, and approved in writing by, the	REASON: To minimise detrimental effects to the neighbouring amenities, the amenities of the area in general, detriment to the natural environment through the risks of pollution and dangers to highway safety, during the construction phase.		Yes	Measures for managing impacts on public users of the road network are controlled through the **Outline CTMP [REP1-112],** with key measures summarised below: • Road widening; • Traffic Management; • Signage;

Requirement	Reason	Requirement to be discharged by:		Applicant's Response
		Secretary of State	Wiltshire Council	
Local Planning Authority. These shall include the following: 1. provision for the on-site parking of vehicles for site operatives and visitors. 2. provision for the loading and unloading of plant and materials, including turning areas sufficient for accommodating articulated HGVs and AIL vehicles as required. 3. provision for the storage of plant and materials used in constructing the development. 4. the erection and maintenance of security hoarding including decorative displays and facilities for public viewing, where appropriate.				• Restriction of construction vehicle movements to specific times and outside of the peak hours; • Implementation and operation of a booking system; • Provision of appropriate parking; • Wheel wash facilities; • Noise reduction and air quality; • Site security; • Road condition surveys; • Community engagement; and • Monitoring. The updated **Outline CTMP [REP1-112]** submitted at Deadline 1 confirms further detail on carrying out works in the public highway, including the requirement to book road space with Wiltshire Council. This will work the same as Wiltshire Council's current permit scheme but with a more condensed

Requirement	Reason	Requirement to be discharged by:		Applicant's Response
		Secretary of State	Wiltshire Council	
5. locations of wheel washing facilities. 6. measures to control the emission of dust and dirt during construction. 7. a scheme for recycling/disposing of waste resulting from demolition and construction works. 8. measures for the protection of the natural environment. 9. hours of construction, including delivery schedules. 10. traffic routeing signs and HGV turning warning signs (including signage drawing(s)), and associated trimming of vegetation. 11. pre-condition photo surveys (See Informative).				two month timeframe to provide the Applicant with certainty of delivery. Wiltshire will be able to effectively coordinate, and control works on the public highway, including coordination with other construction works from other projects. The updated **Outline CTMP [REP1-112]** submitted at Deadline 1 also sets out further detailed on the proposed monitoring process at Section 6.14. This included details of how any complaints will be processed and responded to. 7. A scheme for recycling/disposing of waste resulting from demolition and construction works is outlined in the **Outline Site Waste Management Plan (SWMP) [REP1-102].** Requirement 9 of the **Draft DCO [REP1-007]** states that *"(1) No part of the authorised development may commence until a site waste management plan for that part has been submitted to and approved by the relevant planning authority. (2) Any site*

Requirement	Reason	Requirement to be discharged by:		Applicant's Response
		Secretary of State	Wiltshire Council	
12. details of the proposed highway works proposed in any access route lengths defined as 'Highway Improvement Areas' (HIA). NOTE: The proposed extent of the HIA lengths in the draft DCO and potential passage mitigation for two HGVS which might be needed on minor roads outside of this is a point of contention as noted. The development shall not be carried out otherwise than in accordance with the approved construction traffic management plans without the prior written permission of the local planning authority. INFORMATIVE Pre-condition Survey Extents				*waste management plan submitted in accordance with this paragraph must be substantially in accordance with the outline site waste management plan as relevant to the activities to which it relates.* *(3) The site waste management plan must be implemented as approved."* A scheme to protect retained habitats and ecological features construction works are outline within the **Outline EPMS [REP1-106]**. This is secured by Requirement 8 of the **Draft DCO [REP1-007].**

Requirement	Reason	Requirement to be discharged by:		Applicant's Response
		Secretary of State	Wiltshire Council	
Photographic pre-condition highway surveys are to be carried out for the following lengths of highway with copies of pre and post condition surveys to be supplied to Wiltshire Council: • Lime Down A-C: Alderton Road, Fosse Way and the unnamed road between the Lime Down A access points 5 and 6 and the junction with Fosse Way. • Lime Down D: The route from Dyson Roundabout via Bradfield Cottages to the Lime Down D access points 7, 8 and 20 The applicant should be informed that the Highway				

Requirement	Reason	Requirement to be discharged by:		Applicant's Response
		Secretary of State	Wiltshire Council	
Authority will pursue rectification of any defects identified by the highway condition survey which can be attributed to the site construction traffic under the provision of S59 of the Highways Act 1980. As such, the undertaker will be required to enter into a bespoke s59 Agreement with the Highway Authority to formalise arrangements.				
CONDITION - Solar PV Sites: Construction Accesses No existing or proposed accesses to be used for construction of the Solar PV sites (Lime Down areas A-E) shall be brought into use for such purpose until full details have been submitted to and	REASON: In the interests of highway safety.		Yes	Construction accesses, including the process for reinstatement of roads, are controlled through the **Outline CTMP [REP1-112]** under the Requirement 15 of the **Draft DCO [REP1-007].** In particular, temporary mitigation of highways required to accommodate AIL movements is set out at section 5.4 and includes measures such as bollard removal, temporary road widening, and vegetation trimming. At Paragraph 5.4.2

Requirement	Reason	Requirement to be discharged by:		Applicant's Response
		Secretary of State	Wiltshire Council	
approved in writing by the Local Planning Authority. These details shall include any proposed re instatement works where any access or the upgrade works to it is deemed temporary and so needs to be returned to the pre construction state at the end of the Construction Phase. INFORMATIVE This applies to access references 1-4, 4a, 4b, 5-17, 17a, 17b, 18-21 as shown on 6.2 Environmental Statement Volume 2, Figure 13-11 Construction Access Locations: Solar PV Sites [APP-156]				of the **Outline CTMP [REP1-112]**, such mitigation will be removed once AIL movements are completed. The Applicant has also provided draft protective provisions to Wiltshire Council as local highway authority and it intends to include these within the **Draft DCO [REP1-007]** at a future deadline, once agreed with Wiltshire Council.

Requirement	Reason	Requirement to be discharged by:		Applicant's Response
		Secretary of State	Wiltshire Council	
CONDITION - Solar PV Sites: Operational Only Accesses None of the additional Operational Only accesses to the Solar PV sites (Lime Down areas A-C and E) shall be brought into use for such purpose until full details have been submitted to and approved in writing by the Local Planning Authority. INFORMATIVE This applies to access references 201-209 as shown on 6.2 Environmental Statement Volume 2, Figure 13-13 Operational Only Access Locations: Solar PV Sites APP-158].	REASON: In the interests of highway safety.		Yes	Table 3.8 of the **Outline OEMP [REP1-098]** provides that the undertaker will provide suitable points of access for operation and maintenance phase vehicles with turning areas. As per Requirement 14 (Operational environmental management plan) prior to the date of final commissioning for any part of the authorised development, a final operational environmental management plan for that part must be submitted to and approved by Wiltshire Council. As such, Wiltshire Council will have the opportunity to comment on accesses during the operational phase of the Scheme. The nine 'Operational Only' access locations serving Lime Down A to E are existing field access points. These will remain in place and unchanged as part of the Scheme and accommodate occasional trips to the proposed habitat areas.

Table 16-4 - Highways – Network Management

Requirement	Reason	Requirement to be discharged by:		Applicant's Response
		Secretary of State	Wiltshire Council	
None identified at this stage due to the expectation that the impacts identified above will be addressed through the inclusion of protective provisions for the benefit of the local highway authority within the draft DCO and through further amendments to the proposed management plans. However, should these negotiations prove unsuccessful, the council reserves the right to seek additional requirements during the examination. Amended provision is required in relation to: • The permitting scheme and any possible future Lane Rental Scheme	To ensure all the normal rules and regulations are in place to protect the highway asset and that coordination with all the normal works across the network are undertaken in the usual thorough way – the council cannot have two sets of different rules for works on its network and must ensure any reinstatements are undertaken to the specified standard to protect the public purse from early failure of trenches.		Yes	The Applicant makes note of this comment. As agreed with Wiltshire Council on 14 April 2026, the Applicant has prepared draft protective provisions for the protection of the Local Highway Authority which have been shared with Wiltshire Council for comment. Subject to any comments on the draft protective provisions that Wiltshire Council might have, the Applicant intends to include these protective provisions in the of the **Draft DCO [REP1-007]** at a future deadline. The Applicant is confident that the form of the protective provisions can be agreed with Wiltshire Council prior to the close of the Examination.

• The Council's network management duties • Adherence to Specification for Reinstatement of Openings of Highways • Adherence to Inspection Code of Practice • Adherence to Section 14 of the Road Traffic Regulation Act 1984				

Table 16-5 -: Public Rights of Way

Requirement	Reason	Requirement to be discharged by:		Applicant's Response
		Secretary of State	Wiltshire Council	
No part of works may commence until detailed design has been submitted to and approved by the LPA showing all stiles removed from within the red line of Lime Down A,B,C,D and E to be replaced by gates only if livestock is present. The authorised development must be carried out in accordance with the approved details.	Reason: To meet Wiltshire Council's Equalities Act obligations.		Yes	Provision of a detailed Public Rights of Way and Permissive Paths Management Plan, substantially in accordance with the **Outline PRoWPPMP [REP1-104]** is secured through Requirement 16 of the **Draft DCO [REP1-007]**. This document would need to be provided to, and approved by the local planning authority (Wiltshire Council) in advance of commencement on any part the Scheme. The Applicant therefore considers the wording of Requirement 16 in Schedule 2 of the **Draft DCO [REP1-007]** is sufficiently robust to ensure agreement of the removal of stiles and appropriate replacement of gates as required for controlling livestock is safeguarded. However, if Wiltshire Council require additional commitments to be made within the **Outline Public Rights of Way and Permissive Paths Management Plan [APP-282]**, the Applicant is able to discuss any additions or amended measures through

Requirement	Reason	Requirement to be discharged by:		Applicant's Response
		Secretary of State	Wiltshire Council	
				agreement of the Statement of Common Ground, a first draft of which is submitted at Deadline 2 **[EN010168/EXAM/8.2]**.
No part of works may commence until detailed design has been submitted to and approved by the LPA showing bridges over natural and man made water courses to be replaced with more accessible solutions. The authorised development must be carried out in accordance with the approved details.	Reason: To meet Wiltshire Council's Equalities Act obligations.		Yes	Provision of a detailed Public Rights of Way and Permissive Paths Management Plan, substantially in accordance with the **Outline PRoWPPMP [REP1-104]** is secured through Requirement 16 of the **Draft DCO [REP1-007]**. This document would need to be provided to, and approved by the local planning authority (Wiltshire Council) in advance of commencement on any part the Scheme. The Applicant therefore considers the wording of Requirement 16 in Schedule 2 of the **Draft DCO [REP1-007]** is sufficiently robust to ensure agreement of the making good of water crossings as required is safeguarded. Where any works to bridges, culverts or watercourse crossings are required, the detailed design and construction methodology would also need to take

Requirement	Reason	Requirement to be discharged by:		Applicant's Response
		Secretary of State	Wiltshire Council	
				account of flood risk, drainage and watercourse protection matters. These are addressed through the **ES Volume 3, Appendix 11-1: Flood Risk Assessment and Drainage Strategy Covering Report [APP-210],** Section 4.1 and Table 5, **ES Volume 3, Appendix 11-9: Flood Risk Assessment and Drainage Strategy - Cable Route Corridor [REP1-037]**, and the **Outline CEMP [REP1-096],** Section 3.14, Table 13. Where separate permits or consents are required and are not disapplied by the **Draft DCO [REP1-007]**, these will be obtained before the relevant works are undertaken. However, if Wiltshire Council require additional commitments to be made to the **Outline PRoWPPMP [REP1-104]**, or is seeking upgrades to water crossings that would go beyond the remit of the DCO and thus be secured by funds through the Community Benefit Fund, the Applicant is able to discuss any additions or amended

Requirement	Reason	Requirement to be discharged by:		Applicant's Response
		Secretary of State	Wiltshire Council	
				measures through agreement of the Statement of Common Ground, a first draft of which is submitted at Deadline 2 **[EN010168/EXAM/8.2]**.
No part of works may commence until detailed design has been submitted to and approved by the LPA showing waymarking to be installed at any change of direction and entry points where a permissive path or Public Right of Way is located. The authorised development must be carried out in accordance with the approved details.	Reason: To allow easy navigation of the Public Rights of Way network.		Yes	Provision of a detailed Public Rights of Way and Permissive Paths Management Plan, substantially in accordance with the **Outline PRoWPPMP [REP1-104]** is secured through Requirement 16 of the **Draft DCO [REP1-007]**. This document would need to be provided to, and approved by the local planning authority (Wiltshire Council) in advance of commencement on any part the Scheme. The Applicant therefore considers the wording of Requirement 16 in Schedule 2 of the **Draft DCO [REP1-007]** is sufficiently robust to ensure agreement of suitable waymarking provision is safeguarded. However, if Wiltshire Council require additional commitments to be made to the **Outline PRoWPPMP [REP1-104]**, the Applicant is able to discuss any additions or amended measures through agreement of

Requirement	Reason	Requirement to be discharged by:		Applicant's Response
		Secretary of State	Wiltshire Council	
				the Statement of Common Ground, a first draft of which is submitted at Deadline 2 **[EN010168/EXAM/8.2]**.
No part of works may commence until detailed design has been submitted to and approved by the LPA showing a pre-condition survey is to be carried out of any Public Right of Way or unsealed public highway prior to commencement of the development. The authorised development must be carried out in accordance with the approved details.	Reason: To monitor the surface condition of the PRoW and identify any areas where reinstatement/repair of the surface is required during the life of the development which can be attributed to damage caused by the applicant undertaking actives required for the construction and ongoing maintenance of the solar park as well as its decommissioning.		Yes	Provision of a detailed Construction Traffic Management Plan, substantially in accordance with the **Outline CTMP [REP1-112]**, and of a detailed Public Rights of Way and Permissive Paths Management Plan, substantially in accordance with the **Outline PRoWPPMP [REP1-104]** are secured through Requirements 15 and 16 of the **Draft DCO [REP1-007]**. These document would need to be provided to, and approved by the local planning authority (Wiltshire Council) in advance of commencement on any part the Scheme. The Applicant therefore considers the wording of Requirements 15 and 16 in Schedule 2 of the **Draft DCO [REP1-007]** is sufficiently robust to ensure the requirement for pre-condition surveys, and reinstatement or repair of highway and PRoW surfaces, is safeguarded. However, if Wiltshire Council

Requirement	Reason	Requirement to be discharged by:		Applicant's Response
		Secretary of State	Wiltshire Council	
				require additional commitments to be made to the **Outline CTMP [REP1-112]** and/or **Outline PRoWPPMP [REP1-104]**, the Applicant is able to discuss any additions or amended measures through agreement of the Statement of Common Ground, a first draft of which is submitted at Deadline 2 **[EN010168/EXAM/8.2]**.
No part of works may commence until detailed design has been submitted to and approved by the LPA showing regular passing bays to be provided on any Public Bridleway or unclassified road which is being used by construction traffic. The authorised development must be carried out in accordance with the approved details.	Reason: In the interests of public safety by providing a safe place for more vulnerable users to wait for vehicles to pass and vice versa.		Yes	Provision of a detailed Construction Traffic Management Plan, substantially in accordance with the **Outline CTMP [REP1-112]**, and of a detailed Public Rights of Way and Permissive Paths Management Plan, substantially in accordance with the **Outline PRoWPPMP [REP1-104]** are secured through Requirements 15 and 16 of the **Draft DCO [REP1-007]**. These documents would need to be provided to, and approved by the local planning authority (Wiltshire Council) in advance of commencement on any part the Scheme. The Applicant therefore considers the wording of Requirements 15 and 16 in Schedule 2 of

Requirement	Reason	Requirement to be discharged by:		Applicant's Response
		Secretary of State	Wiltshire Council	
				the **Draft DCO [REP1-007]** is sufficiently robust to ensure detailed provision of passing places, to minimise conflicts between HGVs and vulnerable PRoW and unclassified road users, is safeguarded. However, if Wiltshire Council require additional commitments to be made within the **Outline CTMP [REP1-112]** and/or **Outline PRoWPPMP [REP1-104]**, the Applicant is able to discuss any additions or amended measures through agreement of the Statement of Common Ground, a first draft of which is submitted at Deadline 2 **[EN010168/EXAM/8.2]**.
No part of works may commence until detailed design has been submitted to and approved by the LPA showing bridges over natural watercourses to be upgraded where appropriate.	To address the likelihood of quicker surface water runoff from the proposal to meet Wiltshire Council's Equalities Act obligations.		Yes	Requirement 22 of the **Draft DCO [REP1-007]** requires the Applicant to prepare a flood risk mitigation detailed design to be submitted and approved by Wiltshire Council, in consultation with the Environment Agency. The flood risk mitigation detailed design must accord with the flood risk assessment and outline drainage strategy unless it can be demonstrated to the

Requirement	Reason	Requirement to be discharged by:		Applicant's Response
		Secretary of State	Wiltshire Council	
The authorised development must be carried out in accordance with the approved details.				satisfaction of the relevant planning authority, in consultation with the Environment Agency, that the approval sought would not give rise to any additional flood risk effects in comparison to those reported in the flood risk assessment and outline drainage strategy unless evidence of a flood risk betterment can be provided. This should provide sufficient comfort to Wiltshire Council that it will have control over the approval of such detailed design, and the Applicant will be required to demonstrate how surface water runoff will be appropriately managed as part of that process.

Table 16-6 - Landscape and Visual

Requirement	Reason	Requirement to be discharged by:		Applicant's Response
		Secretary of State	Wiltshire Council	
1. (Final) Landscape and Ecology Mitigation Plan/s (3) No part of the authorised development within Lime Down Areas A, B, C, D or E, or the Cable Route Corridor (CRC) or other areas included within the DCO limits may commence until a Final Landscape and Ecology Mitigation Plan/s has been submitted to and approved in writing by the LPA. (4) The approved Final Landscape and Ecology Mitigation Plan/s shall be submitted to and approved in writing by the LPA prior to any separate	The DCO application is submitted under 'Rochdale Envelope' principles and contains insufficient levels of detail, or a final development proposal upon which to base a clearly defined 'Landscape and Ecology Mitigation Plan'. A Final Landscape and Ecology Mitigation Plan is necessary to spatially define the mitigating requirements and principles prescribed within the LVIA and the ecological assessments based on a final development proposal for planning certainty.		Yes	Details of the mitigation measures and their long-term management are set out in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060], ES Volume 2, Figure 3-4: Landscape and Ecology Mitigation Plan [REP1-029 to REP1-032]** and the **Outline LEMP [APP-283].** The preparation, approval and implementation of the detailed Landscape and Ecological Management Plan, substantially in accordance with the **Outline LEMP [APP-283]**, are secured through Requirement 7 in Schedule 2 of the **Draft DCO [REP1-007]**, ensuring that the identified mitigation measures are delivered and maintained throughout the lifetime of the Scheme.

Requirement	Reason	Requirement to be discharged by:		Applicant's Response
		Secretary of State	Wiltshire Council	
application seeking detailed landscape design approval/s for that same area.				
2. Detailed Landscape Design approval (5) No part of the authorised development within Lime Down Areas A, B, C, D or E, or the Cable Route Corridor (CRC) or other areas included within the DCO limits may commence until a Detailed Landscape Design for that area or phased sub-area or CRC or phased section of the CRC, or other DCO area has been submitted to and approved in writing by the LPA.	The DCO application is submitted under 'Rochdale Envelope' principles and contains insufficient outline levels of information and/or final development proposal. This matter is required to be agreed with the Local Planning Authority before development commences in order that the development is undertaken in an acceptable manner, to ensure mitigation measures are appropriately designed and specified, that a satisfactory landscaped setting for the development is provided, and existing important landscape/ecological features are adequately protected during the course of development, and to		Yes	Provision of a detailed Public Rights of Way and Permissive Paths Management Plan, substantially in accordance with the **Outline PRoWPPMP [REP1-104]** is secured through Requirement 16 of the **Draft DCO [REP1-007]**. This document would need to be provided to, and approved by the local planning authority (Wiltshire Council) in advance of commencement on any part the Scheme. The Applicant therefore considers the wording of Requirement 16 in Schedule 2 of the **Draft DCO [REP1-007]** is sufficiently robust to ensure detailed provision of signage, PRoW maintenance and enhancements is safeguarded. However, if Wiltshire Council require additional commitments to be made to the **Outline PRoWPPMP [REP1-104]**, the Applicant is more than willing to discuss any additions or

Requirement	Reason	Requirement to be discharged by:		Applicant's Response
		Secretary of State	Wiltshire Council	
(6) The Detailed Landscape Design must be consistent with the design principles and parameters, the (Final) approved Landscape and Ecology Mitigation Plans and the (Final) approved LEMP. (7) The Detailed Landscape Design plans shall be prepared at a suitable scale and include: • location and current canopy spread of all existing trees and hedgerows on the land; • clearly identify any trees or hedgerows/sections of hedgerow	provide a sufficiently detailed landscaping scheme for future monitoring and planning enforcement purposes.			amended safeguards through agreement of the Statement of Common Ground, a first draft of which is submitted at Deadline 2 **[EN010168/EXAM/8.2]**. The preparation, approval and implementation of the detailed Landscape and Ecological Management Plan, substantially in accordance with the **Outline LEMP [APP-283]**, are secured through Requirement 7 in Schedule 2 of the **Draft DCO [REP1-007]**, ensuring that the identified mitigation measures are delivered and maintained throughout the lifetime of the Scheme.

Requirement	Reason	Requirement to be discharged by:		Applicant's Response
		Secretary of State	Wiltshire Council	
proposed for removal from the land; • full details of any trees and hedgerows to be retained, together with measures for their protection during the course of development; • detailed planting plans and specifications showing all plant species, seed mixes, planting locations, planting and seeding densities, supply provenance, plant stock sizes, and means of protection				

Requirement	Reason	Requirement to be discharged by:		Applicant's Response
		Secretary of State	Wiltshire Council	
from livestock grazing and deer/rabbit browsing; • finished levels and contours including for earth bunds identified to be necessary for noise attenuation functions, pollution control, or long term soil storage for land restoration purposes; • means of enclosure including, fences, gates and security measures; • maintenance tracks, service compounds and car park layouts;				

Requirement	Reason	Requirement to be discharged by:		Applicant's Response
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• other vehicle and pedestrian access and circulation areas, including required highway safety visibility splays; • all hard and soft surfacing materials; • minor artefacts and structures (e.g. signage, refuse and other storage units, signs, lighting, CCTV poles and cameras etc.); • proposed and existing functional services above and below ground (e.g. drainage, power, communications, cables, pipelines,				

Requirement	Reason	Requirement to be discharged by:		Applicant's Response
		Secretary of State	Wiltshire Council	
indicating lines, manholes, supports etc.) alongside details of any relevant utility easements that restrict tree planting; • existing and proposed ponds, drainage ditches and other surface water drainage features; • retained historic landscape features (e.g. dry-stone walls, stone styles, etc.) and proposed protection or restoration, where relevant;				

Requirement	Reason	Requirement to be discharged by:		Applicant's Response
		Secretary of State	Wiltshire Council	
• Location and heights of screening vegetation acting as visual mitigation identified in the LVIA; • PRoW and access enhancements; and • Ecological compensation, mitigation and BNG proposals. (8) The authorised development must be carried out in accordance with the approved Detailed Landscape Design for each part or phased sub-part of development.				
3. Landscaping to be carried out and maintained	To ensure the short-term establishment and long term		Yes	The preparation, approval and implementation of the detailed Landscape

Requirement	Reason	Requirement to be discharged by:		Applicant's Response
		Secretary of State	Wiltshire Council	
(4) All soft landscaping comprised in the approved detailed landscape design shall be implemented in the first planting and seeding season following the commissioning of the development or relevant phase or sub-phase of development unless otherwise agreed in writing with the LPA. (5) All soft landscaping shall be maintained free from weeds and shall be protected from damage by vermin and stock and maintained for a minimum of five years' establishment from completion of each relevant phase or sub-phase. Any trees or plants	management of landscape and ecological features and habitats retained and created by the development, for the benefit of visual amenity and biodiversity for the lifetime of the scheme.			and Ecological Management Plan, substantially in accordance with the **Outline LEMP [APP-283]**, are secured through Requirement 7 in Schedule 2 of the **Draft DCO [REP1-007]**, ensuring that the identified mitigation measures are delivered and maintained throughout the lifetime of the Scheme.

Requirement	Reason	Requirement to be discharged by:		Applicant's Response
		Secretary of State	Wiltshire Council	
which die, are removed/missing, or become seriously damaged or diseased shall be replaced in the next planting season with others of a similar size and species, unless otherwise agreed in writing by the LPA. (6) Long term management of the approved detailed landscaping scheme shall be carried out in accordance with the approved final LEMP for the life of development.				
4. (Final) Landscape and Ecological Management Plan (LEMP)	The DCO application is submitted under 'Rochdale Envelope' principles and the outline LEMP is not based on a final development		Yes	Provision of a detailed Landscape and Ecological Management Plan, substantially in accordance with the **Outline LEMP [APP-283]**, is secured through Requirement 7 of

Requirement	Reason	Requirement to be discharged by:		Applicant's Response
		Secretary of State	Wiltshire Council	
(4) No part of the authorised development may commence until a Final LEMP for the whole of the DCO order limits has been submitted to and approved in writing by the LPA. This shall include detailed landscape and ecological management recommendations and monitoring for each of the Lime Down Areas A, B, C, D, E and the CRC. (5) The final LEMP must be substantially in accordance with the Outline LEMP and include: • objectives and management prescriptions for each habitat and	proposal. This matter is required to be agreed with the Local Planning Authority before development commences to ensure landscape and ecological features retained and created by the development, are appropriately established, and maintained to deliver the embedded mitigation and enhancement measures for visual amenity and biodiversity for the operational lifetime of the development.			the **Draft DCO [REP1-007]**. This document would need to be provided to, and approved by the host authority (Wiltshire Council) in advance of commencement on any part the Scheme. The Applicant therefore considers the wording of Requirement 7 of the **Draft DCO [REP1-007]** is sufficiently robust to ensure the requirement for detailed landscape and ecological management prescriptions as well as a comprehensive monitoring schedule will be delivered.

Requirement	Reason	Requirement to be discharged by:		Applicant's Response
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feature during construction, operation and decommissioning. • success criteria, monitoring methods and frequencies, and triggers for remedial measures; [Monitoring must record survival rates, canopy cover, hedgerow structure, sward composition, habitat condition and any failures against the success criteria in the final LEMP]. • governance, competencies and responsibilities,				

Requirement	Reason	Requirement to be discharged by:		Applicant's Response
		Secretary of State	Wiltshire Council	
including appointment of an Ecological Clerk of Works during construction; • budget and resourcing for the operational life of the development; • data management and reporting protocols; and • arrangements for co ordination with any BNG Management and Monitoring Plan required as separate requirement(s). • objectives and management prescriptions to				

Requirement	Reason	Requirement to be discharged by:		Applicant's Response
		Secretary of State	Wiltshire Council	
achieve embedded landscape enhancement and visual screening measures identified within the LVIA for landscape and visual mitigation purposes. • appropriately scaled supporting plans to illustrate the spatial arrangement and location of each habitat or feature to be managed with clear cross reference to final LEMP management objectives and prescriptions.				

Requirement	Reason	Requirement to be discharged by:		Applicant's Response
		Secretary of State	Wiltshire Council	
(6) The undertaker must undertake landscape and habitat condition monitoring in years 1, 2, 3, 5 and 10, and at five-year intervals thereafter for the duration of the authorised development. Where monitoring indicates success criteria are not met, adaptive management measures must be implemented within six months, with any remedial actions agreed with the LPA. (7) A Landscape Monitoring Report must be submitted to the LPA within three months of each monitoring year.				

Requirement	Reason	Requirement to be discharged by:		Applicant's Response
		Secretary of State	Wiltshire Council	
(8) The authorised development must be carried out and maintained in accordance with the approved Final LEMP and shall be implemented in full and for the lifetime of the development in accordance with the approved details or any necessary subsequent adaptive management measures agreed in writing with the LPA.				
5. (Final) Soil Resource and Management Plan 4) No part of the authorised development may commence until a final Soil Resource and Management Plan (SRMP) has been	The necessary level of required detail is not provided within 7.15 Outline Soil Resources Management Plan [APP-280]. The final detailed SRMP is required to safeguard and sustainably manage all on site soil resources in accordance with recognised current		Yes	The Applicant notes this comment. A detailed SRMP will be prepared post-consent and will be required to be in substantial accordance with the **Outline SRMP [APP-280]** which is secured by Requirement 17 of the **Draft DCO [REP1-007].**

Requirement	Reason	Requirement to be discharged by:		Applicant's Response
		Secretary of State	Wiltshire Council	
submitted to and approved in writing by the LPA. The Final SRMP must be substantially in accordance with the Outline SRMP. 5) The plan must set out methodologies for soil stripping, soil handling - including compaction avoidance, separation of topsoil from subsoil, soil storage details (including maximum storage heights and locations for temporary and long-term storage for future land restoration at decommissioning stage). 6) The authorised development must be carried out in accordance	best practice, to ensure soil health and condition is maintained or improved during the development phases and demonstrate that the reinstatement of land back to baseline agricultural values or agreed agri-environment uses following decommissioning is achievable.			The best practice principles for soil handling and management, including soil reinstatement and land restoration, contained within the **Outline SRMP [APP-280]** will apply throughout the duration of the Scheme, across all phases. As best-practice measures may evolve over the lifetime of the Scheme, the **Outline SRMP [APP-280]** does not prescribe detailed remediation measures at this stage.

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with the final approved Soil Resource and Management Plan.				
6. Arboricultural method statement(s) and tree protection These are highlighted to be necessary, but it is understood the Council's tree officer(s) have already provided the technical requirements and reasons for these.			Yes	The Applicant notes this comment and confirms that a Detailed Arboricultural Method Statement (AMS) will be prepared in accordance with BS 5837:2012 and submitted for approval prior to the commencement of development. Arboricultural mitigation is secured through the **Outline CEMP [REP1-096]** and the **Outline OEMP [REP1-098]**, which are certified documents secured by Requirements 13 and 14 of the of the **Draft DCO [REP1-007]** and subject to approval by Wiltshire Council. In addition, a pre-commencement Requirement will ensure that no stage of development may commence until the Detailed AMS has been approved, with all works thereafter carried out in accordance with the approved details,

Requirement	Reason	Requirement to be discharged by:		Applicant's Response
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				ensuring full control and compliance with BS 5837:2012.
7. Glint and glare assessment and mitigation (4) No part of the authorised development may commence until a Glint and Glare Assessment, and any associated mitigation plan have been submitted to and approved in writing by the LPA. (5) The assessment and mitigation must consider residential receptors, highways, PRoW and aviation receptors and address panel finishes, layout/orientation, finished	The application does not provide a final detailed scheme layout. This condition is necessary to ensure that no unacceptably harmful glint and glare effects will arise from the final design and layout of solar PV panel arrays and areas, or where adverse effects are identified for specific visual receptors that impacts can be acceptably mitigated.		Yes	**ES Volume 3, Appendix 20-4: Solar Photovoltaic Glint and Glare Assessment [APP-261]** has considered potential impacts of glint and glare using worst-case assumptions including 100% PV coverage within the solar panel areas and consideration of options for both fixed south facing and single axis tracking panels. As such, the assessment is deemed to be comprehensive and the final design and layout would not result in any impacts exceeding those within the current assessment. It is not considered necessary for the assessment to be updated following detailed design and the proposed embedded mitigation is considered sufficient to mitigate any potentially significant glint and glare impacts.

Requirement	Reason	Requirement to be discharged by:		Applicant's Response
		Secretary of State	Wiltshire Council	
levels and effectiveness of vegetative screening. (6) The authorised development must be carried out in accordance with the approved mitigation plan.				The **Outline CEMP [REP1-096]** contains mitigation measures in respect of glint and glare. As per Requirement 13 (Construction environmental management plan) of Schedule 2 (Requirements) of the **Draft DCO [REP1-007]** no part of the authorised development may commence until a construction environmental management plan for that part has been submitted to and approved by Wiltshire Council.
8. (Final) Public Rights of Way and Access Enhancement Plan (5) No part of the authorised development may commence until a final PRoW and Access Enhancement Plan has been submitted to and approved in writing by the LPA.	To ensure that Public Rights of Way are appropriately managed during all stages of development and that opportunities to enhance public access are identified and implemented to help achieve objectives of sustainable development.		Yes	Provision of a detailed Public Rights of Way and Permissive Paths Management Plan, substantially in accordance with the **Outline PRoWPPMP [REP1-104]** is secured through Requirement 16 of the **Draft DCO [REP1-007]**. This document would need to be provided to, and approved by the local planning authority (Wiltshire Council) in advance of commencement on any part the Scheme. The Applicant therefore considers the wording of Requirement 16 in Schedule 2 of the **Draft DCO [REP1-007]** is sufficiently robust to ensure management of PRoWs and

Requirement	Reason	Requirement to be discharged by:		Applicant's Response
		Secretary of State	Wiltshire Council	
(6) The plan must identify diversions, improvements, surfacing, gates, viewpoints and interpretation, and demonstrate how opportunities to enhance PRoW and public access have been maximised through design and layout. (7) The PRoW and Access Enhancement Plan must be implemented before operation of the first arrays in the relevant part, unless otherwise agreed in writing by the LPA.				access to the countryside is safeguarded. However, if Wiltshire Council require additional commitments to be made to the **Outline PRoWPPMP [REP1-104]**, the Applicant is able to discuss any additions or amended measures through agreement of the Statement of Common Ground, a first draft of which is submitted at Deadline 2 **[EN010168/EXAM/8.2]**.
9. Community access, interpretation and PRoW condition (3) Prior to operation of the first arrays, the	To ensure that Public Rights of Way are appropriately managed during all stages of development and that opportunities to enhance public access are identified and		Yes	Provision of a detailed Public Rights of Way and Permissive Paths Management Plan, substantially in accordance with the **Outline PRoWPPMP [REP1-104]** is secured through Requirement 16 of the **Draft DCO [REP1-**

Requirement	Reason	Requirement to be discharged by:		Applicant's Response
		Secretary of State	Wiltshire Council	
undertaker must install interpretation boards, viewpoints and wayfinding in locations identified in the PRoW and Access Enhancement Plan and maintain them in good repair for the duration of the authorised development. (4) Annual PRoW condition checks must be included within the Landscape Monitoring Report.	implemented to help achieve objectives of sustainable development.			**007]**. This document would need to be provided to, and approved by the local planning authority (Wiltshire Council) in advance of commencement on any part the Scheme. The Applicant therefore considers the wording of Requirement 16 in Schedule 2 of the **Draft DCO [REP1-007]** is sufficiently robust to ensure management of PRoWs and access to the countryside is safeguarded. However, if Wiltshire Council require additional commitments to be made to the **Outline PRoWPPMP [REP1-104],** the Applicant is able to discuss any additions or amended measures through agreement of the Statement of Common Ground, a first draft of which is submitted at Deadline 2 **[EN010168/EXAM/8.2]**.
10. Construction Environmental Management Plan (CEMP): Landscape and Ecology	To ensure important landscape features and ecological habitats are appropriately protected from construction activities and temporary works during development.		Yes	Provision of a detailed Ecological Protection and Mitigation Strategy, substantially in accordance with the **Outline EPMS [REP1-106]** is secured through Requirement 8 of the **Draft DCO [REP1-007]**. This document would need to be provided to, and approved

Requirement	Reason	Requirement to be discharged by:		Applicant's Response
		Secretary of State	Wiltshire Council	
(4) No part of the authorised development may commence until a CEMP: Landscape and Ecology has been submitted to and approved in writing by the LPA. (5) The CEMP: Landscape and Ecology must include: g) roles and responsibilities, including Ecological Clerk of Works (ECoW) oversight and toolbox talks; h) protective fencing and buffer zones for retained habitats and trees; i) invasive non-native species control measures; j) dust, noise and lighting controls;				by, the host authority (Wiltshire Council) in advance of commencement on any part the Scheme. The Applicant therefore considers the wording of Requirement 8 is sufficiently robust to ensure the requirement for detailed landscape and ecological protection measures will be delivered. The **Outline CEMP [REP1-096]** contains mitigation measures in respect of landscape and visual and ecology and biodiversity. As per Requirement 13 (Construction environmental management plan) of Schedule 2 (Requirements) of the **Draft DCO [REP1-007]** no part of the authorised development may commence until a construction environmental management plan for that part has been submitted to and approved by Wiltshire Council.

Requirement	Reason	Requirement to be discharged by:		Applicant's Response
		Secretary of State	Wiltshire Council	
k) soil and water management; and l) temporary landscape works and early planting measures to achieve screening. (6) The authorised development must be carried out in accordance with the approved CEMP: Landscape and Ecology.				
11. Landscape Phasing and early establishment (4) No part of the authorised development may commence until a Landscape Phasing Plan has been submitted to and approved in writing by the LPA.	To ensure timely and co-ordinated delivery of embedded landscape and visual, and ecological mitigation proposals at the earliest opportunity.		Yes	Provision of a detailed Ecological Protection and Mitigation Strategy, substantially in accordance with the **Outline EPMS [REP1-106]** is secured through Requirement 8 of the **Draft DCO [REP1-007].** This document would need to be provided to, and approved by, the host authority (Wiltshire Council) in advance of commencement on any part the Scheme. The Applicant therefore considers the wording of Requirement 8 is sufficiently robust to ensure the requirement for detailed

Requirement	Reason	Requirement to be discharged by:		Applicant's Response
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(5) The Phasing Plan must provide for advance planting and habitat creation to be undertaken at the earliest practicable stage for priority receptor groups identified in the LVIA and coordinate with grid connection works. (6) Planting and habitat creation in each phase must be implemented in the first planting season following completion of construction works in that phase.				landscape and ecological protection measures will be delivered. Provision of a detailed Landscape and Ecological Management Plan, substantially in accordance with the **Outline LEMP [APP-284]**, is secured through Requirement 7 of the **Draft DCO [REP1-007]**. This document would need to be provided to, and approved by the host authority (Wiltshire Council) in advance of commencement on any part the Scheme. The Applicant therefore considers the wording of Requirement 7 is sufficiently robust to ensure the requirement for detailed landscape and ecological management prescriptions as well as a comprehensive monitoring schedule will be delivered.
12. Design change control (3) The authorised development must be carried out in accordance with the design principles and parameters; any	The DCO application is submitted under 'Rochdale Envelope' principles and is subject to change, during the course and lead up to examination. The assessment of landscape and visual effects should		Yes	The EIA presented within the ES has been undertaken adopting the principles set out in the Planning Inspectorate's Advice Note Nine: Rochdale Envelope (Ref 20) which provides guidance regarding the degree of flexibility that may be considered appropriate

Requirement	Reason	Requirement to be discharged by:		Applicant's Response
		Secretary of State	Wiltshire Council	
material departure requires approval of the relevant planning authority accompanied by an addendum assessing any change in landscape and visual effects. (4) A Design Commitments Register must be maintained for examination and post consent governance and made available to the relevant planning authority on request.	be based on up to date and worse case development scenarios to inform planning judgements, and future governance and enforcement actions.			within an application for development consent under the Planning Act 2008 (Ref 7). The advice note acknowledges there may be aspects of the Scheme design that are not yet fixed and, therefore, it may be necessary for the EIA to assess likely worst-case variations to ensure all foreseeable significant environmental effects of the Scheme are considered. **ES Volume 1 Chapter 6: EIA Methodology [APP-058]** sets out that for each technical discipline, including landscape and visual impact assessment (LVIA), the maximum (and where relevant, minimum) parameters for the elements have been assessed under the Rochdale Envelope approach. The design parameters used to define the scenario for each discipline are set out in Table 3-1 of **ES Volume 1 Chapter 3: The Scheme [APP-055]** and **Design Principles and Parameters [REP1A-008].** The EIA has undertaken a worst-case scenario

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		Secretary of State	Wiltshire Council	
				assessment based on these Design Parameters, including the LVIA. The **Draft DCO [REP1-007]** at Requirement 5 requires detailed design approval for Works No. 1, 2, 3 and 5 to accord with the relevant parts of the **Design Principles and Parameters [REP1A-008].** As an approved document, any proposed amendments to the Design Principles and Parameters would be constrained by Requirement 3 and the Applicant would need to demonstrate that it would be unlikely to give rise to any materially new or materially different environmental effects. The **Commitments Register [REP1-114]** submitted with the DCO application is not a secured document. It is a register, intended to allow stakeholders to track commitments from the Environmental Statement chapters through to the relevant secured documents, along with design commitments secured within the **Design Principles and**

Requirement	Reason	Requirement to be discharged by:		Applicant's Response
		Secretary of State	Wiltshire Council	
				Parameters [REP1A-008] and **Works Plan [APP-005]**. The mitigation measures it signposts will implemented by the secured documents stipulated by requirements set out with Schedule 2 of the **Draft DCO [REP1-007]**. These documents will be produced post consent and where stipulated in the requirements approved by the relevant planning authority.
13. Lighting (4) Prior to operation of any part of the authorised development, a Lighting Strategy must be submitted to and approved in writing by the LPA. (5) The Lighting Strategy must minimise artificial light spill and avoid upward light spill, use downward directed, motion activated	To mitigate as far as practicable against all unnecessary effects of artificial light pollution associated with the development, to protect important dark corridors for wildlife, and to safeguard the dark skies 'special quality' of the Cotswold National Landscape.		Yes	**ES Volume 1, Chapter 3: The Scheme [APP-055]** set out that the Scheme has been designed to minimise the need for external lighting. Lighting is not required within the Solar PV Arrays during the operational phase. Motion-sensing security lighting will be provided within substations and the BESS Area and will be used only for maintenance and security purposes. The potential effects of lighting were considered within the Landscape and Visual Impact Assessment in **ES Volume 1, Chapter 8: Landscape and Visual Impact**

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luminaires where practicable, to protect integrity of existing dark corridors for wildlife, and to conserve the intrinsic dark skies special quality of the Cotswold National Landscape. (6) The authorised development must be operated in accordance with the approved Lighting Strategy.				**Assessment [APP-060]**, which considers the implications of operational lighting on landscape and visual receptors. No significant effects of lighting, above those recorded for landscape and visual receptors, were recorded. The impacts of lighting on ecological features are also assessed in **ES Volume 1, Chapter 9: Ecology and Biodiversity [REP1-015]**. The assessment concludes that there would be no significant effects on ecological features. Quality 10 - Dark skies 'special quality' of the Cotswold National Landscape (CNL) has been assessed in **ES Volume 3, Appendix 8-6 Assessment of Effects on the Cotswolds National Landscape and its Special Qualities [APP-197]**. The assessment concluded 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.

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				The **Outline OEMP [REP1-098]** sets out operational lighting controls including that security lighting within the substations and BESS would be motion sensors, good practice measures would be employed to minimise light spill, and that the detailed OEMP will specify how lighting will be installed and used, which will serve to mitigate adverse impacts on ecological receptors which are adversely impacted by lighting, such as bats. The preparation, approval by the relevant planning authority and implementation of detailed OEMP, substantially in accordance with the **Outline OEMP [REP1-098]**, is secured through requirement 14 in Schedule 2 of the **Draft DCO [REP1-007]**, ensuring lighting impacts are appropriately controlled throughout the lifetime of the Scheme.
14. BNG delivery and monitoring (NSIP regime)	To ensure the development contributes towards nature recovery		Yes	Provision of a detailed Landscape and Ecological Management Plan, substantially in accordance with the **Outline LEMP [APP-284]** is secured through Requirement 7 of the

Requirement	Reason	Requirement to be discharged by:		Applicant's Response
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(4) Where the statutory BNG regime for NSIPs is in force, the undertaker must achieve and maintain the biodiversity gain objective across the order limits or via registered off-site biodiversity units or statutory credits, calculated with the applicable statutory biodiversity metric. (5) Habitats created for the purpose of achieving BNG must be managed for the duration of development. (6) A BNG Management and Monitoring Plan must be submitted to and approved prior to	targets and delivers sustainable development.			**Draft DCO [REP1-007]**. This document would need to be provided to, and approved by, the host authority (Wiltshire Council) in advance of commencement on any part the Scheme. The Outline LEMP sets out management measures for all retained and newly created habitats, as well as a comprehensive schedule of monitoring. The Applicant therefore considers the wording of Requirement 7 is sufficiently robust to ensure the requirement for details of how BNG will be delivered, as well as details of long-term management, monitoring and reporting to the relevant planning authority, can be agreed and secured. Requirement 9 (Biodiversity net gain) of Schedule 2 (Requirements) to the **Draft DCO [REP1-007]** provides that no part of the authorised development may commence until a biodiversity net gain strategy has been submitted to and approved by Wiltshire Council in consultation with the relevant statutory nature conservation body. The

Requirement	Reason	Requirement to be discharged by:		Applicant's Response
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operation of the authorised development and must include annual reporting to the relevant planning authority and, where applicable, updates to any national register. (8) Where irreplaceable habitat is affected, bespoke compensation must be delivered in accordance with the applicable policy framework.				biodiversity net gain strategy must include details of how the strategy will secure a minimum of 10% biodiversity net gain in habitat units, hedgerow units and river units for the authorised development during the operation of the authorised development, and the metric that has been used to calculate that those percentages will be reached.
15. Vegetation management beneath arrays (4) Prior to operation of any part of the authorised development, a Vegetation Management Plan for that part must be	It is not clear from the information submitted to date how the grassland/vegetation (both existing and proposed) located beneath solar panel areas will be managed, to achieve the landscape and ecological benefits stated.		Yes	Provision of a detailed Landscape and Ecological Management Plan, substantially in accordance with the **Outline LEMP [APP-283]**, is secured through Requirement 7 of the **Draft DCO [REP1-007]**. This document would need to be provided to, and approved by, the host authority (Wiltshire Council) in advance of commencement on any part the

Requirement	Reason	Requirement to be discharged by:		Applicant's Response
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submitted to and approved in writing by the LPA. (5) The plan must set out mowing/topping regimes, compatible sheep grazing prescriptions (including stocking densities and exclusion periods), and no spray buffer zones adjacent to hedgerows and watercourses. (6) The authorised development must be operated in accordance with the approved Vegetation Management Plan.				Scheme. The Applicant therefore considers the wording of Requirement 7 is sufficiently robust to ensure the requirement for detailed vegetation management prescriptions can be agreed and delivered.
16. Invasive non-native species (3) The undertaker must prepare and implement an	To safeguard the integrity of existing native habitats and species present across the large site areas.		Yes	Provision of a detailed Ecological Protection and Mitigation Strategy, substantially in accordance with the **Outline EPMS [REP1-106]** is secured through Requirement 8 of the **Draft DCO [REP1-007]**. This document

Requirement	Reason	Requirement to be discharged by:		Applicant's Response
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Invasive Non Native Species Management Plan for the order limits covering construction and operation, including surveillance, treatment and biosecurity measures. (4) The plan must be submitted to and approved in writing by the LPA before commencement.				would need to be provided to, and approved by, the host authority (Wiltshire Council) in advance of commencement on any part the Scheme. The **Outline EPMS [REP1-106]** sets out specific measures for the surveillance and treatment of invasive non-native species (INNS) as well as biosecurity measures designed to prevent the accidental spread of INNS. The Applicant therefore considers the wording of Requirement 8 is sufficiently robust to ensure INNS are controlled during construction works. Provision of a detailed Landscape and Ecological Management Plan, substantially in accordance with the **Outline LEMP [APP-283]** is secured through Requirement 7 of the **Draft DCO [REP1-007]**. This document would need to be provided to, and approved by the host authority (Wiltshire Council) in advance of commencement on any part the Scheme. The Applicant therefore considers the wording of Requirement 7 is sufficiently robust to ensure the requirement for

Requirement	Reason	Requirement to be discharged by:		Applicant's Response
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				measures to control INNS during the operational phase of the scheme can be agreed with the Council and secured.
17. Decommissioning and restoration (5) Not less than 12 months before cessation of renewable energy generation within any part of the authorised development, the undertaker must submit a Decommissioning and Restoration Plan (DRP) for that part to the LPA for approval in writing. (6) The DRP should include details of planned sequenced phased removal of all renewable energy infrastructure components from the land,	To ensure that following the cessation of temporary long-term renewable energy use, all development will be removed from the land and the land restored back to productive farming, or other agreed agri-environment use(s), necessary for planning certainty.		Yes	The Applicant makes note of this comment. Following discussions with Wiltshire Council the Applicant has included additional wording within Requirement 20 (Decommissioning and restoration) within Schedule 2 (Requirements) to the **Draft DCO [REP1-007]** submitted at Deadline 1. The amendment ensures that associated development cannot remain in place beyond the decommissioning date of the relevant part of Work No. 1. This prevents the operational lifetime of the authorised development being extended by later-commissioned ancillary works. Specific enhancements to the PRoW network would be agreed with Wiltshire Council and the relevant landowner at the time of implementation. Where these fall within the remit of the DCO, these are already secured

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and phased restoration of all DCO farmland back to baseline condition(s). (7) The DRP must provide for: • removal of panels, BESS, all structures, fencing, maintenance tracks and hardstanding's and underground infrastructure where it can be achieved without undue environmental harm. • soil reinstatement and restoration to agricultural use compatible with baseline land capability or				through the **Outline PRoWPPMP [REP1-104]** by Requirement 16 of the **Draft DCO [REP1-007]**. Where specific enhancements to the PRoW network have been made through the funding set aside in the Community Benefit Fund, these would be considered Wiltshire Council's or the landowners' duty to maintain. With respect to permissive path enhancements directly provided by the Scheme, these are not anticipated to be retained, subject to landowner discretion, as the land is to be restored to agricultural use as existing at the point of decommissioning. This is secured through the **Outline Decommissioning Strategy [REP1-100]** by Requirement 20 of the **Draft DCO [REP1-007]**. A detailed SRMP will be prepared post-consent and will be required to be in substantial accordance with the **Outline SRMP [APP-280]** which is secured by

Requirement	Reason	Requirement to be discharged by:		Applicant's Response
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retention/transition of successful habitats where agreed; measures to prevent introduction or spreading of any non-native species during all decommissioning and restoration activities. • restoration and re-planting of hedgerows where these were removed to facilitate either construction access or operational maintenance accesses, or additionally				Requirement 17 of the **Draft DCO [REP1-007].** The best practice principles for soil handling and management, including soil reinstatement and land restoration, contained within the **Outline SRMP [APP-280]** will apply throughout the duration of the Scheme, across all phases. As best-practice measures may evolve over the lifetime of the Scheme, the **Outline SRMP [APP-280]** does not prescribe detailed remediation measures at this stage. Measures to prevent spread of non-native species, and other aspects of ecological protection, including pollution and contamination prevention, are described in the **Outline Decommissioning Strategy [REP1-100]**, secured by Requirement 20 of the **Draft DCO [REP1-007]**. Provision of a detailed Landscape and Ecological Management Plan, substantially in accordance with the **Outline LEMP [APP-283]** is secured through Requirement 7 of the

Requirement	Reason	Requirement to be discharged by:		Applicant's Response
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required for removal. • to facilitate the removal of energy infrastructure and maintenance tracks as part of decommissioning works. • removal of highway improvement areas/HGV passing places, and restoration back to rural highway verges, unless otherwise agreed in writing with the LPA. • retention of PRoW enhancements where agreed; and				**Draft DCO [REP1-007]**. This document would need to be provided to, and approved by the host authority (Wiltshire Council) in advance of commencement on any part the Scheme. The Applicant therefore considers the wording of Requirement 7 is sufficiently robust to ensure the requirement for detailed landscape and ecological management prescriptions as well as a comprehensive monitoring schedule will be delivered.

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• details of post restoration monitoring arrangements for a period of five years. (8) Decommissioning must be completed within 24 months of cessation of energy generation, storage or transfer, unless otherwise agreed in writing by the LPA.				

Table 16-7 -: Built Heritage

Requirement	Reason	Requirement to be discharged by:		Applicant's Response
		Secretary of State	Wiltshire Council	
Prior to the commencement of works in respect of Lime Down E, design details for the highway improvement works to the site access track from the South West of Rodbourne (which shall include details for mitigation of impact on the character and appearance of the conservation area) shall be submitted to and approved in writing by the LPA. The detailed design must be implemented as approved. Alternatively, details for the reinstatement of the track following the construction phase could be conditioned.	To secure appropriate mitigation of the heritage impact resulting from the upgrading of the construction access to Site E on the character and appearance of Rodbourne Conservation Area.		Yes	The Applicant has discussed highway improvement works to the access track (Works Number 8b) to Lime Down E, which is located to the south of Rodbourne Conservation Area. The Applicant has updated the **Outline CEMP [REP1-096]** (submitted at Deadline 1) to include provision that the Wiltshire Council Conservation Officer should be consulted on the approval of design for the access Works Number 8b. As such the Applicant considers the character of Rodbourne Conservation Area to be appropriately safeguarded through the **Outline CEMP [REP1-096]** which will be secured through Requirement 13 of the **Draft DCO [REP1-007]**. The Applicant will continue to discuss this topic with Wiltshire Council.

Table 16-8 - Public Health

Requirement	Reason	Requirement to be discharged by:		Applicant's Response
		Secretary of State	Wiltshire Council	
No part of the authorised development may commence until a communication strategy be submitted and approved, with measurable and accountable outcomes for the mitigation on community identity and resilience impacts.	To ensure the community engagement and the safeguarding of community wellbeing		Yes	Approval of the terms of reference for a community liaison group is secured through Requirement 4 of the **Draft DCO [REP1-007]**. The Applicant understands it would be the responsibility of this group to set out a detailed communication strategy, rather than being fixed by the Applicant ahead of this group being formally appointed. The Applicant therefore considers the wording of Requirement 4 in Schedule 2 is sufficiently robust to ensure community engagement and wellbeing is safeguarded for the decommissioning process.
No part of the authorised development may commence until a Decommissioning Strategy is submitted and approved, to include mitigations for the impact on community identity and resilience.	To ensure the community engagement and the safeguarding of community wellbeing		Yes	Provision of a detailed Decommissioning Strategy, substantially in accordance with the **Outline Decommissioning Strategy [REP1-100]** is secured through Requirement 20 of the **Draft DCO [REP1-007]**. This document would need to be provided to, and approved by the local planning authority (Wiltshire Council) in advance of any

Requirement	Reason	Requirement to be discharged by:		Applicant's Response
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				decommissioning activities being undertaken on any part the Scheme. The Applicant therefore considers the wording of Requirement 20 in Schedule 2 is sufficiently robust to ensure community engagement and wellbeing is safeguarded for the decommissioning process.

Table 16-9 - Public Protection

Requirement	Reason	Requirement to be discharged by:		Applicant's Response
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Not Required. Once the OCEMP and OEMP issues have been resolved then further conditions will not be necessary.			Yes	The Applicant notes this comment.

Table 16-10 - Flood Risk and Drainage

Requirement	Reason	Requirement to be discharged by:		Applicant's Response
		Secretary of State	Wiltshire Council	
Detailed Construction Environmental Management Plan (CEMP) No development shall commence until a CEMP: Water and Pollution Control has been submitted to and approved by the LPA. The CEMP shall include: (i) phased temporary drainage layouts (swales, cutoff drains, check-dams, settlement tanks) sized to control the 1 in 10-year event with mapped exceedance to safe locations; (ii) wheel-wash locations and maintenance; (iii) bunded fuel storage and designated refuelling zones;	To secure temporary drainage, pollution prevention, and sediment control measures during construction. This requirement amends and supplements the draft DCO Construction Environmental Management Plan requirement by specifying minimum flood-risk-critical content that must be included within the CEMP.		Yes	The Applicant agrees that construction-phase drainage, sediment control and pollution prevention measures should be secured through the detailed CEMP before works commence. This is already provided for through the existing DCO Requirement for the detailed CEMP, which must be substantially in accordance with the **Outline CEMP [REP1-096]**. The **Outline CEMP [REP1-096],** Section 3.6, Table 5 secures construction-phase water management, temporary drainage, sediment control, wheel washing, washdown controls, bunded storage, designated refuelling, spill response, water quality monitoring and no uncontrolled discharge. The detailed CEMP will confirm the final construction-phase drainage layout, sequencing, inspection regime and incident response procedures before works commence.

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(iv) turbidity/oil sheen trigger levels and stop-work thresholds; (v) inspection frequencies, incident response and reporting.				The Applicant considers that the existing DCO Requirement and certified **Outline CEMP [REP1-096]** provide the appropriate control mechanism. A further standalone Requirement is not necessary. Detailed matters such as temporary drainage sizing, trigger levels and stop-work thresholds are best defined in the detailed CEMP by reference to the final construction programme, works sequencing, ground conditions, receptor sensitivity and prevailing site risks.
Pre- and Post-Construction Exceedance Flow Routing Plan Prior to commencement, a plan showing pre- and post-construction exceedance routes for the 1 in 100-year + climate change event shall be submitted to and approved by the LPA, demonstrating that	To manage overland flow paths during extreme rainfall events and prevent concentrated runoff.		Yes	The Applicant agrees that exceedance flow routes should be managed during construction and operation. This is already addressed through the FRA&DS suite (**ES Volume 3, Appendices 11-1 to 11-9: Flood Risk Assessment and Drainage Strategy [REP1-037 to REP1-054]**) and the detailed CEMP process. The **ES Volume 3, Appendices 11-1 to 11-9: Flood Risk Assessment and Drainage**

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overland flow would be directed away from receptors (dwellings, highways, watercourses) during temporary works and operational phases.				**Strategy [REP1-037 to REP1-054]** consider flood risk, topography and surface water flow routes across the Scheme. The **Outline CEMP [REP1-096],** Section 3.6, Table 5 secures temporary drainage, sediment control, runoff management and inspection measures during construction. The Scheme retains existing overland flow routes, uses permeable access tracks at existing ground levels, and provides cross-drainage where required to avoid obstruction or concentration of flow. Temporary drainage and exceedance management will be confirmed through the detailed CEMP by reference to the final construction programme, sequencing, ground conditions and receptor sensitivity. The Applicant considers that a separate Requirement for a pre- and post-construction exceedance flow routing plan for the 1 in 100-year plus climate change event is disproportionate for temporary construction

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				conditions, given the short construction duration and the embedded controls already secured. Permanent drainage for formal infrastructure areas remains designed to the appropriate 1 in 100-year plus climate change standard through **ES Volume 3, Appendices 11-1 to 11-9: Flood Risk Assessment and Drainage Strategy [REP1-037 to REP1-054].**
Horizontal Directional Drilling (HDD) Method Statement and Frac-Out Contingency No trenchless crossing within 20 m of an ordinary watercourse shall commence until an HDD method statement and frac-out contingency plan is has been submitted to and approved in writing by the LPA.	To control the risk of drilling fluid breakout and subsurface migration associated with trenchless crossings near ordinary watercourses, and to prevent contamination of watercourses or groundwater that could result in flood-risk or water-quality impacts.		Yes	The Applicant agrees that HDD and trenchless crossing methodologies near ordinary watercourses should be agreed through the appropriate approval route, including drilling fluid management and breakout contingency controls. This process is already established. The **ES Volume 3, Appendix 11-1: Flood Risk Assessment and Drainage Strategy Covering Report [REP1-037],** Section 4.1 and Table 5 identifies the watercourse crossings, preferred crossing methodology and relevant regulatory authority. The **ES**

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The approved details shall confirm how LLFA principles will be applied where ordinary watercourse consent would ordinarily be required (notwithstanding any DCO disapplication and the applicability of Protective Provisions). The authorised works shall thereafter be carried out in accordance with the approved details.				**Volume 3, Appendix 11-9: Flood Risk Assessment and Drainage Strategy - Cable Route Corridor [REP1-053],** Paragraphs 2.3.5 to 2.3.6 and 2.11.1 to 2.11.2 confirms that the Watercourse Crossing Schedule has been shared with the LLFA, and that detailed HDD design, crossing methods, drilling fluid management, pollution prevention measures and construction controls will be secured through the DCO, detailed CEMP and relevant permitting processes. HDD risks are also addressed through the **Outline CEMP [REP1-096],** Section 3.14, Table 13 and **WFD Assessment [REP1-094],** Section 7.1. Where works require separate permits or consents and these are not disapplied by the DCO, these will be obtained before the relevant works are undertaken. The Applicant will continue to engage with Wiltshire Council as LLFA on the detailed methodology for ordinary watercourse crossings, but considers that

Requirement	Reason	Requirement to be discharged by:		Applicant's Response
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				this is already secured through the existing DCO and detailed CEMP process.
Operational Drainage Inspection, Testing and Maintenance Plan Prior to operation of the authorised development, an asset register and Operational Inspection, Testing and Maintenance Plan shall be submitted to and approved in writing by the LPA for all SuDS and sealed and lined drainage systems, including those serving substations and battery energy storage systems. The approved plan shall include details of access points, inspection intervals, isolation valve automatic testing frequency, alarm and fail-safe arrangements, and	To ensure that SuDS and sealed drainage systems are inspected, tested and maintained over the operational lifetime of the development, preventing blockages, system failure and associated localised flood risk.		Yes	The Applicant agrees that operational drainage systems should be inspected, tested and maintained throughout the operational life of the Scheme. This is already secured through the detailed OEMP, which must be substantially in accordance with the **Outline OEMP [REP1-098]**. The **Outline OEMP [REP1-098],** Paragraphs 2.14.1 to 2.14.3 and Section 3.6, Table 5 secures operational drainage management, including inspection and maintenance of drainage systems so that they continue to perform as designed. The detailed OEMP will confirm the relevant asset register, access arrangements, inspection frequencies, maintenance regime and response procedures for operational drainage assets. Drainage and containment associated with BESS and substation areas is also addressed through the standalone **Firewater**

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KPI-based response times for blockages. The drainage systems shall thereafter be operated and maintained in accordance with the approved plan.				**Containment and Drainage Strategy – Lime Down D Battery Energy Storage System [REP1-124]** and **Firewater Containment and Drainage Strategy - Lime Down Substation [REP1-125]**. Those documents set out the relevant containment, isolation, testing and maintenance principles for incident drainage and potentially contaminated runoff. The Applicant considers that the requirements in the **Outline OEMP [REP1-098]** and certified outline documents provide the appropriate control mechanisms. A further standalone Requirement is not necessary. Detailed matters such as valve testing frequency, alarm and fail-safe arrangements, and operational response times are best confirmed in the detailed OEMP and asset-specific operational procedures, where relevant to the final approved drainage design.

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Flood Zone 3b Definition and Compliance Plan Prior to detailed layout approval, the applicant shall map Flood Zone 3b within the Order limits (using best available EA/LLFA guidance) and whether layout, levels, SuDS and access arrangements comply with functional floodplain policy; any assets within or interfacing with 3b must show resilience and no loss of flood storage. This should be submitted to the LPA alongside any application for detailed design consent.	To ensure site layout and operational infrastructure comply with flood risk policy for functional floodplain.		Yes	The Applicant agrees that functional floodplain should be considered where the Scheme interacts with fluvial flood extents. This has been, and is being, addressed on a location-specific basis. The Applicant does not consider that a Scheme-wide Flood Zone 3b Definition and Compliance Plan is necessary. Flood Zone 3b forms part of Flood Zone 3 and sits within the wider mapped Flood Zone 2 extent. Land outside the mapped Flood Zone 2 extent cannot, by definition, be Flood Zone 3b. The only locations where the proposed development materially interacts with mapped fluvial flood extents are Lime Down D and Lime Down E2. At Lime Down D, detailed hydraulic modelling has been undertaken, including consideration of flood depths, climate change and functional floodplain storage. This is reported in **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [REP1-017],** Paragraphs

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				11.7.40 to 11.7.43 and **ES Volume 3, Appendix 11-6: Flood Risk Assessment and Drainage Strategy - Lime Down D/BESS [REP1-047]**. At Lime Down E2, further hydraulic modelling is being progressed to define local flood behaviour, including Flood Zone 3b where relevant. These matters relate to Main River flood risk and will be agreed with the Environment Agency as the relevant consultee. Where watercourses are not represented in the mapped Flood Zone 2 or 3 extents, the assessment has used proportionate methods, including surface water flood mapping, site-specific review of topography and drainage features, watercourse buffers and Manning's-based open channel calculations where appropriate. The BESS and substations are located in Flood Zone 1. No built infrastructure that would be inappropriate in Flood Zone 3b will be

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				located within functional floodplain. The Applicant therefore considers that functional floodplain compliance is already being addressed through **ES Volume 3, Appendices 11-1 to 11-9: Flood Risk Assessment and Drainage Strategy [REP1-037 to REP1-054]** and ongoing modelling work, and that a further standalone Requirement is not necessary.
SuDS Retirement and Decommissioning Drainage Plan At least 12 months before decommissioning of any phase, a plan must be submitted to the LPA for approval identifying every SuDS/sealed system with its end-state (retain/remove/backfill), procedures to drain, sample and dispose of residual	To clarify the removal, retention or backfilling of drainage features at decommissioning, and to ensure the safe drainage, sampling and disposal of sealed systems so as to avoid residual flood risk or pollution pathways.		Yes	This matter is already secured through the detailed Decommissioning Strategy, which is secured by **Draft DCO [REP1-007],** Requirement 20. The **Outline Decommissioning Strategy [REP1-100],** Section 3.6, Table 5 secures decommissioning water management controls, including temporary drainage, sediment control, SuDS management and pollution prevention. The **Outline Decommissioning Strategy [REP1-100],** Section 3.16, Table 15 secures waste handling and licensed disposal principles.

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fluids/liners via licensed facilities, and sequencing of temporary drainage during removal. Decommissioning shall thereafter be carried out in accordance with the approved plan.				The detailed Decommissioning Strategy will confirm the phase-specific drainage layout, sequencing and treatment of drainage features, including whether they are retained, removed, backfilled or otherwise managed. Any residual fluids, liners, contaminated materials or drainage components will be sampled, removed or managed through appropriate licensed routes where required. The Applicant considers that these matters are appropriately addressed within the detailed Decommissioning Strategy rather than through a separate standalone SuDS retirement Requirement.
Soil Reinstatement Targets and Verification The Decommissioning Plan shall define soil reinstatement performance targets (e.g. bulk density ranges, infiltration rates, surface roughness and vegetation cover), together	To ensure that soils are reinstated to a standard that restores infiltration capacity and greenfield runoff characteristics, avoiding residual increases in surface water runoff or flood risk following decommissioning		Yes	Soil reinstatement is already secured through the DCO control framework. Requirement 17 of the **Draft DCO [REP1-007]** requires a Soil Resources Management Plan to be submitted to and approved by the relevant planning authority and implemented as approved. Requirement 20 of the **Draft DCO [REP1-007]** requires a decommissioning

Requirement	Reason	Requirement to be discharged by:		Applicant's Response
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with a verification regime including field and laboratory testing, to demonstrate recovery of greenfield hydrological performance following decommissioning.				plan to be submitted to and approved by the relevant planning authority before decommissioning works are carried out. The **Outline Decommissioning Strategy [REP1-100],** Section 3.12, Table 11 requires a record of condition, soil handling controls, measures to remove compaction where required, and restoration measures. This provides the appropriate framework for reinstating soils and restoring vegetation cover following decommissioning. The Applicant does not consider it proportionate to fix numerical targets such as bulk density ranges or infiltration rates at this stage. Appropriate reinstatement criteria and verification measures should be defined in the detailed decommissioning plan, having regard to the baseline condition at that time, the decommissioning methodology, the intended restoration use and relevant good practice.

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Decommissioning Water-Quality Monitoring No part of the authorised development shall be decommissioned until a Decommissioning Water-Quality Monitoring Plan has been submitted to and approved in writing by the LPA. The plan shall specify monitoring locations upstream and downstream of works, parameters to be monitoring (including, but not limited to, total suspended solids, pH and hydrocarbons), monitoring frequency, trigger levels and reporting arrangements. Decommissioning shall thereafter be carried out in accordance with the approved plan, with monitoring results report to the LPA, the	To evidence that sediment and pollution are effectively controlled during decommissioning, protecting watercourses and groundwater from adverse impacts during asset removal and restoration.		Yes	The Applicant agrees that water quality risks during decommissioning should be monitored where required. This is already secured through the detailed decommissioning plan required by Requirement 20 of the **Draft DCO [REP1-007]**. Requirement 20 requires a decommissioning plan to be submitted to and approved by the relevant planning authority before decommissioning works are carried out, and for the approved plan to be implemented. The **Outline Decommissioning Strategy [REP1-100],** Section 3.6, Table 5 includes decommissioning water quality monitoring, comprising visual inspections and risk-based on-site measurements and sampling where appropriate. The detailed Water Management Plan will define monitoring locations, parameters, trigger levels, frequency, methods and reporting arrangements, proportionate to the sensitivity

Requirement	Reason	Requirement to be discharged by:		Applicant's Response
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Environment Agency and the LLFA.				of the receiving environment and the works being undertaken. Where sampling is undertaken, MCERTS (the Environment Agency's Monitoring Certification Scheme) (Ref 18) methods will be used where applicable, with analysis by UKAS (United Kingdom Accredited Service) (Ref 19) accredited laboratories. The Applicant considers that these matters are appropriately secured through the detailed decommissioning plan and associated Water Management Plan. A further standalone Decommissioning Water-Quality Monitoring Plan Requirement is not necessary.
Firewater and Spill Containment (Decommissioning) No part of the authorised development shall be decommissioned until details of firewater and spill containment have been	To ensure that abnormal events during decommissioning, including firewater release or accidental spills, are effectively contained, preventing uncontrolled discharges and associated flood risk or pollution impacts.		Yes	The Applicant notes this comment; this is secured through the **Draft DCO [REP1-007]**. Section 7.1.4 of the **Outline BSMP [REP1-100]** stipulates: "The implementation of the Outline BSMP is secured through a Requirement in Schedule 2 of the **Draft DCO [REP1-007].** This will stipulate that a detailed Battery Safety Management Plan will be

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submitted to and approved in writing by the LPA. The approved details shall include capacity calculations demonstrating adequate containment of firewater and spill volumes during dismantling activities, together with details of tested isolation valves, off-take points for removal and disposal, and on-site contingency storage. Decommissioning shall thereafter be carried out in accordance with the approved details.				submitted to and approved in consultation with D&WFRS, the Environment Agency (EA), and by the relevant planning authorities prior to the commencement of the works for the BESS. This plan will be substantially in accordance with the Outline BSMP." In addition, decommissioning controls are secured through Requirement 20 of the **Draft DCO [REP1-007]**, which requires a decommissioning plan to be submitted to and approved before decommissioning works are carried out. The decommissioning plan must be substantially in accordance with the **Outline Decommissioning Strategy [REP1-100]**. The **Outline Decommissioning Strategy [REP1-100],** Section 3.6, Table 5 and Section 3.16, Table 15 secures decommissioning water management, pollution prevention, spill response and licensed waste disposal principles. The detailed decommissioning plan will confirm

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				the phase-specific arrangements for spill response, drainage isolation, testing, removal and disposal where required. A further standalone Requirement is not necessary.
Substation and BESS Containment Performance Prior to operation of any substation or battery energy storage system, evidence demonstrating containment performance shall be submitted to and approved in writing by the LPA. The submitted evidence shall demonstrate that sealed and lined drainage systems and automatic isolation valves at substations and battery energy storage systems are capable of containing the greater of 110% of the largest vessel	To ensure that substations and battery energy storage systems are designed and operated with adequate containment capacity to prevent uncontrolled release of firewater, fuel or contaminated runoff, thereby avoiding residual flood risk and pollution impacts to land and watercourses.		Yes	The Applicant notes this comment; this is secured through the DCO. Section 7.1.4 of the **Outline BSMP [REP1-110]** stipulates: *"The implementation of the Outline BSMP is secured through a Requirement in Schedule 2 of the Draft DCO [EN010168/APP/3.1]. This will stipulate that a detailed Battery Safety Management Plan will be submitted to and approved in consultation with D&WFRS, the Environment Agency (EA), and by the relevant planning authorities prior to the commencement of the works for the BESS. This plan will be substantially in accordance with the Outline BSMP."* In addition, operational drainage and containment matters are secured through

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volume or the design rainfall event until removal, and shall include details of routine function testing and record keeping. The authorised development shall thereafter be operated in accordance with the approved containment measures.				Requirement 11 of the **Draft DCO [REP1-007]**, which requires written details of the surface water drainage scheme and any foul water drainage system to be submitted to and approved before the relevant part of the authorised development commences. The approved scheme must be implemented as approved. Operational management is also secured through Requirement 14 of the **Draft DCO [REP1-007]**, which requires an Operational Environmental Management Plan to be submitted and approved prior to final commissioning and implemented as approved. The detailed drainage design will be informed by the **ES Volume 3, Appendices 11-1 to 11-9: Flood Risk Assessment and Drainage Strategy [REP1-037 to REP1-054]**, the **Outline OEMP [REP1-098]**, the **Firewater Containment and Drainage Strategy – Lime Down D Battery Energy Storage System [REP1-124]** and **Firewater Containment and Drainage Strategy -**

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				Lime Down Substation [REP1-125]. These documents set out the relevant containment, isolation, testing and maintenance principles. The Applicant considers that a further standalone Requirement is not necessary. The containment approach differs between asset types. For the BESS, the drainage system forms part of the incident containment strategy. For substations, the principal pollution risk is associated with oil-filled transformers and similar plant, and the approach is based on source containment within sealed bunded enclosures, with local isolation, testing and removal where required. A single blanket requirement based on the same containment calculation and automatic isolation valve arrangement for both asset types would not reflect the detailed design basis for each asset.
Hydraulic modelling (1D–2D) and exceedance assessment	To demonstrate that the authorised development would not alter flood-risk behaviour,		Yes	The Applicant agrees that flood risk and exceedance should be assessed using methods proportionate to the source,

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		Secretary of State	Wiltshire Council	
No development shall commence until a single, integrated Hydraulic Modelling and Exceedance Assessment has been submitted to and approved in writing by the LPA. The assessment shall be prepared in accordance with the Environment Agency's "Using modelling for flood risk assessments" and river modelling technical standards and shall: (a) Provide 2D surface-water modelling for the pre-construction, construction (temporary works), operational and decommissioning states for each PV area (A–E) and hydrologically connected land within the Order limits, together	including exceedance, and to support confirmation of compliance with functional floodplain and surface water flood-risk policies.			pathway and sensitivity of risk. The Applicant does not consider that the proposed Requirement is necessary or proportionate. It would require scheme-wide 2D surface water modelling for every PV area, and 1D to 2D coupled modelling for all ordinary watercourses, irrespective of mapped flood risk, development interaction, receptor sensitivity or whether the watercourse is material to the Scheme design. This is consistent with the consultation record. At a meeting with the Environment Agency on11 October 2024, the Environment Agency agreed that blanket modelling across the entire Scheme was not required and that modelling should be targeted to specific areas of identified risk. At the 27 February 2025 LLFA meeting, Ben Wilding, acting for Wiltshire Council LLFA, stated that it was "not sensible to request modelling for whole site" and supported the position that solar panels do not cause detrimental runoff impacts where properly managed. At the 27

Requirement	Reason	Requirement to be discharged by:		Applicant's Response
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with an appropriate buffer (minimum 100 m), merged into contiguous domains where flow connectivity exists; (b) Include 1D–2D coupled fluvial modelling for all ordinary watercourses within or adjacent to the Order limits, to define Flood Zone 3b (functional floodplain) and interactions with site works; (c) Assess, as a minimum, the 1 in 30-year, 1 in 100-year and 1 in 100-year plus climate change events, including sensitivity testing for rainfall duration, culvert blockage and ground-condition roughness				May 2025 LLFA meeting, Wiltshire Council LLFA supported the passive infiltration approach for panel areas, confirmed that further testing or interim remediation detail was not needed at that stage, and supported the 70% betterment approach for impermeable infrastructure. The submitted assessment has already applied a proportionate hierarchy of methods. Main River flood risk has been, or is being, addressed through detailed hydraulic modelling where the Scheme materially interacts with mapped fluvial flood extents. This applies to Lime Down D, where detailed hydraulic modelling has been undertaken for Gauze Brook and the Unnamed Main River, and Lime Down E2, where further modelling is being progressed in relation to Gabriel's Well. These matters relate to Main River flood risk and will be reported through the Examination, with

Requirement	Reason	Requirement to be discharged by:		Applicant's Response
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for pre-works, temporary works and operational states; (d) Demonstrate how exceedance routes are identified and safeguarded away from sensitive receptors (including dwellings, highways, watercourses and Public Rights of Way), and that the proposed drainage and earthworks would not increase flood risk elsewhere; (e) Provide model outputs including depth, velocity, hazard mapping and flow vectors, together with GIS layers; and (f) Include a quality assurance				ongoing engagement with the Environment Agency as the relevant consultee. The request to define Flood Zone 3b across all ordinary watercourses within or adjacent to the Order Limits is not justified. Flood Zone 3b forms part of Flood Zone 3 and sits within the wider mapped Flood Zone 2 extent. Land outside the mapped Flood Zone 2 extent cannot, by definition, be Flood Zone 3b. Where minor or unmapped watercourses are not represented in the mapped Flood Zone 2 or 3 extents, the assessment has used proportionate methods, including surface water flood mapping, site-specific review of topography and drainage features, watercourse buffers, and Manning's-based open channel calculations where appropriate. The request for 2D modelling of every PV area for pre-construction, construction, operation and decommissioning states is also disproportionate. Panelled areas are not

Requirement	Reason	Requirement to be discharged by:		Applicant's Response
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statement demonstrating compliance with Environment Agency modelling standards, together with a Model Review Note responding to Environment Agency and LLFA comments. Where the Applicant demonstrates that a specific parcel of land is hydrologically isolated and does not influence Flood Zone 3b definition or exceedance routing, the LPA may agree a proportionate reduction in model coverage for that parcel.				impermeable hardstanding, do not create a formal drainage system and do not introduce a new controlled discharge to watercourses. They will remain permeable and vegetated, with the land moving from agricultural use to permanent grassland and wildflower cover beneath and between arrays. The relevant controls are soil protection, vegetation establishment, retention of existing overland flow routes and targeted drainage for formal infrastructure areas, rather than engineered drainage or modelled attenuation of panelled fields. Formal drainage from impermeable infrastructure, including substations, BESS and other hardstanding areas, has been assessed quantitatively. This is addressed in **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [REP1-017]**, Paragraphs 11.10.33 to 11.10.39 and **ES Volume 3, Appendix 11-1: Flood Risk Assessment and Drainage Strategy Covering Report [REP1-037]**, Sections 6.4

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				and 6.5. Formal drainage areas are attenuated and controlled, including restriction to 70% of equivalent greenfield rates where required for the 1 in 1-year and 1 in 2-year events, with attenuation for the 1 in 100-year plus climate change event. Construction-phase exceedance, runoff, sediment and erosion risks are temporary and are controlled through the detailed CEMP process. Requiring full 1 in 100-year plus climate change modelling of temporary construction and decommissioning states across all PV areas would be disproportionate given the short duration of those phases and the embedded controls secured through the **Outline CEMP [REP1-096]**, Section 3.6, Table 5 and the **Outline Decommissioning Strategy [REP1-100]**, Section 3.6, Table 5. Operational drainage inspection and maintenance is secured through the **Outline OEMP [REP1-098]**, Paragraphs 2.14.1 to

Requirement	Reason	Requirement to be discharged by:		Applicant's Response
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				2.14.3 and Section 3.6, Table 5. Decommissioning drainage and water quality controls are secured through the detailed decommissioning plan required by Requirement 20 of the **Draft DCO [REP1-007]**, which must be substantially in accordance with the **Outline Decommissioning Strategy [REP1-100]**. The Applicant therefore considers that the proposed additional modelling Requirement is not required. **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [REP1-017]**, **ES Volume 3, Appendices 11-1 to 11-9: Flood Risk Assessment and Drainage Strategy [REP1-037 to REP1-054]**, targeted hydraulic modelling, detailed drainage design, CEMP, OEMP and decommissioning controls provide the appropriate and proportionate framework to demonstrate that the Scheme will not increase flood risk elsewhere.

Table 16-11 - Climate Change

Requirement	Reason	Requirement to be discharged by:		Applicant's Response
		Secretary of State	Wiltshire Council	
Development must not commence until the management plans have been approved, to include measures that minimise greenhouse gas emissions, especially during the construction phase, through the Construction Environmental Management Plan, Operational Environmental Management Plan and Decommissioning Strategy, especially around the use of ultra-low emissions vehicles, and embodied carbon.	To reduce GHG emissions as much as possible		Yes	Best practice mitigation measures are included within the **ES Volume 1, Chapter 7: Climate Change [APP-059]** to manage emissions during each phase. The additional measures proposed by Wiltshire Council in the climate change section of this Local Impact Report will be considered for inclusion within the relevant management plans with updates submitted at later deadlines of Examination, where required. Greenhouse gas (GHG) mitigation measures are included within section 3.2, table 1 of the **Outline CEMP [REP1-096],** section 3.2, table 1 of the **Outline OEMP [REP1-098]** and within section 3.2, table 1 of the **Outline Decommissioning Strategy [REP1-100].** These are each secured by Requirements 13, 14 and 20 of Schedule 2 (Requirements) to the **Draft DCO [REP1-007].** Pursuant to

Requirement	Reason	Requirement to be discharged by:		Applicant's Response
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				the Requirements, final versions of these documents must be approved by Wiltshire Council and must be substantially in accordance with the outline versions.
Development must not commence until the management plans have been approved, to include measures relating to recycling of panels. E.g. work with circular economy organisations to ensure recycling of panels and other materials, collaborating on innovative approaches as necessary, working with local organisations and finding local solutions where possible.	Minimise environmental impact, GHG emissions and in particular embodied carbon and improve circularity of materials use.		Yes	As above

Table 16-12 - Soils and Agriculture

Requirement	Reason	Requirement to be discharged by:		Applicant's Response
		Secretary of State	Wiltshire Council	
No part of the scheme should commence until a pollution incident plan has been submitted to and approved by the local planning authority	To minimise the impact of any pollution incidents		Yes	The Applicant notes this comment. Table 5 of the **Outline CEMP [REP1-096]** confirms that a plan to deal with accidental pollution would be included within the detailed CEMP(s). This is secured by Requirement 13 of Schedule 2 (Requirements) to the **Draft DCO [REP1-007]**. The Final CEMP(s) must be approved by Wiltshire Council and must be substantially in accordance with the outline version.
If during the lifetime of the scheme any of the land that is a part of the scheme is to be used for livestock, then Wiltshire Council would need to be consulted and agree on fencing/protective equipment required. This should be submitted and approved by the local planning authority	To eliminate any damage that could be caused by livestock during the operational phase to equipment and the general public. This should be incorporated into the initial construction phase.		Yes	Provision of a detailed Landscape and Ecological Management Plan, substantially in accordance with the **Outline LEMP [APP-283]** is secured through Requirement 7 of the **Draft DCO [REP1-007]**. This document would need to be provided to, and approved by the host authority (Wiltshire Council) in advance of commencement on any part the Scheme. The Applicant therefore considers the wording of Requirement 7 is sufficiently robust to ensure the requirement for detailed

Requirement	Reason	Requirement to be discharged by:		Applicant's Response
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through the detailed design requirement.				landscape and ecological management prescriptions as well as a comprehensive monitoring schedule will be delivered.
No part of the scheme should be started until a comprehensive soil sampling scheme has been submitted to and approved by the local planning authority in writing, to include inspection of subsurface for signs of compaction using test manually dug holes	To ensure the soil is in a fit state to resume agricultural production after decommissioning is completed.		Yes	The Applicant notes this comment. The current baseline conditions have been determined through soil surveys undertaken by a suitably qualified soil scientist, as reported in **ES Volume 3, Appendix 17-1: Agricultural Land Classification and Soil Resource Survey Report [REP1-063]**, which serves as a pre-condition record of the soils. The **Outline SRMP [APP-280]** which is secured by Requirement 17 of the **Draft DCO [REP1-007]**, states that compaction will be monitored during construction. The Detailed SRMP will include further detail on post-construction/pre-decommissioning sampling, including boreholes and trial pits, and will form part of the overall Decommissioning Strategy, secured by Requirement 20 of the **Draft DCO [REP1-**

Requirement	Reason	Requirement to be discharged by:		Applicant's Response
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				007], noting that industry best practice may evolve in the future.

Table 16-13 -: Arboriculture

Requirement	Reason	Requirement to be discharged by:		Applicant's Response
		Secretary of State	Wiltshire Council	
development shall commence on site, and; no equipment, machinery or materials shall be brought on to site for the purpose of development, until a comprehensive Arboricultural Method Statement, prepared in accordance with British Standard 5837: 2012: "Trees in Relation to Design, Demolition and Construction - Recommendations"; and detailing all methods and materials proposed to be used for tracks, accesses, associated infrastructure, any aspect of the Solar PV Sites, and any aspect of the cable route corridor, within, or in the instance of tracks and	The OAMS submitted with the DCO application documentation contained insufficient information to enable this matter to be considered prior to granting consent and the matter is required to be agreed with the Local Planning Authority before development commences in order that the development is undertaken in an acceptable manner, to enable the Local Planning Authority to ensure the retention of trees, groups, woodlands and hedgerows on and off the site in the interests of visual and ecological amenity.		Yes	The Applicant notes this comment and confirms that a Detailed Arboricultural Method Statement (AMS) will be prepared in accordance with BS 5837:2012 and submitted for approval prior to the commencement of development. The Detailed AMS will provide site-specific methodologies, materials, sequencing and protection measures for all works within or adjacent to Root Protection Areas, including tracks, accesses, Solar PV infrastructure and the cable route corridor. Arboricultural mitigation is secured through the **Outline CEMP [REP1-096]** and the **Outline OEMP [REP1-098]**, which are certified documents secured by Requirements 13 and 14 of the DCO and subject to approval by Wiltshire Council. In addition, a pre-commencement Requirement will ensure that no stage of development may commence until the Detailed AMS has been approved, with all

Requirement	Reason	Requirement to be discharged by:		Applicant's Response
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accesses on the periphery of, the RPA of any tree or group, has been submitted to and approved in writing by the Local Planning Authority.				works thereafter carried out in accordance with the approved details, ensuring full control and compliance with BS 5837:2012.
No demolition, site clearance or development shall commence on site, and; no equipment, machinery or materials shall be brought on to site for the purpose of development, until a comprehensive Arboricultural Method Statement, prepared in accordance with British Standard 5837: 2012: "Trees in Relation to Design, Demolition and Construction - Recommendations"; and detailing all methods and materials proposed to be used for the installation of each BESS, including root barriers	The OAMS submitted with the DCO application documentation contained insufficient information to enable this matter to be considered prior to granting consent and the matter is required to be agreed with the Local Planning Authority before development commences in order that the development is undertaken in an acceptable manner, to enable the Local Planning Authority to ensure the retention of trees, groups, woodlands and hedgerows on and off the site in the interests of visual and ecological amenity.		Yes	The Applicant notes this comment and confirms that a Detailed Arboricultural Method Statement (AMS) will be prepared in accordance with BS 5837:2012 and submitted for approval prior to the commencement of development. The Detailed AMS will include site-specific methodologies, materials and protection measures for the installation of Battery Energy Storage Systems (BESS), including appropriate controls to prevent soil contamination, such as the use of root barriers and measures to prevent leaching. Arboricultural mitigation is secured through the **Outline CEMP [REP1-096]** and the **Outline OEMP [REP1-098]**, which are certified documents secured by Requirements 13 and 14 of the **Draft DCO**

Requirement	Reason	Requirement to be discharged by:		Applicant's Response
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for the prevention of leaching of chemicals, has been submitted to and approved in writing by the Local Planning Authority.				**[REP1-007]** and subject to approval by Wiltshire Council. In addition, a pre-commencement Requirement will ensure that no stage of development may commence until the Detailed AMS has been approved, with all works thereafter carried out in accordance with the approved details, ensuring full control and compliance with BS 5837:2012.
No demolition, site clearance or development shall commence on site, and; no equipment, machinery or materials shall be brought on to site for the purpose of development, until comprehensive Tree Protection Plans, prepared in accordance with British Standard 5837: 2012: "Trees in Relation to Design, Demolition and Construction - Recommendations"; detailing	The OAMS submitted with the DCO application documentation contained insufficient information to enable this matter to be considered prior to granting consent and the matter is required to be agreed with the Local Planning Authority before development commences in order that the development is undertaken in an acceptable manner, to enable the Local Planning Authority to ensure the retention of trees, groups,		Yes	The Applicant notes this comment and confirms that Detailed Tree Protection Plans (TPPs) will be prepared in accordance with BS 5837:2012 and submitted for approval prior to the commencement of development. The TPPs will provide site-specific details of protective fencing locations, specifications and ground protection measures for all retained trees and hedgerows. Arboricultural mitigation is secured through the **Outline CEMP [REP1-096]** and the **Outline OEMP [REP1-098]**, which are certified documents secured by Requirements 13 and 14 of the **Draft DCO [REP1-007]** and subject to

Requirement	Reason	Requirement to be discharged by:		Applicant's Response
		Secretary of State	Wiltshire Council	
the locations and types of protective fencing and ground protection proposed, has been submitted to and approved in writing by the Local Planning Authority. The protective fencing shall be erected in accordance with the approved details. The protective fencing shall remain in place for the entire development phase and until all equipment, machinery and surplus materials have been removed from the site. Such fencing shall not be removed or breached during construction operations.	woodlands and hedgerows on and off the site in the interests of visual and ecological amenity.			approval by Wiltshire Council. A pre-commencement Requirement will ensure that no stage of development may commence until the TPPs have been approved, and that all protective fencing and ground protection are installed and retained for the duration of construction in accordance with the approved details, ensuring full protection of retained trees in line with BS 5837:2012.
No demolition, site clearance or development shall commence on site, and no	The Tree Impact Plans submitted with the DCO application documentation		Yes	Where construction takes place within the RPA, as outlined in the OAMS, bespoke mitigation and protection measures will be

Requirement	Reason	Requirement to be discharged by:		Applicant's Response
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equipment, machinery or materials shall be brought on to site for the purpose of development, until revised Tree Impacts Plans, prepared in accordance with British Standard 5837: 2012: "Trees in Relation to Design, Demolition and Construction - Recommendations"; labelling all trees, groups, woodlands, and hedgerows within the Order Limits appropriately, and detailing all infrastructure in relation to Lime Down Solar Park, has been submitted to and approved in writing by the Local Planning Authority. (This condition should be added should the plans not be	demonstrated high-impact construction within the RPA of trees, groups, woodlands, and hedgerows to be retained, without sufficient mitigation to prevent unnecessary harm to said trees, groups, woodlands, and hedgerows. The location and mitigation is required to be agreed with the Local Planning Authority before development commences in order that the development is undertaken in an acceptable manner, to enable the Local Planning Authority to ensure the retention of trees, groups, woodlands and hedgerows on and off the site in the interests of visual and ecological amenity.			installed to ensure that the below and above ground components of the retained trees are protected. This detail will be provided in the detailed AMS to be produced.

Requirement	Reason	Requirement to be discharged by:		Applicant's Response
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submitted prior to determination)				

Table 16-14 - Ecology and Biodiversity

Requirement	Reason	Requirement to be discharged by:		Applicant's Response
		Secretary of State	Wiltshire Council	
1. Compliance with Submitted Documents The development will be carried out in strict accordance with the following documents and plans: • Landscape and Ecology Mitigation Plans (Environmental Statement Volume 2, Figure 3-4-1 to 3-4-5.2).	For the avoidance of doubt and for the protection, mitigation and enhancement of biodiversity		Yes	The Applicant notes this comment. The final details of all landscape and ecological measures, shown in **ES Volume 2, Figure 3-4: Landscape and Ecology Mitigation Plan [REP1-029 to REP1-032]** will only be finally determined at the detailed design state. Embedded design measures are secured as part of the **Design Principles and Parameters [REP1A-008]** which is secured by Requirement 5 of the **Draft DCO [REP1-007].**

Requirement	Reason	Requirement to be discharged by:		Applicant's Response
		Secretary of State	Wiltshire Council	
• Final Ecological Protection and Mitigation Strategy (EPMS). • Hedgerow Removal Plan embedded within and comprising Annex A of the EPMS. • Schedule of Protective Ecological Buffers. • Habitats Regulations Assessment Report. • Final Detailed Landscape and Ecology Management Plan LEMP (LEMP). • Final Construction Environmental Management Plan (CEMP). • Habitat Management and Monitoring Plan (HMMP).				A detailed EPMS is secured via Requirement 8 of the **Draft DCO [REP1-007].** The current Hedgerow Removal Plan contained with Annex A of the **Outline EPMS [REP1-106]** is indicative only. The final details of hedgerow removal, particularly within the Cable Route Corridor, will only be determined at the detailed design stage. A detailed LEMP is secured via Requirement 7 of the **Draft DCO [REP1-007].** A detailed CEMP is secured via Requirement 13 of the **Draft DCO [REP1-007].** Both the **Outline EPMS [REP1-106]** and the **Outline CEMP [REP1-096]** set out construction phase lighting controls and limitations, designed to avoid significant adverse impacts to light-sensitive ecological

Requirement	Reason	Requirement to be discharged by:		Applicant's Response
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• Lighting Strategy covering • construction and operational/maintenance phases). • Decommissioning and Restoration Plan/Strategy. Note: This is not an exhaustive list and the ExA should include any other technical drawings, and/or relevant sections of reports relating to mitigation they deem appropriate within this DCO requirement if minded to approve the application.				features. A detailed EPMS and a detailed CEMP are secured via Requirements 8 and 13 of the **Draft DCO [REP1-007]** respectively. In addition, the **Outline OEMP [REP1-098]** sets out operational lighting controls. A detailed OEMP, substantially in accordance with the **Outline OEMP [REP1-098]** is secured via Requirement 14. A detailed Decommissioning Strategy is secured by Requirement 20 of the **Draft DCO [REP1-007]**.
2. (Final) Detailed Landscape and Ecology Management Plan LEMP (LEMP)	To ensure the long-term management of landscape and ecological features retained and created by the development, for the benefit of visual amenity and		Yes	Provision of a detailed Landscape and Ecological Management Plan, substantially in accordance with the **Outline LEMP [APP-283]** is secured through Requirement 7 of the **Draft DCO [REP1-007]**. This document

Requirement	Reason	Requirement to be discharged by:		Applicant's Response
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Prior to the start of each phase of construction, a final Landscape and Ecology Management Plan (LEMP) shall be submitted to and approved in writing by the Local Planning Authority. The LEMP will include long term objectives and targets, management responsibilities and maintenance schedules for each ecological feature within the development, together with a mechanism for monitoring success of the management prescriptions, incorporating review and necessary adaptive management in order to attain targets. The LEMP shall be implemented in full and for the lifetime of the development in	biodiversity for the lifetime of the scheme.			would need to be provided to, and approved by the host authority (Wiltshire Council) in advance of commencement on any part the Scheme. The Applicant therefore considers the wording of Requirement 7 is sufficiently robust to ensure the requirement for detailed landscape and ecological management prescriptions as well as a comprehensive monitoring schedule will be delivered.

Requirement	Reason	Requirement to be discharged by:		Applicant's Response
		Secretary of State	Wiltshire Council	
accordance with the approved details.				
3. (Final) Construction Environmental Management Plan (CEMP) Prior to the commencement of each phase of the works, including demolition, ground works/excavation, site clearance, vegetation clearance and boundary treatment works, a final Construction Environmental Management Plan (CEMP) shall be submitted to the local planning authority for approval in writing. The CEMP shall provide details of the avoidance, mitigation and protective measures to be implemented before and during	To ensure adequate protection and mitigation for ecological receptors prior to and during construction, and that works are undertaken in line with current best practice and industry standards and are supervised by a suitably licensed and competent professional ecological consultant where applicable.		Yes	Provision of a detailed Ecological Protection and Mitigation Strategy, substantially in accordance with the **Outline EPMS [REP1-106]** is secured through Requirement 8 of the **Draft DCO [REP1-007]**. This document would need to be provided to, and approved by, the host authority (Wiltshire Council) in advance of commencement on any part the Scheme. The **Outline EPMS [REP1-106]** outlines all elements proposed by the Council to be covered by the CEMP, including identification and details of protection areas/buffer zones, working method statements of protected/priority species, mitigation strategies for certain species and habitats, schedules for sensitive timing of works and attendance of an Ecological Clerk of Works (EcoCoW), and roles and responsibilities.

Requirement	Reason	Requirement to be discharged by:		Applicant's Response
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the construction phase, including but not necessarily limited to, the following: • Identification of ecological protection areas/buffer zones and tree root protection areas and details of physical means of protection, e.g. exclusion fencing. • Working method statements for protected/priority species, such as nesting birds and reptiles. • Mitigation strategies already agreed with the local planning authority prior to determination, such as for great crested newts, dormice or bats; this should comprise the				The Applicant therefore considers the wording of Requirement 8 is sufficiently robust to ensure the requirement for detailed ecological protection measures can be agreed and delivered.

Requirement	Reason	Requirement to be discharged by:		Applicant's Response
		Secretary of State	Wiltshire Council	
pre-construction/construction related elements of strategies only. • Schedules for activities with specific timing requirements in order to avoid/reduce potential harm to ecological receptors; including details of when a licensed ecologist and/or ecological clerk of works (ECoW) shall be present on site. • Key personnel, responsibilities and contact details (including Site Manager and ecologist/ECoW).				

Requirement	Reason	Requirement to be discharged by:		Applicant's Response
		Secretary of State	Wiltshire Council	
Development shall be carried out in strict accordance with the approved CEMP.				
4. Biodiversity Net Gain (BNG): Habitat Management and Monitoring Plan (HMMP) Prior to the commencement of each phase of the works, a Habitat Management and Monitoring Plan (the HMMP), prepared in accordance with the statutory Biodiversity Gain Plan and including: • a non-technical summary; • the roles and responsibilities of the people or organisation(s) delivering the HMMP; • the planned habitat creation and	To ensure the development delivers a biodiversity net gain on site in accordance with Schedule 7A of the Town and Country Planning Act 1990.		Yes	Provision of a detailed Landscape and Ecological Management Plan, substantially in accordance with the **Outline LEMP [APP-284]** is secured through Requirement 7 of the **Draft DCO [REP1-007]**. This document would need to be provided to, and approved by the host authority (Wiltshire Council) in advance of commencement on any part the Scheme. The Applicant therefore considers the wording of Requirement 7 is sufficiently robust to ensure the requirement for details of all habitat creation and enhancement measures, all landscape and ecological management prescriptions as well as a comprehensive monitoring schedule can be agreed and delivered, without requirement for a separate HMMP.

Requirement	Reason	Requirement to be discharged by:		Applicant's Response
		Secretary of State	Wiltshire Council	
enhancement works to create or improve habitat to achieve the biodiversity net gain in accordance with the statutory Biodiversity Gain Plan and schedule for implementation; • the management measures to maintain habitat in accordance with the statutory Biodiversity Gain Plan for a period of 30 years from the completion of development; and • the monitoring methodology and specification of a Monitoring Pack (to include but not exclusively up to date Management Actions				

Requirement	Reason	Requirement to be discharged by:		Applicant's Response
		Secretary of State	Wiltshire Council	
Logs, Habitat Condition Assessment Reports, metric calculation; and corresponding post intervention Habitat Map) which shall be submitted to the Local Planning Authority in years 2 (two) 5 (five) 10 (ten) 15 (fifteen) 20 (twenty) and 30 (thirty) of the Maintenance Period, has been submitted to, and approved in writing by, the local planning authority. The created and/or enhanced habitat shall be managed and maintained in accordance with the statutory HMMP at all times thereafter.				

Requirement	Reason	Requirement to be discharged by:		Applicant's Response
		Secretary of State	Wiltshire Council	
5. (Final) Ecological Protection and Mitigation Strategy (EPMS) Prior to the commencement of each phase of the works, a final Ecological Protection and Mitigation Strategy (EPMS) shall be submitted to and approved in writing by the Local Planning Authority. Development shall be carried out in strict accordance with the approved EPMS.	To ensure adequate protection and mitigation for ecological receptors prior to and during construction and operation, and that works are undertaken in line with current best practice and industry standards and are supervised by a suitably licensed and competent professional ecological consultant where applicable.		Yes	Provision of a detailed Ecological Protection and Mitigation Strategy, substantially in accordance with the **Outline EPMS [REP1-106]** is secured through Requirement 8 of the **Draft DCO [REP1-007]**. This document would need to be provided to, and approved by, the host authority (Wiltshire Council) in advance of commencement of any part the Scheme. The Applicant therefore considers the wording of Requirement 8 is sufficiently robust to ensure the requirement for detailed ecological protection measures can be agreed and delivered.
6. Lighting Strategy (covering construction and operational/ maintenance phases) In relation to the Cable Route Corridor (CRC) where it coincides with the 4km greater	To avoid illumination of habitat used by bats.		Yes	**ES Volume 1, Chapter 3: The Scheme [APP-055]** set out that the Scheme has been designed to minimise the need for external lighting. Lighting is not required within the Solar PV Arrays during the operational phase. Motion-sensing security lighting will be provided within substations

Requirement	Reason	Requirement to be discharged by:		Applicant's Response
		Secretary of State	Wiltshire Council	
horseshoe bat consultation zone around the Box Mine component area of the Bath and Bradford on Avon Bats Special Area of Conservation (SAC). No external light fixture or fitting will be installed within the application site unless details of existing and proposed new lighting have been submitted to and approved by the Local Planning Authority in writing. The submitted details will demonstrate how the proposed lighting will impact on bat habitat compared to the existing situation. The plans will be in accordance with the appropriate Environmental Zone standards				and the BESS Area and will be used only for maintenance and security purposes. The impacts of lighting on ecological features are also assessed in **ES Volume 1, Chapter 9: Ecology and Biodiversity [REP1-015]**. The concludes that, with the adoption of embedded mitigation measures, not significant adverse effects ecological features are expected. Both the **Outline EPMS [REP1-106]** and the **Outline CEMP [REP1-096]** set out construction phase lighting controls and limitations, designed to avoid significant adverse impacts to light-sensitive ecological features. A detailed EPMS and a detailed CEMP are secured via Requirements 8 and 13 of the **Draft DCO [REP1-007]** respectively. In addition, the **Outline OEMP [REP1-098**] sets out operational lighting controls. A detailed OEMP, substantially in accordance with the **Outline OEMP [REP1-098]** is secured via Requirement 14.

Requirement	Reason	Requirement to be discharged by:		Applicant's Response
		Secretary of State	Wiltshire Council	
set out by the Institution of Lighting Professionals (ILP) Guidance Notes on the Avoidance of Obtrusive Light (GN 01/2021) and Guidance note GN08/23 "Bats and artificial lighting at night", issued by the Bat Conservation Trust and Institution of Lighting Professionals.				The Applicant therefore considers the wording of DCO Requirements is sufficiently robust to ensure the details on lighting controls can be agreed and delivered.
7. Decommissioning and Restoration Plan/Strategy Not later than 12 months before each phase of the planned decommissioning of the solar park a scheme for decommissioning and the restoration of the site must be submitted to the Local Planning Authority and approved in writing. The scheme will be based on update ecological	To ensure adequate protection and mitigation for ecological receptors during the decommissioning phase and to ensure compliance with legislation in respect of protected habitats and species, planning policy and best practice		Yes	Provision of a detailed Decommissioning Strategy, substantially in accordance with the **Outline Decommissioning Strategy [REP1-100]** is secured through Requirement 20 of the **Draft DCO [REP1-007]**. This document would need to be provided to, and approved by, the host authority (Wiltshire Council) in advance of commencement on any part the Scheme. Section 3.4, Table 3 of the **Outline Decommissioning Strategy [REP1-100]** includes the following measure 'No more

Requirement	Reason	Requirement to be discharged by:		Applicant's Response
		Secretary of State	Wiltshire Council	
surveys and must make provision for the removal of the solar arrays and the associated above ground structures, equipment and foundations, to a depth of at least one metre below finished ground level. The scheme must include the management and timing of any works; a traffic management plan; an environmental management plan including measures to protect wildlife.				than twelve months prior to decommissioning commencing, land within the Order Limits will be visited by an appropriately qualified ecologist to identify any ecological constraints arising from decommissioning activities. Further surveys, mitigation and/or compensatory measures may then be required in line with prevailing guidance. As a minimum, an extended UK Habitat Classification Walkover Survey (or equivalent) is considered likely to be required to identify the potential presence of protected species and important habitats' The Applicant therefore considers the wording of Requirement 20 is sufficiently robust to ensure the requirement for a detailed Decommissioning Strategy can be agreed and delivered.

Table 16-15 -: Minerals and Waste

Requirement	Reason	Requirement to be discharged by:		Applicant's Response
		Secretary of State	Wiltshire Council	
Construction Environmental Management Plan (CEMP) - As included within the Draft DCO [REP1-007]	To secure the relevant mitigation measures.		Yes	The Applicant notes this comment. A detailed CEMP, substantially in accordance with the **Outline CEMP [REP1-096]** is secured via Requirement 13 of the **Draft DCO [REP1-007].**
Operational Environmental Management Plan (OEMP) - As included within the Draft DCO [REP1-007]	To ensure the sustainable management of waste.		Yes	The Applicant notes this comment. A detailed OEMP, substantially in accordance with the **Outline OEMP [REP1-098]** is secured via Requirement 14 of the **Draft DCO [REP1-007]**.
Site Waste Management Plan (SWMP) - As included within the Draft DCO [REP1-007]	To ensure waste is managed in accordance with regulatory and good practice requirements.		Yes	The Applicant notes this comment.
Decommissioning Strategy (DS) - As included within the Draft DCO [REP1-007]	To secure removal of plant and structures at the end of the project.		Yes	The Applicant notes this comment. A detailed Decommissioning Strategy, substantially in accordance with the **Outline Decommissioning Strategy [REP1-100]** is

Requirement	Reason	Requirement to be discharged by:		Applicant's Response
		Secretary of State	Wiltshire Council	
				secured by Requirement 20 of the **Draft DCO [REP1-007]**.

17 Consolidated List of Suggested Section 106 Agreements

Table 17-1 - Public Rights of Way Suggested S106 Agreement

Wiltshire Council Comments	Applicant's Response
A section 106 contribution of £20,000 per annum index linked should be paid annually. Reason (including justification for why a condition is not adequate) This contribution is required to improve Public Rights of Way outside of the red line boundary which will receive additional usage from members of the public wishing to enjoy the PRoW network within a more traditional landscape setting. The sum is requested so that new routes can be created to help to link up PRoW. To divert PRoW to provide routes which reduce conflict between land managers and the public. This contribution would allow for those most affected by the development to have a PRoW network which could still meet their needs and be accessible to as many users as possible. It is suggested that the money is to be spent on public footpaths within 2km of the red line boundary of Lime Down A,B,C,D and E and 3km for other PRoW. After 20 years this is to be expanded to cover footpaths with 3km and other PRoW within 4km after 40 years this area should be increased to cover footpaths within 4km and other PRoW within 5km. If the development time scale is extended then the contributions should continue' on the same	The Applicant considers the request for additional contributions towards the wider PRoW network in relation to the Scheme via a Section 106 Agreement, to be something that should be explored further in consultation with Wiltshire Council. Any amount and locations to be incorporated would require further scrutiny, given the proposed expansion beyond the Scheme boundary that has been suggested over time. The Applicant would question the relative interaction of PRoWs at greater distances, though would agree that the enhancement of PRoWs in close proximity to the scheme, but outside of the Scheme's Order Limits, could benefit from improvement alongside the Applicant's proposed improvements and permissive routes contained in the Application. Financial contributions to PRoW network maintenance and upgrades beyond those under the responsibility of the Applicant that cannot be agreed to be delivered by a s106 within the Scheme would need to be agreed through the Community Benefit Fund which operates and is to be agreed outside of the DCO process. The Applicant is exploring bespoke mechanisms through which requests, such as the provision of funds for specific purposes, could be implemented. The Applicant considers the specific request made by the local

Wiltshire Council Comments	Applicant's Response
basis as they had been and a further increase of 1km per 10 years for the area where the funding can be spent.	authority for an annual sum to use for upgrades to the PRoW network in the areas surrounding the Scheme would be a suitable use of the Community Benefit Fund, and would be supported by the Applicant. The Applicant confirms that discussions with representatives of Wiltshire Council's Countryside Access Team have been undertaken and are ongoing through the process of discussions to agree a Statement of Common Ground, a first draft of which is submitted at Deadline 2 **[EN010168/EXAM/8.2]**.

Table 17-2 – Flood Risk and Drainage S106 Agreement

Wiltshire Council Comments	Applicant's Response
None identified Reason (including justification for why a condition is not adequate) All flood risk and drainage mitigation required to address the impacts of the authorised development can be secured, enforced and maintained through Development Consent Order Requirements and planning-style conditions. No matters have been identified that require a Section 106 planning obligation in order to achieve acceptable flood-risk or drainage outcomes.	The Applicant notes this comment.

Table 17-3 – Ecology and Biodiversity S106 Agreement

Wiltshire Council Comments	Applicant's Response
Developer contribution to be secured by means of a S106 for the LPA to monitor the delivery of significant on-site BNG gains over a period of 30 years. The S106 should reflect the HMMP which should set out how it will be monitored and the frequency of reporting from the applicant to the LPA. Reason (including justification for why a condition is not adequate) The LPA will be responsible for monitoring over the 30 year period. Explanatory Note: Calculation of the developer contribution is considered to constitute a matter for the Examination, and potentially for an Issue Specific Hearing, should one be held in relation to ecology and biodiversity. This is because Wiltshire Council's Schedule of Fees and Charges, which sets out standard fees for monitoring on-site Biodiversity Net Gain, are not applicable to complex, phased developments. Instead, developments of that type necessitate calculation of a bespoke monitoring fee that is index linked and secured by means of a legal agreement. In addition, for complex phased developments delivering significant on-site enhancements the council would prefer	Financial contributions to monitor the delivery of on-site BNG beyond those actions falling under the responsibility of the Applicant would need to be agreed through an agreed mechanism. The Applicant intends to agree a consistent approach to monitoring with Wiltshire Council across all aspects of the Scheme and welcomes further discussion with the Council on this matter.

Wiltshire Council Comments	Applicant's Response
submission of a habitat management and monitoring plan (HMMP) with the application in accordance with guidance from DEFRA (Creating a habitat management and monitoring plan for BNG - GOV.UK). The HMMP should provide details that would serve to inform the calculation of the bespoke monitoring fee. This DCO application has not been accompanied by a HMMP, however, and as such it is deemed this matter will need to be resolved through the Examination process. It is therefore considered that to calculate the developer contribution at this juncture, and in advance of advice from the Examining Authority, would be premature	
Developer contribution to be secured towards the LPA monitoring the measures set out in the LEMP, which should cover the construction and operational phases. Reason (including justification for why a condition is not adequate) The LPA will be responsible for monitoring over the lifetime of the Scheme, which is proposed to be at least 60 years. Explanatory Note: Calculation of the developer contribution is considered to constitute a matter for the Examination, and potentially for an Issue Specific Hearing, should one be held in relation to ecology and biodiversity.	Provision of a detailed Landscape and Ecological Management Plan, substantially in accordance with the **Outline LEMP [APP-283]** is secured through Requirement 7 of the **Draft DCO [REP1-007]**. This document would need to be provided to, and approved by the host authority (Wiltshire Council) in advance of commencement on any part the Scheme. The Applicant therefore considers the wording of Requirement 7 is sufficiently robust to ensure the requirement for detailed landscape and ecological management prescriptions as well as a comprehensive monitoring schedule will be delivered. The Applicant is currently considering the request for a financial contribution towards ecological monitoring in relation to the Scheme and the appropriate mechanism for securing such monitoring fees. The Applicant will seek to agree a consistent

Wiltshire Council Comments	Applicant's Response
Although Wiltshire Council's Schedule of Fees and Charges stipulates an hourly rate used to calculate developer contributions for the monitoring of habitat and species mitigation delivery, given that the mitigation strategy requirements for this DCO application may be subject to change through the Examination process, it is deemed prudent for the bespoke developer contribution amount to be determined once the mitigation strategies and ecological monitoring matters detailed in the Outline Landscape and Ecological Management Plan [APP-283] have been agreed. The bespoke monitoring fee will need to be index linked and secured by means of a legal agreement. Furthermore, it is considered a matter to be resolved through the Examination on account of there being a number of outstanding issues regarding the Scheme to be addressed through the Examination process, which in turn would facilitate determination of the developer contribution. It is therefore considered that to calculate the developer contribution at this juncture, and in advance of advice from the Examining Authority, would be premature.	approach to monitoring across all aspects of the Scheme with Wiltshire Council.

18 Lime Down Solar Park – Local Policy Context

Table 18-1 Wiltshire Core Strategy (January 2015)

Core Policy 41: Sustainable Construction and Low carbon Energy

Climate change adaptation

New development, building conversions, refurbishments and extensions will be encouraged to incorporate design measures to reduce energy demand. Development will be well insulated and designed to take advantage of natural light and heat from the sun and use natural air movement for ventilation, whilst maximising cooling in the summer.

Sustainable construction

New homes (excluding extensions and conversions) will be required to achieve at least Level 4 (in full) of the Code for Sustainable Homes.
Conversions of property to residential use will not be permitted unless Building Research Establishment Environmental Assessment Method's (BREEAM) Homes "Very Good" standards are achieved.
All non-residential development will be required to achieve the relevant BREEAM "Very Good" standards, rising to the relevant BREEAM "Excellent" standards from 2019.

Existing buildings

Retrofitting measures to improve the energy performance of existing buildings will be encouraged in accordance with the following hierarchy:

i. Reduce energy consumption through energy efficiency measures
ii. Use renewable or low-carbon energy from a local/district source
iii. Use building-integrated renewable or low carbon technologies.

Opportunities should be sought to facilitate carbon reduction through retrofitting at whole street or neighbourhood scales to reduce individual costs, improve viability and support coordinated programmes for improvement.

Wiltshire Council Comment	Applicant's Response
While the Lime Down proposals align with Core Policy 41 in principle through the provision of renewable electricity, there are fundamental shortcomings in carbon performance. The submitted evidence indicates an exceptionally long and potentially unachievable carbon payback period, an overly narrow and methodologically weak assessment of greenhouse gas emissions, and very substantial construction-phase emissions occurring during critical carbon budget periods. The absence of clear evidence demonstrating a credible net carbon benefit, together with reliance on future mitigation measures, means the proposals fail to meet the substantive requirements of Core Policy 41.	The Scheme's compliance with Core Policy 41 is set out in Annex B: Local Policy Accordance Tables of the **Planning Statement [REP1-087]** (see page 663). In addition to the wider benefits of the Scheme in the provision of renewable energy and reduction in greenhouse gas emissions, the Applicant has set out how the design of the Scheme has incorporated climate change resilience measures to ensure that the design of the Scheme is sustainable. Regarding the net carbon benefit, the conservative assessment presented within **ES Volume 1, Chapter 7: Climate Change [APP-059]** which shows that there would be a net benefit from the scheme which would result in a significant beneficial effect. The methodology to assess the greenhouse gases is clearly set out within **ES Volume 1, Chapter 7: Climate Change [APP-059]** and uses industry standard best practice methodologies (ISEP Guidance (Ref 11)) and sources for assessment (e.g. DESNZ Greenhouse Gas Accounting Factors). Should less conservative assumptions be used (e.g. comparison to other energy generating methods), there is an estimated payback year of 3 years from the scheme.
Core Policy 42: Standalone Renewable Energy Installations	

Proposals for standalone renewable energy schemes will be supported subject to satisfactory resolution of all site specific constraints. In particular, proposals will need to demonstrate how impacts on the following factors have been satisfactorily assessed, including any cumulative effects, and taken into account: i. The landscape, particularly in and around AONBs ii. The Western Wiltshire Green Belt iii. The New Forest National Park iii. Biodiversity iv. The historic environment including the Stonehenge and Avebury World Heritage Site and its setting v. Use of the local transport network vii. Residential amenity, including noise, odour, visual amenity and safety vi. viii. Best and most versatile agricultural land. Applicants will not be required to justify the overall need for renewable energy development, either in a national or local context.

Wiltshire Council Comment	**Applicant's Response**
The principle of proposals for renewable energy development receives broad support from Policy CP42 to the Wiltshire Core Strategy, as well as supporting Wiltshire's Green and Blue Infrastructure and Climate strategies, provided that they are suitably located and sufficiently mitigate any adverse development specific and cumulative environmental effects. However, compliance with local and national planning policy cannot yet be demonstrated due to outstanding information and insufficient mitigation proposals.	The Scheme's compliance with Core Policy 42 of the Wiltshire Core Strategy (Ref 9) is set out in Annex B: Local Policy Accordance Tables of the **Planning Statement [REP1-087]** (see page 668)**.** With regard Wiltshire Council's comment on outstanding information and mitigation proposals, this has been addressed separately in this document where specifically raised.
Core Policy 50: Biodiversity and Geodiversity **Protection**	

Development proposals must demonstrate how they protect features of nature conservation and geological value as part of the design rationale. There is an expectation that such features shall be retained, buffered, and managed favourably in order to maintain their ecological value, connectivity and functionality in the long-term. Where it has been demonstrated that such features cannot be retained, removal or damage shall only be acceptable in circumstances where the anticipated ecological impacts have been mitigated as far as possible and appropriate compensatory measures can be secured to ensure no net loss of the local biodiversity resource, and secure the integrity of local ecological networks and provision of ecosystem services.

All development proposals shall incorporate appropriate measures to avoid and reduce disturbance of sensitive wildlife species and habitats throughout the lifetime of the development.

Any development potentially affecting a Natura 2000 site must provide avoidance measures in accordance with the strategic plans or guidance set out in paragraphs 6.75-6.77 above where possible, otherwise bespoke measures must be provided to demonstrate that the proposals would have no adverse effect upon the Natura 2000 network. Any development that would have an adverse effect on the integrity of a European nature conservation site will not be in accordance with the Core Strategy.

Biodiversity enhancement

All development should seek opportunities to enhance biodiversity. Major development in particular must include measures to deliver biodiversity gains through opportunities to restore, enhance and create valuable habitats, ecological networks and ecosystem services. Such enhancement measures will contribute to the objectives and targets of the Biodiversity Action Plan (BAP) or River Basin/Catchment Management Plan, particularly through landscape scale projects, and be relevant to the local landscape character.

Local sites

Sustainable development will avoid direct and indirect impacts upon local sites through sensitive site location and layout, and by maintaining sufficient buffers and ecological connectivity with the wider environment. Damage or disturbance to local sites will generally be unacceptable, other than in exceptional circumstances where it has been demonstrated that such impacts: i. cannot reasonably be avoided ii. are reduced as far as possible iii. are outweighed by other planning considerations in the public interest iv. where appropriate compensation measures can be secured through planning obligations or agreements.

Development proposals affecting local sites must make a reasonable contribution to their favourable management in the long-term	
Wiltshire Council Comment	**Applicant's Response**
The proposal fails to demonstrate, as part of the design rationale, the effective protection, retention, buffering and favourable long-term management of biodiversity and geodiversity features. Wiltshire Council considers that mitigation relies heavily on future management plans, does not overcome habitat fragmentation and connectivity harm at landscape scale, and does not deliver demonstrable protection outcomes for the lifetime of the development.	The Scheme's compliance with Core Policy 50 is set out in Annex B: Local Policy Accordance Tables of the **Planning Statement [REP1-087]** (see p683). With regard to the specific points raised details of the mitigation measures and their long-term management are set out in **ES Volume 1, Chapter 8: Landscape and Visual Impact Assessment [APP-060]**, **ES Volume 2, Figure 3-4: Landscape and Ecology Mitigation Plan [REP1-029 to REP1-032]** and the **Outline LEMP [APP-283]**. Potential impacts on ecology and biodiversity are fully assessed in **ES Volume 1, Chapter 9: Ecology and Biodiversity [REP1-015]**. This assessment considers baseline ecological conditions and evaluates likely significant effects arising during the construction, operation and decommissioning phases of the Scheme. It identifies avoidance, mitigation and enhancement measures to address potential impacts on habitats and protected and notable species. It also identifies opportunities for ecological enhancement, including the creation and long-term management of habitats, and delivery of biodiversity net gain. The mitigation hierarchy was considered throughout the design process, including avoidance of impacts to important ecological

	features through removal of fields from the Order Limits and inclusion of ecological buffer zones within Scheme design, for example. Embedded and further mitigation measures described in **ES Volume 1, Chapter 9: Ecology and Biodiversity [REP1-015]** will be secured via long-term management plans as a requirement of the Development Consent Order (DCO) process. The preparation, approval and implementation of the detailed Landscape and Ecological Management Plan, substantially in accordance with the **Outline LEMP [APP-283]**, is secured through Requirement 7 in Schedule 2 of the **Draft DCO [REP1-007]**, ensuring that the identified mitigation measures are delivered and maintained throughout the lifetime of the Scheme. The preparation, approval and implementation of the detailed Ecological Protection and Mitigation Strategy (EPMS), substantially in accordance with the **Outline EPMS [REP1-106]**, are secured through Requirement 8 in Schedule 2 of the **Draft DCO [REP1-007]**. These requirements ensure that ecological protection and enhancement measures are delivered and maintained throughout construction and operation of the Scheme.
Core Policy 51: Landscape Development should protect, conserve and where possible enhance landscape character and must not have a harmful impact upon landscape character, while any negative impacts must be mitigated as far as possible through sensitive design and landscape measures. Proposals should be informed by and sympathetic to the distinctive character areas identified in the	

relevant Landscape Character Assessment(s) and any other relevant assessments and studies. In particular, proposals will need to demonstrate that the following aspects of landscape character have been conserved and where possible enhanced through sensitive design, landscape mitigation and enhancement measures:

i. The locally distinctive pattern and species composition of natural features such as trees, hedgerows, woodland, fi eld boundaries, watercourses and waterbodies.

ii. The locally distinctive character of settlements and their landscape settings.

iii. The separate identity of settlements and the transition between man-made and natural landscapes at the urban fringe.

iv. Visually sensitive skylines, soils, geological and topographical features.

v. Landscape features of cultural, historic and heritage value.

vi. Important views and visual amenity.

vii. Tranquillity and the need to protect against intrusion from light pollution, noise, and motion.

viii. Landscape functions including places to live, work, relax and recreate.

ix. Special qualities of Areas of Outstanding Natural Beauty (AONBs) and the New Forest National Park, where great weight will be afforded to conserving and enhancing landscapes and scenic beauty

Proposals for development within or affecting the Areas of Outstanding Natural Beauty (AONBs), New Forest National Park (NFNP) or Stonehenge and Avebury World Heritage Site (WHS) shall demonstrate that they have taken account of the objectives, policies and actions set out in the relevant Management Plans for these areas. Proposals for development outside of an AONB that is sufficiently prominent (in terms of its siting or scale) to have an impact on the area's special qualities (as set out in the relevant management plan), must also demonstrate that it would not adversely affect its setting.

Wiltshire Council Comment	**Applicant's Response**
Compliance with Wiltshire Core Strategy Policy CP51 'Landscape' is not possible as the project cannot fulfil the	**ES Volume 1, Chapter 8: Landscape and Visual [APP-060]** takes into account the effects on landscape character and

requirement to: 'protect, conserve and where possible enhance landscape character and that new development must not have a harmful impact upon landscape character'. The Project will have a harmful impact on landscape character due to its contrasting nature with the existing baseline situation and scale of land use change proposed. However, the scale of this harm over 749.30ha plus the CRC corridor, is clearly a major issue over a protracted, intergenerational project lasting for 60 years. Landscape mitigation and enhancement proposals are provided, but whether these are actually suitable to be sympathetic to the baseline character of the receiving landscape is debatable. This is because the existing low hedgerows currently allow longer views over and appreciation of the wider landscape, which would be impacted by the visual mitigation strategy, which proposes to allow most hedgerows to grow taller to deliver the required screening. While planting lines of trees offset from hedgerows, i.e. along the Fosse Way north west of Fosse Lodge, or planting double width hedgerows to improve screening are not identified to be characteristic of landscape baseline features.	visual amenity in detail, and acknowledges that there would be an immediate change to the character of the Sites themselves and their immediate surroundings as they change from an area of arable farmland to solar infrastructure. However, the introduction of the solar arrays and other associated infrastructure would not become a defining feature on the landscape once operational (e.g. at year 1 and year 15). The LVIA recognises that there are Significant effects to the character of the landscape and visual amenity of the area. However, the landscape led approach to the development has utilised the mitigation hierarchy to minimise adverse effects. Avoidance measures include avoiding development adjacent to the National Landscape where it would affect its setting and avoiding development where it would be visually intrusive and affect the character and visual experience of the landscape. Embedded mitigation measures principally comprise a range of offsets and buffers and specific landscape design parameters outlined in Tables 7 and 8 of **ES Volume 1, Appendix 8-6 Assessment of Effects on the Cotswolds National Landscape and its Special Qualities [APP-197].** These include retention and enhancement of the existing landscape framework to gap up existing hedgerows and provide new tree lines to increase age and species diversity. The embedded mitigation also includes new planting to both mitigate the visual effects of the Scheme and provide landscape benefits including the re-establishment of historic hedgerows within the setting of the CNL, new areas of native woodland, trees, scrub and

	grassland, new planting within riparian corridors to enhance rivers and wetland, as well the restoration of dry-stone walls and creation of new/reestablishment of historic ponds.

Core Policy 52: Green Infrastructure

Development shall make provision for the retention and enhancement of Wiltshire's green infrastructure network, and shall ensure that suitable links to the network are provided and maintained. Where development is permitted developers will be required to:

i. retain and enhance existing on site green infrastructure

ii. make provision for accessible open spaces in accordance with the requirements of the adopted Wiltshire Open Space Standards

iii. put measures in place to ensure appropriate long term management of any green infrastructure directly related to the development

iv. provide appropriate contributions towards the delivery of the Wiltshire Green Infrastructure Strategy

v. identify and provide opportunities to enhance and improve linkages between the natural and historic landscapes of Wiltshire.

If damage or loss of existing green infrastructure is unavoidable, the creation of new or replacement green infrastructure equal to or above its current value and quality, that maintains the integrity and functionality of the green infrastructure network, will be required.

Proposals for major development should be accompanied by an audit of the existing green infrastructure within and around the site and a statement demonstrating how this will be retained and enhanced through the development process.

Development will not adversely affect the integrity and value of the green infrastructure network, prejudice the delivery of the Wiltshire Green Infrastructure Strategy, or provide inadequate green infrastructure mitigation.

Green infrastructure projects and initiatives that contribute to the delivery of a high quality and highly valued multi-functional green infrastructure network in accordance with the Wiltshire Green Infrastructure Strategy will be supported. Contributions (financial or other) to support such projects and initiatives will be required where appropriate from developers.	
Wiltshire Council Comment	**Applicant's Response**
The proposals do not comply because they would fragment and degrade the function, connectivity and multifunctional value of the existing green infrastructure network. Wiltshire Council considers that the scale of the development would harm ecological, landscape and recreational GI functions, and that proposed mitigation and planting measures do not deliver meaningful enhancement or compensate for network fragmentation. Green infrastructure is not protected or strengthened as required by the policy, but instead reduced to residual mitigation around large-scale infrastructure.	The Scheme's compliance with Core Policy 52 is set out in Annex B: Local Policy Accordance Tables of the **Planning Statement [REP1-087]** (see p692) and summarised in section 13 above. With regard to the specific points raised, Section 4.2 of the **Design Approach Document [APP-268]** sets out the positive design outcomes of the Scheme to ensure it is sustainable and sensitive to place, including green infrastructure considerations. The Scheme design integrates with the landscape, and where practicable, enhances the landscape and local green infrastructure network, to improve biodiversity and ecological connectivity across the Solar PV Sites. Enhancement measures will contribute to and strengthen the connectivity between a number of the Local Wildlife Sites located close to the Solar PV Sites and the local landscape, through the provision of new hedgerows, tree and woodland planting in the vicinity of the sites, and through the creation of areas of species rich grassland and scrub planting within the Solar PV Sites, which may provide ecological 'stepping stones' for various species within the local, largely arable landscape. The **Design Principles and Parameters [REP1A-008]** sets out the design principles and parameters by which the Scheme has

	been designed, and the Environmental Impact Assessment has been undertaken. The design principles have informed the parameters which are secured by Requirement 5 in Schedule 2 of the **Draft DCO [REP1-007]** and apply to the detailed design of the Scheme post consent. The Landscape Strategy set out in the **Outline LEMP [APP-283]** aims to set out the approach to habitat creation and management in order to provide ecological enhancements, strengthen the green infrastructure within the local area, and to provide landscape and visual mitigation through screening of the Scheme. The **Outline LEMP [APP-283]** draws upon the Draft Wiltshire Local Nature Recovery Strategy (Ref 2) and sets out that the Scheme as designed will broadly contribute to these priorities. The **Outline LEMP [APP-283]** will be secured by Requirement 7 in Schedule 2 of the **Draft DCO [REP1-007].** Further, significant tree and woodland planting is proposed within the Order Limits as outlined in the **Outline LEMP [APP-283]**, which will result in the creation of 11.37 ha of new native broadleaved woodland. Locations for planting have been directed by the need for landscaping and visual impact mitigation, but opportunities have also been taken to connect habitat parcels. Once established, this level of woodland planting will result in a significant beneficial effect on the extent of woodland within the Order Limits, which would, by extension, contribute to the connectivity of woodland stands and green infrastructure across the local landscape.

Core Policy 55: Air Quality Development proposals, which by virtue of their scale, nature or location are likely to exacerbate existing areas of poor air quality, will need to demonstrate that measures can be taken to effectively mitigate emission levels in order to protect public health, environmental quality and amenity. Mitigation measures should demonstrate how they will make a positive contribution to the aims of the Air Quality Strategy for Wiltshire and where relevant, the Wiltshire Air Quality Action Plan. Mitigation may include: i. landscaping, bunding or separation to increase distance from highways and junctions ii. possible traffic management or highway improvements to be agreed with the local authority iii. abatement technology and incorporating site layout/separation and other conditions in site planning iv. traffic routing, site management, site layout and phasing v. v. where appropriate, contributions will be sought toward the mitigation of the impact a development may have on levels of air pollutants	
Wiltshire Council Comment	**Applicant's Response**
The Lime Down proposals comply with Wiltshire Core Strategy Core Policy 55. The development is not located within or adjacent to an Air Quality Management Area, and while construction activities would generate temporary emissions, these are capable of being satisfactorily mitigated through standard construction management measures. Operational impacts on air quality would be negligible, and Wiltshire Council does not identify air quality as a constraint or reason for objection.	The Applicant notes this comment.
Core Policy 56: Contaminated Land	

Development proposals which are likely to be on or adjacent to land which may have been subject to contamination will need to demonstrate that measures can be taken to effectively mitigate the impacts of land contamination on public health, environmental quality, the built environment and amenity. Developers will be required to demonstrate that the development site is, or will be, made suitable for the proposed final use and will need to provide one or more of the following documents: i. Detailed site history identifying possibly contaminative uses. ii. Site characterisation: The nature and extent of any contamination and the hazards and risks posed. iii. Detailed remediation scheme: Including methodology and quality assurance. iv. Methodology to report unexpected contamination. v. Methodology to ensure verification of remedial works. vi. Details of long term monitoring and maintenance proposals (where necessary). The need for, type and complexity of reports will depend on the specific site.

Wiltshire Council Comment	**Applicant's Response**
The development is located on predominantly agricultural land with no identified contamination constraints, and any potential risks arising from construction activities can be appropriately assessed and, where necessary, remediated through standard investigation and mitigation measures. Wiltshire Council does not identify contaminated land as a concern, and the policy's requirements can be satisfied without difficulty.	The Applicant notes this comment.
Core Policy 57: Ensuring High Quality Design and Place Shaping	

A high standard of design is required in all new developments, including extensions, alterations, and changes of use of existing buildings. Development is expected to create a strong sense of place through drawing on the local context and being complementary to the locality. Applications for new development must be accompanied by appropriate information to demonstrate how the proposal will make a positive contribution to the character of Wiltshire through:

i. enhancing local distinctiveness by responding to the value of the natural and historic environment, relating positively to its landscape setting and the existing pattern of development and responding to local topography by ensuring that important views into, within and out of the site are to be retained and enhanced

ii. the retention and enhancement of existing important landscaping and natural features, (e.g. trees, hedges, banks and watercourses), in order to take opportunities to enhance biodiversity, create wildlife and recreational corridors, effectively integrate the development into its setting and to justify and mitigate against any losses that may occur through the development

iii. responding positively to the existing townscape and landscape features in terms of building layouts, built form, height, mass, scale, building line, plot size, elevational design, materials, streetscape and rooflines to effectively integrate the building into its setting

iv. being sympathetic to and conserving historic buildings and historic landscapes the maximisation of opportunities for sustainable construction techniques, use of renewable energy sources and ensuring buildings and spaces are orientated to gain maximum benefit from sunlight and passive solar energy, in accordance with Core Policy 41 (Sustainable Construction and Low Carbon Energy)

v. making efficient use of land whilst taking account of the characteristics of the site and the local context to deliver an appropriate development which relates effectively to the immediate setting and to the wider character of the area

vi. having regard to the compatibility of adjoining buildings and uses, the impact on the amenities of existing occupants, and ensuring that appropriate levels of amenity are achievable within the development itself, including the consideration of privacy, overshadowing, vibration, and pollution (e.g. light intrusion, noise, smoke, fumes, effluent, waste or litter)

vii. incorporating measures to reduce any actual or perceived opportunities for crime or antisocial behaviour on the site and in the surrounding area through the creation of visually attractive frontages that have windows and doors located to assist in the informal surveillance of public and shared areas by occupants of the site

viii. ensuring that the public realm, including new roads and other rights of way, are designed to create places of character which are legible, safe and accessible in accordance with Core Policy 66 (Strategic Transport Network)

ix. the sensitive design of advertisements and signage, which are appropriate and sympathetic to their local setting by means of scale, design, lighting and materials

x. taking account of the needs of potential occupants, through planning for diversity and adaptability, and considering how buildings and space will be used in the immediate and long term future

xi. the use of high standards of building materials, finishes and landscaping, including the provision of street furniture and the integration of art and design in the public realm

xii. the case of major developments, ensuring they are accompanied by a detailed design statement and masterplan, which is based on an analysis of the local context and assessment of constraints and opportunities of the site and is informed by a development concept, including clearly stated design principles, which will underpin the character of the new place

xiii. meeting the requirements of Core Policy 61 (Transport and New Development)

Wiltshire Council Comment	**Applicant's Response**
Wiltshire Council considers that the scale, form and cumulative impacts of the development fail to deliver high-quality design or positive place-shaping outcomes. The scheme does not respond appropriately to local context or reinforce landscape and settlement identity, relying instead on mitigation to offset harm rather than embedding design quality within the proposal's structure.	The Scheme's compliance with Core Policy 57 is set out in Annex B: Local Policy Accordance Tables of the **Planning Statement [REP1-087]** (see p699), including details of how the Scheme complies with each of the bullet points listed in Core Policy 57. As set out within **Design Principles and Parameters [REP1A-008]**, the Scheme has adopted a Design Vision following an analysis of the local context and baseline information of the

	Scheme location, which sets out that the Scheme efficiently deliver renewable energy while being sensitive to, and exploring opportunities to enhance, the surrounding communities and land uses in Wiltshire. The Design Vision for the Scheme will be delivered by the Design Principles which were developed informed by national and local planning policy (including Wiltshire Core Strategy (Ref 9)), the outcome of non-statutory and statutory consultation, the local context of the Scheme, environmental surveys and assessments and the key themes set out in the guidance documents. Requirement 5 of the **Draft DCO [REP1-007]** sets out that the development must be carried out in accordance with the **Design Principles and Parameters [REP1A-008]**. This approach is taken to ensure suitable flexibility in the design of the Scheme, so that the latest technology can be used, while ensuring that good design will be embedded in the final design and that the impacts of the Scheme will not differ from those set out in the Environmental Statement. With regard to the specific points raised the **Design Approach Document [APP-268]** (DAD) demonstrates how good design has been embedded in the design of the Scheme and how the design of the Scheme has evolved up to the point of the DCO Application within a clear design framework provided by a Design Vision and Design Principles. The DAD has been prepared in accordance with the Planning Inspectorate's guidance titled 'Nationally Significant Infrastructure Projects: Advice on Good Design' (Ref 21) and sets out the design decisions taken at each step of the Scheme's development,

	and the rationale for these decisions, as well as the mechanisms by which good design will be secured post consent. Design Principle 1 sets out how the Scheme is 'landscape led' and gives due weight to the intrinsic character and beauty of the surrounding countryside. Section 4.2 of the **Design Approach Document [APP-287]** explains how the Scheme achieves positive design outcomes in the context of NPS EN-1 (Ref 3) which states at Paragraph 4.7.2 *"Applying good design to energy projects should produce sustainable infrastructure sensitive to place, including impacts on heritage, efficient in the use of natural resources, including land-use, and energy used in their construction and operation, matched by an appearance that demonstrates good aesthetic as far as possible."* Section 4.2 of the **Design Approach Document [APP-287]** sets out the design measures that make the Scheme sustainable and sensitive to place, including integration with the landscape, enhancement measures and the creation of permissive paths. Section 4.2 of the **Design Approach Document [APP-287]** goes on to describe how the Scheme has been efficient in its use of resources and how its appearance demonstrates good aesthetic as far as possible. The design of the Scheme has evolved in response to the outcomes of environmental assessment, stakeholder engagement, consultation feedback at non-statutory, statutory and targeted consultation, and technical studies, within a framework provided by a Design Vision and Design Principles

	which have sought to minimise adverse impacts, enhance opportunities, and balance flexibility and certainty in the DCO application. The **Design Approach Document [APP-287]** outlines how good design will be secured post-consent through a suite of management plans and requirements in the **draft DCO [REP1-007]**, including the **Design Principles and Parameters [REP1A-008]**, the **Outline LEMP [APP-283]**, and the **Outline CEMP [REP1-096]**. **ES Volume 1, Chapter 8: Landscape and Visual Impact [APP-060]** takes into account the effects on landscape character and visual amenity in detail, and acknowledges that there would be there would be an immediate change to the character of the Sites themselves and their immediate surroundings as they change from an area of arable farmland to solar infrastructure. However, the introduction of the solar arrays and other associated infrastructure would not become a defining feature on the landscape once operational (e.g. at year 1 and year 15). The LVIA recognises that there are Significant effects to the character of the landscape and visual amenity of the area. However, the landscape led approach to the development has utilised the mitigation hierarchy to minimise adverse effects. Avoidance measures include avoiding development adjacent to the National Landscape where it would affect its setting and

	avoiding development where it would be visually intrusive and affect the character and visual experience of the landscape. Embedded mitigation measures principally comprise a range of offsets and buffers and specific landscape design parameters outlined in Tables 7 and 8 of **ES Volume 3, Appendix 8-6 Assessment of Effects on the Cotswolds National Landscape and its Special Qualities [APP-197]**. These include retention and enhancement of the existing landscape framework to gap up existing hedgerows and provide new tree lines to increase age and species diversity. The embedded mitigation also includes new planting to both mitigate the visual effects of the Scheme and provide landscape benefits including the re-establishment of historic hedgerows within the setting of the CNL, new areas of native woodland, trees, scrub and grassland, new planting within riparian corridors to enhance rivers and wetland, as well the restoration of dry-stone walls and creation of new/reestablishment of historic ponds. The benefits of the proposed mitigation are recorded within the separate assessment on Landscape Fabric and have been informed by Wiltshire's and the Cotswold Nature Recovery strategy/plan.
Core Policy 58: Ensuring the Conservation of the Historic Environment Development should protect, conserve and where possible enhance the historic environment. Designated heritage assets and their settings will be conserved, and where appropriate enhanced in a manner appropriate to their significance, including:	

i. nationally significant archaeological remains
ii. World Heritage Sites within and adjacent to Wiltshire
iii. buildings and structures of special architectural or historic interest
iv. the special character or appearance of conservation areas
v. historic parks and gardens
vi. important landscapes, including registered battlefields and townscapes.

Distinctive elements of Wiltshire's historic environment, including non-designated heritage assets, which contribute to a sense of local character and identity will be conserved, and where possible enhanced. The potential contribution of these heritage assets towards wider social, cultural, economic and environmental benefits will also be utilised where this can be delivered in a sensitive and appropriate manner in accordance with C

re Policy 57 (Ensuring High Quality Design and Place Shaping).

Heritage assets at risk will be monitored and development proposals that improve their condition will be encouraged. The advice of statutory and local consultees will be sought in consideration of such applications.

Wiltshire Council Comment	**Applicant's Response**
The approach to archaeological assessment and mitigation is mostly complied with, however the evaluation assessments are not complete and the full details of the mitigation has not yet been agreed.	The Scheme's compliance with Core Policy 58 is set out in Annex B: Local Policy Accordance Tables of the **Planning Statement [REP1-087]** (see p711). Interim trial trenching reports were submitted as part of the DCO Application (**ES Volume 3, Appendix 12-5 Interim Evaluation Trial Trenching Reports Part 1–5 [APP-225 to APP-229]**) and full trial trenching reports will be submitted, in

	advance of determination of the Application by the Secretary of State. An interim geophysical survey report of the Cable Route Corridor was submitted as part of the DCO Application (**ES Volume 3, Appendix 12-4b Archaeological Geophysical Survey Report – Cable Route Corridor [APP-224]**) and a full report covering the geophysical survey of the Cable Route Corridor will be submitted, in advance of determination of the Application by the Secretary of State. However, regardless of the later submission of these reports, there is sufficient information to assess the impacts of the Scheme and to inform PIN's recommendation. An Outline Archaeological Mitigation Strategy was submitted as part of the DCO Application (**ES Volume 3, Appendix 12-6: Outline Archaeological Mitigation Strategy [APP-230]**) and will be updated as required with the results of outstanding works.
Core Policy 61: Transport and New Development New development should be located and designed to reduce the need to travel particularly by private car, and to encourage the use of sustainable transport alternatives. As part of a required transport assessment, the following must be demonstrated: i. That consideration has been given to the needs of all transport users, where relevant, according to the following hierarchy: a. Visually impaired and other disabled people b. Pedestrians	

c. Cyclists
d. Public transport
e. Goods vehicles
f. Powered two-wheelers
g. Private cars

ii. That the proposal is capable of being served by safe access to the highway network.

iii. That fit for purpose and safe loading/unloading facilities can be provided where these are required as part of the normal functioning of the development.

Where appropriate, contributions will be sought towards sustainable transport improvements, and travel plans will be required to encourage the use of sustainable transport alternatives and more sustainable freight movements.

Wiltshire Council Comment	**Applicant's Response**
Core Policy 61 is considered to be mainly complied with on balance, subject to the effective implementation of transport mitigation measures. Wiltshire Council raises significant concerns regarding the scale, duration and residual impacts of construction traffic on rural roads and vulnerable users, but does not identify an inherent policy conflict; impacts are potentially capable of mitigation in principle.	The Applicant notes that Wiltshire Council considers Core Policy 61 to be mainly complied with. Further details on how the Scheme is considered to comply with Core Policy 61 is provided in Annex B: Local Policy Accordance Tables of the **Planning Statement [AREP1-087]** (see page 713). With regard to the specific concerns raised on transport, mitigation will be provided in the form of the following: • The **Outline CTMP [REP1-112]**; • The **Outline PRoWPPMP [REP1-104]**; • The proposed highway widening; and

	• The Construction Worker Travel Plan With the inclusion of these measures the Scheme is not likely to result in any significant residual Transport and Access effects during the construction, operation and decommissioning phases.
Core Policy 62: Development Impacts on the Transport Network Developments should provide appropriate mitigating measures to offset any adverse impacts on the transport network at both the construction and operational stages. Proposals for new development should not be accessed directly from the national primary route network outside built-up areas, unless an overriding need can be demonstrated.	
Wiltshire Council Comment	**Applicant's Response**
Core Policy 62 is considered to be mainly complied with on balance. Wiltshire Council raises significant concerns regarding the scale, duration and residual impacts of construction traffic on the transport network, but does not identify an inherent policy conflict; impacts are potentially capable of mitigation in principle, subject to effective implementation.	The Applicant notes that Wiltshire Council considers Core Policy 62 to be mainly complied with. Further details on how the Scheme is considered to comply with Core Policy 62 is provided in Annex B: Local Policy Accordance Tables of the **Planning Statement [REP1-087]** (see page 717). An **Outline CTMP [REP1-112]** has been prepared and will be secured by Requirement 15 in Schedule 2 of the **Draft DCO [REP1-007]**. The **Outline CTMP [REP1-112]** will be a framework for the management of construction vehicle movements to and from the Order Limits, to ensure that the effects of the temporary construction phase on the local highway network are minimised. The **Outline CTMP [REP1-112]** sets out construction access arrangements, construction

	vehicle routing, construction vehicle trip generation, and the management/mitigation measures. The Final CTMP(s) will be prepared prior to the commencement of development and will accord with the **Outline CTMP [REP11-122]**.
Core Policy 67: Flood Risk Development proposed in Flood Zones 2 and 3 as identified within the Strategic Flood Risk Assessment will need to refer to the Strategic Housing Land Availability Assessment when providing evidence to the local planning authority in order to apply the sequential test in line with the requirements of national policy and established best practice. All new development will include measures to reduce the rate of rainwater run-off and improve rainwater infiltration to soil and ground (sustainable urban drainage) unless site or environmental conditions make these measures unsuitable.	
Wiltshire Council Comment	**Applicant's Response**
The development incorporates a number of embedded mitigation measures which, if implemented as proposed, would limit the likelihood and severity of adverse flood risk and water quality effects relative to uncontrolled construction or operation. These include construction-phase drainage controls, operational drainage associated with substations and battery energy storage systems (BESS), and the use of SuDS-based features and sealed drainage with automatic isolation to limit uncontrolled discharges during abnormal events. The scheme would also remove agricultural fertiliser application across the site, reducing nutrient runoff pressures relative to the pre-development baseline. However, notwithstanding these measures, the information submitted does not yet demonstrate that flood risk and	Further details on how the Scheme is considered to comply with Core Policy 67 is provided in Annex B: Local Policy Accordance Tables of the **Planning Statement [REP1-087]** (see page 719). With regard to the specific concerns raised, the Applicant does not agree that there are outstanding flood risk or drainage evidence gaps. Construction-phase runoff, sediment and hydrocarbon risks are controlled through the detailed CEMP process, secured by Requirement 13 of the **Draft DCO [REP1-007]**, which requires the CEMP to be substantially in accordance with the **Outline CEMP [REP1-096]**. The **Outline CEMP [REP1-096],** Section 3.6, Table 5 secures temporary drainage, sediment control, wheel washing, designated

drainage effects can be adequately managed across all phases of development. In particular, there remains uncertainty regarding the management of sediment-laden or hydrocarbon-contaminated runoff during construction, the absence of a defined SuDS retirement strategy at decommissioning, and unresolved matters relating to exceedance routing and long-term drainage performance. Additional evidence gaps relate to the absence of a defined Flood Zone 3b, the potential implications of introducing additional impermeable areas, and the need to demonstrate that controlled discharges would not increase flood risk to receiving watercourses downstream.	refuelling, bunded storage, spill response, water quality monitoring and no uncontrolled discharge. Operational drainage is secured through Requirement 11 of the **Draft DCO [REP1-007]**, which requires details of the surface water drainage scheme to be submitted and approved, substantially in accordance with the outline drainage strategy. Formal drainage areas, including substations, BESS and other hardstanding areas, are attenuated and controlled, with post-development runoff restricted where required, including to 70% of equivalent greenfield rates for the 1 in 1-year and 1 in 2-year events. Operational inspection and maintenance is secured through Requirement 14 of the **Draft DCO [REP1-007]** and the **Outline OEMP [REP1-098],** Paragraphs 2.14.1 to 2.14.3 and Section 3.6, Table 5. Panelled areas are not impermeable hardstanding, do not create a positive drainage system and do not introduce a new controlled discharge to watercourses. They will remain permeable and vegetated, with the land moving from agricultural use to grassland and wildflower cover beneath and between arrays. The relevant control is therefore to maintain natural drainage characteristics through soil protection, vegetation establishment and retention of existing overland flow routes, rather than to introduce engineered drainage across panelled fields. Decommissioning drainage, SuDS management, soil handling and water quality controls are secured through Requirement 20 of the **Draft DCO [REP1-007]** and the **Outline**

	Decommissioning Strategy [REP1-100]. The detailed decommissioning plan will confirm the phase-specific drainage layout, sequencing, treatment of drainage features and reinstatement controls before decommissioning works are carried out. Flood Zone 3b has been considered where the Scheme materially interacts with mapped fluvial flood extents, namely Lime Down D and Lime Down E2. Land outside the mapped Flood Zone 2 extent cannot, by definition, be Flood Zone 3b. Lime Down D has been subject to detailed hydraulic modelling, and further modelling is being progressed at Lime Down E2. These matters relate to Main River flood risk and will be agreed with the Environment Agency as the relevant consultee. The BESS and substations are located in Flood Zone 1. The Applicant therefore considers that the Scheme complies with Core Policy 67 and that additional hydrology Requirements are not necessary.
Core Policy 68: Water Resources Development must not prejudice the delivery of the actions and targets of the relevant River Basin or Catchment Management Plan, and should contribute towards their delivery where possible. Non-residential development will be required to incorporate water efficiency measures. Developers will be expected to submit details of how water efficiency has been taken into account during the design of proposals.	

Development proposals within a Source Protection Zone, Safeguard Zone or Water Protection Zone must assess any risk to groundwater resources and groundwater quality and demonstrate that these would be protected throughout the construction and operational phases of development.	
Wiltshire Council Comment	**Applicant's Response**
Core Policy 68 is considered to be mainly complied with on balance. Wiltshire Council does not identify water resources as an inherent constraint to development but notes that compliance is contingent on the effective assessment and management of groundwater risks, the implementation of construction-phase pollution controls, and the incorporation of appropriate water-efficiency measures within non-residential elements of the scheme.	The Applicant notes that Wiltshire Council considers Core Policy 68 to be mainly complied with. Further details on how the Scheme is considered to comply with Core Policy 68 is provided in Annex B: Local Policy Accordance Tables of the **Planning Statement [APP-267]** (see page 741). With regard to the compliance issue raised, the Applicant agrees that groundwater risk, construction-phase pollution control and water efficiency are the relevant matters for Core Policy 68. These matters are addressed through **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [REP1-017]**, **ES Volume 1, Chapter 19: Ground Conditions [APP-071]**, the **WFD Assessment [REP1-094]**, the **Outline CEMP [REP1-096]** and the **Outline Water Resources Strategy [APP-290]**. Construction-phase pollution controls are secured through Requirement 13 of the **Draft DCO [REP1-007]**, with the detailed CEMP required to be substantially in accordance with the **Outline CEMP [REP1-096]**. Water efficiency and limited operational water demand are addressed through the **Outline Water Resources Strategy [APP-290]**. The Applicant therefore agrees that compliance with Core Policy 68 is

	secured through the submitted assessment and control framework.

Table 18-2 Saved Policies of the North Wiltshire Local Plan 2011

NE12: Woodland The creation, conservation, enhancement and positive management of woodlands across the district will be supported. In particular, areas of ancient and seminatural woodland should be protected. The retention of the visual amenity and nature conservation value will be sought in particular at the following: i. Bird's Marsh Wood, Chippenham ii. Vincient's Wood, Chippenham iii. Pockeredge Drive Wood, Corsham iv. Woodland within Braydon Forest.	
Wiltshire Council Comment	**Applicant's Response**
The Lime Down proposals conflict with saved Policy NE12 because they fail to adequately protect the visual amenity, ecological function and setting of ancient and semi-natural woodland, including within the wider Braydon Forest landscape. Wiltshire Council considers that the scale of development and associated disturbance would result in long-term harm that cannot be satisfactorily mitigated or compensated.	The Scheme's compliance with Policy NE12 is considered in Annex B: Local Policy Accordance Tables of the **Planning Statement [REP1-087]** (see page 723). The Scheme would not have any impact on woodland within Braydon Forest as it is at a sufficient distance from the Site so as not to be impacted.
NE14: Trees and the Control of New Development Permission will not be granted for proposals that would result, or be likely to result, in the loss of trees, hedges, lakes/ponds or other important landscape or ecological features that could be successfully and appropriately incorporated into the design of a development.	

Planning conditions will be imposed and Tree Preservation Orders made, for safeguarding single and small groups of trees in the interests of public amenity.	
Wiltshire Council Comment	**Applicant's Response**
The Lime Down proposals conflict with saved Policy NE14 because they would result in the loss and functional degradation of trees and hedgerows that could otherwise be retained and incorporated into the scheme. Wiltshire Council considers that the scale, layout and associated disturbance would harm the amenity and ecological value of these features, contrary to the policy's protective requirements.	The Scheme's compliance with Policy NE14 is considered in Annex B: Local Policy Accordance Tables of the **Planning Statement [REP1-087]** (see page 725). The Applicant does not agree that the Lime Down proposals conflict with Policy NE14. The Scheme has been designed to retain and incorporate trees and hedgerows wherever reasonably practicable, with losses limited to those that are unavoidable due to the scale, linear nature and technical requirements of nationally significant infrastructure. Any loss or functional change to trees and hedgerows has been assessed on a precautionary basis and is accompanied by a comprehensive package of mitigation and compensation measures, including tree protection, replacement planting, hedgerow reinstatement and habitat creation, secured through the **Outline CEMP [REP1-096], ES Volume 3, Appendix 10-1 Arboricultural Impact Assessment and Outline Arboricultural Method Statement [APP-206]**, **Outline LEMP [APP-283]** and **Outline EPMS [APP-106].**
NE18: Noise and Pollution Development will only be permitted where it would not generate, or itself be subject to, harm upon public health or cause pollution to the environment by the emission of excessive noise, light intrusion, smoke, fumes, other forms of air pollution, heat, radiation, effluent or vibration.	

Wiltshire Council Comment	Applicant's Response
Saved Policy NE18 is considered to be mainly complied with on balance, as the Lime Down proposals do not give rise to inherent noise or pollution constraints but would generate significant construction-phase impacts that require effective mitigation and control to protect residential amenity.	The Applicant notes the comment that Policy NE18 is considered to be mainly complied with. With regard to effective mitigation and control to protect residential amenity, such measures are outlined in the **Outline CEMP [REP1-096]**. These include avoiding simultaneous noisy works, the use of temporary screens, locating construction compounds at least 250 m from residents and providing prior warning of the timing and duration of noisy works. With such measures in place, significant adverse effects from noise and vibration during the construction phase are not anticipated.
T5: Safeguarding Development affecting public rights of way, cycle and pedestrian routes will only be permitted where satisfactory provision, in terms of safety, attractiveness and convenience, is made to retain or divert the existing or proposed route. Land for the following transport proposals is safeguarded on the proposals map: • Chippenham Bus Station • Corsham Railway Station • Cotswold Water Park Eastern Spine Road • Dualling of A350, North of Chippenham • Frogwell to Bumpers Farm Bus only link • Local Transport Plan Cycle Network Plans • Pockeredge Farm, Peel Circus, Local Distributor • Link Road • Purton Railway Station	

• Spring Quarry Access Road • Swindon and Cricklade Railway • Swindon North Distributor Road • Thames and Severn Canal • Wilts and Berks Canal • • Wootton Bassett Railway Station.	
Wiltshire Council Comment	**Applicant's Response**
Policy T5 is considered to be mainly complied with on balance, as the Lime Down proposals do not prejudice safeguarded transport schemes and impacts on public rights of way are capable of mitigation. However, compliance is contingent on the effective implementation of measures to maintain safety, attractiveness and convenience of routes throughout construction and operation.	The Applicant notes the comment that Policy T5 is considered to be mainly complied with. The effective implementation of measures set out in the **Outline PRoWPPMP [REP1-104]** to maintain safety, attractiveness and convenience of public rights of way is committed to and secured as a requirement of the DCO.

Table 18-3 Wiltshire and Swindon Minerals Core Strategy 2006-2026 (adopted 2009)

MCS6: Safeguarding Mineral Resources, Railhead Facilities and Mineral Recycling Facilities In establishing, monitoring and reviewing Mineral Safeguarding Areas (MSAs) the councils will work with the minerals and waste industries, land owners and other local planning authorities to safeguard the following assets from potential sterilisation by other forms of development: • Mineral Resource Zones; • All existing active and dormant minerals sites; • Land within 1km of active and dormant mineral sites; • Sites for future mineral working allocated within DPDs; • Operational land associated with existing and proposed Mineral Recycling Facilities; and • Operational land associated with the existing Rail Aggregate Depot at Wootton Bassett and any proposed new rail-head facilities and sidings.	
Wiltshire Council Comment	**Applicant's Response**
The Lime Down proposals are considered to comply with Minerals Core Strategy Policy MCS6 on balance as mineral resources have been safeguarded from unnecessary sterilisation.	The Applicant notes this comment.
MDC4: Safeguarding Mineral Resources, Railhead Facilities and Mineral Recycling Facilities	

Proposals for development within Mineral Safeguarding Areas, as defined on the Proposals Map, that may prevent or adversely affect current or possible future mineral extraction and/or associated ancillary operations, rail-head facilities, and mineral recycling facilities within Wiltshire and Swindon will be opposed unless: • An appropriate quantity of mineral can be reasonably extracted prior to or in phase with the proposed non-mineral development such that the extraction does not unreasonably prevent or hinder the non-minerals development; or • It can be proven that the mineral deposit is unlikely to be worked due to its quality or quantity; or • The development is of a temporary nature and can be completed and the site restored to a condition that does not inhibit extraction within the timescale that the mineral is likely to be needed; or • There is an overriding need for the proposed non-minerals development to commence without delay.

Wiltshire Council Comment	**Applicant's Response**
The Lime Down proposals are considered to comply with Policy MCS6 on balance as mineral resources have been safeguarded from unnecessary sterilisation.	The Applicant notes this comment.

WCS6: Waste Reduction and Auditing
Proposals for developments that meet the criteria below will be required to design and provide facilities for occupiers of the development to recycle/compost waste (bring systems) and/or facilities within individual or groups of properties or premises for the source separation and storage of different types of waste for recycling and/or composting. • any development providing 10 or more dwelling units; • any new development of shopping centres or facilities where the total gross floorspace amounts to 500 square metres or more; • any development of business, industrial, distribution or storage development where the gross floorspace/increase in gross floorspace amounts to 300 square metres or more;

- transport, leisure, recreation, tourist, community, or educational facilities including public car parks and park and ride facilities.

Such provision will be expected to have regard to the existing capacity of facilities already available and to the existing Recycling Plan or Municipal Waste Management Strategy relevant to the area. Proposals for the developments identified above must also be accompanied by a waste audit, which must include:

a. the type and volume of waste that the development process will generate (the development process comprises the construction process and any other operations necessary to bring the development into being);

b. the steps to be taken to reduce, re-use and recycle any waste that is produced through the development process;

c. the steps to be taken to reduce the production of hazardous wastes in the development process;

d. the steps to be taken to minimise the use of raw materials in the development process;

e. the steps to be taken to reduce the use of hazardous materials in the development process;

f. the steps to be taken to minimise the pollution potential of unavoidable waste;

g. the steps to be taken to dispose of unavoidable waste in an environmentally acceptable manner;

h. the steps to be taken to ensure maximum waste recovery (e.g. recycling and composting) once the development is completed/occupied; and

i. proposals for the transport of waste created during the development process and subsequent use of the site.

Development proposals outside of the thresholds above will be required to demonstrate that they have had sufficient regard to minimising waste produced as part of the development process and to the waste hierarchy in identifying a chosen management method for wastes that are produced as part of the development process.

Wiltshire Council Comment	**Applicant's Response**

Policy WCS6 is considered to be mainly complied with on balance, as the Lime Down proposals are capable of incorporating appropriate construction and operational waste-reduction, recycling and auditing measures. Compliance is contingent on the provision and implementation of detailed waste audits and management arrangements, but no inherent conflict with the policy is identified.	The Applicant notes this comment. Regarding the provision and implementation of detailed waste audits and management arrangements these are outlined for construction in the **Outline Site Waste Management Plan [REP1-102].** Requirement 9 of the **Draft DCO [REP1-007]** states that "(1) No part of the authorised development may commence until a site waste management plan for that part has been submitted to and approved by the relevant planning authority. (2) Any site waste management plan submitted in accordance with this paragraph must be substantially in accordance with the outline site waste management plan as relevant to the activities to which it relates. (3) The site waste management plan must be implemented as approved." For operation and decommissioning detailed waste audits and management arrangements will be outlined in the detailed OEMP (Waste Management Strategy) and Decommissioning Strategy (and decommissioning Site Waste Management Plan). These plans would be substantially in accordance with the **Outline OEMP [REP1-098]** and the **Outline Decommissioning Strategy [REP1-100].**

Table 18-4 Hullavington Neighbourhood Plan 2016 - 2026 (made 2019)

Policy 1: Settlement Boundary The settlement boundary is identified in the Proposals Map. Development proposals will be supported WITHIN the settlement boundary, subject to compliance with Policy 3 in the Neighbourhood Development Plan and other relevant policies of the Development Plan. Development proposals OUTSIDE the settlement boundary will be supported where: • they are in accordance with the Development Plan Policies in respect of appropriate uses in the countryside; • they relate to necessary utilities infrastructure and where no reasonable alternative location is possible; and • • they are in compliance with Policy 3 within this Neighbourhood Development Plan	
Wiltshire Council Comment	**Applicant's Response**
The Lime Down proposals include solar array land and associated infrastructure within the Hullavington Neighbourhood Plan area. The Lime Down proposals conflict with Hullavington Neighbourhood Plan Policy 1. The development lies outside the settlement boundary, does not demonstrate that the scale and location of utilities infrastructure is necessary with no reasonable alternative, and fails to comply with Policy 3, which is a prerequisite for support under Policy 1.	Details of the Scheme's compliance with Policy 1 are provided in Annex B: Local Policy Accordance Tables of the **Planning Statement [REP1-087]** (page 857). The scale and location of the utilities infrastructure is considered to be necessary and in line with national planning policy. Regarding the scale of the development, the **Statement of Need [REP1-085]** demonstrates that the Scheme is urgently needed at the scale proposed in order to meet national energy policy aims. Given the urgent need for renewable energy to be deployed at scale, the size of the Scheme is considered to be appropriate to the grid connection offer for the Scheme.

	With regard to reasonable alternative locations, the Applicant has assessed alternatives in **ES Volume 3, Appendix 4-1: Site Selection Assessment Report [APP-185]**. This sets out the six-stage approach used by the Applicant to identify the proposed location for the Scheme. The Site Selection Assessment Report concludes that there are no obviously more suitable and available locations within the 20 km search area than the proposed location for the Scheme and that the Scheme's location is therefore assessed to be suitable for the scale of solar development proposed. With regard to Policy 3, the Scheme's compliance is dealt with in the following section.

Policy 3: Planning applications in the Parish, apart from Site 690

All proposals for development or redevelopment, where appropriate having regard to the size and scale of the development, will be expected to:

1. deliver predominantly 2 and 3 bed properties unless it can be demonstrated through robust, up to date market evidence an alternative mix is required, including the appropriate number of affordable housing as required by WCS CP43; and ensure that any new affordable housing is allocated in line with Wiltshire Council's Affordable Housing allocation policies and procedures current at the time of any planning application;
2. deliver high quality, well designed homes that use traditional external materials, where possible; designed to be in keeping with the historic buildings and layout of the village; referencing the 'Design Concept for Development' Appendix 3. Designs should be locally distinctive reflecting style and scale proportionate to the historic central spine of Hullavington (which can be seen in Fig. 11 on page 7);
3. strongly encourage the incorporation of sustainable design features facilitating accessible and adaptable dwellings;

4. actively support opportunities for maximizing energy efficiency in terms passive and active design approaches to sustainable development;
5. be designed to take account of both: Wiltshire's Landscape Character Assessment and Historic Landscape Characterisation; so as to respect the village's wider rural landscape and historic setting;
6. provide high quality boundary treatments, which reflect the character of the Parish, referring to the 'Design Concept for Development' Appendix 3, using traditional materials, such as dry stonewalling, where possible, to keep the development in context with both the village and wider Parish. Where new green landscaping boundaries are planted, they shall be comprised of native or wildlife enhancing hedgerow species, to encourage biodiversity;
7. include landscaping within the development that reflects the traditional, rural context of the village and any new green landscaping shall be of native or wildlife enhancing species, to encourage biodiversity;
8. protect and where possible enhance wildlife habitats and corridors, encouraging biodiversity by conserving the network of green infrastructure that contributes towards increasing biodiversity, providing appropriate buffers to existing natural spaces that have community, biodiversity and heritage significance, applicants are encouraged to submit a biodiversity action plan with any application;
9. contribute to the provision, extension and maintenance of accessible green space, including green space for sport and children's play space for the enjoyment of residents, in accordance with Wiltshire Council's Open Space Standards;
10. where possible, retain historic on-site public right of ways within an attractive setting. Any unavoidable loss of quality or extent should be compensated for locally offsite, such that there is no net detriment to the quality or extent of the public right of way network;
11. ensure proposals that may impact on a heritage asset, whether designated or non-designated, should be accompanied by an assessment of the significance of the asset and the impact of the proposal upon its significance, using appropriate expertise, where necessary. In the case of a heritage asset with archaeological interest, a desk top assessment should be submitted and, where necessary, a field evaluation carried out;
12. protect the residential amenity of adjoining occupiers;

13. demonstrate that there is adequate parking to meet the current minimum standards and show how the car parking will be integrated within any landscaping scheme for the proposed development so as not to dominate the street scene;
14. provide an appropriate level of private external amenity space to include refuse, recycling and cycle storage to ensure a high quality and a well-managed property and streetscape;
15. provide accessible pedestrian and cycle connections to the surrounding countryside and village, with particular focus to those who are using a pushchair, wheelchair, walking aid or mobility scooter; and
16. demonstrate traffic generation and parking does not adversely affect road and pedestrian safety.

Wiltshire Council Comment	**Applicant's Response**
The Lime Down proposals conflict with Hullavington Neighbourhood Plan Policy 3. The scale and form of the development fail to respect the village's rural landscape and historic setting, do not deliver high-quality locally distinctive design, adversely affect green infrastructure, biodiversity and public rights of way, and do not adequately protect residential amenity or address traffic impacts.	The Scheme's compliance with Policy 3 is set out in Annex B: Local Policy Accordance Tables of the **Planning Statement [REP1-087]** (see page 858). Regarding the specific concerns raised: 1. The scale and form is considered to respect the village's rural landscape and historic setting: **ES Volume 1, Chapter 8: Landscape and Visual Impact Assessment [APP-060]**, demonstrates consideration of both: Wiltshire's Landscape Character Assessment and Historic Landscape Characterisation. No significant effects have been identified as a result of the Scheme to any heritage assets within Hullavington or the historic character of the land directly adjacent to it (see **ES Volume 1, Chapter 12: Cultural Heritage [APP-064]**, supported by **Volume 3, Appendix 12-1: Heritage Statement [APP-219]**). This includes the Hullavington Airbase

	Conservation Area. It should be noted that Hullavington Village is not designated as a heritage Conservation Area. Section 3.5 of the **Design Approach Document [APP-268]** sets out how the local landscape context and historic context were considered from an early stage in the design process to inform the adoption of design principles that result in a Scheme sympathetic to the landscape and historic setting of the area. Design Principle 1 sets out how the Scheme is 'landscape led' and gives due weight to the intrinsic character and beauty of the surrounding countryside, while Design Principle 7 sets out that the design of the Scheme will be sensitive to above and below ground heritage assets and their setting, by locating infrastructure at a suitable distance and through appropriate landscape screening. The design principles have informed the parameters, as set out in **Design Principles and Parameters [REP1A-008].** The parameters contained within the **Design Principles and Parameters [REP1A-008]** are secured under Requirement 5 (detailed design approval) in the **Draft DCO [REP1-007]** and apply to the detailed design of the Scheme, post consent. Landscape and visual effects of the Scheme have been assessed in **ES Volume 1, Chapter 8, Landscape and Visual Impact Assessment [APP-060]**. No significant adverse effects have been identified as a result of the Scheme to visual receptors within the settlement of Hullavington. **ES Volume 1, Chapter 8: Landscape and Visual Impact Assessment [APP-060]** takes into account the effects on

	landscape character and visual amenity in detail, and acknowledges that there would be there would be an immediate change to the character of the Sites themselves and their immediate surroundings as they change from an area of arable farmland to solar infrastructure. However, the introduction of the solar arrays and other associated infrastructure would not become a defining feature on the landscape once operational (e.g. at year 1 and year 15). 2. The Scheme is considered to deliver high quality locally distinctive design: The **Design Approach Document [APP-268]** (DAD) demonstrates how good design has been embedded in the design of the Scheme and how the design of the Scheme has evolved up to the point of the DCO Application within a clear design framework provided by a Design Vision and Design Principles. The DAD has been prepared in accordance with the Planning Inspectorate's guidance titled 'Nationally Significant Infrastructure Projects: Advice on Good Design' (Ref 21) and sets out the design decisions taken at each step of the Scheme's development, and the rationale for these decisions, as well as the mechanisms by which good design will be secured post consent. Design Principle 1 sets out how the Scheme is 'landscape led' and gives due weight to the intrinsic character and beauty of the surrounding countryside. The LVIA recognises that there are Significant effects to the character of the landscape and visual amenity of the area. However, the landscape led

	approach to the development has utilised the mitigation hierarchy to minimise adverse effects. Avoidance measures include avoiding development adjacent to the National Landscape where it would affect its setting and avoiding development where it would be visually intrusive and affect the character and visual experience of the landscape. Embedded mitigation measures principally comprise a range of offsets and buffers and specific landscape design parameters outlined in Tables 7 and 8 of **ES Volume 3, Appendix 8-6 Assessment of Effects on the Cotswolds National Landscape and its Special Qualities [APP-197]**. These include retention and enhancement of the existing landscape framework to gap up existing hedgerows and provide new tree lines to increase age and species diversity. The embedded mitigation also includes new planting to both mitigate the visual effects of the Scheme and provide landscape benefits including the re-establishment of historic hedgerows within the setting of the CNL, new areas of native woodland, trees, scrub and grassland, new planting within riparian corridors t enhance rivers and wetland, as well the restoration of dry-stone walls and creation of new/reestablishment of historic ponds. The benefits of the proposed mitigation are recorded within the separate assessment on Landscape Fabric and have been informed by Wiltshire's and the Cotswold Nature Recovery strategy/plan.

	The design of the Scheme has evolved in response to the outcomes of environmental assessment, stakeholder engagement, consultation feedback at non-statutory, statutory and targeted consultation, and technical studies, within a framework provided by a Design Vision and Design Principles which have sought to minimise adverse impacts, enhance opportunities, and balance flexibility and certainty in the DCO application. The DAD outlines how good design will be secured post-consent through a suite of management plans and requirements in the **Draft DCO [REP1-007],** including the **Design Principles and Parameters [REP1A-008],** the **Outline LEMP [APP-283],** and the **Outline CEMP [REP1-096].** 3. The Scheme is not considered to adversely affect green infrastructure and biodiversity: Potential impacts on ecology and biodiversity are fully assessed in **ES Volume 1, Chapter 9: Ecology and Biodiversity [REP1-015]**. This assessment considers baseline ecological conditions and evaluates likely significant effects arising during the construction, operation and decommissioning phases of the Scheme. It identifies avoidance, mitigation and enhancement measures to address potential impacts on habitats and protected and notable species. It also identifies opportunities for ecological enhancement, including the creation and long-term management of habitats, and delivery of biodiversity net gain. The assessment concludes that no significant adverse effects on ecology and

	biodiversity are anticipated during construction or operation, with the exception of skylark and hedgerows. Residual significant adverse effects on these receptors are anticipated at a local-level of geographical importance only. Specific mitigation and habitat enhancement measures for ground nesting birds are incorporated into the Scheme design to reduce effects as far as practicable. These include the provision of suitably large, open set-aside and grassland habitats designed to provide appropriate breeding and foraging conditions. These measures are illustrated in **ES Volume 2, Figure 3-4: Landscape and Ecological Mitigation Plan [REP1-029 to REP1-032]** and detailed in the **Outline LEMP [APP-283].** 4. The Scheme is not considered to adversely affect public rights of way, adequately protects residential amenity and addresses traffic impacts: The traffic impacts are addressed as follows: Annex J of **ES Volume 3, Appendix 13-1: Transport Assessment [REP1-057 and REP1-059]** demonstrates adequate carriageway width or frequency of passing place opportunity to pass at least an HGV and a light vehicle as requested in comments provided by Wiltshire Council in its response (August 2025) to the Transport Assessment Scoping Note and confirmed in Paragraph 4 of 'Appendix A - Highways and Transport Document Review - Detailed Comments' of the Wiltshire Council Relevant Representation [RR-4934] This confirms that no passing bay or widening improvements are

	needed to accommodate these movements on the construction route outside of the Order Limits. For the construction route between Dyson Roundabout and Bradfield Cottages, the distances between passing points outside of the Order Limits are all less than 50 metres, with forward visibility extending to the next passing point and beyond. As set out in the **Outline CTMP [REP-112]**, a booking system will be set up to manage arrivals and departures to the Order Limits. This will be implemented in coordination with banksmen, which will be able to hold back any cross-over, should there be any delays on the roads. This will prevent HGVs generated by the Scheme passing each other in opposite directions on the local roads forming part of the construction routes and will be confirmed as part of the Final CTMP(s). The construction route to Lime Down D is split between the route to Bradfield Cottages, which serves Lime Down D (West) and the A429, which serves Lime Down D (East). With regard to the Lime Down D (west) construction route, excessive widening of the existing rural route to allow two HGVs to pass would be over engineering, because of the following reasons: • Temporary nature of the construction period; • Trip generation of 56 HGVs on the route to Lime Down D (west) is an estimate of the deliveries on a peak day, so does not represent a daily average;

	• Trip generation of 56 HGV on the route to Lime Down D (west) is based on the worst-case assumptions, including but not limited to, all phases and Solar PV Sites being constructed simultaneously and a 50% uplift; • Assuming the proposed construction programme shown in Table 13-9 of **ES Volume 3, Appendix 13-1: Transport Assessment [REP1-057 and REP1-059],** where all sites are not constructed concurrently, the maximum average daily number of HGV movements along the route to Lime Down D (west) is only 30 per day/less than 5 per hour/one every 14 minutes (less than the journey time along the route); • Delivery times during the construction phase are limited to those times set out in the **Outline CTMP [REP1-112]**. There will be no HGV construction trips outside of these hours; • There would be a much greater impact on hedgerow, trees and character; and • Low level of existing HGVs on the route to Lime Down D (west) – The average number of existing HGV movements is only 46 per day, with some of these movements occurring outside of proposed construction hours set out in the **Outline CTMP [REP1-112]**. Annex K in **ES Volume 3, Appendix 13-1: Transport Assessment [REP1-057 and REP1-059]** demonstrates there

	is adequate carriageway width and/or passing place opportunity for two HGVs along the construction route to Lime Down D (west).

Table 18-5 Sherston Neighbourhood Plan 2006 to 2026 (made 2019)

Policy 1: Protection of Community Services, Facilities and Business Premises

Facilities, services, shops and local businesses recognised as important to the local community are shown on Maps 5A and 5B and listed below. The loss of community facilities or services, or the change of use of businesses to non- business or non-community uses, will be resisted.

Where a change of use that would result in the loss of a community asset or service, or the change of use of a business to a nonbusiness or non-community use is proposed, this should demonstrate why the benefits arising from the proposal outweighs the harm to the community in respect of the loss of a local asset and must be supported by evidence to demonstrate that the existing use of the asset is no longer viable, including at least six months active marketing for an alternative community or business use, taking full account of local market conditions.

Facilities/premises to be protected:

a. Village Hall
b. Scout Hut
c. British School Room
d. The Methodist Chapel
e. Carpenter Arms PH
f. The Rattlebone PH
g. The Angel (hotel and restaurant)
h. Grays Garage
i. The Old School (shops and offices)
j. Tucks

k. The Tolsey Surgery l. Apples and Pears m. The Wine Shop n. Stretchline Premises o. Pinkney Park Business Units p. p. B & W Equine Vets at Willesley	
Wiltshire Council Comment	**Applicant's Response**
Policy 1 only applies if a proposal would result in the loss or change of use of specific listed community facilities or businesses. Lime Down does not affect any of those assets, so the policy is complied with and is effectively neutral in decision-making terms.	The Applicant notes this comment.
Policy 2: Protection of Open Spaces and Open Areas The Village Hall field, the Recreation Ground and the Allotments, shown on Map 6, are designated as Local Green Space, where new development is ruled out other than in very special circumstances. Development must respect the character and appearance of the land identified on Map 7, at Avon river valleys, Manor Farm and Grove Wood.	
Wiltshire Council Comment	**Applicant's Response**
The Lime Down proposals do not involve development within any Local Green Space designated on Map 6, nor do they physically extend into the open areas identified on Map 7.	The Applicant notes this comment.

Accordingly, there is no direct loss or encroachment onto land protected by Policy 2. While Policy 2 also requires development to respect the character and appearance of the Map 7 areas, the absence of physical overlap and the separation between the site and those locations means no material harm to their character or appearance has been demonstrated. Wider landscape effects are addressed elsewhere in the assessment.	
Policy 9: Protection of Sports Facilities The loss of existing open space, sports and recreational buildings and land, including playing fields, will be resisted unless it can be clearly demonstrated that the open space, buildings or land is surplus to requirements; or the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quality and quantity in a suitable location; or the development is for alternative sports and recreation provision, the need for which clearly outweighs the loss.	
Wiltshire Council Comment	**Applicant's Response**
Policy 9 is complied with, as the Lime Down proposals do not result in the loss of any sports or recreational facilities or land. The policy's tests for resisting loss are therefore not engaged.	The Applicant notes this comment.

Table 18-6 Adopted Malmesbury Neighbourhood Plan (2015) and Draft Neighbourhood Plan (2022)

Policy 13 (same for both plans) The Neighbourhood Plan Design Guide as set out in Volume II of this Plan should be taken into consideration in all developments to ensure a high quality of design that respects the specific character of Malmesbury Town and the surrounding area	
Wiltshire Council Comment	**Applicant's Response**
The Lime Down proposals conflict with Policy 13 of the Malmesbury Neighbourhood Plan. Although the Lime Down proposals are not within the town itself, their scale, spread and industrial character would introduce significant change into the surrounding landscape that forms part of Malmesbury's setting. The proposals do not demonstrate how this change would respect the spatial, visual and landscape context identified in the Design Guide. The scale and industrial form of the proposals undermine the objectives of both the adopted and draft neighbourhood plans.	The Scheme's compliance with Policy 13 is set out in Annex B: Local Policy Accordance Tables of the **Planning Statement [REP1-087]** (see page 874). Regarding how the proposals respect the spatial, visual and landscape context identified in the Neighbourhood Plan Design Guide, as set out in the **Design Approach Document [APP-268]** the Scheme has also adopted design principles from the outset to guide the design of the Scheme. Design Principle 1 sets out that the design of the Scheme will be 'Landscape Led' and give due weight to the intrinsic character and beauty of the surrounding countryside, while design principle 2 has been adopted to ensure adherence to the mitigation hierarchy to reduce impacts and control any adverse effects on the environment throughout the lifecycle of the Scheme from construction through to operation and maintenance and decommissioning. This has led to the following design changes in relating to feedback and good design considerations (note the changes below relate only to Lime Down E given its

	proximity to Malmesbury – refer to the **Design Approach Document [APP-268]** for further changes): • Removal of field E16 from the Scheme due to landscape and visibility matters (being on higher ground), and removal of field E8 (previously intended to be used for ecological mitigation) from the Order Limits following further field work due to the lack of suitability of the field for ecological mitigation. • Removal of Solar PV Panels from fields E7, E9 and E10 following further considerations relating to visibility of the panels due to the gradient of the land, as well as to ensure the protection of existing vegetation. • Other refinements including the removal of small areas of Solar PV Panels to allow for environmental buffers and environmental mitigation and enhancement as a result of further surveys and consultation feedback. The LVIA recognises that there are Significant effects to the character of the landscape and visual amenity of the area. However, the landscape led approach to the development has utilised the mitigation hierarchy to minimise adverse effects. Avoidance measures include avoiding development adjacent to the National Landscape where it would affect its setting and avoiding development where it would be visually intrusive and affect the character and visual experience of the landscape. Embedded mitigation measures principally comprise a range of offsets and buffers and specific landscape design parameters

	outlined in Tables 7 and 8 of **ES Volume 3, Appendix 8-6 Assessment of Effects on the Cotswolds National Landscape and its Special Qualities [APP-197]**. These include retention and enhancement of the existing landscape framework to gap up existing hedgerows and provide new tree lines to increase age and species diversity. The embedded mitigation also includes new planting to both mitigate the visual effects of the Scheme and provide landscape benefits including the re-establishment of historic hedgerows within the setting of the CNL, new areas of native woodland, trees, scrub and grassland, new planting within riparian corridors to enhance rivers and wetland, as well the restoration of dry-stone walls and creation of new/reestablishment of historic ponds. The introduction of solar arrays and associated infrastructure is not expected to become a defining feature of the landscape once mitigation measure have matured by Year 15. This conclusion is based on six key factors: the dispersed layout of the Sites; the reversible and 'overlaid' nature of the Scheme; the effectiveness of mitigation planting, particularly by Year 15; the delivery of Biodiversity Net Gain; and the creation of a strengthened legacy landscape The **Design Approach Document [APP-268]** (DAD) demonstrates how good design has been embedded in the design of the Scheme and how the design of the Scheme has evolved up to the point of the DCO Application within a clear design framework provided by a Design Vision and Design Principles. The DAD has been prepared in accordance with the

	Planning Inspectorate's guidance titled 'Nationally Significant Infrastructure Projects: Advice on Good Design' (Ref 21) and sets out the design decisions taken at each step of the Scheme's development, and the rationale for these decisions, as well as the mechanisms by which good design will be secured post consent. Design Principle 1 sets out how the Scheme is 'landscape led' and gives due weight to the intrinsic character and beauty of the surrounding countryside. The design of the Scheme has evolved in response to the outcomes of environmental assessment, stakeholder engagement, consultation feedback at non-statutory, statutory and targeted consultation, and technical studies, within a framework provided by a Design Vision and Design Principles which have sought to minimise adverse impacts, enhance opportunities, and balance flexibility and certainty in the DCO application. The DAD outlines how good design will be secured post-consent through a suite of management plans and requirements in the **Draft DCO [REP1-007],** including the **Design Principles and Parameters [REP1A-008],** the **Outline LEMP [APP-283],** and the **Outline CEMP [REP1-096].**

Table 18-7 Joint Melksham Neighbourhood Plan 2 (2025)

Policy 1: Sustainable Design and Construction As appropriate to their scale, nature and location, development proposals should demonstrate how they have mitigated and been designed to adapt to the impacts of climate change. This includes: a. the submission of a Sustainable Energy Strategy to demonstrate how carbon emissions are minimised, with the target of zero carbon in operation (regulated and unregulated energy); b. embedding the Energy Hierarchy within the design of buildings by prioritising fabric first, orientation, design, and landscaping, to minimise energy demand for heating, lighting, and cooling, as well as maximising renewable energy generation. Proposals should respond positively to opportunities to improve space heating and energy consumption by considering a range of low-carbon and renewable technologies; c. demonstrating good connections to existing services and facilities, and/or a mix of uses that minimises the need to travel by private vehicle; d. using carbon sequestration and other sustainable approaches such as shade; and e. e. the retention of existing buildings where practicable, and the incorporation of associated retrofitting measures to improve the energy performance of existing buildings.	
Wiltshire Council Comment	**Applicant's Response**
Joint Melksham Neighbourhood Plan 2 Policy 1 is considered to be mainly complied with on balance. The Lime Down proposals include a Sustainable Energy Strategy and deliver zero-carbon electricity generation in operation; however, elements relating to the energy hierarchy, place-based design responses and reduced reliance on private vehicle travel are	The Applicant notes this comment relating to the Scheme's compliance with Joint Melksham Neighbourhood Plan 2 Policy 1. The Applicant's **Statement of Need [REP1-085]** describes how and why the Scheme addresses all relevant aspects of government policy including achieving its energy objective to ensure the supply of energy to the national energy system always remains secure (Section 8.5), reliable (Section 8.5),

only partially achieved, given the nature and location of the development. Compliance is therefore contingent on effective implementation.	affordable (Chapter 9), and consistent with meeting legally binding climate change targets (Section 5.10). The **Design Approach Document [APP-268]** sets out the design vision and the design principles that have provided a clear framework for the evolution of the Scheme's design since inception to ensure that good design is embedded. It also sets out the design evolution of the Scheme from inception to DCO submission, detailing the design decisions which have been made at each step of the Scheme's development, including the rationale for these decisions. Section 4.2 of the **Design Approach Document [APP-268]** sets out the positive design outcomes that will deliver a Scheme that is sustainable and sensitive to place over the lifetime of the development. The Scheme will result in sustainable infrastructure that is sensitive to place by delivering a design that has followed the mitigation hierarchy to avoid and reduce impacts as far as possible, integrates with the landscape, provides ecological and landscape enhancements and improves recreational facilities through the creation of 12.8 km of new permissive paths. **ES Volume 1, Chapter 7: Climate Change [APP-059]** sets out in Paragraph 7.9.6 measures to reduce reliance on private vehicle travel during construction. This includes encouraging the use of lower carbon modes of transport by identifying and communication local bus connections and pedestrian and cycle access routes to/from the Scheme, providing appropriate facilities for the safe storage of cycles, and implementing a shuttlebus to reduce the number of trips made by construction

	staff. Similar methods have been included within Table 1 of the **Outline Decommissioning Strategy [REP1-100]** and will be implemented along with other climate resilient measures during the decommissioning phase of the Scheme.
Policy 2: Local Renewable and Low Carbon Energy Generation 1. Proposals for renewable energy, low carbon energy generation projects/developments, and associated infrastructure, including Battery Energy Storage Systems (BESS), will be supported where it can be demonstrated that: a. the siting and scale of the proposal is appropriate to its setting; b. the proposal will not result in adverse impacts on the local environment which cannot be satisfactorily mitigated; c. the proposal does not create an unacceptable impact on the amenity and safety; and d. the proposal does not have an unacceptable degree of impact on a feature of natural or biodiversity importance. Proposals for stand alone, ground mounted solar photovoltaic development should demonstrate, where possible that some form of agricultural activity will continue, and/or there are biodiversity improvements around arrays; and, e. the proposal, when taking into consideration other renewable and low carbon energy developments and associated infrastructure in the area, will not result in an unacceptable cumulative impact. 2. 2. Schemes which result in direct benefits to the local community such as energy supplied directly, or financial benefits, will be supported. Proposals for community energy generation projects (with full or partial ownership and/or control by a local community) will be strongly supported. In addition, schemes where the energy produced can be used on or near the generation site/where energy storage is incorporated will be supported. In both cases, proposals should comply with the criteria in the first part of this policy.	
Wiltshire Council Comment	**Applicant's Response**

The Lime Down proposals conflict with Policy 2. Although renewable energy generation and storage are supported in principle, the development fails to demonstrate that its siting and scale are appropriate to the setting, that environmental, amenity and biodiversity impacts can be satisfactorily mitigated, or that cumulative effects are acceptable.	The Applicant notes that renewable energy generation and storage are supported in principle. With regard to siting and scale and whether this is appropriate to its setting , **ES Volume 3, Appendix 4-1: Site Selection Assessment Report [APP-185]** sets out the alternative locations considered for the Scheme and concludes that there are not more suitable and available locations within the 20 km search area than the proposed location for the Scheme and the Scheme's location is therefore assessed to be suitable for the scale of solar development proposed. Regarding the scale of the development, the **Statement of Need [REP1-085]** demonstrates that the Scheme is urgently needed at the scale proposed in order to meet national energy policy aims. Given the urgent need for renewable energy to be deployed at scale, the size of the Scheme is considered to be appropriate to the grid connection offer for the Scheme. With regard to the setting, Section 3.5 of the **Design Approach Document [APP-268]** sets out how the local landscape context and historic context were considered from an early stage in the design process to inform the adoption of design principles that result in a Scheme sympathetic to the landscape and historic setting of the area. Design Principle 1 sets out how the Scheme is 'landscape led' and gives due weight to the intrinsic character and beauty of the surrounding countryside, while Design Principle 7 sets out that the design of the Scheme will be sensitive to above and below ground heritage assets and their setting, by locating infrastructure at a suitable distance

	and through appropriate landscape screening. The design principles have informed the parameters, as set out in **Design Principles and Parameters [REP1A-008].** The parameters contained within the **Design Principles and Parameters [REP1A-008]** are secured under Requirement 5 (detailed design approval) in the **Draft DCO [REP1-007]** and apply to the detailed design of the Scheme, post consent. Potential impacts on ecology and biodiversity are fully assessed in **ES Volume 1, Chapter 9: Ecology and Biodiversity [REP1-015].** This assessment considers baseline ecological conditions and evaluates likely significant effects arising during the construction, operation and decommissioning phases of the Scheme. It identifies avoidance, mitigation and enhancement measures to address potential impacts on habitats and protected and notable species. It also identifies opportunities for ecological enhancement, including the creation and long-term management of habitats, and delivery of biodiversity net gain. The assessment concludes that no significant adverse effects on ecology and biodiversity are anticipated during construction or operation, with the exception of skylark and hedgerows. Residual significant adverse effects on these receptors are anticipated at a local-level of geographical importance only. The applicant disagrees with the notion that the Application fails to demonstrate that the cumulative effects are acceptable; any significant effects have been clearly outlined and will need to be considered in the Planning Balance when the DCO is

	being determined by the Examining Authority. Cumulative effects have been carefully considered in accordance with Planning Inspectorate guidance (Ref 15) and the relevant NPS EN-1 (Ref 3), NPS EN-3 (Ref 4) and NPS EN-5 (Ref 5) requirements as set out in **ES Volume 1, Chapter 21 Cumulative and In Combination Effects [APP-074].** The chapter sets out the approach and conclusions of the **ES [APP-052 to APP-074]** technical chapter cumulative assessments. Taking a conservative worse case approach, significant cumulative effects are identified at a limited and discrete number of receptors comprising tourism and recreation impacts during the construction phase on Corsham Park, PRoW WT|CORM|122, PRoW WT|HULL|29, and Sustrans Cycle Route 403, and on skylark at a District level. These significant effects are clearly set out in **ES Volume 1, Chapter 21 Cumulative and In Combination Effects [APP-074]**. The Applicant has made every effort to minimise likely significant effects where practicable and notes any residual significant effects are matters which will have to be considered in the planning balance when the DCO is determined by the Examining Authority.
Policy 3: Flood Risk and Natural Flood Management Natural flood management works to conserve and enhance the ecological flood storage value of the water environment, including watercourse corridors and catchments, will be supported. Development proposals in locations with known flooding issues should include appropriate mitigation and construction methods, and, where appropriate, contributions towards wider catchment projects.	

As appropriate to their scale, nature and location, development proposals should demonstrate how flood risk is mitigated. This approach should include measures to reduce the amount of rainwater run-off and incorporate Sustainable Drainage Systems.	
Wiltshire Council Comment	**Applicant's Response**
JMNP2 Policy 3 is considered to be mainly complied with on balance. Within the neighbourhood plan area, the Lime Down proposals are limited to grid-connection infrastructure, which does not result in increased flood risk, incorporates appropriate mitigation and construction practices, and avoids permanent changes to drainage or floodplain function. While the scope does not lend itself to wider catchment-level natural flood management measures, the policy's objectives are met on a proportionate basis subject to implementation controls.	The Applicant notes the comment. With regard to implementation controls, the Applicant agrees that the Scheme complies with JMNP2 Policy 3 on a proportionate basis. The works within the neighbourhood plan area are limited to grid connection infrastructure and do not give rise to a requirement for catchment-scale natural flood management as mitigation. Flood risk and drainage controls for the cable route are addressed through **ES Volume 3, Appendix 11-9: Flood Risk Assessment and Drainage Strategy - Cable Route Corridor [REP1-053]**. Construction-phase drainage, sediment control, pollution prevention and watercourse protection measures are secured through Requirement 13 of the **Draft DCO [REP1-007]**, which requires the detailed CEMP to be substantially in accordance with the **Outline CEMP [REP1-096]**. Where surface water drainage details are required for any relevant part of the authorised development, these are secured through Requirement 11 of the **Draft DCO [REP1-007]**. Separately, the Applicant is actively reviewing whether natural flood management or wider catchment measures could be brought forward as a community benefit. This does not form part of the mitigation relied upon in the ES or **ES Volume 3,**

	Appendices 11-1 to 11-9: Flood Risk Assessment and Drainage Strategy [REP1-037 to REP1-054] but is being explored. The Applicant therefore agrees that JMNP2 Policy 3 is complied with on a proportionate basis.
Policy 5: Community Engagement Development proposals should be prepared with early, proactive, proportionate and effective engagement. Developers are therefore encouraged to follow the approach set out in the Melksham Community Engagement Protocol and the Wiltshire Council Statement of Community Involvement.	
Wiltshire Council Comment	**Applicant's Response**
The scheme has been consulted on in line with statutory requirements and the Council's Statement of Community Involvement, so Policy 5 is not breached. However, concerns remain locally about how effective that engagement was in shaping the proposals, which means it is best described as mainly complied with on balance rather than fully complied with.	The Applicant has sought to undertake pre-application consultation in as robust a form as practicable, to allow interested parties to have access to as much information as available at the time of consulting as possible, to help alleviate concerns about the potential future impacts of the Scheme on people's lives. The **Consultation Report [APP-022]** sets out the Applicant's approach to pre-application consultation and demonstrates how consultation was undertaken with a wide range of stakeholders, including local communities, community organisations, statutory consultees and those with an interest in land. This has included in-person events and online communications, with consultation materials provided both digitally and in hard form, and free-to-use communication channels to respond back to the Applicant team.

Policy 11: Sustainable Transport and Active Travel As appropriate to their scale, nature and location, development proposals should complement the Sustainable Transport Hierarchy, including provision for ultra-low emission vehicles. Proposals for major development should demonstrate through a proportionate Travel Plan how sustainable transport modes are maximised and that safe and suitable movement can be achieved for all people. As a key element in the local sustainable transport network, proposals that would achieve further improvements to the accessibility and quality of the links between the wider town and Melksham railway station will be supported. Improvements to the quality of the public realm around the station will also be supported.	
Wiltshire Council Comment	**Applicant's Response**
Policy 11 is considered to be mainly complied with on balance. While the Lime Down proposals are constrained by their rural location and cannot deliver broader active-travel or rail-station connectivity benefits, a proportionate Travel Plan and site-specific measures can be implemented to manage travel demand and ensure safe and suitable movement. Compliance is therefore contingent on effective implementation and attracts limited positive weight.	The Applicant notes this comment.
Policy 12: Green and Blue Infrastructure 1. Development that will result in the creation of new Green and Blue Infrastructure (GBI) and/or contribute to the protection, management, enhancement and connectivity of existing GBI will be supported; the potential for GBI within the Neighbourhood Area is illustrated diagrammatically in Figure 12. 2. As appropriate to their scale, nature and location, development proposals for major developments must: a. identify the existing GBI within and around the development site, and	

b. demonstrate how GBI has been incorporated into the proposal, and 3. c. assess and address how the proposal will benefit the function and connectivity of GBI through the site and beyond.	
Wiltshire Council Comment	**Applicant's Response**
JMNP2 Policy 12 is considered to be mainly complied with on balance. Within the neighbourhood plan area, the Lime Down proposals are limited to grid-connection infrastructure, which identifies existing green and blue infrastructure, avoids permanent impacts on its function or connectivity, and provides for reinstatement following construction. While the scope does not lend itself to significant new GBI creation or enhancement, the policy's objectives are met on a proportionate basis.	Section 4.2 of the **Design Approach Document [APP-268]** sets out the positive design outcomes of the Scheme to ensure it is sustainable and sensitive to place, including green infrastructure considerations. The Scheme design integrates with the landscape, and where practicable, enhances the landscape and local green infrastructure network, to improve biodiversity and ecological connectivity across the Solar PV Sites. Enhancement measures will contribute to and strengthen the connectivity between a number of the Local Wildlife Sites located close to the Solar PV Sites and the local landscape, through the provision of new hedgerows, tree and woodland planting in the vicinity of the sites, and through the creation of areas of species rich grassland and scrub planting within the Solar PV Sites, which may provide ecological 'stepping stones' for various species within the local, largely arable landscape. The **Design Principles and Parameters [REP1A-008]** sets out the design principles and parameters by which the Scheme has been designed, and the Environmental Impact Assessment has been undertaken. The design principles have informed the parameters which are secured by Requirement 5 in Schedule 2 of the **Draft DCO [REP1-007]** and apply to the detailed design of the Scheme post consent.

	The Landscape Strategy set out in the **Outline LEMP [APP-283]** aims to set out the approach to habitat creation and management in order to provide ecological enhancements, strengthen the green infrastructure within the local area, and to provide landscape and visual mitigation through screening of the Scheme. The **Outline LEMP [APP-283]** draws upon the Draft Wiltshire Local Nature Recovery Strategy (Ref 2) and sets out that the Scheme as designed will broadly contribute to these priorities. The **Outline LEMP [APP-283]** will be secured by Requirement 7 in Schedule 2 of the **Draft DCO [REP1-007].** Further, significant tree and woodland planting is proposed within the Order Limits as outlined in the **Outline LEMP [APP-283]**, which will result in the creation of 11.37 ha of new native broadleaved woodland. Locations for planting have been directed by the need for landscaping and visual impact mitigation, but opportunities have also been taken to connect habitat parcels. Once established, this level of woodland planting will result in a significant beneficial effect on the extent of woodland within the Order Limits, which would, by extension, contribute to the connectivity of woodland stands and green infrastructure across the local landscape.
Policy 13: Biodiversity Development proposals, including those for field based solar farms. will be expected to deliver at least a 10% improvement in biodiversity value within and, where appropriate, beyond the site in order to deliver tangible benefits for biodiversity, including specific attention for protected species. Proposals which deliver a higher Biodiversity Net Gain will be particularly supported.	

Where appropriate, development proposals should demonstrate sensitive responses to statutory and non-statutory nature conservation sites (as shown on Figure 13), such as accommodating a buffer zone.	
Wiltshire Council Comment	**Applicant's Response**
JMNP2 Policy 12 (Biodiversity) is considered to be mainly complied with on balance. Within the neighbourhood plan area, the Lime Down proposals are limited to grid-connection infrastructure which avoids permanent habitat loss, addresses protected species through proportionate controls, and provides for reinstatement following construction. While the scope does not lend itself to significant local biodiversity enhancement, the policy's objectives are met on a proportionate basis.	The Applicant notes this comment.
Policy 14: Open Spaces Development proposals that involve the whole or partial loss of an existing open space (other than the designated Local Green Spaces) should demonstrate through an assessment of open space provision, using the quantity and access standards for open space as set out by Wiltshire Council, that: a. there is a surplus in the catchment area of open space beyond that required to meet both current and forecast need, and full consideration has been given to all functions that the open space performs, or b. b. a replacement open space (or enhancement of the remainder of the existing site) provides a net benefit to the community in terms of the quantity, quality and accessibility of the open space including by walking and cycling.	
Wiltshire Council Comment	**Applicant's Response**
The Lime Down proposals comply with Joint Melksham Neighbourhood Plan 2 Policy 14, as they do not involve the	The Applicant notes this comment.

loss of any existing open space. The policy's assessment and replacement requirements are therefore not engaged.	
Policy 15: Community Facilities 1. Development proposals that involve the loss, in whole or part, of a community facility (as identified in Figure 14a, b & c, and detailed in the Community Facilities Report) must demonstrate that: a. adequate alternative provision exists or will be provided in an equally accessible or more accessible location, including by walking and cycling, within the catchment area of the facility; or b. it would not be economically viable, feasible or practicable to retain the building or site for use as a community facility; redevelopment for noncommunity use will only be considered as a last resort and where all other options have been exhausted. 2. Proposals for new community facilities in the Plan area will be supported where the applicant can demonstrate the need and benefits of the proposed facility, or where replacement or enhanced facilities are proposed as mitigation against the loss of any community facilities within the Plan area. New or replacement community facilities should be located where there is a choice of travel options and should be accessible to all members of the community.	
Wiltshire Council Comment	**Applicant's Response**
The Lime Down proposals comply with Joint Melksham Neighbourhood Plan 2 Policy 15, as they do not result in the loss, in whole or part, of any identified community facility. The policy's requirements relating to alternative provision, viability or replacement facilities are therefore not engaged.	The Applicant notes this comment.
Policy 16: Policy 16: Designation of Local Green Spaces	

The sites shown on figure 15, and listed on page 95, are designated as Local Green Spaces. Development proposals within the identified LGSs will only be supported in very special circumstances.

Wiltshire Council Comment	**Applicant's Response**
The Lime Down proposals comply with Joint Melksham Neighbourhood Plan 2 Policy 16, as they do not involve development within any designated Local Green Space. The policy's restrictive tests are therefore not engaged.	The Applicant notes this comment.

Policy 17: Trees and Hedgerows

1. Ancient and Veteran Trees:

To be supported, development proposals should ensure that there will be no loss or deterioration of the irreplaceable habitats of ancient woodlands (as shown in Figure 12) and ancient or veteran trees found outside ancient woodland, unless the need for and benefits of the development in that location clearly outweigh the loss. In accordance with current guidance a minimum buffer of at least 15 metres in width should be maintained between ancient woodland and any development boundary. A buffer zone around an

ancient or veteran tree should be at least 15 times larger than the diameter of the tree.

2. Other Existing Trees and Hedgerows:

To be supported, development proposals should ensure that there is no damage to or loss of trees of good arboricultural and amenity value. Existing trees and hedgerows on development sites should be retained where possible and incorporated as placemaking features in new development. Where there is an unavoidable loss of trees on site, the number and type of replacement trees should be informed by the quality and size of trees lost. Integration of existing hedgerows into private curtilage must be avoided where possible.

3. Increased Tree Canopy:

Wherever practicable, development proposals on sites outside of the town centre, and greater than 0.5 ha in size, should deliver an increase in site tree canopy cover. This should be demonstrated through a tree planting plan, and should be delivered through the retention of existing trees and/or the planting of new trees in public areas and in private gardens. Where this approach is not practicable, other green infrastructure features (such as green roofs) appropriate to the site should be provided.	
Wiltshire Council Comment	**Applicant's Response**
Within the neighbourhood plan area, the Lime Down proposals are limited to grid-connection infrastructure which avoids permanent loss or deterioration of trees and hedgerows, applies appropriate protective measures, and provides for reinstatement following construction. While the scope does not allow for a demonstrable net increase in canopy cover locally, the policy's objectives are met on a proportionate basis subject to implementation controls.	The Applicant notes this comment. With regard to implementation controls, measures for the implementation (including species and sizes), management, monitoring and replacement of landscape and ecological mitigation are set out in the **Outline LEMP [APP-283].** The detailed LEMP will need to be substantially in accordance with the **Outline LEMP [APP-283]** secured through Requirement 7 in Schedule 2 of the **Draft DCO [REP1-007].**

Policy 18: Landscape Character

As appropriate to their scale, nature, and location, development proposals will be expected to:

a. integrate natural features such as trees, hedgerows and the local river systems that contribute to both the landscape character and setting of the development;

b. demonstrate that the whole scheme, including hard landscape and planting proposals, draws on local landscape characteristics and features through reference to relevant existing landscape and historic landscape assessments, supplemented by any additional site specific assessments, and

c. respond sensitively to the transition between settlement edge and countryside and maintain the separate identity of settlements; and conserve or enhance the character, openness, tranquillity and amenity of the open countryside.

Wiltshire Council Comment	Applicant's Response
Within the neighbourhood plan area, the Lime Down proposals are limited to grid-connection infrastructure which avoids permanent change to landscape character, respects settlement edges, and conserves openness and tranquillity following reinstatement. While opportunities for landscape enhancement are limited by the nature of the works, the policy's objectives are met on a proportionate basis subject to implementation controls.	The Applicant notes this comment. With regard to implementation, controls measures for the implementation (including species and sizes), management, monitoring and replacement of landscape and ecological mitigation are set out in the **Outline LEMP [APP-283].** The detailed LEMP will need to substantially in accordance with the **Outline LEMP [APP-283]** secured through Requirement 7 in Schedule 2 of the **Draft DCO [REP1-007].**

Policy 19: Separation of Settlements

Development proposals should respect the separation between the following settlements:

- Whitley and Shaw;
- Shaw and Melksham;
- Beanacre and Melksham; and
- Berryfield and Semington.

Proposals for development between the settlements listed above should:

a. be in conformity with development plan policies;

b. demonstrate that they would deliver economic, community and/or environmental benefits which would outweigh any harm to the role and function of the area between the two settlements (individually or cumulatively) as set out in section 1 of this policy, and as detailed in the Green Gap and Wedge Study (2023);

c. minimise and mitigate their urbanising effects, such as artificial lighting and traffic movements; and

d. where practicable, retain trees and hedgerows and, as appropriate to their scale and nature, incorporate additional screening trees and hedgerows as edge features to minimise the impact of development on the separation of the settlements concerned. Development proposals which would result in the loss of, or an unacceptable reduction of the contribution which it makes to the separation of the settlements concerned will not be supported.	
Wiltshire Council Comment	**Applicant's Response**
Within the neighbourhood plan area, the Lime Down proposals are limited to underground grid-connection infrastructure which does not result in the loss of, or an unacceptable reduction in, the land's contribution to maintaining separation between settlements. The policy is therefore not engaged	The Applicant notes this comment.
Policy 20: Locally Distinctive, High Quality Design Development proposals should contribute positively to the conservation, enhancement and extension of the quality and local distinctiveness of the neighbourhood area. In addition to having regard to the National Design Guidance and Wiltshire Design Guide, development proposals must demonstrate how they have been informed by the adopted Melksham Design Guidelines and Codes, therefore how they have responded positively to the history and character of the area in which the site is located. Proposals for major development must demonstrate through a masterplan through a Design and Access Statement how the proposed development layout, density, access proposals and building design approach complement and extend the positive characteristics of Melksham and Melksham Without's settlements and landscape, both historic and topographic.	
Wiltshire Council Comment	**Applicant's Response**
As the works are underground and temporary in the Neighbourhood Plan area, they cannot meaningfully improve	The Applicant notes this comment.

local character or create new places. However, they avoid lasting harm and restore the area once complete. Given the limited nature of the works, this is a proportionate and acceptable way of meeting the policy, provided the agreed safeguards are carried out.	

Policy 21: Local Heritage

Proposals for development within the Melksham Conservation Area must show how they preserve or enhance the setting, characteristics and special qualities that make up the architectural and historic character.

For other assets of local heritage importance, including archaeological importance, and buildings or structures identified as Non-designated Heritage Assets (as set out in the 2023 Locally Valued Non-Designated Heritage Asset Report or subsequent updates), mapped on Figure 19 (including notable buildings as shown on Figure 20) development proposals should demonstrate that appropriate consideration has been given to:

a. the significance of the heritage asset;
b. its most distinctive and important features;
c. the elements of its setting and immediate surrounds that contribute to its significance, and
d. the contribution the asset and its setting makes to the character of the local area (whether in the Conservation Area or not)
e. any planning application must not only consider heritage issues but show that they have been fully taken into account via a heritage statement. Archaeological surveys of a particular site may also be required prior to the determination of an application.

Wiltshire Council Comment	**Applicant's Response**
The Lime Down proposals comply with Joint Melksham Neighbourhood Plan 2 Policy 16, as they do not involve	The Applicant notes this comment.

development within any designated Local Green Space. The policy's restrictive tests are therefore not engaged.	

Table 18-8 Chippenham Without Neighbourhood Plan 2022 – 2036 (published 2023)

Policy CWoNP – HE1 All new development within the Neighbourhood Plan Area must demonstrate good quality design by demonstrating a positive response to the local character of the historic rural landscape.	
Wiltshire Council Comment	**Applicant's Response**
Within the Chippenham Without NP area, the Lime Down proposals are limited to an underground cable corridor with temporary construction impacts only. No solar arrays, BESS, substations or permanent above-ground infrastructure are proposed. Following reinstatement, there would be no long-term change to the character, openness or historic rural landscape. The proposal therefore demonstrates an appropriate response and does not conflict with Policy CWoNP-HE1.	The Applicant notes this comment.
Policy CWoNP – HE2 All new developments within the Neighbourhood Plan Area must demonstrate good quality design by responding to the local character of the historic built and natural environment.	
Wiltshire Council Comment	**Applicant's Response**
The cable corridor avoids permanent alteration to the historic built or natural environment and does not result in lasting harm to the setting of historic assets. Archaeological interest is addressed through proportionate assessment and mitigation.	The Applicant notes this comment.

As a result, the proposals preserve historic character in outcome and do not conflict with Policy CWoNP-HE2.	
Policy CWoNP – HE3 All new developments should conserve and preserve historic assets in the Parish commensurate with their historic status.	
Wiltshire Council Comment	**Applicant's Response**
Within the Chippenham Without Neighbourhood Plan area, development is limited to an underground cable corridor with temporary construction impacts only, and there is no permanent harm to historic assets or their settings. Proportionate archaeological assessment and mitigation ensure that heritage interests are conserved in outcome.	The Applicant notes this comment.
Policy CWoNP – NE1 Where appropriate development proposals must: a. Demonstrate how proposals consider the landscape character of Allington, Sheldon and Lanhill including setting and visual impacts. b. Protect existing rights of way and link in new routes to offer the community opportunities for additional countryside access routes and cycleways where possible. c. c. Include landscape enhancements of appropriate species mix and character.	
Wiltshire Council Comment	**Applicant's Response**
Within the Chippenham Without Neighbourhood Plan area, the proposals are limited to an underground electricity cable	The Applicant notes this comment.

corridor, with temporary construction works and reinstatement. There are no solar arrays, BESS, substations or permanent above-ground structures within the NP boundary. As a result, no long-term change to landscape character, setting or visual impact on Allington, Sheldon or Lanhill arises following reinstatement. The cable corridor alignment avoids permanently severing public rights of way. Appropriate restoration is proposed using suitable landscape treatments	
Policy CWoNP – NE2 All new development must seek to contribute to sustainable development. Where appropriate, proposals should: a. Deliver biodiversity net gains. b. Protect geodiversity where possible. c. c. Adopt best practice in sustainable urban drainage.	
Wiltshire Council Comment	**Applicant's Response**
Policy CWoNP – NE2 is complied with. Within the Chippenham Without Neighbourhood Plan area, the Lime Down proposals are limited to a temporary underground cable corridor with reinstatement, resulting in no lasting harm to biodiversity or geodiversity and adopting proportionate best-practice surface-water management during construction.	The Applicant notes this comment.
Policy CWoNP – BE3 Development proposals must be of a high quality which respects the Local character, and it must be demonstrated that:	

a. New development is of a scale that is appropriate within both its immediate context as well as the character of the local area. b. Materials used within new developments are appropriate and respond to the local vernacular. c. The form of new development must respect the existing character of the area. d. d. Designated Heritage Assets and their settings must be thoroughly considered where appropriate.

Wiltshire Council Comment	**Applicant's Response**
Within the Chippenham Without Neighbourhood Plan area, the Lime Down proposals are limited to a temporary underground cable corridor that results in no lasting change to scale, form or materials and preserves the character of the area and the settings of heritage assets following reinstatement.	The Applicant notes this comment.

Policy CWoNP – E4
Proposals for community facilities that are of an appropriate scale will be supported. Existing community facilities are as follows: • Allington Farm Shop and Café • Texaco Garage and Shop • Chippenham Rugby Club and Allington Cricket Club Golf Driving Range. Any development proposal that would result in the loss of community facilities must clearly demonstrate that the use is not viable. Development proposals which would result in the loss of a community facility but are able to demonstrate that the facility will be replaced in an alternative location within the Neighbourhood Plan Area will be supported.

Wiltshire Council Comment	**Applicant's Response**

Policy CWoNP – E4 is complied with, as the Lime Down proposals do not involve the provision of new community facilities and do not result in the loss, relocation, or reduced viability of any existing community facilities identified in the Chippenham Without Neighbourhood Plan. The policy's protection and replacement tests are therefore not engaged.	The Applicant notes this comment.

Table 18-9 Chippenham Neighbourhood Plan (May 2024)

Policy SCC3 – Standalone Renewable Energy Proposals for standalone renewable energy developments, including renewable energy storage, will be supported where it can be robustly demonstrated that: a) The costs and benefits compare favourably with potentially less intrusive options, such as large scale building mounted renewable energy; b) A comprehensive landscape impact assessment has been undertaken which has informed the proposals for the location of new infrastructure and all mitigation measures identified in that are implemented; c) the wider benefits of providing energy from renewable sources, including contributions to national carbon reduction objectives and targets, outweigh any adverse impacts on the local environment or amenity, including any cumulative adverse impacts from existing or planned renewable energy developments; and d) additional social, economic or environmental benefits which benefit the local community over the lifetime of the project are provided; In addition, proposals for ground mounted solar photovoltaic development will be expected to make most effective use of the land around arrays through demonstrating that agricultural use will continue, and/or achieving a minimum of 10% biodiversity net gain on site. Proposals for community energy projects where there is full or partial community ownership involvement will be strongly supported	
Wiltshire Council Comment	**Applicant's Response**
The principle of proposals for renewable energy development receives broad support from policy SCC3 to the Chippenham Neighbourhood Plan, provided that they are suitably located and sufficiently mitigate any adverse development specific and cumulative environmental effects. However, compliance with local and national planning policy cannot yet be demonstrated due to outstanding information and insufficient mitigation proposals.	The Cable Route Corridor does not pass through the Chippenham Neighbourhood Plan area, although the Applicant notes that there is considered to be general policy compliance with policy SCC3. With regard Wiltshire Council's comment on outstanding information and mitigation proposals more generally, this has been addressed separately in this document where specifically raised.

Table 18-10 Corsham Neighbourhood Plan 2016 - 2026 (made 2019)

Policy CNP E1 Otherwise acceptable proposals for development which protect and, where possible, enrich the habitat of the protected bat species associated with the Bath and Bradford on Avon Bats Special Area of Conservation (SAC) will be supported. Applicants will need to demonstrate how their proposals would contribute to the delivery of the Corsham Batscape Strategy, including details of measures to preserve and, where possible, enhance wildlife corridors, (especially with regard to foraging areas), priority flight lines and maternity roosts. Proposals that enhance the biodiversity of Corsham will be supported.	
Wiltshire Council Comment	**Applicant's Response**
No element of the Lime Down proposals lies within the Corsham Neighbourhood Plan area. Neither the solar park nor the associated underground grid connection passes through Corsham parish, and Corsham Neighbourhood Plan policies are therefore not engaged by the development.	The Cable Route Corridor passes through the Corsham Neighbourhood Plan area. The Scheme's compliance with the Corsham Neighbourhood Plan Policy CNP E1 is set out in Annex B: Local Policy Accordance Tables in the **Planning Statement [REP1-087]** (see page 913).
Policy CNP E2 All new development should seek to contribute to the achievement of sustainable development. Proposals should: a. Safeguard and, where possible, enhance biodiversity and geodiversity; b. Adopt best practice in sustainable urban drainage; c. Reduce flood risk and ensure that the design and location of new development is resilient to the effects of flooding	

Proposals are encouraged to demonstrate:

d. Innovative design which seeks to achieve low carbon sustainable design;

e. The promotion of the efficient use of natural resources, the re-use and recycling of resources, and the production and consumption of renewable energy;

f. Grey water re-use; and

g. The development of low and zero carbon energy through a range of technologies

Wiltshire Council Comment	**Applicant's Response**
No element of the Lime Down proposals lies within the Corsham Neighbourhood Plan area. Neither the solar park nor the associated underground grid connection passes through Corsham parish, and Corsham Neighbourhood Plan policies are therefore not engaged by the development.	The Cable Route Corridor passes through the Corsham Neighbourhood Plan area. The Scheme's compliance with the Corsham Neighbourhood Plan Policy CNP E2 is set out in Annex B: Local Policy Accordance Tables in the **Planning Statement [REP1-087]** (see from page 915).

Policy CNP E3

Development proposals should protect, conserve and where possible enhance the special qualities of the Cotswold AONB and the distinctive characteristics of the Landscape Setting of the Corsham Rolling Lowlands. Development should:

a. Maintain existing woodland cover and hedge trees wherever possible;

b. Restore field boundaries around settlements where there is gapping or degradation wherever possible;

c. Demonstrate how the proposal relates to Corsham in terms of landscape, setting and visual effects;

d. Create new woodland cover where necessary to mitigate the landscape or visual impact of new development; and

e. Protect existing Public Rights of Way and link in new routes to offer local people recreational opportunities in terms of countryside access routes and cycleways.

All proposed landscaping must be of an appropriate species mix and of local provenance.	
Wiltshire Council Comment	**Applicant's Response**
No element of the Lime Down proposals lies within the Corsham Neighbourhood Plan area. Neither the solar park nor the associated underground grid connection passes through Corsham parish, and Corsham Neighbourhood Plan policies are therefore not engaged by the development.	The Cable Route Corridor passes through the Corsham Neighbourhood Plan area. The Scheme's compliance with the Corsham Neighbourhood Plan Policy CNP E3 is set out in Annex B: Local Policy Accordance Tables in the **Planning Statement [REP1-087]** (see page 916).
Policy CNP E4 Development that results in the loss of green infrastructure identified on Figure 5 (on page 28) or that results in any harm to their character, setting, appearance, general quality or amenity value would only be permitted if, as a minimum, the community would gain equivalent benefit from the provision of suitable replacement green infrastructure.	
Wiltshire Council Comment	**Applicant's Response**
No element of the Lime Down proposals lies within the Corsham Neighbourhood Plan area. Neither the solar park nor the associated underground grid connection passes through Corsham parish, and Corsham Neighbourhood Plan policies are therefore not engaged by the development.	The Cable Route Corridor passes through the Corsham Neighbourhood Plan area. The Scheme's compliance with the Corsham Neighbourhood Plan Policy CNP E4 is set out in Annex B: Local Policy Accordance Tables in the **Planning Statement [REP1-087]** (see page 921).
Policy CNP HW1 Development proposals should seek to protect, improve and extend Corsham's green infrastructure network as identified on Figure 5 (on page 28) to support a healthy community. Innovative proposals that contribute to sustainable pedestrian/cyclist linkages between the town and its rural setting will be supported.	

Wiltshire Council Comment	Applicant's Response
No element of the Lime Down proposals lies within the Corsham Neighbourhood Plan area. Neither the solar park nor the associated underground grid connection passes through Corsham parish, and Corsham Neighbourhood Plan policies are therefore not engaged by the development.	The Cable Route Corridor passes through the Corsham Neighbourhood Plan area. The Scheme's compliance with the Corsham Neighbourhood Plan Policy CNP HW1 is set out in Annex B: Local Policy Accordance Tables in the **Planning Statement [REP1-087]** (see page 922).
Policy CNP HW3 Community green space (including formal and informal sports pitches) identified in Figure 5 (on page 28 and shown in more detail on Maps A1 to A4 in Appendix 2) will be safeguarded and enhanced through new development proposals. Developers must engage with Corsham Town Council at an early opportunity to discuss and potentially secure the long-term management of the open spaces in the public interest.	
Wiltshire Council Comment	**Applicant's Response**
No element of the Lime Down proposals lies within the Corsham Neighbourhood Plan area. Neither the solar park nor the associated underground grid connection passes through Corsham parish, and Corsham Neighbourhood Plan policies are therefore not engaged by the development.	The Cable Route Corridor passes through the Corsham Neighbourhood Plan area. The Scheme's compliance with the Corsham Neighbourhood Plan Policy CNP HW3 is set out in Annex B: Local Policy Accordance Tables in the **Planning Statement [REP1-087]** (see page 924).
Policy CNP HE1 All new development within the Corsham Neighbourhood Plan Area must demonstrate good quality design. This means responding to and integrating with local surroundings and landscape context as well as the existing built environment. Good design for Corsham means:	

a. Achieving high quality design that respects the scale, character and historic built fabric of existing and surrounding buildings;

b. Respecting established building plot arrangements, widths and architectural rhythm of the street scene including front gardens, railings, walls and hedges;

c. Establishing 'gateways' into the town (shown in Figure 10 on page 34) at:

   i. Cross Keys,

   ii. Pickwick,

   iii. Pound Pill,

   to reinforce the identity of the historic centre and enhance the visitor awareness and experience;

d. Using good quality materials that complement the existing historic vernacular of Corsham whilst respecting the individual context of each proposal; and

e. Taking into account the key views identified in Figures 12 and 13 and ensuring that any development within these views respects the key features of the views.

Planning permission will not be granted for development that undermines these core design principles and fails to improve the form and function of the Corsham Neighbourhood Plan Area.

Wiltshire Council Comment	**Applicant's Response**
No element of the Lime Down proposals lies within the Corsham Neighbourhood Plan area. Neither the solar park nor the associated underground grid connection passes through Corsham parish, and Corsham Neighbourhood Plan policies are therefore not engaged by the development.	The Cable Route Corridor passes through the Corsham Neighbourhood Plan area. The Scheme's compliance with the Corsham Neighbourhood Plan Policy CNP HE1 is set out in Annex B: Local Policy Accordance Tables in the **Planning Statement [REP1-087]** (see page 925).
Policy CNP T1	

Development proposals that generate a significant amount of traffic movement must be accompanied by evidence that sets out the transport issues relating to the development including the measures to be taken to deal with the anticipated transport impacts of the scheme. If the impact cannot be satisfactorily mitigated the proposal will be resisted.	
Wiltshire Council Comment	**Applicant's Response**
No element of the Lime Down proposals lies within the Corsham Neighbourhood Plan area. Neither the solar park nor the associated underground grid connection passes through Corsham parish, and Corsham Neighbourhood Plan policies are therefore not engaged by the development.	The Cable Route Corridor passes through the Corsham Neighbourhood Plan area. The Scheme's compliance with the Corsham Neighbourhood Plan Policy CNP T1 is set out in Annex B: Local Policy Accordance Tables in the **Planning Statement [REP1-087]** (see page 926).

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