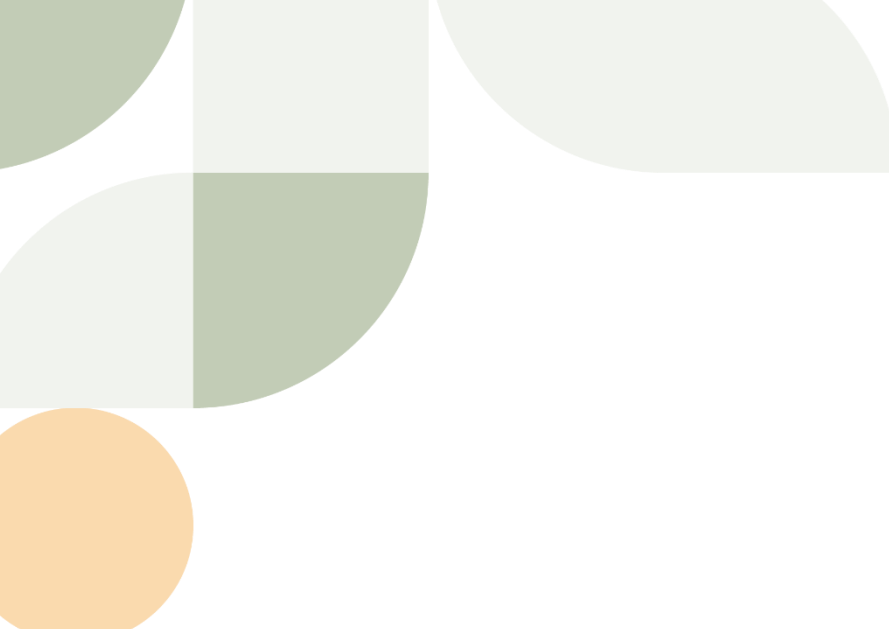




Lime Down

Solar Park

The Applicant's Response to Written Representations

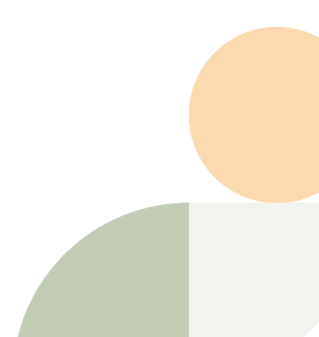
May 2026

Revision 1

Planning Inspectorate Reference: EN010168

Document Reference: EXAM/9.22

**The Infrastructure Planning (Examination Procedure) Rules 2010
Rules 8(1)(c)**



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1 Introduction

1.1 Purpose of the Document

- 3.1.1 This document provides Lime Down Solar Park Limited (the Applicant's) response to the Written Representations (WRs) submitted to the Planning Inspectorate (PINS) by 01 May 2026, relating to Examination Deadline 1 for the Development Consent Order (DCO) Application (the Application) for Lime Down Solar Park (the Scheme).
- 3.1.2 The Local Impact Report submitted by Wiltshire Council **[REP1-137]**, a host authority for the Scheme, has been responded to separately in the Applicant's Response to the Local Impact Report **[EN010168/EXAM/9.21]**. South Gloucestershire Council, also a host authority, did not submit a Local Impact Report at Deadline 1.
- 3.1.3 A total of 112 Written Representations and other documents were submitted at Deadline 1 by Interested Parties. These were published on the PINS website on 11 May 2026.
- 3.1.4 The Applicant has endeavoured to provide a response to all Written Representations, however due to the volume of information submitted at Deadline 1, and the reduced timescales in which to respond, where a detailed response is required to address specific points raised, and where indicated in this document, a Technical Note will be provided at Deadline 3.

1.2 Structure of the Report

- 3.1.5 This document provides a response from the Applicant to the matters raised in the Written Representations and is structured as follows:
- **Table 1-1** sets out the list of acronyms used for management documents that form part of the Applicant's submission and may have been referred to by the Applicant in responding to WRs.
 - **Table 1-2** lists the local authorities that have submitted WRs. These submissions are presented and responded to in full in **Section 2** of this document.
 - **Table 1-3** lists the statutory consultees, undertakers and notable parties that have submitted WRs and with whom the Applicant has undertaken a Statement of Common Ground. These submissions are presented and responded to in full in **Section 3** of this document.
 - **Table 1-4** lists the statutory consultees, undertakers and notable parties that have submitted WRs and are not presented in **Table 1-3**. These submissions are presented and responded to in full in **Section 4** of this document.
 - **Table 1-5** lists the town councils, parish councils, and parish meetings that have submitted WRs. These submissions are presented and responded to in full in **Section 5** of this document.

- **Table 1-6** lists the parties that have submitted WRs and are also listed within the **Book of Reference [REP1-011]**. These submissions are presented and responded to in full in **Section 6** of this document.
- **Table 1-7** lists the WRs received from members of the public and all remaining organisations and businesses. These submissions are presented and responded to in full in **Section 7** of this document.

3.1.6 References to the Application documentation are provided in accordance with the referencing system set out in the Planning Inspectorate's Lime Down Solar Park [Examination Library](#).

3.1.7 Revision suffixes have also been attached to any documents which, since submission, have been revised for and resubmitted at Deadline 1 to the Planning Inspectorate.

Table 1-1 List of Acronyms for Submission Documents

Acronym	Document
DCO	Development Consent Order
CR	Consultation Report (shorthand for appendices)
EIA	Environmental Impact Assessment
ES	Environmental Statement
BNG	Biodiversity Net Gain
FRADS	Flood Risk Assessment and Drainage Strategy
CEMP	Construction Environmental Management Plan
EPMP	Ecological Protection and Mitigation Plan
OEMP	Operational Environmental Management Plan
DS	Decommissioning Strategy
SRMP	Soil Resources Management Plan
SWMP	Site Waste Management Plan
PROWPPMP	Public Rights of Way and Permissive Paths Management Plan
LEMP	Landscape and Ecological Management Plan
SSCEP	Skills, Supply Chain and Employment Plan
BSMP	Battery Safety Management Plan
CTMP	Construction Traffic Management Plan
EqIA	Equality Impact Assessment
WRS	Water Resources Strategy

3.2 Tables of Parties submitting Written Representations

Table 1-2 List of Parties whose Written Representations are Responded to in Section 2

Examination Library Reference	Acronym	Book of Reference Plot Number	Written Representation Received from
REP1-138	WC	Party not referenced in the Land and Rights Negotiations Tracker.	Wiltshire Council

Table 1-3 List of Parties whose Written Representations are Responded to in Section 3

Examination Library Reference	Acronym	Book of Reference Plot Number	Written Representation Received from
REP1-154 REP1-155	NH	09-018, 09-019, 09-020, 09-021, 13-003, 13-005, 13-006, 13-008, 13-009, 13-012, 13-013, 13-014, 13-016, 20-001, 20-002, 20-003, 21-001, 21-002, 21-003, 21-004, 21-005,	National Highways Limited

Examination Library Reference	Acronym	Book of Reference Plot Number	Written Representation Received from
		21-006, 21-007	
REP1-151	EA	N/A	Environment Agency
REP1-160	CNL	N/A	Cotswolds National Landscape Board
REP1-156	NE	N/A	Natural England
REP1-167 REP1-168 REP1-169 REP1-170 REP1-171 REP1-172 REP1-173 REP1-174 REP1-175 REP1-176 REP1-177 REP1-178 REP1-179 REP1-180 REP1-181 REP1-182 REP1-183 REP1-184 REP1-185 REP1-186 REP1-187 REP1-188	SLD	N/A	Stop Lime Down
REP1-152	HE	N/A	Historic England
REP1-157	NR	03-014, 03-015, 03-016, 03-017, 03-018, 03-019, 03-020, 03-021, 03-022, 03-023, 03-024, 03-025,	Network Rail Infrastructure Ltd

Examination Library Reference	Acronym	Book of Referenc e Plot Number	Written Representation Received from
		03-026, 03-027, 03-028, 03-029, 03-030, 03-031, 03-032, 03-033, 03-034, 03-035, 03-036, 03-037, 03-038, 03-039, 03-040, 03-041, 03-042, 03-048, 03-049, 03-050, 03-051, 03-052, 03-056, 03-057, 03-058, 03-064, 03-066, 03-067, 03-068, 03-069, 03-070, 03-076, 03-078, 04-004, 04-010, 04-015, 04-016, 04-017, 04-018, 04-019, 04-029, 04-031, 04-032,	

Examination Library Reference	Acronym	Book of Reference Plot Number	Written Representation Received from
		04-035, 04-038, 05-037, 06-007, 06-009, 06-025, 06-026, 06-027, 06-029, 06-030, 06-031, 06-033, 14-004, 14-007a, 14-009, 14-010, 14-011, 14-012, 14-013, 14-014, 14-019, 14-020, 14-021, 14-022, 14-023, 14-031, 14-032, 14-033, 14-035, 14-040, 14-043, 14-044, 14-044a, 14-045, 14-045a, 16-014	
REP1-153	MOD	N/A	Ministry of Defence
AS-013	NGET	16-014, 16-016, 16-019, 16-017, 16-020	National Grid Electricity Transmission PLC

Table 1-4 List of Parties whose Written Representations are Responded to in Section 4

Examination Library Reference	Acronym	Book of Reference Plot Number	Written Representation Received from
REP1-165	NGT	01-039, 01-042, 01-044, 01-045, 01-046, 01-047, 01-048, 01-052, 01-053, 01-054, 01-055, 01-056, 02-002, 02-003, 02-005, 02-006, 02-010, 02-015, 02-016, 02-017, 02-018, 02-019, 02-020, 02-021, 02-022, 02-023, 03-001, 03-006, 03-014, 03-015, 03-016, 03-017, 03-018, 03-019, 03-020, 03-021, 03-022, 03-023, 03-024, 03-025,	Mills & Reeve LLP on Behalf of National Gas

Examination Library Reference	Acronym	Book of Reference Plot Number	Written Representation Received from
		03-026, 03-027, 03-028, 03-029, 03-030, 03-031, 03-032, 03-033, 03-034, 03-035, 03-036, 03-037, 03-038, 03-039, 03-040, 03-041, 03-042, 03-050, 03-067, 03-068, 03-078, 04-002, 04-003, 10-006, 10-007	
REP1A-021	GRUL	N/A	Grenergy Renewables UK Limited
REP1-158	BWEV	N/A	B&W Equine Vets
REP1-238	RS	N/A	Rosalind Savage MP
REP1-163	GSLD	N/A	Grittleton Sevington and Leigh Delamere Village Hall and Recreation Ground
REP1-189	CCS	N/A	The Courtyard Café – Sherston
REP1-200	JA	N/A	Cllr Jon Atkey
REP1-191	WPF	N/A	West Park Farm
REP1-159	CW	N/A	Chippenham Wheelers/British Cycling
REP1-164	KMT	N/A	KMT Farming and Consultancy on behalf of Mr and Mrs Eavis

Examination Library Reference	Acronym	Book of Reference Plot Number	Written Representation Received from
REP1-192	WMH	N/A	Whatley Manor
REP1-161	CFP	N/A	Craig Fuller Property S&A Ltd
REP1-166	SBFT	N/A	Sherston Boule Festival and Tournament Committee
REP1-162	FRN	N/A	Foxley Road Nurseries
REP1-190	RECA	N/A	The Renewable Energy Coalition for Academia Ltd

Table 1-5 List of Parties whose Written Representations are Responded to in Section 5

Examination Library Reference	Acronym	Book of Reference Plot Number	Written Representation Received from
REP1-148	SPC	N/A	Sherston Parish Council
REP1-150	YKPC	N/A	Yatton Keynall Parish Council
REP1-141	EGPM	N/A	Easton Grey Parish Meeting
REP1-140	CWPC	N/A	Chippenham Without Parish Council
REP1-145	KLPC	N/A	Kington Langley Parish Council
REP1-143	GPC	N/A	Grittleton Parish Council
REP1-146	LAPC	N/A	Luckington and Alderton Parish Council
REP1-149	SSQPC	N/A	Stanton St Quintin Parish Council
REP1-144	HPC	N/A	Hullavington Parish Council
REP1-139	BSPC	N/A	Biddestone and Slaughterford Parish Council
REP1-147	MWPC	N/A	Melksham Without Parish Council
REP1-142	GSPC	N/A	Great Somerford Parish Council

Examination Library Reference	Acronym	Book of Reference Plot Number	Written Representation Received from
REP1-136	MTC	N/A	Malmesbury Town Council
REP1-134 REP1-135	CTC	N/A	Corsham Town Council

Table 1-6 List of Parties whose Written Representations are Responded to in Section 6

Examination Library Reference	Acronym	Book of Reference Plot Number	Written Representation Received from
REP1-227	MGN	08-005, 08-006, 09-007, 09-008	Matthew Gerard Newman
REP1-241	SJH	10-006	Susan J Hunt
REP1-236	RCT	10-004, 10-005	Richard Charles Tanner
REP1-234	PD	06-017	Piers Dibben
REP1-235	RW	10-012, 10-013	Rachel White
REP1-198	AHA	04-014, 04-024, 04-028, 08-001, 08-002, 08-003, 08-004, 09-012, 09-013, 09-014, 09-015, 09-016	Ashton Hawker
REP1-193	AA	07-022	Adrian Andrews
REP1-223	MCH	04-037, 04-055,	(Mary) Christine Hamilton

Examination Library Reference	Acronym	Book of Reference Plot Number	Written Representation Received from
		04-056, 04-057, 04-058, 04-059, 04-060, 04-061, 05-001, 05-002, 05-003, 05-004, 05-005, 05-008, 05-009, 05-010, 05-011, 05-012, 05-013, 05-014, 05-015, 05-016, 05-017, 05-018, 05-019, 05-020, 05-023, 05-024, 05-025	
REP1-212	JC	08-005	James Cole
REP1-213	JA	07-022	Jane Andrews
REP1-233	PK	09-001	Paul Kirk

Table 1-7 List of Parties whose Written Representations are Responded to in Section 7

Examination Library Reference	Acronym	Written Representation Received from
REP1-231	PW	Patrick Williams

Examination Library Reference	Acronym	Written Representation Received from
REP1-202 REP1-203 REP1-204	DF	Dermot Farrington
REP1-214 REP1-215	JF	January Farrington
REP1-242	TC	Tony Coombes
REP1-243 REP1-244	VJC	Vivienne Jane Clarke
REP1-217	JJ	Jill Johnston
REP1-245	WH	Warren Hateley
REP1-240	SH	Stephen Harvey
REP1-239	SHD	Simon Henry Durrant
REP1-195	AH	Alicia Hawker
REP1-225	MLD	Mark Ledlie Hawkesworth
REP1-220	JL	Josie Lewis
REP1-232	PD	Paul Bird
REP1-208	GDPR- LDSF-086	GDPR -LDSF-086
REP1-221	JHT	Julie Heather Terrington
REP1-209	GDPR- LDSF-030	GDPR-LDSF-030
REP1-226	MVJ	Mark Vincent Judge
REP1-199	CDC	Christian de Coulon
REP1-218 REP1-219	JMB	Joan Marie Bassler
REP1-196	AP	Andrew Pivars
REP1-211	HM	Hannah Marwick
REP1-206	EB	Erica Boldy
REP1-201	CRW	Colin Richard Wootton
REP1-210	GP	Geoffrey Philipps
REP1-229 REP1-230	MB	Michaela Boldy

Examination Library Reference	Acronym	Written Representation Received from
REP1-222	KH	Karen Hallam
REP1-228	MLP	Michael Llewellyn Palmer
REP1-194	ALJ	Alex Lloyd-Jones
REP1-207	GDPR-LDSF-018	GDPR -LDSF-018
REP1-205	DQ	Don Queen
REP1-197	DAF	Dr Annemarie Farrington
REP1-224	MP	Maggie Pivars
REP1-237	RJ	Richard Jeffcoate

2 The Applicant's responses to host and neighbouring Local Authorities

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
Wiltshire Council REP1-138				
WC-001	Description and DCO Process	Executive Summary	Executive Summary 2.1. As a Unitary Authority, Wiltshire Council provides a single tier of local government functions. It is the Highways Authority for all roads and public rights of way, which are not trunk roads. It is also the responsible authority for the implementation of a broad range of Government Regulation related to public protection and is the Local Planning Authority (LPA) for the area. The Council has regulatory responsibility for managing impacts on Wiltshire's natural environment, heritage assets and landscape. As the Lead Local Flood Authority (LLFA), Wiltshire Council has a number of duties and powers to control and minimise flood risk. Furthermore, the Wiltshire Council Archaeology Service (WCAS) has a	The Applicant recognises the important role that Wiltshire Council have to play as the Host Authority of the Lime Down Scheme including through their duties as Highway Authority, LPA, LLFA and WCAS. The Applicant appreciates all of the engagement which has taken place with Wiltshire to date in their capacity of the aforementioned roles. It noted that Wiltshire Councils Written Representation should be read in conjunction with the Relevant Representation and Local Impact Report. The Applicant notes Wiltshire Council's view that the Scheme is in alignment with the National Policy Statements. It is hoped that through the course of Examination the Applicant will continue to engage and work with the Council in order to demonstrate that the impacts

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			statutory duty to advise the Local Planning Authority on the impact of development proposals on archaeological remains in the county. 2.2. Wiltshire Council is the primary Host Authority for the proposed Lime Down Solar Park development (Planning Inspectorate Reference: EN010168). 2.3. Wiltshire Council's Written Representation provides additional detail and information on the areas of concern, as identified in the council's Relevant Representation [RR-4934]. It should therefore be read in conjunction with the council's Relevant Representation and Local Impact Report, which will also be submitted into Examination at Deadline 1. 2.4. Wiltshire Council confirms that national energy policy clearly	of the Scheme have been properly assessed and mitigated.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			supports the delivery of renewable energy, including solar generation. However, the council emphasises that this support is not unconditional and must be balanced against environmental protection, sound planning principles, and demonstrable evidence that impacts have been properly assessed and mitigated.	
WC-002	Description and DCO Process	Executive Summary	2.5. With regards to landscape, visual and tranquillity considerations, Core Policy 51 of the Wiltshire Core Strategy requires development to protect and, where possible, enhance landscape character. Wiltshire Council concludes that the scheme is fundamentally not landscape-led. Instead, the Environmental Statement assesses the impacts of a predetermined site selection rather than demonstrating that landscape considerations informed the choice, scale, or configuration of development.	The Applicant notes the concerns raised but does not agree that the Scheme is not landscape led. The Applicant has undertaken an extensive and genuine consultation process with both the CNL Board and Officers from Wiltshire County Council (WCC) throughout the pre-application and Examination process to inform an iterative and landscape led approach to design resulting in a landscape scheme that is substantive and responds to Nature Recovery Strategies and guidelines within published Landscape Character documents. The Scheme has been iteratively refined in response to consultation feedback, including the

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			2.6. Two locations are used to illustrate these concerns in detail: the Fosse Way and the village of Norton. The proposal would introduce sporadic solar infrastructure on both sides of the Fosse Way for approximately five kilometres, including at points marking entry to and exit from the Cotswolds National Landscape. The council considers this would industrialise a historic, tranquil route valued for recreation, landscape character and its role as an approach to the National Landscape.	removal of panels from sensitive parcels such as those along the Fosse Way, additional viewpoint testing, expanded visualisations and refinement of mitigation proposals. The landscape and visual impact assessment has been undertaken with consideration of the appropriate and relevant guidance and robustly assesses both the landscape and visual effects of the Scheme independently to ensure both the impacts and effects on the fabric and character of the landscape are taken into account as well as views and visibility. ES Volume 1, Chapter 8 Landscape and Visual [APP-060] fully and transparently acknowledges adverse effects to both Landscape Character and Visual Amenity as a consequence of the Scheme whilst also identifying embedded mitigation and long-term 'legacy landscape' restoration measures. A detailed LVIA methodology that conforms to the landscape Institutes

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				Guidelines for Landscape and Visual Impact Assessment (GLVIA3) is included within ES Appendix 8.1 [APP-187], which has been progressed and agreed with the Local Planning Authorities. The LVIA recognises the statutory importance of the Cotswold National Landscape (CNL). A standalone Assessment on the Cotswold National Landscape (CNL) and its Special Qualities has been undertaken in ES Appendix 8-6 [APP-197]. The Fosse Way passes through the Scheme for approximately 5 km from Fosse Lodge to the south to Foxley Road to the north. Apart from a 1.8 km stretch of Byway to the north of Lime Down Site B, the Fosse Way is a surfaced local road with no pavements. Six field parcels within the Scheme adjoin the Fosse Way: Field B6 to the north and Fields C22, C23, C11, C12 and C14 to the south are proposed for solar infrastructure. As part of the iterative design process and in response to consultation, no

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				infrastructure is proposed along the byway section of the Fosse Way. The Scheme design has also ensured that solar infrastructure is not located to both sides of the Fosse Way (apart from a very small section adjacent to the railway line between field parcels C11 and C14). The LVIA in ES Volume 1, Chapter 8: Landscape and Visual [APP-060] recognises that there are Moderate Adverse effects (Significant) on the Fosse Way (receptor TR145) during Construction and Year 1 as set out in ES Volume 3, Appendix 8-3-2-2 Landscape and Visual Assessment Sheets (Significant) [APP-191]. The proposed mitigation measures as set out in the Outline Landscape and Ecological Mitigation Plan [REP1-029 to REP1-032] will reduce the effects of the Scheme to Moderate/Minor Adverse by Year 15. Responses relating to the village of Norton are provided below.
WC-003	Description and DCO Process	Executive Summary	2.7. Similarly, the village of Norton would be surrounded to the north, south and west by extensive solar	The visual effects of the Scheme on the village of Norton (Receptor RS008)) have been assessed in ES Volume 1,

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			arrays, cable corridors, and substantial battery energy storage infrastructure. The council considers that the scale and proximity of these elements would dominate the village's rural setting, fundamentally altering its landscape character and visual amenity.	Chapter 8: Landscape and Visual [APP-060]. These receptors are assessed in Appendix 8-3-1: Visual Assessment Sheets (Not carried through to the ES Assessment) [APP189]. No significant effects were recorded due to the distance to infrastructure from the receptors and the fact that the village is nestled within a valley. The LVIA in ES Volume 1, Chapter 8: Landscape and Visual [APP-060] recognises that there will be Moderate Adverse (Significant) effects on the character of the Landscape surrounding Norton during construction as a result of the Scheme and the change from agricultural land to a solar infrastructure.
WC-004	Description and DCO Process	Executive Summary	2.8. Across the scheme, the council raises concern about the need for excessively tall mitigating hedgerows to screen panels, creating "tunnelling" effects along roads and Public Rights of Way, and about the lack of information on soil stockpiling and restoration. Tranquillity,	The Applicant recognises that low hedgerows are characteristic of the landscape which allow open views in places. However, it is also recognised that not all hedgerows are managed low and the dispersed nature of the Sites and the characteristic rolling topography limits the visibility of the

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			identified as a special quality of the Cotswolds National Landscape, is considered inadequately assessed, with noise modelling failing to capture experiential and cumulative effects on residents and visitors within a high-sensitivity rural landscape.	scheme. Although existing and proposed new hedgerows are to be managed at 4.5m, on the edge of the CNL where fields are retained for positive enhancement, hedgerows would be retained at their current height to maintain views across the landscape to and from the CNL. The LVIA in ES Volume 1, Chapter 8: Landscape and Visual [APP-060] recognises that the CNL is of high sensitivity. The CNL has been assessed as an individual receptor and the effects of the Scheme on the CNL and its Special Qualities (including tranquillity) are set out in a standalone assessment in ES Volume 3: Appendix 8-6 [APP-197].
WC-005	Ecology and Biodiversity	Executive Summary	2.9. With regards to ecological, biodiversity and hedgerow considerations, Wiltshire Council's Written Representation raises concern with the treatment of hedgerows within the Draft Development Consent Order [APP-016]. Schedule 12 of the draft DCO effectively lists all hedgerows within	Article 40 of the draft DCO [REP1-007] provides general powers of hedgerow removal that are constrained by 40(4) via both Schedule 12 of the draft DCO and the Outline EPMS [REP1-106] . Schedule 12 identifies the extent within which the hedgerow removal powers can be exercised, noting that the specific locations of

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			the Order Limits as potentially removable, allowing significant flexibility at later stages. The council considers this approach inconsistent with the Rochdale Envelope principles, undermining clarity, assessment transparency, and confidence that impacts have been fully assessed. 2.10. Although other documents within the application quantify likely hedgerow losses, these figures are not reflected within Schedule 12, nor are minimum or maximum extents of removal specified. This creates uncertainty and weakens enforceability. The council recommends that hedgerow removal should be tightly defined and controlled within the DCO to avoid unassessed impacts emerging post-consent.	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 EPSM [REP1-106] sets out the total amount of hedgerow that can be removed for any particular activity within the extents identified in Schedule 12 at Sections 2.4 and 5.2 in line with the hedgerow removal assessed in Paragraphs 9.10.137 to 9.10.138 of ES Chapter 9: Ecology and Biodiversity [REP1-015]. Under Requirement 8 of the draft DCO, Wiltshire Council must approve the detailed EPSM (including that the proposed hedgerow removal is in substantial accordance with that proposed under the Outline EPSM [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

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				Environmental Statement. To assist Wiltshire Council and other parties, the Applicant has inserted a footnote beneath each table in Schedule 12 of the draft DCO [REP1-007] at Deadline 1 that explains the hedgerow removal powers with cross reference to Article 40.
WC-006	Ecology and Biodiversity	Executive Summary	2.11. Concerns also extend to the Habitats Regulations Assessment [APP-275] for the Bath and Bradford-on-Avon Bats Special Area of Conservation (SAC). The Council notes that baseline data are incomplete, with parts of the cable route corridor not having been subject to habitat survey and assumptions relied upon instead. Moreover, there has been no bat survey undertaken within the section of cable route corridor that coincides with the greater horseshoe bat consultation zone around the Box Mine component of the SAC. The council questions whether worst-case scenarios have genuinely been assessed, particularly in relation to	The Applicant notes this comment and has responded to the detailed comments on this matter below.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			cumulative hedgerow losses within the bat SAC consultation zone.	
WC-007	Ecology and Biodiversity	Executive Summary	2.12. Furthermore, Wiltshire Council raises specific concerns in relation to ground-nesting birds, particularly skylark and yellow wagtail. The council disputes the suggestion that foraging habitat beneath solar panels can meaningfully compensate for the loss of breeding habitat and reiterates that assessments should assume only poor-quality modified grassland beneath and between panels to remain precautionary.	The Applicant has responded to comments relating to ground nesting birds in detail in Table 2-1:RR-4934, Section WC-108, on Page 165-166 of the Applicant's Response to Relevant Representations [PDA-009], where it is explained that although grassland expected to establish within and beneath panels has been assumed to represent modified grassland in poor condition (which is a UKHab habitat type and predicted condition, rather than a comment on its quality for use by birds), this does not preclude it from providing valuable foraging habitat for grounds nesting birds including skylark and yellow wagtail. Such permanent grasslands are typically more productive per hectare as foraging habitat when compared to arable systems. The Applicant acknowledges that this does not fully compensate for the loss of breeding habitat, but as set out in Paragraphs 9.12.32 and 9.12.33 of

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				ES Volume 1, Chapter 9: Ecology and Biodiversity [REP1-015] , it is reiterated that this measure can be expected to mitigate impacts on the local skylark population through increasing the breeding success of skylarks nesting in the adjacent arable fields. It is the Applicant's view that a suitably precautionary approach to the assessment of ground nesting birds (including skylarks) has been taken
WC-008	Ecology and Biodiversity	Great Crested Newts	2.13. For Great Crested Newts, while presence has been confirmed within the Solar PV sites, the licensing and mitigation strategy remains unclear. The council advises that the Examining Authority should seek clarification on whether appropriate licensing will be secured and how legal compliance will be ensured in relation to the Solar PV sites.	The Applicant notes this comment and has responded to the detailed comment on this matter below.
WC-009	Ecology and Biodiversity	Biodiversity Net Gain	2.14. Although Biodiversity Net Gain is not yet mandatory for NSIPs, the Applicant has committed to achieving a minimum 10% gain. Wiltshire Council's review of the submitted BNG Metric [PDA-008]	The Applicant notes this comment and has responded to the detailed comment on this matter below.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			and BNG Assessment Report [APP-273] identifies multiple technical weaknesses: the absence of habitat reference numbers preventing verification, missing condition assessment data, the use of unusually large minimum mapping units, and inconsistencies in the treatment of irreplaceable habitats such as veteran trees. While some professional judgements appear reasonable, the council concludes that the evidence base is currently insufficiently robust or transparent.	
WC-010	Cultural Heritage	Listed buildings	2.18. In heritage terms, the council identifies potential harm to the setting of Grittleton House (Grade II*) arising from construction compounds and cable routes (additional to other impacts identified previously), noting that this impact has not yet been fully assessed. Additional site visits and analysis are being pursued.	See response to WC-083.
WC-011	Transport and Access	Road network	2.19. Furthermore, highways and transport impacts remain a substantial concern, particularly	Carriageway width or frequency of passing place opportunity to pass at least an HGV and a light vehicle: as

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			given the reliance on narrow rural roads during construction. The council considers damage to the local highway network highly likely and maintains that a formal agreement under Section 59 of the Highways Act or sufficient Protective Provisions should be secured to protect public assets.	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-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

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				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. 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;

Reference	Theme	Issue	Comments/Issue Raised	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; - Impact on hedgerow, trees and character; and - Low level of existing HGVs on the route to Lime Down A

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				(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

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				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 REP-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; - 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

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				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

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				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 REP-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;

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				• 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 REP-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

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				these surveys will be confirmed as part of the Final CTMP.
WC-012	Socio-Economics, Recreation and Tourism	Economic impact	2.20. The council also concludes that while county-wide economic effects may be limited, impacts on the local economy during construction and decommissioning would be significant.	The Applicant has aimed to provide a robust assessment of adverse economic impacts in ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]. Therein, the Applicant has assessed that there is a likely worst-case temporary loss of 50 FTE tourism industry jobs as a result of the Scheme's construction, and a worst-case long-term loss of 20 FTE agricultural jobs. This accounts for less than 0.7% of tourism-based employment within 5 km of the Scheme less than 0.29% of agricultural employment in Wiltshire (BRES, 2023 data). Additional mitigation measures have been secured through the Outline CTMP [REP1-112], Outline PROWPPMP [REP1-104] and the Outline SSCEP [REP1-108]. Together these seek to reduce these losses to tourism through mitigating traffic impacts, impact to PROWs, and

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				focusing on local recruitment, promoting local suppliers where practicable, and through providing retraining opportunities for workers in tourism-dependent industries. These measures are secured by the Requirements 15, 16, and 18 in Schedule 2 to the Draft DCO [REP1-007] .
WC-013	Climate Change and Energy Need	GHG Emissions	2.21. The council commissioned an independent review from the University of Exeter Centre for Energy and the Environment to examine the Applicant's Climate Change chapter of the Environmental Statement [APP-059], and specifically the assessment of greenhouse gas (GHG) emissions. The independent report concludes that the Applicant's assessment likely underestimates the scheme's embodied and lifecycle carbon emissions and relies on unrealistic assumptions about future grid decarbonisation. Wiltshire Council acknowledges that large-scale solar	The Applicant notes this comment and is planning to respond in a separate Technical Note submitted at Deadline 3.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			generation has a role in supporting long-term decarbonisation, which comes with a 'cost' of greenhouse gas emissions. However, even when using the figures submitted by the Applicant, the scheme appears to have a much longer carbon payback time than similar projects which is a cause for concern, and potentially for further assessment. Furthermore, uncertainty remains regarding the carbon consequences of hedgerow loss, soil disturbance and land conversion, due to insufficient detail in the proposals. 2.22. The report also concludes that the significance of emissions impacts has been assessed too narrowly, using a comparison with the whole UK carbon budget for the power sector. It may be that a broader assessment, including consideration of impacts at multiple scales, including local carbon budget, sector-specific emissions and national policy would result in a	

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			different conclusion of the scheme's negative and positive impacts.	
WC-014	Human Health	Executive Summary	2.23. Public health considerations focus on mental health, community cohesion and the cumulative stress effects associated with prolonged construction, environmental change and perceived loss of rural identity.	The Applicant notes this comment and has addressed the comments made by Wiltshire Council in detail below (at WC-096).
WC-015	Description and DCO Process	Executive Summary	2.24. Wiltshire Council's Written Representation also identifies proposed amendments to the draft DCO [APP-016] with regards to Requirements for Scheme Commencement, Phasing and commissioning, and Decommissioning and land restoration. The council's concerns have previously been identified within its Relevant Representation [RR-4934], however as a result of information portrayed by the Applicant at Issue Specific Hearing 1, additional refinement is considered necessary.	The Applicant has considered the amendments proposed by Wiltshire Council to the Requirements contained within Schedule 2 (Requirements) to the Draft DCO [REP1-007] . The Applicant has provided full responses to each proposed amendment in its responses to Wiltshire Council's Local Impact Report.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
WC-016	Description and DCO Process	Executive Summary	2.25. This Written Representation also identifies where further clarity is required with regards to land that the council owns or has an interest in. The Book of Reference [APP-020] and associated land plans should provide greater clarity as to the rights sought over each parcel of land, including their nature, extent and duration, and to ensure that only land which is demonstrably necessary and proportionate to the delivery of the proposed development is included within the Order land. Where the acquisition of rights over adopted highway land is proposed, the council considers that this should be limited to what is strictly required and, where appropriate, addressed through bespoke side agreements or protective provisions rather than through the compulsory acquisition powers of the DCO.	In respect of Wiltshire Council's concerns in relation to highway works, the Applicant is progressing Protective Provisions for the protection of Wiltshire Council in its capacity as local highway authority. Negotiations as to the form of Protective Provisions are ongoing and, once agreed, these will be contained within Schedule 15 (Protective Provisions) to the Draft DCO [REP1-007] . The Applicant anticipates that Protective Provisions will be agreed prior to the close of Examination.
WC-017	Description and DCO Process	Executive Summary	2.26. In conclusion, Wiltshire Council recognises the strategic importance of renewable energy generation but	Existing flooding in the wider catchment, including during Storm Bert, is acknowledged. That is

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			considers that the Lime Down Solar Park proposal is of a scale, configuration and location that would lead to substantial and inadequately mitigated harm. The council therefore does not support the scheme as submitted and considers that development consent should not be granted unless these issues can be and are comprehensively addressed through further evidence, scheme redesign and strengthened DCO Requirements.	not evidence that the Scheme would increase runoff or flood risk. The submitted assessment demonstrates that overland flow routes are retained, formal drainage areas are controlled, and the Scheme would not materially increase flood risk elsewhere.
WC-018	General Remarks	Introduction and Context	Executive Summary END Introduction and Context 3.1. This document is Wiltshire Council's Written Representation in respect of the examination of the Development Consent Order (DCO) application to the Secretary of State for Energy Security and Net Zero by Lime Down Solar Park Limited under section 37 to the Planning Act 2008 (Planning Inspectorate Reference: EN010168).	The Applicant notes this comment.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			3.2. As a Unitary Authority, Wiltshire Council provides a single tier of local government functions. It is the Highways Authority for all roads and public rights of way, which are not trunk roads. It is also the responsible authority for the implementation of a broad range of Government Regulation related to public protection and is the Local Planning Authority (LPA) for the area. The Council has regulatory responsibility for managing impacts on Wiltshire's natural environment, heritage assets and landscape. As the Lead Local Flood Authority (LLFA), Wiltshire Council has a number of duties and powers to control and minimise flood risk. Furthermore, the Wiltshire Council Archaeology Service (WCAS) has a statutory duty to advise the Local Planning Authority on the impact of development proposals on archaeological remains in the county.	

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			3.3. As the primary Host Authority for the scheme, the council submitted a Relevant Representation [RR-4934] which set out its key areas of concern in relation to the Lime Down Solar Park proposal, including where there were outstanding questions that require answers during this process, and where there is a requirement for additional mitigation and compensation to be forthcoming in order to address or seek to address the council's concerns. The council's Relevant Representation also identified some additional or strengthened Requirements that are considered to be necessary. 3.4. Given the comprehensive nature of the council's Relevant Representation, this Written Representation does not repeat aspects raised within the Relevant Representation, instead the council has used this submission to provide additional detail and information, where appropriate, on	

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			those identified areas of concern. This Written Representation supplements rather than replaces the council's Relevant Representation. 3.5. This response is without prejudice to any further representations the council will make throughout the examination process, and it should be read in conjunction with the council's Relevant Representation [RR-4934] and its Local Impact Report, which will also be submitted into Examination at Deadline 1.	
WC-019	Scheme Description and DCO Process	National and Local Policy Considerations	4. National and Local Policy Considerations 4.1. Wiltshire Council has set out the National and Local Policy Context within its Relevant Representation and Local Impact Report. 4.2. However, since the council's Relevant Representation	The Applicant acknowledges the current status of the Wiltshire Council Local Plan, which is reflected in the Planning Statement [REP1-087] submitted at Deadline 1. The Applicant has provided an assessment of the Scheme against the Wiltshire Council Core Strategy and the emerging Local Plan, which is set out at Annex B of the Planning

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			was submitted, on 27 February 2026, Wiltshire Council received a response from the Inspectors appointed by the Government to examine the Local Plan in relation to the proposed programme of work that had been submitted to them. 4.3. Having reviewed the council's proposed work programmes, the Inspectors set out two options for the council, to either (i) withdraw the Local Plan from examination or (ii) request that the Inspectors draft a final report (which would recommend non-adoption). Wiltshire Council are planning to take a report (recommending proceeding with one of these two options) to the scheduled Cabinet (6 May) and Council (19 May) meetings in May 2026. 4.4. The council remains firmly committed to ensuring that Wiltshire has a robust and up-to-date Local Plan in place as swiftly as possible, including its commitment to deliver a	Statement [REP1-087], given these are likely to be important and relevant to the Secretary of State's decision making under Section 104 of the Planning Act 2008.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			new Local Plan in line with Government expectations. 4.5. Following the elected member decision on how to proceed, the council will update the Examining Authority at the next available deadline opportunity.	
WC-020	Landscape and Visual	Landscape and Visual Considerations	5. Landscape and Visual Considerations 5.1. Core Policy 51 Landscape is a key policy of the Wiltshire Core Strategy (2015) and remains extant. It should be considered a material consideration in the DCO application decision-making process. The policy 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	The Applicant considers that the Scheme complies with Wiltshire Core Policies "CP51: Landscape" and "CP42(i): Standalone Renewable Energy Installations" and the reasoning is set out in further detail in Annex B – Local Policy Accordance Tables of the Planning Statement [REP1-087] (see pages 687 and 707 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

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			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 (most relevant bullet points only): i. The locally distinctive pattern and species composition of natural features such as trees, hedgerows, woodland, field boundaries, watercourses and waterbodies. ii. The locally distinctive character of settlements and their landscape	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 and agreed that Lime Down Sites A, B and C are within the setting of the Cotswolds National Landscape (CNL). The applicant considers the proposals to be in line with Cotswolds Conservation Board position statement on landscape-led development (April 2021). The Statement notes: "landscape led development is one in which development within the CNL and its setting is compatible with and, ideally, makes a positive contribution to the statutory purpose of AONB designation, which is to conserve and enhance the natural beauty of the area. A landscape-led approach, at this level, is promoted in Policy CC1 of the Cotswolds AONB Management Plan 2018-2023.²⁶"

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			settings. iv. Visually sensitive skylines, soils, geological and topographical features. 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.	The Scheme was refined through an iterative design process with extensive consultation with the CNL Board, to avoid and reduce effects on the CNL and its setting. Panels along the edge of the CNL have been avoided in fields C2, C3 and C4 where significant visual effects on receptors within the CNL were identified. Panels were also avoided within from fields C1, C6, C8, the western section of C9 and the majority of C10, with this land now proposed for ecological mitigation to protect the setting of the CNL. In addition, panels within fields A11 and A12 have been avoided and the land repurposed for ecological mitigation to protect the setting of the CNL towards Sherston. All land parcels adjacent to the CNL are proposed to deliver habitat enhancement, 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.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			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's Landscape Officer's emphasis) 5.2. Policy CP51 gives a useful outline of the requirements of the Environmental Statement (ES) Landscape and Visual Impact Assessment (LVIA) and those issues which will have to be addressed in that document. However, despite the Applicant's assertion throughout the ES, here is very little evidence that the setting of the Cotswolds National Landscape and the amenity of local residents, whilst being acknowledged, have been given due regard in the selection of the proposed development sites and the scale of the project as a whole.	Although there are no direct landscape 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 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.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			Thus, what has been provided by the Applicant is not landscape led and cannot be considered so, it is an assessment of a fait accompli in terms of the development sites selected. It is difficult to see how a project informed by a genuine 'landscape led' approach could reasonably conclude that development of the scale proposed was suitable to be introduced into an accepted high value landscape. Citing the South Downs National Park Adopted Design Guide 2022, the definition of a Landscape Led approach to design is: <i>"Design which is strongly informed by understanding the essential character of the site and its context (the landscape), creates development which speaks of its location, responds to local character and fits well into its environment. It needs to conserve and enhance the natural beauty, wildlife and cultural heritage of the area and create sustainable and successful places"</i>	

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			<i>for people."</i> Thus, a genuine landscape led scheme prioritises the existing natural, cultural and topographical features, using landscape character to guide design and location of development and infrastructure without disrupting or dominating the character of the receiving environment. 5.3. To illustrate the inherent failing of the project to be landscape led the Council has taken two examples: the Fosse Way route through the site and the landscape setting of the village of Norton, to demonstrate the shortcomings of the landscape and visual appraisal and mitigation measures considered in respect of the proposed development and how the development proposals, as far as they have been provided, pay no more than lip service to the character	

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			and visual amenity of the receiving landscape.	
WC-021	Landscape and Visual	The Fosse Way	The Fosse Way 5.4. The Fosse Way was a Roman Road linking Exeter with Lincoln and of approximately 370km in length. The section of the route through the Cotswolds is one of the most popular walking sections. Between west of Malmesbury and Bath, the route follows a linear north-east to south-west alignment. It is predominantly within the Cotswolds National Landscape (CNL), with a section between west of Foxley (north) and East Dunley (south), falling just outside the CNL boundary, but within the landscape setting of the National Landscape throughout. Across this area the route is defined by a mixture of minor roads and byways, running through an area of highly rural unspoilt countryside. It is extremely popular for recreation and an important wayfinding route to access and explore the CNL, but it is	As noted above, the Fosse Way passes through the Scheme for approximately 5km from Fosse Lodge to the south to Foxley Road to the north. Apart from a 1.8km stretch of Byway to the north of Lime Down Site B, the Fosse Way is a surfaced local road with no pavements. Six field parcels within the Scheme adjoin the Fosse Way: Field B6 to the north and Fields C22, C23, C11, C12 and C14 to the south are proposed for solar infrastructure. As part of the iterative design process and in response to consultation, no infrastructure is proposed along the by way section of the Fosse Way. The Scheme design has also ensured that solar infrastructure is not located to both sides of the Fosse Way (apart from a very small section adjacent to the railway line between field parcels C11 and C14). The LVIA in ES Volume 1, Chapter 8: Landscape and Visual [APP-060] recognises that there are Moderate Adverse effects (Significant)

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			not a dedicated trail. 5.5. The proposal is to undertake sporadic solar development on both sides of the Fosse Way for the 5km distance between East Dunley and Foxley. The CNL's designated boundary crosses the Fosse Way at each end of this 5km length and denote entrance approaches and exit points to / from the CNL. Thus, the distinctive rural landscape of high value and high sensitivity of this section of the Fosse Way route and the setting of the CNL will be industrialised for a period of 60+ years creating a potentially irreversible change to the character and visual amenity of the landscape. 5.6. Key issues which have not been adequately addressed:	on the Fosse Way (receptor TR145) during Construction and Year 1 as set out in Volume 3, Appendix 8-3-2-2 Landscape and Visual Assessment Sheets (Significant) [APP-191]. The proposed mitigation measures as set out in the Outline Landscape and Ecological Mitigation Plan [REP1-029 to REP1-032] will reduce the effects of the Scheme to Moderate/Minor Adverse by Year 15. Regarding Landscape Value and Sensitivity, the Applicant would like to take this opportunity to clarify the judgements made in the LVIA in ES Volume 1, Chapter 8: Landscape and Visual [APP-060] and defined in detail within ES Volume 3, Appendix 8-3-2-2 Landscape and Visual Assessment Sheets (Significant) [APP-191]. The CNL as a designated landscape is assessed as High Value and High Sensitivity. Lime Down Sites A, B and C within the 1 km and 2km Study Areas which are within the setting of the CNL are assessed a High to Medium Value and High to Medium Sensitivity. Sites D

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				and E within the 1km and 2km Study Areas are assessed as Medium Value and Medium Sensitivity.
WC-022	Landscape and Visual	The Fosse Way	Creation of 5 number major access points to construct Lime Down Solar Park areas A, B and C, taken off the Fosse Way as illustrated by 6.2 Environmental Statement Volume 2, Figure 13-11 Construction Access Locations: Solar PV Sites [APP-156], and use of 5 number access points taken off the Fosse Way for ongoing maintenance as illustrated by 6.2 Environmental Statement Volume 2, Figure 3-4-3.1 (Site C Sheet 1), Landscape and Ecology Mitigation Plan [APP-084], allowing uninterrupted views of solar development and infrastructure.	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 to the nearest highway link and identify the sensitivity of receptors based on the relationship with the highway environment in line with paragraph 1.31 IEMA transport and access guidelines. The relationship to the highway environment is determined on the following transport factors: •Severance of communities •Road vehicle driver and passenger delay •Non-motorised user delay •Non-motorised amenity

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				•Fear and intimidation on and by road users •Road user and pedestrian safety •Hazardous/large loads ES Volume 1, Chapter 13: Transport and Access [REP1-019] has set out and assessed the likely effects of the Scheme in relation to transport and access. Likely effects on the Fosse Way have been assessed for the construction, operation and decommissioning phases of the Scheme. The Scheme is not likely to result in any significant residual Transport and Access effects during the construction, operation and decommissioning phases. An Outline CTMP [REP1-112] and Outline PROWPPMP [REP1-104] have been prepared to manage construction vehicle movement during the construction phase and operation and maintenance phase. An Outline CTMP [REP1-112] supports the DCO Application and includes outline measures to minimise

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				transport and access impacts as far as practicable.
WC-023	Landscape and Visual	The Fosse Way	Increased traffic flows along the Fosse Way during construction, operation and decommissioning, resulting in a loss of tranquillity and additional visual intrusion.	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. Figure 4.1 in the Outline CTMP [REP1-112] illustrates the proposed HGV construction routes. In the assessment of transport impacts we assign a receptor to the nearest highway link and identify the sensitivity of receptors based on the relationship with the highway environment in line with paragraph 1.31 IEMA transport and access guidelines. The relationship to the highway environment is determined on the following transport factors: •Severance of communities •Road vehicle driver and passenger delay

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				•Non-motorised user delay •Non-motorised amenity •Fear and intimidation on and by road users •Road user and pedestrian safety •Hazardous/large loads ES Volume 1, Chapter 13: Transport and Access [REP1-019] has set out and assessed the likely effects of the Scheme in relation to transport and access. Likely effects on the Fosse Way have been assessed for the construction, operation and decommissioning phases of the Scheme. The Scheme is not likely to result in any significant residual Transport and Access effects during the construction, operation and decommissioning phases. An Outline CTMP [REP1-112] and Outline PROWPPMP [REP1-104] have been prepared to manage construction vehicle movement during the construction phase and operation and maintenance phase. An Outline CTMP [REP1-112] supports

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				the DCO Application and includes outline measures to minimise transport and access impacts as far as practicable. The Fosse Way passes through the Scheme for approximately 5km from Fosse Lodge to the south to Foxley Road to the north. Apart from a 1.8km stretch of Byway to the north of Lime Down Site B, the Fosse Way is a surfaced local road with no pavements. Six field parcels within the Scheme adjoin the Fosse Way: Field B6 to the north and Fields C22, C23, C11, C12 and C14 to the south are proposed for solar infrastructure. As part of the iterative design process and in response to consultation, no infrastructure is proposed along the by way section of the Fosse Way. The Scheme design has also ensured that solar infrastructure is not located to both sides of the Fosse Way (apart from a very small section adjacent to the railway line between field parcels C11 and C14). The LVIA in ES Volume 1, Chapter 8: Landscape and Visual

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				[APP-060] recognises that there are Moderate Adverse effects (Significant) on the Fosse Way (receptor TR145) during Construction and Year 1 as set out in Volume 3, Appendix 8-3-2-2 Landscape and Visual Assessment Sheets (Significant) [APP-191] . The proposed mitigation measures as set out in the Outline Landscape and Ecological Mitigation Plan [REP1-029 to REP1-032] will reduce the effects of the Scheme to Moderate/Minor Adverse by Year 15.
WC-024	Landscape and Visual	The Fosse Way	Lack of consideration of the relationship of the Fosse Way within the receiving landscape of high value and sensitivity comprising the setting of, and approaches to and from the CNL, resulting in the industrialisation of a key part of the most popular part of the Fosse Way Route for recreation and travel between different areas of the CNL.	The Fosse Way passes through the Scheme for approximately 5km from Fosse Lodge to the south to Foxley Road to the north. Apart from a 1.8km stretch of Byway to the north of Lime Down Site B, the Fosse Way is a surfaced local road with no pavements. Six field parcels within the Scheme adjoin the Fosse Way: Field B6 to the north and Fields C22, C23, C11, C12 and C14 to the south are proposed for solar infrastructure. As part of the iterative design process and in response to consultation, no

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				infrastructure is proposed along the by way section of the Fosse Way. The Scheme design has also ensured that solar infrastructure is not located to both sides of the Fosse Way (apart from a very small section adjacent to the railway line between field parcels C11 and C14). The LVIA in ES Volume 1, Chapter 8: Landscape and Visual [APP-060] recognises that there are Moderate Adverse effects (Significant) on the Fosse Way (receptor TR145) during Construction and Year 1 as set out in Volume 3, Appendix 8-3-2-2 Landscape and Visual Assessment Sheets (Significant) [APP-191] . The proposed mitigation measures as set out in the Outline Landscape and Ecological Mitigation Plan [REP1-029 to REP1-032] will reduce the effects of the Scheme to Moderate/Minor Adverse by Year 15.
WC-025	Landscape and Visual	The Fosse Way	Requirement to grow the relatively low existing field boundary hedges to at least 4.5m high to screen the solar panels, creating a tunnel-like effect along parts of the Fosse Way and	The Applicant recognises that low hedgerows are characteristic of the landscape which allow open views in places. However, it is also recognised that not all hedgerows are managed

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			screening the expansive rural views over the countryside towards the CNL.	low and the dispersed nature of the Sites and the characteristic rolling topography limits the visibility of the scheme. Although existing and proposed new hedgerows are to be managed at 4.5 m, on the edge of the CNL where fields are retained for positive enhancement, hedgerows would be retained at their current height to maintain views across the landscape to and from the CNL.
WC-026	Landscape and Visual	The Fosse Way	To the south-east of the Fosse Way panels located within Field C14 will be visible viewed over the low eastern roadside hedgerow (located outside DCO boundary limits) and over the railway cutting travelling south along the Fosse Way. These open views will remain for the life of development.	The LVIA in ES Volume 1, Chapter 8: Landscape and Visual [APP-060] recognises that there are Moderate Adverse effects (Significant) on the Fosse Way (receptor TR145) during Construction and Year 1 as set out in Volume 3, Appendix 8-3-2-2 Landscape and Visual Assessment Sheets (Significant) [APP-191] . The proposed mitigation measures as set out in the Outline Landscape and Ecological Mitigation Plan [REP1-029 to REP1-032] will reduce the effects of the Scheme to Moderate/Minor Adverse by Year 15. It is agreed that there will be open views

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				towards Field C14 for a short section of the Fosse when travelling south.
WC-027	Landscape and Visual	The Fosse Way	There are no indicative details as to where the vast quantities of topsoil and subsoil will be stored or distributed for later use in land restoration. This could be on areas reserved for landscape and / or ecological mitigation and embedded mitigation, or close to high value features such as the Fosse Way.	A detailed schedule of soil depths, textures and volumes to be excavated from each of the construction areas will be contained in the Detailed Soil Resources Management Plan (SRMP), which is secured by Requirement 17 of Schedule 2 of the Draft DCO [REP1-007] , along with proposed locations for storing different soil types (incompatible textures, and topsoil and subsoil). The locations and dimensions of soil stockpiles will be determined in collaboration with other topics, with the Outline CEMP [REP1-096] and the Outline LEMP [APP-283] also making early provisions for soil bunds and stockpiles.
WC-028	Landscape and Visual	The Fosse Way	5.7. As a result, Wiltshire Council recommends: • The removal of all proposed solar development from the area between the Fosse Way and the CNL boundary, thus maintaining the high value rural character of the	The Applicant notes this comment.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			landscape and the relationship between the unspoilt landscapes of the CNL and that through which the Fosse Way passes.	
WC-029	Landscape and Visual	The Fosse Way	To the south-east of the Fosse Way there should be no solar infrastructure development close to the route (e.g. one field depth as a minimum). This will reduce the screening height requirement for the hedging lining the route and avoid creation of long visual tunnelling effects, whilst maintaining existing field boundary patterns.	Panels to both sides of the Fosse Way have been avoided except for a very small section (95m) adjacent to the railway line between field parcels C11 and C14. Long visual tunnelling effects would require hedgerows to both sides.
WC-030	Transport and Access	The Fosse Way	An accurate plan of vehicular movements affecting the Fosse Way route through the duration of the project will be required.	Figure 4.1 in the Outline CTMP [REP1-112] illustrates the proposed HGV construction routes. This includes route along the Fosse Way. A 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]. This presents specific assessed quantities of material volumes and component type/numbers for each Solar PV Site. Notes are

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				included for clarity, with a breakdown of Trip Generation based on construction phasing also provided. The calculations show the proposed trip generations for each Solar PV site. The calculated daily and hourly flows for the proposed construction routes are based upon the proposed construction programme and are presented in Annex F of ES Volume ES Volume 3, Appendix 13-1: Transport Assessment [REP1-057 and REP1-059] .
WC-031	Landscape and Visual	The Fosse Way	Where long-term maintenance access is necessary from the Fosse Way, the planting of a secondary hedge inside the access points, although not ideal from a landscape character point of view, would restrict receptor views of the developed field parcels when passing the access points.	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 Indivisible Loads (AIL), totalling approximately 327 m in length.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				Sections of hedgerow to be permanently removed for new internal access tracks where no existing gap is present will typically be between 3.5 m to 6 m wide, with a maximum of 10 m of hedgerow to be removed in any one location for this element of the Scheme. Sections of hedgerow to be removed to provide access from the existing highway network, including for Abnormal Indivisible Loads (AIL) will require a maximum of 18 m of hedgerow loss at any one access point, although would typically be less than this at most access points. 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. A Hedgerow Removal Plan showing anticipated permanent hedgerow losses is provided at

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				Appendix A of the Outline EPSM [REP1-106]. With regard to the Fosse Way, there are 7 separate Access points required to provide access into the adjacent areas of LD Sites B and C. Of these only 4 access points provide access into fields with solar PV infrastructure: • Solar Access Point 202 into field B6; • Solar Access Point 3 into field C22; • Solar Access Point 19 into field C12; and • Solar Access Point 1 into field C11. All of the above access points are accessed from the Fosse Way where it is made up of tarmacked Public Highway, with most users therefore traveling by motor vehicles moving at speed. It is recognised that this section of the Fosse Way is used by other forms of road user such as

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				pedestrians, cyclists and horse riders etc. On decommissioning the land within the Scheme would be returned to landowners, and it is expected that the equivalent of today's countryside protection laws would be in place protecting the removal of hedgerows and trees associated with the landscape mitigation proposals. As such, at decommissioning, the proposal by WC to provide for a secondary hedgerow behind the existing would be at odds with the existing field pattern and not be in keeping with the landscape character of the area or align with the aims of the Nature Recovery Strategies or published Landscape Character documents. As such, given the small number of proposed Access Points that would actually result in views of the array through the gaps (4), the width of the gap and the distance between the farthest two Access Points (approx.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				3.6km), it is considered that the visual impact associated with these transient, glimpsed, oblique views (and temporary, all be it long term) through these gaps does not warrant the permanent impact to landscape character associated with the planting of a secondary hedgerow behind the existing.
WC-032	Ecology and Biodiversity Soils and Agriculture	The Fosse Way	The indicative locations, form/s and duration of topsoil and subsoil storage should be given more consideration by the Applicant at this stage to demonstrate to the ExA that embedded mitigation measures, Biodiversity Net Gain (BNG) commitments, and other mitigation and enhancement measures being proposed are feasible and can still take place; that the proposed storage of these materials for future restoration does not create further, as yet, unassessed adverse landscape or visual effects for high value sensitive features or receptors; and to demonstrate to the ExA that suitable	All of the excavated soil resource will be retained on-site and stored in stockpiles which will be subject to best practice management such as seeding and nutrient sampling, as referenced in the Outline Soil Resources Management Plan (SRMP) [APP-280]. Detailed records of each stockpile will be maintained, such that each resource can be easily identified come reinstatement. The Outline Decommissioning Strategy [REP1-100] further confirms at 2.1.5 that areas of hardstanding will be removed and the soil profiles reinstated using the stockpiled soils,

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			volumes of uncontaminated, healthy soils will be available for subsequent farmland restoration following decommissioning.	that would have been excavated from those areas during construction.
WC-033	Landscape and Visual	The Settlement of Norton	The Settlement of Norton 5.8. Norton is a small village and civil parish located just outside the CNL and approximately 1km to the south-east of the Fosse Way. It is located almost centrally within the DCO application area on gently undulating farmland with hedges and trees / woodland forming an important component of, for the most part, an intimate landscape. The village is served by minor roads and is also accessed by several rural footpaths. Rural countryside views are in evidence in all directions from the village, often filtered by trees. No industrial or major development is visible or perceived from the village or its environs. 5.9. The proposed development would involve the construction of two	The visual effects of the Scheme on the village of Norton (Receptor RS008)) has been assessed in ES Volume 1, Chapter 8: Landscape and Visual [APP-060]. These receptors are assessed in Appendix 8-3-1: Visual Assessment Sheets (Not carried through to the ES Assessment) [APP189]. No significant effects were recorded due to the distance to infrastructure from the receptors and the fact that the village is nestled within a valley. The LVIA in ES Volume 1, Chapter 8: Landscape and Visual [APP-060] recognises that there will be Moderate Adverse (Significant) effects on the character of the Landscape surrounding Norton during construction as a result of the Scheme and the change from agricultural land to a solar infrastructure.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			major areas of solar panels and infrastructure to both the north and south of the village, Lime Down Solar Park Sites B and D respectively as well as a particularly large swathe of the cable route corridor located to the southwest of the village which includes a major construction compound. The distance of the development areas from Norton means that solar development will effectively dominate the village to the north, south and west, with a substantial area to the south, in Site D, on slightly rising ground being devoted to the energy storage Battery Energy Storage System (BESS) and possibly a substation site area. These are very large industrial developments in their own right, which the council considers have not been adequately assessed against the receiving landscape character and the visual amenity of the area, in particular the landscape setting of Norton and potential intervisibility.	

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			5.10. Key issues which have not been adequately addressed:	
WC-034	Landscape and Visual	The Settlement of Norton	• The construction of large areas of solar panel development immediately to the north and south of the village (Lime Down Solar Park Sites B and D) leading to their dominance in the rural setting.	Please refer to response above.
WC-035	Landscape and Visual	The Settlement of Norton	• The dominance of solar panels associated with Site B across the fields to the east of the access road leading to the village from the north, Eastern Grey approach.	Please refer to response above.
WC-036	Landscape and Visual	The Settlement of Norton	• The proposed construction route across fields to the northwest of the village running parallel to the Fosse Way (Byway section) in combination with the wide swathe of cable route corridor to the west of the village impact approaches and setting of the village from the north and west.	Please refer to response above.
WC-037	Landscape and Visual	The Settlement of Norton	• Several hectares of land in Lime Down Solar Park Site D have been	Please refer to response above.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			earmarked for energy storage and potentially substation facilities, which are major industrial features of the scheme and potentially have the greatest landscape and visual impacts being located on gently rising, slightly higher ground.	
WC-038	Landscape and Visual	The Settlement of Norton	Requirement to grow the existing relatively low field boundary hedges to at least 4.5m to screen the solar panels removing open views.	The Applicant recognises that low hedgerows are characteristic of the landscape which allow open views in places. However, it is also recognised that not all hedgerows are managed low and the dispersed nature of the Sites and the characteristic rolling topography limits the visibility of the scheme. Although existing and proposed new hedgerows are to be managed at 4.5m, on the edge of the CNL where fields are retained for positive enhancement, hedgerows would be retained at their current height to maintain views across the landscape from the CNL.
WC-039	Socio-Economics, Recreation and Tourism	The Settlement of Norton	Every Public Right of Way (PRoW) and every public road approaching and exiting the village of Norton will be impacted to varying degrees by	The LVIA in in ES Volume 1, Chapter 8: Landscape and Visual [APP-060] recognises that there are Major / Moderate Adverse effects to users of

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
	Landscape and Visual		the development at all stages of the project.	Honey Lane (Receptor TR202) when leaving the village of Norton to the north east; Major / Moderate Adverse effects to users of the road leaving Norton to the north west towards Easton Grey (Receptor TR060); and Moderate Adverse effects to users of the road leaving the village to the southeast towards Hullavington (Receptor TR061). Minor Adverse effects were recorded for users of the road leaving the village to the south west. (Receptor TR057) as Site D is not visible and the effects relate to the Cable Route Corridor There are three Footpaths which provide access to the countryside from Norton. WT NORT 10 (Receptor TP116) heads south from the village into Lime Down Site D where users will experience Major/Moderate Adverse effects; Footpath WT NORT 1 (receptor TP037) heads north from the village into Lime Down Site B where users will experience Major/Moderate Adverse effects; Footpath WT NORT 5 (receptor TP109) heads west from the village to

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				connect with the Fosse Way and is part of the White Walls Way. Users of this footpath will experience Moderate/Minor Adverse Effects (non significant) effects as development along the Fosse Way. As part of the landscape led approach to the development Fields B3, B4 and B5 were removed from the PEIR layout following consultation as these field were highly visible from the Fosse Way and the White Walls Way. Both receptors were considered to have a high sensitivity to change. The assessment of impacts to tourism and recreation receptors in ES Volume 1 Chapter 16: Socio-Economics, Tourism and Recreation [APP-068] and its supporting ES Volume 3 Appendix 16-2 Tourism and Recreation Receptor Tables [APP-241] has assessed the impacts to each PROW on the approach to Norton, and finds no significant adverse effects to these routes at any phase of the Scheme, subject to implementation of mitigation measures. A significant adverse effect

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				to the Wiltshire Way cycle route during construction and decommissioning has been assessed, however this is predominantly likely to occur as a result of HGV traffic and direct views of the Scheme along the Fosse Way between Ladyswood and Grittleton. Traffic impacts are mitigated through the use of a haul route parallel to the Fosse Way to access Lime Down B for construction, rather than using the local highway network through Norton, and the use of traffic mitigation measures to reduce impacts on the Norton-Hullavington road. These measures seek to minimise impacts to residents and to visitors.
WC-040		The Settlement of Norton	There are no indicative details of where the vast quantities of topsoil and subsoil arising from the construction of the project and being relied upon for restoration will be stored or distributed. This could be on areas reserved for landscape / ecological mitigation and embedded	A detailed schedule of soil depths, textures and volumes to be excavated from each of the construction areas will be contained in the Detailed Soil Resources Management Plan (SRMP), which is secured by Requirement 17 of Schedule 2 of the Draft DCO [REP1-007], along with proposed locations for storing different soil types (incompatible

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			mitigation or close to high value sensitive features or receptors.	textures, and topsoil and subsoil). The locations and dimensions of soil stockpiles will be determined in collaboration with other topics, with the Outline CEMP [REP1-096] and the Outline LEMP [APP-283] also making early provisions for soil bunds and stockpiles.
WC-041	Landscape and Visual	The Settlement of Norton	5.11. As a result, Wiltshire Council recommends: • The sites proposed for the solar development immediately to the north and south of the village should be reconsidered in light of the potential dominance of solar panels in the village's landscape setting. Areas close to both the north and south of the village should be pulled back from the settlement edge to reduce their visual dominance and the landscaped boundaries increased to mitigate and reduce potential views.	The Applicant notes this comment.
WC-042	Landscape and Visual	The Settlement of Norton	• To the north of the village, the solar panels in Lime Down Solar Park Site B will dominate the village entrance,	The Applicant notes this comment. Please see response

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			where currently there are some of the most open views in the receiving landscape. The proximity of the panels close to the road and their orientation will result in significant, inadequately mitigated views, to an extent which will be dependent on their construction. Moving the panels away from the road and considerably increasing the landscape buffer will help to reduce the impact, although it will have to be accepted that currently available long views across the landscape will substantially change.	above regarding the effects on local roads and footpaths.
WC-043	Landscape and Visual	The Settlement of Norton	The effects of the BESS and substation on the landscape setting and visual amenity of Norton, and the lanes linking through to Hullavington (south) and Eastern Grey (north), need to be assessed and suitable landscape mitigation and enhancement measures introduced to protect rural identity and setting to the village.	The Applicant notes this comment. Please see response above regarding the effects on local roads and footpaths.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
WC-044	Landscape and Visual	The Settlement of Norton	At any site access points retained for future maintenance access of solar panel, BESS or substation areas, the planting of a secondary hedge inside the access, although not ideal from a character point of view, would restrict receptor views of the development when passing by the access points.	The Applicant notes this comment.
WC-045	Soils and Agriculture Landscape and Visual	The Settlement of Norton	The indicative locations, form/s and duration of topsoil and subsoil storage should be given more consideration by the Applicant at this stage to demonstrate to the ExA that embedded mitigation measures, BNG commitments, and other mitigation and enhancement measures being proposed are feasible and can still take place; that the proposed storage of these materials for future restoration does not create further, as yet, unassessed adverse landscape or visual effects for high value sensitive features or receptors; and to demonstrate to the ExA that suitable volumes of uncontaminated, healthy	All of the excavated soil resource will be retained on-site and stored in stockpiles which will be subject to best practice management such as seeding and nutrient sampling, as referenced in the Outline Soil Resources Management Plan (SRMP) [APP-280]. Detailed records of each stockpile will be maintained, such that each resource can be easily identified come reinstatement. The Outline Decommissioning Strategy [REP1-100] further confirms at 2.1.5 that areas of hardstanding will be removed and the soil profiles reinstated using the stockpiled soils,

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			soils will be available for subsequent farmland restoration following decommissioning.	that would have been excavated from those areas during construction.
WC-046	Soils and Agriculture	Soil Storage for Land Restoration	Soil Storage for Land Restoration 5.12. Concern is raised in relation to as yet unknown excavated waste soil volumes anticipated to arise from the construction of access tracks and ditches; foundations for solar tracker panels; BESS, conversion units and substation compounds and associated foundations. 5.13. The project is likely to generate huge amounts of excess / waste soils which will need to be stockpiled on site for 60+ years pending their eventual re-use within land restoration plans. The likely soil volumes involved will be vast, requiring creation of substantial soil stockpiling areas within each site area (Lime Down Solar Park Sites A to E). 5.14. The 7.15 Outline Soil	A detailed schedule of soil depths, textures and volumes to be excavated from each of the construction areas will be contained in the Detailed Soil Resources Management Plan (SRMP), which is secured by Requirement 17 of Schedule 2 of the Draft DCO [REP1-007], along with proposed locations for storing different soil types (incompatible textures, and topsoil and subsoil). The locations and dimensions of soil stockpiles will be determined in collaboration with other topics, with the Outline CEMP [REP1-096] and the Outline LEMP [APP-283] also making early provisions for soil bunds and stockpiles.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			Resources Management Plan [APP-280] simply defers all matters of how much soil, where the soil will be taken from, and where the soil will be stored / stockpiled etc. onto a DCO requirement (3.1 Draft Development Consent Order [APP-016]) for the preparation of a detailed Soil Resources Management Plan (Requirement 17), after the DCO is granted. 5.15. The DCO application does not attempt to illustrate where, or in what form, the stockpiling of soils might be accommodated on Lime Down Solar Park Sites A to E. The council believes the issue of soil stockpiling for later use in restoration, should be given more consideration by the Applicant at this stage to demonstrate to the ExA that soil stockpiles will not impact delivery of proposed embedded mitigation measures, impact BNG commitments, or other mitigation and enhancement measures; demonstrate that the proposed	

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			storage of soils for future restoration use is unlikely to result in further, as yet unassessed adverse landscape or visual effects for high value sensitive features or receptors; and demonstrate to the ExA that sufficient volumes of uncontaminated, healthy soils will be available for subsequent farmland restoration following the decommissioning.	
WC-047	Soils and Agriculture	Soil Storage for Land Restoration	5.16. As an example, to further illustrate this point, the likely resulting excavated soil volumes arising from just the construction of the access tracks leading to the BESS site in Lime Down Solar Park Site D west from the railway bridge (western BESS access) and east from Norton Road (eastern BESS access) based on the illustrative drawing showing a typical cross section through the 'Access track to the BESS Area' (6.3 Environmental Statement Volume 3, Appendix 3-3 Illustrative Drawings [APP-184]), the council estimates that the	The construction of access tracks is anticipated to require the stripping of topsoil only, which is typically to 250-350 mm depth, not 500 mm. A soil volume of 4,500 m ³ in a bund of 43 m x 43 m would only be 2.4m high. Best practice for topsoil storage requires that bunds are constructed to no greater height than 3m, therefore the footprint requirement would be smaller than the Council has estimated.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			construction of just these two tracks will result in a soil stock pile requirement somewhere in the region of 4,500m³ (without any bulking factor applied). This has been calculated based on the following assumptions: • Total average construction depth below existing ground levels of 500mm. • A track construction width of 6m (no widened bends). • A cross-sectional road construction area of 3m². • Ditches each side with estimated cross-sectional ditch cut area of 0.6m². (600mm deep x 500mm wide (bottom) 1,500mm wide (top) x 2). • Western access track length to BESS area of 330 Linear metres. • Eastern access track length to BESS area of 900 Linear metres. • Total access track lengths 1,230 Linear metres. • 3.6m³ of resulting excavated soils (no bulking factor included) generated per Linear metre of BESS	

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			access track and ditches constructed. 5.17. This single access track would result in a minimum stockpile area requirement of at least 43m x 43m (based on recommended, maximum soil storage heights of 3m).	
WC-048	Soils and Agriculture	Soil Storage for Land Restoration	5.18. When this is combined with the additional soils generated from the construction of all the internal access tracks, BESS and substation compounds and foundations, this soil stockpile requirement will significantly increase. It is not clear how the Applicant plans to sensitively design or locate these long-term stockpiles or intends to integrate or incorporate these within the Outline Landscape and Ecology Mitigation plans.	A detailed schedule of soil depths, textures and volumes to be excavated from each of the construction areas will be contained in the Detailed Soil Resources Management Plan (SRMP), which is secured by Requirement 17 of Schedule 2 of the Draft DCO [REP1-007], along with proposed locations for storing different soil types (incompatible textures, and topsoil and subsoil). The locations and dimensions of soil stockpiles will be determined in collaboration with other topics, with the Outline CEMP [REP1-096] and the Outline LEMP [APP-283] also making early provisions for soil bunds and stockpiles.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
WC-049	Noise and Vibration Landscape and Visual	Tranquillity Technical Note	5.19. The 9.2 Tranquillity Technical Note [PDA-010] for Lime Down Solar Park was provided by the Applicant at Procedural Deadline A on 9 March 2026. The document is, in effect, a synopsis of 6.1 Environmental Statement Volume 1, Chapter 14 Noise and Vibration [APP-066]. It does not contain any new information but has a focus on the potential effects on the tranquillity of the Cotswold National Landscape (CNL), having been produced in response to Relevant Representations. Much of the text is purely a transfer of text for various disciplines, which means that the text which is actually relevant to tranquillity (Noise and Vibration) is quite scant in places. It is of concern that the document is so focused that it has not included assessments of the effects on the setting of the CNL, let alone the wider receiving landscape. No further survey work has been undertaken, but this is possibly unsurprising considering that the actual site layout is yet to	Within the landscape remit, tranquillity has been fully assessed in a standalone Assessment on the Cotswold National Landscape (CNL) and its Special Qualities in ES Volume 3, Appendix 8-6 [APP-197] . Following consultation with the CNL Board, concern over traffic movements within the CNL were expressed and in response to this, the Applicant prepared the Technical Note on tranquillity. The Technical Note [PDA-010] was prepared to aid the CNL Board by providing 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 Environmental Statement (ES) for the Scheme.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			be established despite the Rochdale Envelope requiring the establishing of maximum and minimum parameters. 5.20. The 6.1 Environmental Statement Volume 1, Chapter 14 Noise and Vibration [APP-066] was scoped by the Planning Inspectorate and was the subject of an engagement with Wiltshire Council Environmental Health Department. Therefore, the scope and recommended parameters have been established outside the Landscape remit. This means that, although tranquillity is considered to be a considerable asset of landscape (Guidelines for Landscape and Visual Impact Assessment (LVIA) (3rd edition) glossary page 158) the survey work has been predicated on standard noise modelling methodology and acoustic modelling software (ISO 9613:2024) utilising the Lowest	

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			Observable Adverse Effect Level (LOAEL) and Significant Observable Adverse Effect Level (SOAEL) for construction and operational noise. However, in terms of the receiving landscape the sensitivity of the receptor, which in this case is 'High', is key when making what has to be a qualitative assessment of the effects of the noise from the development, throughout all its stages and duration, on the ambient or perceived tranquillity of the landscape as a whole and by residents and the visitors to the area. This is particularly pertinent as 'tranquillity' is identified to be a 'special quality' of the CNL and is relevant to its setting. 5.21. Although the majority of the calculated noise and vibration levels fall within the LOAEL and SOAEL acceptability levels, determining the much more subjective effects of increased noise levels on receptors across what is by its nature, a tranquil rural landscape, is a difficult	

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			process. The assessment required is to assess the effect of the industrial noise sources on the rural countryside environment whether or not they reach unacceptable decibel levels. These findings, which relate to the type of noise, even if difficult to quantify, should feed into the overall assessment of the effects of the development on the receiving landscape. 5.22. There is an acceptance by the Applicant of a level of increased noise during construction and decommissioning, although the duration of this could be several years in total, but during operation and maintenance, Chapter 14 Noise and Vibration [APP-066] states at 14.10.54 that: "the effects arising from the operation and maintenance of the Scheme are likely to be not significant during both daytime and night-time periods."	

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			5.23. The Tranquillity Technical Note [PDA-010] hasn't answered the fundamental questions relating to how the potential noise from the proposed development from construction to decommissioning is going to affect the landscape as a resource and the receptors (residents and visitors) within the receiving landscape area/s. It is unlikely that this can be ascertained with any degree of certainty until a fully detailed development scheme is submitted.	
WC-050	Ecology and Biodiversity	Draft Development Consent Order and Hedgerows	6. Ecology and Biodiversity Considerations Draft Development Consent Order and Hedgerows 6.1. As highlighted in Wiltshire Council's Relevant Representation [RR-4934], the 6.1 Environmental Statement Volume 1, Chapter 9 Ecology and Biodiversity [APP-061] does not	The Applicant notes this comment on the identification of hedgerows identified and mapped on the TPO and Hedgerow Plan [APP-011]. An explicit discussion on the extent to which 'Important Hedgerows' (as defined under the Hedgerow Regulations 1997) will be impacted by the Scheme was not included within the ecological assessment contained within ES Volume 1, Chapter 9

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			specifically identify or discuss important hedgerows as defined by the Hedgerow Regulations 1997. Nonetheless, the location and extent of hedgerows within the Order Limits that meet the qualifying criteria under the regulations have evidently been identified as an extensive list of important hedgerows is detailed in Part 2 of Schedule 12 of the 3.1 Draft Development Consent Order [APP-016] and substantive extents are illustrated on the 2.7 TPO and Hedgerow Plan [APP-011]. As such, it is expected that Chapter 9 of the ES should have likewise detailed these hedgerows and assessed the potential for effects on important hedgerows given the legal protection afforded to these important features.	Ecology and Biodiversity [REP1-015] . This is in part because the 'importance' or otherwise of hedgerows in the context of the Hedgerow Regulations 1997 is not solely based on their ecological value, but also on account of landscape and heritage considerations. The assessment of hedgerows within ES Volume 1, Chapter 9 Ecology and Biodiversity [REP1-015] was instead based on their intrinsic value to biodiversity (such as their value as wildlife corridors and shelter/foraging resources for a range of protected / notable species). This is in line with the evaluation of all other habitat types present within the Order Limits and in accordance with the methodology described for the evaluation of Ecological Importance in paragraphs 9.6.19 to 9.6.22 of ES Volume 1, Chapter 9 Ecology and Biodiversity [REP1-015] .
WC-051	Ecology and Biodiversity	Draft Development	6.2. Schedule 12, ('Hedgerows to be removed') Part 1 and 2 of the Draft DCO appears to have listed every	The Applicant notes these comments. Article 40 of the Draft DCO [REP1-007] provides general powers of

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
		Consent Order and Hedgerows	hedgerow within the Order Limits. This, presumably, is to allow the Applicant total flexibility in respect of the number and locations where hedgerow removal may be required, such as for site accesses (both internal and from adjacent highways), should the Secretary of State grant approval of the DCO application. The underpinning rationale and intended restrictions on hedgerow removal set out within other plans and documents submitted as part of the DCO application are noted. Moreover, the provisions of Article 40, paragraph (4) in Part 6: Miscellaneous and General of the Draft DCO [APP-016] are recognised, and are as follows: "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	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, which specifies "removal of part of..." the specified length of hedgerow. The Outline EPSM [REP1-106] sets out the total amount of hedgerow that can be removed for any particular activity within the extents identified in Schedule 12 at Sections 2.4 and 5.2 in line with the hedgerow removal assessed in Paragraphs 9.10.137 to 9.10.138 of Chapter 9: Ecology and Biodiversity [REP1-015]. Under Requirement 8 of the draft DCO, Wiltshire Council must approve the detailed EPSM (including that the proposed hedgerow removal is in substantial accordance with that

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			removed) to the extent set out in the landscape and ecological management plan approved pursuant to requirement 7 in Schedule 2(requirements)." 6.3. Although paragraph (4) of Article 40 requires hedgerow removal to be in accordance with that set out in the Landscape and Ecological Management Plan (LEMP), an outline version of which has been submitted with the DCO application [APP-283], the council's Ecology Officer remains concerned regarding the approach to Schedule 12. The Hedgerow Removal Plans include notes which specify that final decisions regarding hedgerow tree removal will be made during detailed site design and cable trench micro-siting. This may result in the Applicant opting to use the flexibility afforded by Schedule 12, leading to additional hedgerow and hedgerow tree removal taking place. It is also possible that refinements to the scheme design post DCO	proposed under the Outline EPSM [REP1-106]). These controls should provide reassurance 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 has inserted a footnote beneath each table in Schedule 12 of the draft DCO [REP1-007] at Deadline 1 that explains the hedgerow removal powers with cross reference to Article 40.

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			approval (if permission is granted) and prior to the commencement of construction, could result in additional hedgerow removal being detailed in the Final LEMP compared to the Outline LEMP. This, in turn, could give rise to objections from the council to the Final LEMP submitted at the discharge of DCO Requirements stage, and in practice it would be difficult for substantive issues with final documents and plans to be satisfactorily addressed and overcome at the discharge of DCO Requirements stage. Given that Wiltshire Council is not the ultimate determining authority for this proposal, it is possible that in real terms, the council would have limited ability to affect material alterations to the Final LEMP, even if it differs from the Outline LEMP in respect of hedgerow removal, and even if the associated DCO Requirement necessitates that the Final LEMP is broadly in line with the Outline LEMP. This could lead to an impasse where the council is not satisfied that	

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			the DCO Requirement can be discharged. 6.4. The council's Ecology Officer queries why paragraph (4) of Article 40 [APP-016] refers to only the LEMP and not also to the 7.19 Outline EPSM (EPMS) [APP-284] and the Hedgerow Removal Plan(s) embedded within the EPMS and / or 6.2 Environmental Statement Volume 2, Figure 3-4-1 to 3-4-5.2 Landscape and Ecology Mitigation Plan [APP-084] and 6.3 Appendix 9-8 Schedule of Protective Ecological Buffers [APP-205]. It is deemed that citing other pertinent documents and plans in Article 40, paragraph (4) would serve to ensure that approved hedgerow removal is suitably prescriptive and that there is consistency across the documents and plans for the avoidance of doubt. 6.5. The concerns that Wiltshire Council's Ecology Officer maintains	

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			regarding Schedule 12 [APP-016] and that the extensive and apparently all- encompassing lists in Part 1 and 2 haven't been refined or reduced as the scheme design has progressed, are compounded by a number of interrelated and underpinning issues which are discussed in the subsequent paragraphs. These issues serve to undermine assurance that Article 40, paragraph (4) of the Draft DCO will be fully effective in securing minimal hedgerow removal, even if detailed in the Final LEMP.	
WC-052	Ecology and Biodiversity	Draft Development Consent Order and Hedgerows	6.6. It is noted that a Hedgerow Removal Plan(s) is included at Annex A within the 7.19 Outline EPSM (EPMS) [APP-284]. It is somewhat obstructive that these important plans, which in effect comprise a part of the design and works package, were not submitted as a stand-alone set of plans in the DCO application to aid easy identification of their existence, rather than being embedded within	The Applicant notes these comments. Any required hedgerow removal is expected to occur during the Construction Phase of the Scheme. The Outline EPMS [REP1-106] is concerned with protection of retained habitats and wildlife during the Construction Phase. This includes measures designed to ensure no inadvertent hedgerow removal occurs beyond that strictly required to facilitate construction

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			the Outline EPMS. Furthermore, it is considered that the Outline EPMS doesn't actually constitute an appropriate document for the Hedgerow Removal Plans to be embedded within, given that the focus of the EPMS pertains to ecological protection and mitigation rather than to details of vegetation removal and site works. 6.7. In addition, paragraph 1.1.8 of the Outline EPMS [APP-284] states: "A Hedgerow Removal Plan is provided within an Annex A at the end of this document. This plan provides the location and extent of all anticipated permanent and temporary hedgerow removal required as part of the Scheme." Contrary to what is stipulated in the Outline EPMS, the Hedgerow Removal Plan(s) does not, in fact, delineate or quantify the extent of hedgerow removal proposed either on the plan itself or in the associated key, and instead only illustrates the proposed	work, and stipulation of maximum hedgerow widths of hedgerow sections to be removed for certain construction activities. It also outlines measures for reinstatement or replanting of hedgerows required to be temporarily removed for cable installation works. It is the Applicant's view therefore that the EPMS is an appropriate document for the Hedgerow Removal Plan to be embedded within. 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, which specifies "removal of part of..." the specified length of hedgerow.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			locations. 6.8. Furthermore, Parts 1 and 2 of Schedule 12 of the Draft DCO [APP-016] do not provide the projected lengths of hedgerow that would be removed at each location (where removal proves necessary). A guideline minimum and / or maximum extent of hedgerow that would likely require removal at each location is not even provided. Instead, every description in column (2) (titled Extent of removal) of the tables contained within Part 1 and Part 2 of Schedule 12 allows complete flexibility by stating that there would be removal of 'part of the hedgerow that is listed in column (1). For example, in Schedule 12, Part 2 relating to hedgerow ID SH238, the description in column (2) merely states: "Removal of part of approximately 564m of hedgerow within the area identified by an orange line on sheet 1 of the hedgerows plan." As the term 'part of' is not defined or quantified in	The Outline EPSM [REP1-106] sets out the total amount of hedgerow that can be removed for any particular activity within the extents identified in Schedule 12 at Sections 2.4 and 5.2 in line with the hedgerow removal assessed in Paragraphs 9.10.137 to 9.10.138 of Chapter 9: Ecology and Biodiversity [REP1-106]. Under Requirement 8 of the draft DCO, Wiltshire Council must approve the detailed EPSM (including that the proposed hedgerow removal is in substantial accordance with that proposed under the Outline EPSM [REP1-106]). These controls should provide reassurance 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 has inserted a footnote beneath each table in Schedule 12 of the draft DCO [REP1-

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			Article 40, in effect there is no restriction placed on what that could comprise. 6.9. The reference to 'the hedgerows plan' within the above extract and throughout column (2) of Part 1 and 2 of Schedule 12 is referring to the TPO and Hedgerow Plan [APP-011] rather than the Hedgerow Removal Plan(s) embedded within the Outline EPMS [APP-284]. Whilst there is logic in citing the TPO and Hedgerow Plan because it illustrates the location and extent of all the hedgerows within the Order Limits and so corresponds to Schedule 12 in terms of the hedgerow ID numbers, it does not illustrate or specify the extent of potential hedgerow removal within each of the hedgerows. Similarly, the Hedgerow Removal Plans show the approximate location of permanent and temporary hedgerow removal within the Solar PV Sites and temporary removal within the Cable Route Corridor (CRC) but also do	100] at Deadline 1 that explains the hedgerow removal powers with cross reference to Article 40.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			not specify the extent of removal proposed at each discrete location. 6.10. Therefore, although strictly speaking, the tables in Schedule 12, Part 1 and 2 stipulate that parts of each of the hedgerows listed will be removed and cross references to the 'hedgerows plan', the reader finds that neither the TPO and Hedgerow Plan in Schedule 12, or the Hedgerows Removal Plan(s) within the Outline EPMS, quantifies hedgerow removal and nor does Schedule 12 itself. 6.11. Given that the scope of Schedule 12 has not been refined or reduced as the scheme design progressed in the run up to the DCO submission, and appears to include all hedgerows within the Order Limits thereby allowing total flexibility, the council's Ecology Officer considers that at the very least, minimum and maximum extents of hedgerow removal could have been detailed in Schedule 12 and the Hedgerow	

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			Removal Plan(s), particularly as this information and level of detail is known to the Applicant and is provided elsewhere within the DCO application, as discussed below. The omission of any detail regarding extent of hedgerow removal within Schedule 12 and the Hedgerow Removal Plan(s), together with the failure to cite the latter plan within Schedule 12 or to cross reference to other DCO application documents that do specify the intended hedgerow removal extent, further undermines the council's confidence in the approach to Schedule 12. There appears no sound reason to omit details regarding the extent of potential hedgerow removal from either Schedule 12 or the Hedgerow Removal Plan(s) aside from to allow complete flexibility, and to weaken the provisions in paragraph (4) of Article 40 in the Draft DCO [APP-016].	
WC-053	Ecology and Biodiversity	Draft Development	6.12. As aforementioned, other documents submitted as part of the	Article 40 of the draft DCO [REP1-007] provides general powers of

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
		Consent Order and Hedgerows	DCO application do provide detail regarding proposed hedgerow removal, such as in 7.4 Design Principles and Parameters [APP-269] which states: "The maximum width of Solar PV access tracks will be 3.5 m. The maximum width of Solar PV access tracks at passing places will be 6 m." This has been transposed into Chapter 9 of the ES [APP-061] which specifies in paragraph 9.9.7: "Access for construction (at both the Solar PV Sites and the Cable Route Corridor) and operational maintenance has been specifically designed to utilise existing field entrances and gaps in hedgerows and other linear habitats wherever possible. This has been completed through collaboration between several technical disciplines, and through scrutinising OS, topographical and aerial imagery. Through this exercise, the need for new gaps in hedgerows or new ditch crossings has been minimised as far as	hedgerow removal that are constrained by 40(4) by both Schedule 12 and the Outline EPSM [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 EPSM [REP1-106] sets out the total amount of hedgerow that can be removed for any particular activity within the extents identified in Schedule 12 at Sections 2.4 and 5.2 in line with the hedgerow removal assessed in Paragraphs 9.10.137 to 9.10.138 of Chapter 9: Ecology and Biodiversity [REP1-015]. Under Requirement 8 of the draft DCO, Wiltshire Council must approve the detailed EPSM (including that the proposed hedgerow removal is in substantial accordance with that

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			possible. Internal access/maintenance tracks have also been routed so as to avoid designated ecological buffer zones wherever possible. New permanent gaps through hedgerows into fields are understood to measure approximately 3.5-6 m in width, in keeping with typical agricultural accesses (as set out within Chapter 3: The Scheme [EN010168/APP/6.1]) and the ecological mitigation measures determined to be necessary for the opening of gaps are set out within the Outline EPSM (Outline EPMS)[EN010168/APP/7.19]." 6.13. In addition, paragraph 1.8.2 of the 7.8 Biodiversity Net Gain (BNG) Assessment Report [APP-273] specifies that where permanent internal access tracks need to cross existing hedgerows, hedgerow losses will be between 3.5-6m in width at each crossing point. It also states that where new access points from the adjacent highway	proposed under the Outline EPSM [REP1-106]). These controls should provide reassurance 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 has inserted a footnote beneath each table in Schedule 12 of the draft DCO [REP1-007] at Deadline 1 that explains the hedgerow removal powers with cross reference to Article 40.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			are required, or where the widening of an existing access from the highways is required, hedgerow removal of up to 18m would be required to allow for abnormal loads. 6.14. The BNG Assessment Report [APP-273] goes on to quantify the approximate total hedgerow removal for the Order Limits. In relation to the Solar PV Sites, paragraph 1.8.4 stipulates: "In total, approximately 343 m of existing hedgerow is anticipated to be lost across the Solar PV Sites. All remaining hedgerows within the Solar PV Sites will either be retained or enhanced." In terms of the CRC (excluding Works No. 9), paragraph 1.8.5 states: "In total, approximately 1.406 km of existing hedgerow is anticipated to be lost throughout the Cable Route Corridor, as shown on the Hedgerow Removal Plan provided in Annex A of DCO Volume 7, Outline EPSM [EN010168/APP/7.19]"	

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			. All remaining hedgerows within the Cable Route Corridor will be retained." Paragraph 1.8.11 also specifies: "A small quantum (54 m) of hedgerow losses will not be reinstated, to allow for permanent access gaps for maintenance during operation." 6.15. As discussed earlier, and contrary to the suggestion in paragraph 1.8.5 of the BNG Assessment Report [APP-273], the Hedgerow Removal Plan does not actually stipulate the lengths of hedgerow removal as the plans are not annotated or marked up accordingly, and the associated description in the key does not indicate the extents of hedgerow removal shown on the plans. That aside, given the greater level of detail regarding proposed hedgerow removal provided within the BNG Assessment Report [APP-273], ES Chapter 9 [APP- 061] and the 7.4 Design Principles and Parameters [APP-269], it is considered that this	

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			should have been transposed to Schedule 12 and that the level of flexibility currently afforded by the scope of Schedule 12, should not be required. 6.16. It is therefore deemed inappropriate for the Draft DCO [APP-016] to be approved in its current form, even if this all-encompassing approach has been used elsewhere, and that the approach adopted in the preparation of Schedule 12 constitutes a misuse of the 'Rochdale Envelope' approach. Government Guidance in the form of NSIPs – Advice Note Nine: Rochdale Envelope (Republished July 2018 (version 3)), sets out criteria that Applicants opting to apply the 'Rochdale Envelope' approach should meet. It is considered that the DCO application has not wholly fulfilled and complied with the criteria or demonstrated a sound rationale for the approach taken to the Draft DCO contents, for the reasons already discussed. Advice Note	

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			Nine: specifies: "If flexibility is sought then it is essential that Applicants ensure the following is achieved: • that the approach is explained clearly for the purpose of consultation and publicity at the Pre-application stage; • that the Environmental Statement (ES) explains fully how the flexibility sought (sic) has been taken into account in the assessments and why it is required; and • that there is consistency across the application documents including any other relevant environmental assessments (e.g Habitats Regulations Assessment (HRA) or Water Framework Directive (WFD) assessment)."	
WC-054	Ecology and Biodiversity	Draft Development Consent Order and Hedgerows	6.17. Although Schedule 12 [APP-016] effectively sets out the worst-case scenario in line with the principles required when adopting the 'Rochdale Envelope' approach, this has not wholly informed or been	The Applicant notes the comments on how hedgerow loss calculations have been facilitated. The Applicant notes the discrepancy highlighted between the total hedgerow

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			assessed within Chapter 9 of the ES [APP-061], the 7.10 Habitats Regulations Assessment Report (HRA) [APP-275] or the recently submitted Statutory Biodiversity Net Gain (BNG) Metric [PDA-008] and the accompanying BNG Assessment Report [APP-273]. This is because the assessments detailed within these documents and the information input into the Statutory BNG Metric have been based on the locations shown on the Hedgerow Removal Plans and the parameters discussed above; namely that where permanent internal access tracks need to cross existing hedgerows, hedgerow losses will be between 3.5-6m in width at each crossing point and that where the widening of an existing access from the highways is required, hedgerow removal of up to 18m would be required. This has facilitated the hedgerow loss calculations provided in paragraphs 1.8.4 and 1.8.5 of the BNG Assessment Report [APP-273] and which have been used to inform	removal described in ES Volume 1, Chapter 9: Ecology and Biodiversity [REP1-015] and what is presented in paragraphs 1.8.4 and 1.8.5 of the Biodiversity Net Gain (BNG) Assessment Report [REP1-089] . This discrepancy is due to the fact calculations presented in the BNG Assessment Report [REP1-089] for the Solar PV Sites have also taken into account areas of the Cable Route Corridor which are included in Works No. 9 (as shown in the Works Plan [REP1-005]) where permanent (at least for the lifespan of the Scheme) habitat creation and enhancement measures are proposed, including in Fields C24 and C25 as shown on ES Volume 2, Figure 3-4-3.2: Landscape and Ecological Management Plan [REP1-030] . The area of the Cable Route Corridor covered by Works No. 9 is excluded from the calculations presented for the Cable Route Corridor in the BNG Assessment Report [REP1-089] . This is slightly different to the approach taken in ES Chapter 9 [REP1-015] , where the

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			assessment conclusions in Chapter 9 of the ES [APP-061]. As an aside, it is noted that Chapter 9 indicates that total hedgerow removal across the Solar PV Sites will be 327m and 1.43km within the CRC which is inconsistent with paragraphs 1.8.4 and 1.8.5 respectively of the BNG Assessment Report. Clearly there should be consistency of information across the DCO documents and plans. The assessments and BNG Metric have also assumed the implementation of avoidance and mitigation measures as set out in Chapter 9, ES Volume 2, Figure 3-4-1 to 3-4-5.2 Landscape and Ecology Mitigation Plans [APP-084], the Outline EPSM (EPMS) [APP-284], and 6.3 Appendix 9-8 Schedule of Protective Ecological Buffers [APP-205]. 6.18. It is therefore the case that despite Chapter 9 of the ES specifying that it has been based on a 'reasonable worst case scenario', it is unclear what the assessed	areas covered by the Solar PV Sites and Cable Route Corridor are described exclusively with no cross over between the two, and thus there is a small difference in calculations present between ES Chapter 9 [REP1-015] and the BNG Assessment Report [REP1-089]. In determining the 'reasonable worst-case scenario' for the purposes of the assessment presented in ES Chapter 9 [REP1-015], the assessment of impacts on hedgerows has been undertaken using precautionary worst-case assumptions. For example, a reasonable estimate of calculated permanent and temporary hedgerow removal requirements are set out in ES Chapter 9 [REP1-015] (e.g. paragraphs 9.10.137 and 9.10.138) and illustrated within the 'Hedgerow Removal Plan' within the Outline EPSM [REP1-106]. The Applicant acknowledges the final extent of permanent and temporary hedgerow removal cannot

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			reasonable worst case scenario actually comprises seeing as the content of Schedule 12 of the Draft DCO hasn't been assessed, how it has been derived, what plans representing the reasonable worst case scenario Chapter 9 and other ecological submissions have been based on, and how it relates to Schedule 12 to ensure that the worst case scenario has in fact been subject to assessment. Also, it is not evident how 'reasonable worst case' has been qualified or defined. As such, considerable uncertainty remains in this regard.	be determined until the detailed design stage. The estimates provided are nevertheless considered a reasonable precautionary scenario. Any subsequent design refinement will be required to remain within the assessed parameters and will be controlled through the DCO Requirements, including the Outline EPMS [REP1-106], which provide further assurance that ecological mitigation and enhancement will be secured. These prescribe certain parameters that constrain post-consent design (for example, maximum width of hedgerow breaches) and will ensure no greater ecological effects could arise than those reported.
WC-055	Ecology and Biodiversity	Habitats Regulations Assessment (HRA)	6.19. In the interests of avoiding repetition, the council's Ecology Officer advises that the above comments pertaining to the Draft DCO [APP-016] and concerns regarding hedgerow removal are also relevant to, and for consideration by, the ExA in relation	The Applicant notes these comments. With regards to outstanding habitat surveys within the Cable Route Corridor, the Applicant has responded to comments relating to these in detail in Table 2-1: RR-4934, Section WC-090, on Page 144-145 of the Applicant's Response to

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			to the necessary preparation of a Report on the Implications for European Sites (RIES) to be undertaken by the ExA for the purposes of enabling the Secretary of State, as competent authority, to undertake its HRA. 6.20. The comments provided by the council herein in relation to the HRA Report [APP-275] are intended to supplement those provided in the council's Relevant Representation [RR-4934]. 6.21. The HRA Report submitted by the Applicant includes a screening assessment and appropriate assessment in respect of the Bath and Bradford-on-Avon Bats Special Area of Conservation (SAC). 6.22. The ExA is requested to take into account that the version of the HRA [APP- 275] submitted to PINS alongside the DCO application, hasn't been informed by full baseline information for the whole CRC as	Relevant Representations [PDA-009], where it is explained that all such areas have now been subject to survey. The survey methodology applied was consistent with that reported in the ES for the rest of the Cable Route Corridor. The Applicant has updated ES Volume 1, Chapter 9: Ecology and Biodiversity [REP1-015] with the findings of these surveys and the revised version was submitted at Deadline 1. Overall, it is considered these do not materially change the assessment of likely significant effects presented either in ES Chapter 9 [REP1-015] or the Habitat Regulations Assessment Report [APP-275].

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			17ha had not been subject to habitat survey, and so assumptions have been made about the un-surveyed habitats. 6.23. It is not evident that the HRA has been wholly based on the worst-case scenario as is required when relying on the Rochdale Envelope approach (please refer to earlier comments regarding the Draft DCO and hedgerow removal).	
WC-056	Ecology and Biodiversity	Habitats Regulations Assessment (HRA)	6.24. In terms of mitigation measures, including embedded mitigation measures, discussed within the HRA to minimise impacts to functionally linked land (FLL) within the CRC where it coincides with the 4km greater horseshoe bat consultation zone around the Box Mine component area of the Bath and Bradford-on-Avon Bats SAC, it needs to be borne in mind that the 10m maximum extents of hedgerow removal proposed, comprise the amount of removal that would be undertaken at a number of discrete	The Applicant notes this comment. As discussed in the Habitat Regulations Assessment (HRA) Report [APP-275] and detailed within Section 2.4 of the Outline EPMS [REP1-106], any required hedgerow breaches associated with cable installation works within the 4 km greater horseshoe bat consultation zone around Box Mine (a 'Wiltshire Impact Zone for Bat Species') will be of a maximum 10 m wide. This is secured by requirement 8 of the draft DCO [REP1-007]. The Applicant acknowledges the final extent of hedgerow removal cannot

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			locations. As such, there will be a number of such locations within the bat SAC consultation zone and therefore the total hedgerow removal within the consultation zone will evidently be greater. Also, although the HRA discusses that in the bat SAC consultation zone, the CRC working width will be reduced from the typical 25m to 12m at all locations where hedgerow removal will be required and that the extent of hedgerow that will be removed will be a maximum of 10m at each location, it does not provide detail regarding the expected total number of localised hedgerow breaches and the likely maximum total length of hedgerow within the area of the bat SAC consultation zone that coincides with the CRC. This information is provided in the ES Chapter 9 [APP-061] and so should have been transposed into the HRA to provide as much information regarding proposed works as possible, thereby ensuring a robust and comprehensive	be determined until the detailed design stage. However, the Applicant confirms that at present five such breaches are anticipated to be required with the Wiltshire Impact Zone for Bat Species. With reference to the Hedgerow Removal Plan contained within Annex A of the Outline EPMS [REP1-106]. These are at hedgerows labelled HR144, HR145, HR146, HR147 and HR148. As such a total of 50 m of hedgerow is expected to be removed, which is considered to be a reasonable worst case scenario, given the linear nature of the Cable Route Corridor, the number of hedgerows present, and the maximum widths of hedgerow breaches allowed for within the Outline EPMS [REP1-106] in this location. All such sections of hedgerow to be removed will be reinstated / replanted following completion of cable installation works. 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

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			assessment, and also for consistency across the DCO application documents.	in principle with Natural England, with only minor procedural points of clarification remaining between the parties which are expected to be resolved through ongoing discussions
WC-057	Ecology and Biodiversity	Habitats Regulations Assessment (HRA)	6.25. In addition, although the Outline EPMS [APP-284] states that a maximum of 10m of hedgerow will be removed within the CRC where it coincides with the bat SAC consultation zone, this minimum distance isn't stipulated or shown on the relevant sheets of the Hedgerow Removal Plans (Sheets 40-45) or in the associated legends. This leads to a lack of certainty, assurance and consistency across the submitted documents and plans. Furthermore, the stipulation that hedgerow removal within the bat SAC consultation zone will be restricted to 10m has been omitted from the relevant rows of Schedule 12, namely the rows for the hedgerows that are shown on Sheets 40 to 45 of the Hedgerow Removal Plans.	The Applicant notes this comment. 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 EPSM [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 hedgerow. The Outline EPSM [REP1-106] sets out the total amount of hedgerow that can be removed for any particular activity, including the maximum extents identified for removal where hedgerows lie within the Wiltshire Impact Zones for Bat Species (i.e. 10

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				m) in paragraph 2.4.3. Under Requirement 8 of the draft DCO, Wiltshire Council must approve the detailed EPSM (including that the proposed hedgerow removal is substantially in accordance with that proposed under the Outline EPSM [REP1-106]). These controls should provide reassurance 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 has inserted a footnote beneath each table in Schedule 12 of the draft DCO [REP1-007] at Deadline 1 that explains the hedgerow removal powers with cross reference to Article 40.
WC-058	Ecology and Biodiversity	Habitats Regulations Assessment (HRA)	6.26. A minor point of note is that Table 5 in the HRA [APP-275] incorrectly refers to Bechstein's bat in the row pertaining to lesser horseshoe bat.	The Applicant acknowledges this is an error in Table 5 of the Habitat Regulations Assessment Report [APP-275] . An updated version of this document will be provided at Deadline

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				3 to reflect the outcomes of on-going consultation with Natural England; this error will be corrected at the same time.
WC-059	Ecology and Biodiversity	Habitats Regulations Assessment (HRA)	6.27. The council maintains its stance that targeted bat survey within the section of the CRC that coincides with the bat SAC consultation zone should have been conducted to ensure the HRA was informed by sufficient baseline information and to provide confidence that the mitigation proposed is in fact sufficient and appropriate.	The Applicant maintains that, due to the short-term and temporary and temporary nature of works within the CRC, the relatively localised construction footprint (i.e. 25 m typical width of the cable works plus temporary construction compounds) and the absence of permanent operational effects, an adequate assessment of impacts on foraging / commuting bats has been made based on the appraisal of habitats undertaken. It is the Applicant's view that potential impacts within the CRC, including temporary habitat loss, disturbance and fragmentation, have been assessed on a precautionary and reasonable worst-case basis, and that the mitigation measures to be secured as part of DCO requirements are appropriate for ensuring no significant residual adverse impacts will occur in line with the conclusions of ES Volume 1, Chapter

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				9 Ecology and Biodiversity [REP1-106].
WC-060	Ecology and Biodiversity	Outline EPSM (EPMS)	Outline EPSM (EPMS) 6.28. There appears to be a discrepancy between the section numbers cited in the contents page of the Outline EPSM (EPMS) [APP-284] and the section numbers within the main body of the report. 6.29. Section 6 of the Outline EPMS is titled 'Method Statement 5: Permanent Habitat Removal (Solar PV Sites) - including Avoidance of Impacts on Protected Species' (and is listed as Section 5 in the contents page on account of the aforementioned formatting error), which suggests that this section of the document pertains to the Solar PV Sites alone. Nonetheless, this section of the EPMS repeatedly discusses works within the CRC as well as the Solar PV Sites contrary to the suggestion in the section title. Presumably this is an error and	The Applicant notes this formatting error. An updated version of the Outline EPSM [REP1-106] has been submitted at Deadline 1 with this corrected.

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			instead should have just been discussed in Section 7 of the document which is titled 'Method Statement 6: Temporary Habitat Removal and Reinstatement (Cable Route Corridor) - including Avoidance of Impacts on Protected Species'.	
WC-061	Ecology and Biodiversity	Breeding Birds	6.30. The council's Relevant Representation [RR-4934] raised issues regarding the deliverability of the additional mitigation measures for ground nesting birds of open farmland proposed in paragraphs 9.12.31 - 9.12.32 of the ES Chapter 9: Ecology and Biodiversity [APP-061] which states: <i>"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...The first way in which the impact of displacement on skylark</i>	The Applicant has responded to comments relating to ground nesting birds in detail in Table 2-1:RR-4934, Section WC-108, on Page 165-166 of the Applicant's Response to Relevant Representations [PDA-009], where it is explained that although grassland expected to establish within and beneath panels has been assumed to represent modified grassland in poor condition, this does not preclude it from providing valuable foraging habitat for grounds nesting birds including skylark and yellow wagtail. The Applicant acknowledges that this does not compensate for the loss of breeding habitat as is made clear

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			<i>(and yellow wagtail) will be reduced is through the large-scale creation of optimal foraging habitat in the form of diverse grassland types under / between Solar PV Panels and within buffer zones."</i> 6.31. In the Relevant Representation, the council's Ecology Officer highlighted that as had already been specified in the council's Statutory Consultation response to the PEIR, for the purposes of the ecological impact assessment (and the BNG Assessment) it should be assumed that only modified grassland of poor condition can be achieved underneath and between the solar panels. 6.32. Further to the comments in the Relevant Representation, the council has supplementary concerns regarding the statement in the above extract of Chapter 9 of the ES that the impact of displacement of skylark and yellow wagtail, will be	within ES Volume 1, Chapter 9: Ecology and Biodiversity [REP1-015], which concludes that significant adverse effects on skylarks will occur as a result of displacement. However, as set out in Paragraphs 9.12.32 and 9.12.33 of ES Chapter 9 [REP1-015], it is reiterated that this measure can be expected to reduce impacts on the local skylark population through increasing the breeding success / productivity of skylarks nesting in the immediately surrounding landscape. It is the Applicant's view that this is neither inaccurate nor misleading, and a suitably precautionary approach to the assessment of ground nesting birds (including skylarks) has been taken. The Applicant acknowledges the reference to 'diverse' grassland in this instance primarily extends to grassland types within buffer zones and easements, which are expected to represent the relatively diverse grassland habitat type 'other neutral grassland' once established.

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			reduced by the provision of foraging habitat within the Solar PV Sites. The council considers that the substantive displacement of these ground nesting bird species, which will occur as a result of the Scheme, will not be wholly mitigated or offset by the provision of foraging habitat, and that the adverse impacts upon these species due to permanent loss of their breeding habitat, cannot be substantially reduced by the provision of foraging habitat on underneath and between the solar panels. Displaced birds will still require adequate suitable open areas for ground nesting, and the provision of foraging habitat does not comprise like-for-like compensation for the loss of significant areas of nesting habitat. Natural England's standing advice specifies that there should be a suitable amount of replacement habitat to compensate for the displacement, and that for example, there should be no net loss of habitat; like- for-like replacement in	Nevertheless, as explained in Table 2-1: RR-4934, Section WC-108, on Page 165-166 of the Applicant's Response to Relevant Representations [PDA-009], fundamentally the grassland can still be expected to provide improved foraging resources for skylark in comparison to existing arable habitats generally.

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			the vicinity; alternative habitat that is better in quality or area than the habitat to be lost; and maintained habitat connection to allow normal bird movement. 6.33. Whilst it is recognised that paragraphs 9.12.31 - 9.12.32 of the ES Chapter 9 [APP-061] do not state that provision of foraging habitat would constitute like- for-like replacement, and that Chapter 9 does put forward other additional mitigation measures for breeding birds, it is nevertheless deemed that the suggestions in paragraph 9.12.32 of Chapter 9 that the impact of displacement will be reduced through the creation of foraging habitat under and between Solar PV Panels and within buffer zones is inaccurate and somewhat misleading, especially given that it is evident there will be significant effects on breeding birds. 6.34. In any case, as discussed above, the council maintains its	

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			stance that it should not be suggested that 'diverse grassland' can be attained underneath and between the Solar PV Panels, and that instead, not just the BNG Assessment [APP-273] but also the ecological impact assessment presented in ES Chapter 9, should be predicated on the assumption that only modified grassland of poor condition can be achieved in order for the assessments to be suitably precautionary and to reflect the worst case scenario, and also to ensure consistency of approach across the ecological documents and plans. Although modified grassland can have up to 9 species per m ² , this is not considered to constitute diverse grassland and as such the statement in paragraphs 9.12.31- 9.12.32 is flawed.	
WC-062	Ecology and Biodiversity	Great Crested Newts and Mitigation	6.35. ES Chapter 9 [APP-061] identifies that environmental DNA (eDNA) surveys have confirmed the presence of great	The Applicant notes this comment. The assessment of impacts on great crested newts is presented in ES Volume 1, Chapter 9: Ecology and

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
		Strategy for the Solar PV Sites	crested newt (GCN) at two ponds within Sites Lime Down C and E, as well as within a further 14 ponds located within 250 m of the Solar PV Sites. It also details that a large number of ponds are present within 250 m of the CRC but that these ponds have not been subject to GCN surveys as the Scheme will adopt District Level Licensing (DLL) for works within the CRC. 6.36. ES Chapter 9 does not, however, discuss what decision was taken in respect of the Solar PV Sites and the potential need for acquisition of a GCN mitigation licence(s) to allow the works to legally proceed, how the decision was reached and what the justification for the determined approach comprises. There is a clear need for discussion regarding the Solar PV Sites and licensing to be provided, particularly in relation to Lime Down C and E where breeding ponds have been identified.	Biodiversity [REP1-015]. Paragraph 9.10.237 sets out how a key embedded mitigation measure designed to avoid impacts on great crested newts during the construction phase are the implementation of protective buffer zones. All ponds at the Solar PV Sites will be retained regardless of presence of great crested newts, and protected within a minimum 10 m undeveloped buffer zone. Ponds with confirmed great crested newt presence, or any off-site ponds where it has not been possible to survey (and thus GCN presence has been assumed on a precautionary basis) will be protected with a minimum 50 m undeveloped buffer zone. Paragraph 9.10.236 of ES Chapter 9 [REP1-015] also sets out how the most suitable terrestrial habitats at the Solar PV Sites (such as hedgerows, ditches, woodlands and field margin habitats) will be retained and protected with adequate buffers. The protection of these buffer zones is detailed within the Outline EPSM [REP1-106].

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			6.37. If the Applicant and their ecological consultant have decided to rely on the precautionary working methods detailed in Chapter 9 and the Outline EPMS [APP-284], then this should have been stated clearly in the ES Chapter 9. A robust rationale for the approach should have also been provided to demonstrate that it is appropriate, sufficient and would be legally compliant. Supporting evidence could have comprised use of Natural England's GCN rapid risk assessment tool in the GCN Mitigation Licence Method Statement template. Although this rapid risk assessment tool can be overly simplistic, it can still serve to provide a useful guide regarding the likelihood of an offence being committed and the need for acquisition of a mitigation licence to permit legal derogation from the Conservation of Habitats and Species Regulations 2017 (as amended).	The adequacy of the 50 m buffer zone around great crested newt is supported by studies by Jehle (2000) and Cresswell & Whitworth (2004) which have demonstrated that the majority of a great crested newt population will use terrestrial habitats within 50 m of a breeding pond. However, ES Chapter 9 [REP1-015] acknowledges that impacts on great crested newts are unlikely to be avoided alone through the implementation of buffer zones. Although 50 m around breeding ponds represents the core habitat for great crested newts, individual newts can be found beyond this distance particularly where suitable habitat is present. Paragraph 9.12.26 of ES Chapter 9 [REP1-015] describes how additional mitigation measures will be adopted to minimise impacts on great crested newts which could be present outside of protected buffer zones. Such measures include the sensitive timing of certain vegetation removal works, activities requiring the

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			6.38. It is therefore strongly recommended that the ExA requests further information regarding the proposed GCN mitigation strategy for the Solar PV Sites, as well as confirmation as to whether the Applicant intends to apply for a GCN mitigation licence; to apply to use DLL; or not apply for any type of GCN mitigation licence. If it's the latter, then further supporting evidence and a sound justification should be sought given the scale of the Scheme, the potential for adverse effects and the level of protection afforded to this European Protected Species (EPS) which utilises both aquatic and terrestrial habitat within the Solar PV Sites.	attendance of an Ecological Clerk of Works (EcoCoW), and measures to prevent stored materials becoming attractive sheltering features. Such measures are designed to avoid killing/injury and disturbance to individual newts outside of protected buffer areas. These measures are detailed within the Outline EPSM [REP1-106] and will be secured by DCO requirement. It is the Applicant's view that impact avoidance and reduction measures described are appropriate and sufficient for avoiding impacts on individual newts when considering relatively suboptimal habitat comprises the vast majority of the Solar PV Sites (namely arable fields and agricultural grassland), and the relatively low density of ponds found to support great crested newts (2 of 24 ponds at the Solar PV Sites were found to support great crested newts during surveys). As such it is not currently intended to acquire a great crested newt mitigation licence for the Solar PV Sites due to the low likelihood of impacts. This is in accordance with the

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				approach adopted for other similar solar DCO schemes, such as the approved West Burton Solar Farm (EN010132). Studies referred to: Jehle R (2000) The terrestrial summer habitat of radio- tracked great crested newts (Triturus cristatus) and marbled newts (T. marmoratus). Herpetological Journal 10: 137-142 8 Cresswell W and Whitworth R (2004) An assessment of the efficiency of capture techniques and the value of different habitats for the great crested newt Triturus cristatus. English Nature Research Report 576. English Nature, Peterborough
WC-063	Ecology and Biodiversity	Biodiversity Net Gain (BNG)	6.39. As part of the Applicant's response to Procedural Deadline A, a Statutory Biodiversity Net Gain (BNG) Metric [PDA-008] was submitted as an unlocked excel spreadsheet given that this had not been provided as part of the DCO application as should have been the case. The submitted Statutory BNG	The Applicant notes the Council's comments regarding submission of the Statutory Biodiversity Metric [REP1-091] and local policy relating to delivery of Biodiversity Net Gain (BNG). Despite the delivery of 10% BNG not yet being mandatory for Nationally

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			Metric was published on the PINS website on 11th March 2026. 6.40. The omission of the Statutory BNG Metric as an unlocked excel spreadsheet from the DCO application was noted in Wiltshire Council's Relevant Representation [RR-4934] and it was highlighted that this prevented a full and proper review of this element of the proposals. As such, the council has reviewed the recently submitted metric alongside the BNG Assessment Report [APP-273] which was submitted as part of the DCO application. 6.41. DEFRA postponed the commencement date for mandatory BNG for NSIPs from November 2025 to May 2026, and on 15 April 2026 a further update was published which specified that DEFRA will implement a mandatory BNG framework for NSIPs from November 2026. Nevertheless, the Applicant has committed to providing at least 10%	Significant Infrastructure Projects (NSIPs), the Applicant has committed to delivering at least a net gain of 10% within the Scheme. As well as demonstrating compliance with local policy requirements, the Applicant agrees that demonstrable BNG can be used to support the habitat mitigation, enhancement and creation proposals set out within ES Volume 1, Chapter 9: Ecology and Biodiversity [REP1-015] and the wider Development Consent Order (DCO) application. The Applicant can confirm updated versions of the Statutory Biodiversity Metric [REP1-091] and BNG Assessment Report [REP1-089] were submitted at Deadline 1 following completion of baseline surveys within the Cable Route Corridor. The Applicant welcomes the Council's feedback relating to the BNG assessment presented within the DCO.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			BNG for the Lime Down Solar Park project and Core Policy 50 of the Wiltshire Core Strategy (adopted January 2015) requires major development to deliver biodiversity gains. Policy NE2 to the Chippenham Without Neighbourhood Plan 2022 - 2036 requires development (where appropriate) to deliver BNG. Policy GI1 to the Chippenham Neighbourhood Plan (2024) requires major development to demonstrate at least 10% BNG will be attainable. Similarly, Policy 13 to the Joint Melksham Neighbourhood Plan 2 (2025) requires all development to deliver at least 10% BNG and makes particular reference to this requirement extending to solar farms. It is however accepted that only part of the application site is covered by the respective community neighbourhood plans outlined above. 6.42. Furthermore, it is assumed that the Applicant has used the on-site	

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			post intervention projections presented in the metric to substantiate, quantify and evidence the habitat mitigation, enhancement and creation proposals discussed and relied upon in the DCO application, most notably (but not limited to) in the ES Volume 1, Chapter 9 Ecology and Biodiversity [APP-061], the Habitats Regulations Assessment Report (HRA) [APP-275], ES Volume 2, Figure 3-4-1 to 3-4-5.2 Landscape and Ecology Mitigation Plans [APP-084], the Outline EPSM (EPMS) [APP-284] and 6.3 Appendix 9-8 Schedule of Protective Ecological Buffers [APP-205]. Therefore, the habitat, hedgerow and watercourse baseline, creation and enhancement information detailed in the submitted Statutory BNG Metric should align with the aforementioned documents and plans, as well as any other relevant documents and plans that form part of the DCO application. For these reasons, the council has reviewed and	

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			commented on the BNG proposals despite BNG not yet being mandatory for NSIPs. 6.43. It is understood that it is the Applicant's intention to submit additional baseline information and reporting to the ExA following the completion of habitat surveys within the areas of the CRC which had not been subject to survey at the time the BNG Assessment Report [APP-273] and Statutory BNG Metric [PDA-008] were completed (despite the latter only being submitted in March 2026). This matter is discussed in paragraph 1.2.18 of the BNG Assessment Report. It is therefore expected that another version of the Statutory BNG Metric will be submitted to the ExA shortly, in which event the council will review the revised metric and provide any additional observations on the BNG submissions at that juncture. 6.44. The BNG Metric submitted in March 2026 [PDA-008] has been	

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			reviewed and considered alongside the BNG Assessment Report [APP-273] and the rest of the DCO application, and observations are provided in the subsequent paragraphs.	
WC-064	Ecology and Biodiversity	Biodiversity Net Gain (BNG)	Observation 1 6.45. It is not entirely clear which plans representing the worst case scenario, have been used to inform the metric and to therefore derive the on-site post intervention area habitat, hedgerow and watercourse units (which includes habitat retention, creation and enhancement) and the on-site net change in biodiversity units and total percentage net change for area habitat, hedgerow and watercourse. 6.46. Paragraph 1.1.5 of the BNG Assessment Report [APP-273] under the heading 'Assessment Scope', states: "This report, including the above Plates 3-7 and Plates 13-24, provide a quantitative baseline of the biodiversity value of the Scheme.	Plates 3-7 and Plates 13-24 of the Biodiversity Net Gain (BNG) Assessment Report [REP1-089] set out the baseline conditions across the Scheme used for the BNG calculations, as stated in the Council's comment. The baseline data are derived from comprehensive UK Habitat Classification surveys undertaken by experienced surveyors and following the precautionary principle; detailed methodology and survey personnel are set out within ES Volume 3, Appendix 9-1: Ecological Baseline Report [REP1-083]. Plates 8-12 of the BNG Assessment Report [REP1-089] and ES Volume 2, Figure 3-4: Landscape and Ecology Mitigation Plan [REP1-029 to REP1-032] set out the habitat proposals for the Scheme. These plans

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			Together with Plates 8-12 and ES Volume 2, Figure 3-4: Landscape and Ecology Mitigation Plan [EN010168/APAP/6.2], it also sets out the habitat creation, mitigation and enhancement measures that will be implemented to achieve BNG for the Scheme." 6.47. In addition, paragraph 1.1.16 of the BNG Assessment Report [APP-273] specifies: "For the purposes of this assessment, the locations and arrangements of Solar PV Panels and Associated Development have been taken from ES Volume 2, Figure 3-1: Indicative Site Layout Plan [EN010168/APP/6.2]." 6.48. Although these descriptions within the BNG Assessment Report indicate which plans have been used for the purposes of the BNG Assessment and to inform the inputs into the metric, it isn't entirely apparent how it has been ensured that the metric and BNG Assessment Report have been completed on the	reflect anticipated habitat loss and proposals for habitat creation and enhancement measures. Habitat loss has been calculated based on worst-case scenarios; for example, the maximum width of hedgerow crossings has been applied at every cable route crossing point, in line with the maximum widths set out in Section 2.4 of the Outline EPSM [REP1-106]. ES Volume 2, Figure 3-1: Indicative Site Layout Plan [APP-081] provides a worst-case scenario for the proposed area-based habitat losses within the Scheme, as the maximum extent of panel coverage and permanent (for the duration of the Operational phase) infrastructure has been applied. The BNG calculations presented within the Statutory Biodiversity Metric [REP1-091] and BNG Assessment Report [REP1-089] reflect a reasonable worst-case scenario, in line with the overarching methodology for the entire DCO application.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			basis of the worst case scenario as required, given that Applicant has opted to rely on the 'Rochdale Envelope' approach. It is considered that this matter needs to be clarified and addressed where applicable.	
WC-065	Ecology and Biodiversity	Biodiversity Net Gain (BNG)	Observation 2 6.49. Habitat reference numbers have not been provided in the Irreplaceable Habitats, A-1 On-Site Habitat Baseline, A-2 On-Site Habitat Creation, A-3 On-Site Habitat Enhancement, B-1 On-Site Hedge Baseline, B-2 On-Site Hedge Creation, B-3 On-Site Hedge Enhancement, C-1 On-Site Watercourse Baseline, C-2 On-Site Watercourse Creation and C-3 On-Site Watercourse Enhancement tabs of the submitted BNG Metric [PDA-008]. 6.50. The use of habitat reference numbers allows for the labelling of a habitat in the metric, so that it can be matched up with associated mapping provided.	The Applicant acknowledges that Habitat Reference numbers provide a useful tool with which the Statutory Biodiversity Metric [REP1-091] could be compared to associated baseline and proposed habitat mapping, and the content of the BNG Assessment Report [REP1-089]. Owing to the sheer number of individual habitat parcels (2,229 for Habitat Units alone), the data were consolidated within the Statutory Biodiversity Metric [REP1-091], in accordance with the Statutory Biodiversity Metric QGIS Template and GIS Import Tool – User Guide. Consolidation of data is recognised as a limitation to the assessment, however, in the Applicant's view, sufficient justification for this decision has been provided. It should be noted that un-

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			Essentially, users should reference habitat parcels by unique codes on all applicable sheets in the metric. The inclusion of habitat reference numbers enables the reviewer to cross reference between the pre-intervention / baseline calculations in the metric and associated baseline / habitat plans, and between the post-intervention calculations in the metric and the post development plans so it can be verified that the metric and associated plans align and are correct. 6.51. Paragraph 1.11.1 of the BNG Assessment Report [APP-273] states: "The information provided in the Metric are directly related to the Habitat Baseline Plans (Plates 3 – 7) and the Proposed Habitats Plans (Plates 8 – 12)." Whilst these plans are helpful and have been used by the council's Ecology Officer during the review process, because they do not include habitat reference numbers, it proved very	consolidated habitat data would not fit within a single Metric spreadsheet, and multiple documents would need to be provided in this case. Consolidation of data within the Metric precludes assignment of individual Habitat Reference numbers for un-consolidated habitat parcels between QGIS mapping and the Metric within the Import Tool, as the number of habitat parcels exceeds the number of rows within the Metric. As stated within Paragraph 1.2.8 of the BNG Assessment Report [REP1-089], the raw data can be provided in un-consolidated Metric versions and as QGIS shapefiles, if requested.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			difficult to ascertain exactly what is being proposed and where with sufficient degree of certainty. 6.52. In terms of the methodology applied, the BNG Assessment Report details a number of limitations but does not explicitly mention or discuss the omission of habitat reference numbers within the metric. A justification appears to be presented in paragraph 1.2.8 [APP-273] however, and states: "The number of rows generated by the overlay of baseline and proposed habitats once mapped using QGIS approached 2,229 in the case of HU, 1,377 for HeU, and 138 for WU. As per the Statutory Metric QGIS template and GIS import tool User Guide (Ref 16), data have been consolidated into groups of identical values (i.e. multiple polygons with identical baseline values proposed to have identical outcomes) for simpler representation within the Metric. If requested, the raw data can be provided in full."	

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			6.53. Whilst this limitation and the number of rows generated is acknowledged, it is considered that the size of the Scheme should not prohibit the preparation of comprehensive and appropriately marked up plans, BNG Assessment and metric; nor should it hinder the undertaking of a sound and thorough review of the BNG proposals, particularly by the ExA and host authority. As such, the explanation in the report is not deemed to comprise a suitably robust rationale for the omission of the habitat reference numbers. 6.54. The ExA is therefore advised that in the absence of habitat reference numbers accurately linking to appropriately marked up baseline / pre-intervention and post development plans, the council's Ecology Officer cannot verify or corroborate the metric [PDA-008] and BNG Assessment Report [APP-273], despite the provision of the	

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			plates in the BNG Assessment Report. Instead, it was necessary to look at the plans at a higher level than is ideal and to make judgements. This is pertinent because even though mandatory BNG has not yet come into force for NSIPs, the metric effectively underpins the ecological impact assessment as it quantifies biodiversity losses and gains. Moreover, the BNG Assessment and metric have effectively been used to evidence and support the habitat mitigation, creation and enhancement proposals put forward in ES Chapter 9 [APP-061], the HRA [APP-275] and the other ecological documents and plans submitted as part of the DCO application.	
WC-066	Ecology and Biodiversity	Biodiversity Net Gain (BNG)	Observation 3 6.55. According to the BNG Assessment Report [APP-273], the Statutory BNG Metric covers the Solar PV Sites and the CRC. It is stated in paragraphs 1.1.9 of the report: "Given that BNG calculations	As set out within the BNG Assessment Report [REP1-089] , the BNG assessment has been calculated based on the Order Limits in order to reflect the total net change in biodiversity units across the Scheme.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			should be made based on the entire red line boundary of a site (Order Limits in the case of the Scheme), iterations of the BNG calculations have been provided for the Solar PV Sites (including Works No. 9) only (removing the temporary exempt areas, which elevate the baseline), and for the Solar PV Sites and Cable Route Corridor combined." 6.56. Evidently, the ecological consultant has completed the BNG metric twice; once for just the Solar PV Sites (including Works No. 9) which has not been submitted into Examination; and then a second iteration for the Solar PV Sites and CRC combined which comprises the iteration submitted to the ExA in March 2026 at Procedural Deadline A. Section 1.11 of the BNG Assessment Report [APP- 273] includes screenshots of the Final Results tab of the metric for the Solar PV Sites (including Works No.9) alone and of the Final Results tab of the metric for the Scheme as a	The Statutory Biodiversity Metric [REP1-091] includes baseline and proposed habitats within the Solar PV Sites and Cable Route Corridor (CRC). Within the BNG Assessment Report [REP1-089], the headline results were provided from Metric calculations completed for the Solar PV Sites only alongside the assessment of the Order Limits to illustrate that the bulk of habitat creation and enhancement measures are proposed within the Solar PV Sites. This inclusion was intended as a useful indicative reference, to provide context as to the extent and proportion of net gains proposed in different elements of the Scheme. The individual calculations for the Solar PV Sites have not been submitted as part of the Development Consent Order (DCO) application, as the BNG proposals submitted relate to the Scheme as a whole. Justification for the consolidation of habitat rows within the Statutory

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			whole comprising both the Solar PV Sites and the CRC. 6.57. Given that the BNG Assessment Report includes the headline results and associated discussion for the metric relating to the Solar PV Sites alone, it is suggested that this iteration of the metric should have been submitted into Examination for completeness and transparency, and to permit a thorough review of this iteration of the metric alongside the discussion about this metric in the BNG Assessment Report. This is because merely providing a screenshot of the Final Results embedded within the BNG Assessment Report together with a short appraisal does not allow for it to be checked or interrogated and is as such somewhat futile without also providing the associated metric in an unlocked excel format. 6.58. Moreover, as discussed above, due to the omission of habitat	Biodiversity Metric [REP1-091] and subsequent omission of individual habitat parcel references is provided in the relevant response above. The Applicant confirms that all hedgerows to be temporarily removed within the CRC have been treated as lost, followed by creation on reinstatement as set out in paragraph 1.8.2 of the BNG Assessment Report [REP1-089]. As above, the raw data can be provided in un-consolidated Metric versions and as QGIS shapefiles to aid the review of specific scenarios such as hedgerow loss and re-instatement within the CRC, if requested.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			reference numbers in the metric and on corresponding plans, it has not been possible for the council's Ecology Officer to accurately check and verify the metric, plans and BNG Assessment Report. 6.59. In addition, although the calculations in the metric completed for the Solar PV Sites (including Works No. 9) alone (for which, as aforementioned, the council has only seen a screenshot of the Final Results tab) can be analysed alongside the metric completed for the whole Scheme (Solar PV Sites and CRC) and the calculations regarding the projected gains in hedgerow units in the former metric can be subtracted from those in latter metric to ascertain what the projected hedgerow gain calculations are for the CRC, for completeness, it would have been preferable for the metric to be completed a third time for the CRC alone and for this to also be submitted. This is because, for the reasons already discussed, using	

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			the information provided, it is difficult to check for example, that the hedgerow losses and reinstatement within the CRC have been accurately recorded and that the post-intervention biodiversity unit calculations are correct. 6.60. Furthermore, in relation to the approach to the CRC, it has not been possible to corroborate that habitat enhancement has not been input into the metric and that habitat creation is proposed only where existing hedgerows will be reinstated following initial removal in accordance with paragraph 1.1.8 of the BNG Assessment Report [APP-273]. Likewise, it is difficult to verify that the proposed hedgerow reinstatement within the CRC that has been recorded as habitat creation within the metric, has not been double counted and has first been counted as a loss on the baseline tab. It has also not been readily feasible to corroborate that the proposed hedgerow	

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			reinstatement within the CRC has been recorded as the same hedgerow type and condition as that provided for the baseline in accordance with paragraph 1.1.8 of the BNG Assessment Report. This is because only a combined metric for both the Solar PV Sites and CRC has been provided, and no habitat reference numbers have been included in the submitted metric and associated plans. 6.61. To provide some further detail in this regard, given that the hedgerow creation within the CRC relates only to the reinstatement of existing hedgerow features following their removal to permit the cable installation works, and that the reinstated hedgerow should be recorded as the same condition and type as that removed, the associated losses of approximately 1.406km of existing hedgerow within the CRC excluding Works No. 9, as quantified in paragraph 1.8.5 of the BNG Assessment Report, must be	

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			recorded as hedgerow lengths and therefore units lost in the metric. However, because the metric covers the Solar PV Sites and the CRC and doesn't include habitat reference numbers, the council cannot determine whether this has been accurately recorded in the metric. It is evident the metric has calculated that the Solar PV Sites alone would result in a total net percentage change (comprising a gain) in hedgerow units that is 7.04% greater than the total net percentage change (comprising a gain) calculated for the Solar PV Sites and CRC combined. Nevertheless, without seeing a metric for the CRC alone, and given that the submitted metric and plans don't provide habitat reference numbers, it is difficult to verify the exact breakdown and accuracy, and this is particularly relevant in respect of hedgerow losses and gains.	
WC-067	Ecology and Biodiversity	Biodiversity Net Gain (BNG)	Observation 4 6.62. Condition assessment sheets	Figures showing the baseline and proposed habitats are provided in

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			have not been provided for the habitats assigned a condition in the submitted BNG metric and condition assessment information has likewise been omitted from the BNG Assessment Report. Paragraph 1.2.9 of the BNG Assessment Report [APP-273] provides the following explanation: "Condition assessment information for each individual habitat parcel recorded has not been presented in this document, given the number of parcels recorded, as detailed above. Instead, summaries of the overall condition scores for each habitat, hedgerow, and watercourse type are provided in Tables 2 and 3." 6.63. The omission of condition assessment sheets alongside the metric and condition assessment information in the BNG Assessment Report constitutes a deviation from The Statutory Biodiversity Metric User Guide (Last updated: 3 July 2025) (hereafter referred to as 'the User Guide') which states:	Plates 3 - 24 at the end of the BNG Assessment Report [REP1-089]. Given the sheer number of area and linear habitat parcels present across the Scheme, it was not considered proportionate to provide each condition assessment individually for submission. However, a summary of the condition assessment scores for each specific habitat, hedgerow and watercourse type is provided in Tables 2 and 3 in the BNG Assessment Report [REP1-089]. The Applicant acknowledges that this approach deviates from the guidance set out within The Statutory Biodiversity Metric User Guide (Feb 2024; updated July 2025). This decision was based on professional judgement, consideration of the scale of the Scheme, and recognition that a BNG assessment has been provided alongside the Development Consent Order (DCO) application beyond what is statutorily required of NSIP developments.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			"You should conduct a condition assessment for all habitat parcels which require you to assign a condition to them in the biodiversity metric tool. You should use the biodiversity metric condition sheets to do this and provide these as evidence to support your assessment. Biodiversity metric condition sheets can be used to evidence good, moderate or poor condition. Fairly good and fairly poor are intermediate condition categories. If you need to use these, you should: - complete a biodiversity metric condition assessment sheet - make site specific judgements using ecological expertise - explain any deviations against specific condition criterion - provide ecological reasoning" 6.64. Whilst paragraph 1.2.9 of the	Condition assessments have been completed for each individual habitat parcel, and the raw data can be provided as QGIS shapefiles, if requested.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			BNG Assessment Report [APP-273] attempts to justify the omission, the provided rationale is not augmented by the provision of a citation to demonstrate where in guidance this deviation has been advocated for certain circumstances. It is therefore suggested that the ExA interrogates this matter further. Furthermore, the ExA is advised that the absence of condition assessment information has meant that the council's Ecology Officer has not been able to verify the condition of the habitats.	
WC-068	Ecology and Biodiversity	Biodiversity Net Gain (BNG)	Observation 5 6.65. The ExA is requested to note that assumptions have been made in the Statutory BNG Metric [PDA-008] in respect of the 17ha of the CRC that had not been surveyed at the time the BNG Assessment Report was produced. This is discussed in the Limitations section in paragraph 1.2.18 of the aforementioned report [APP-273].	The Applicant can confirm updated versions of the Statutory Biodiversity Metric [REP1-091] and BNG Assessment Report [REP1-089] were submitted at Deadline 1 following completion of baseline surveys within the Cable Route Corridor.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
WC-069	Ecology and Biodiversity	Biodiversity Net Gain (BNG)	Observation 6 6.66. In terms of the Minimum Mapping Units (MMU) used for the BNG Assessment, paragraph 1.2.11 of the BNG Assessment Report [APP-273] states: "Given the extent of the Solar PV Sites, the following Minimum Mappable Units (MMU) for UKHab classification were generally set at: • Area features (HU) – 400 m² (20 m x 20 m); and • Linear features (HeU and WU) – 20 m." • 6.67. Paragraph 1.2.12 of the BNG Assessment [APP-273] presents a justification for this approach and the adoption of these MMU as follows: "It should therefore be noted that some habitat parcels or features below the above MMU thresholds were not individually mapped and included within the BNG calculations. This approach is in line	The Minimum Mappable Units (MMU) for baseline UK Habitat Classification surveys across the Scheme was determined based on guidance presented in Section 2.2 of the UK Habitat Classification User Manual Version 1.0 (May 2018), published by the UK Habitat Classification Working Group. No updates to the guidance relating to MMU are presented in UK Habitat Classification Version 2.0 (2023). As such, the guidance set out within the UK Habitat Classification User Manual Version 1.0 is considered to represent the most recent published guidance relating to MMU and represents a robust source from which to justify determination of MMU at the Solar PV Sites and Cable Route Corridor. Section 2.2 of UK Habitat Classification User Manual Version 1.0 states the following: "The UKHab has been designed to function at two scales:

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			with UKHab guidance and is considered proportionate to the size of the Scheme. An exception to this general rule was made for ponds, as all ponds were individually mapped regardless of area." 6.68. The council has concerns about the large MMU applied and the potential for inaccuracies and the increased risk of significant errors as a result of adopting this approach to mapping the habitats. This is because using a large MMU for area features and linear features can result in smaller areas of high-value habitat being overlooked or subsumed into a lower-value category, resulting in a lower baseline score. This makes achieving the 10% BNG target easier but can fail to reflect the actual ecological baseline and can reduce the accuracy of the metric calculation. 6.69. Therefore, the council cannot corroborate the supposition put	• If a project requires the detailed mapping of small features and where habitats could be very fine grained, it is recommended that surveyors use the fine-scale minimum mapping unit MMU (25m², 5m length). The fine scale MMU may be used for urban or small scale rural development projects, detailed surveys of designated sites and where subtle habitat differences are considered important for the survey scope. • If a project is to undertake surveys on a landscape scale or is only collecting data at broader scales, e.g. Level 3 – Broad Habitats, the large scale MMU (400m² polygon and 20m length) is likely to be more appropriate. For some unenclosed upland areas, a larger MMU of 2500m² may be selected to reduce the number of surveyor days in the field."

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			forward in paragraph 1.2.10 of the BNG Assessment Report [APP-273] which states: "It is anticipated that a non-significant margin of error may occur throughout the mapping process, from collecting data in the field to mapping using QGIS software." 6.70. Furthermore, paragraph 1.2.12 of the BNG Assessment Report [APP-273] states that the approach adopted for the MMU is in line with UKHab guidance. However, an exact citation for the UKHab guidance which advocates the adopted approach has not been provided in paragraph 1.2.12, and the 'References' section of the report also appears to omit the UKHab Classification document or any other UKHab reference. This is pertinent as contrary to what is stipulated in the BNG Assessment Report, it is understood that the 400m² MMU approach that has been applied for Lime Down Solar Park is not actually cited or recommended in	The Scheme is not considered to fall under the urban or small-scale rural development categories, or designated sites. And, given the landscape-scale nature of the Scheme, the large-scale MMU of 400m² and 20m was considered to be most appropriate in this case. It should be noted that the baseline survey methodology comprised an Extended UK Habitat Classification Survey, with detailed methodology provided in Section 2.3 of ES Volume 3, Appendix 9-1: Ecological Baseline Report [REP1-083]. In line with the Handbook for Phase 1 Habitat Survey (2010 Edition), target notes were collected where notable ecological features, including habitat parcels that were too small in size to be captured by the MMU, were present. These target notes are presented in Annex A of Appendix 9-1 [REP1-083] and included within the following figures: ES Volume 2, Figure 9-1-8: Baseline Habitats Map – Lime Down A [APP-

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			the UKHab definitions or any other UKHab guidance, and neither is it discussed in the User Guide. Rather, it is understood to be an approach that has been adopted by practitioners on specific projects entailing landscape-scale surveys and for large-scale upland sites or extensive, uniform farmland sites. 6.71. Therefore, a robust and comprehensive rationale is required to justify the large MMUs used. Whilst paragraphs 1.2.11 and 1.2.12 [APP-273] refer to the extent and size of the Solar PV Sites, there is no discussion regarding the habitats across the Solar PV Sites and whether they are considered sufficiently homogeneous to warrant the approach to MMU adopted. The council therefore suggests that the ExA investigates this matter further and seeks further evidence of where this approach is supported in published guidance, and not just evidence of where this approach has been applied on other	113] to ES Volume 2, Figure 9-1-24: Baseline Habitat Map – Cable Route Corridor [REP1-036]. Only a relatively small number of target notes relating to habitats were recorded during the surveys, with the large majority relating to evidence of, or features with potential to support, protected / notable species. Target notes relating to habitats included small areas of scrub with scattered trees, narrow grassland margins, and ruderal vegetation which are well-represented in baseline habitats recorded across the Scheme and subsequently reflected in the BNG calculations. Habitats identified as target notes were not included within the BNG calculations presented within the BNG Assessment Report [REP1-089] and Statutory Biodiversity Metric [REP1-091], owing to the MMU and given that the habitat types were not notable in the context of the baseline habitats recorded. This limitation is recognised within the BNG Assessment Report [REP1-089] but is not considered

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			projects given that latter in itself does not render the approach to be in line with published standards and guidance.	significant for the reasons outlined above; it is considered unlikely that any small areas of high value habitats were omitted from the assessment and the baseline and corresponding proposals for net gain represent a sufficiently accurate and robust assessment. The large-scale MMU is therefore considered in line with UKHab guidance, and the collection of target note data during baseline surveys ensured that any smaller areas of habitat were captured within the impact assessment presented within ES Volume 1, Chapter 9: Ecology and Biodiversity [REP1-015] .
WC-070	Ecology and Biodiversity	Biodiversity Net Gain (BNG)	Observation 7 6.72. Paragraph 1.2.11 of the BNG Assessment Report [APP-273] only refers to use of the discussed MMU in respect of the Solar PV Sites and no methodology is provided in relation to the CRC. It is assumed therefore that the stated MMU has also been applied to the CRC. It is	The Applicant can confirm that the Minimum Mappable Unit of 400m² for area-based habitats and 20m for linear features applied across the Solar PV Sites was also applied within the Cable Route Corridor (CRC) to ensure consistency across the Scheme. Justification for the use of the defined MMU is provided in the relevant

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			considered that this information and supporting justification for the approach should have been provided within the Methodology. This is considered especially necessary as the proposed CRC is much narrower along the majority of its route than the Solar PV Sites and so using large MMU is likely inappropriate for the CRC. There is a need for the adopted MMU to be applied consistently across the Order Limits given that the metric has been used for the CRC. Nonetheless, as discussed above, the council has concerns regarding the use of the stated MMU for the Solar PV Sites and so these concerns would likewise apply to the CRC in any case. It is recommended that the ExA seeks further information and supporting evidence and justification in respect of this matter.	response above, and it is the Applicant's view that the MMU applied, and habitat data collected, within both the Solar PV Sites and CRC reflect the baseline ecological conditions in sufficient detail to support a robust assessment.
WC-071	Ecology and Biodiversity	Biodiversity Net Gain (BNG)	Observation 8 6.73. The Irreplaceable Habitats tab of the BNG metric [PDA-008] has	The Applicant acknowledges that all individual trees comprising Irreplaceable Habitat have been grouped within a single row

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			listed individual rural trees comprising veteran trees all in one row, effectively grouping them all together. This doesn't comply with the User Guide which requires one row per tree. In the User Guide under the heading 'Recording irreplaceable habitats', in respect of ancient and veteran trees it stipulates: "You should record all ancient and veteran trees as individual trees separately on a single data entry row and mark these as an irreplaceable habitat. This includes ancient and veteran trees in woodlands that are not themselves ancient woodlands and those in hedgerows and lines of trees." 6.74. Paragraph 1.3.6 of the BNG Assessment Report [APP-273] specifies: "42 ancient and veteran trees were recorded within the Solar PV Sites." Paragraph 1.3.7 states: "A total of 10 ancient and veteran trees were recorded within the Cable Route Corridor and have therefore been categorised as Irreplaceable	within the Statutory Biodiversity Metric [REP1-091]. These features were consolidated within the Metric, as with other habitat elements within the Scheme. For clarity, the Applicant can confirm that the 3.10ha baseline habitat area attributable to 51 ancient and veteran trees recorded within the Solar PV Sites and Cable Route Corridor (CRC) and listed within the Irreplaceable Habitats tab of the Statutory Biodiversity Metric [REP1-091] comprised the following individual trees: Solar PV Sites: • 2 medium trees in 'Good' condition (0.0326ha); • 12 large trees in 'Good' condition (0.4397ha); and • 27 very large trees in 'Good' condition (2.0643ha). CRC: • 5 large trees in 'Good' condition (0.1832ha); and • 5 very large trees in 'Good' condition (0.3823ha).

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			Habitat within the Metric." 6.75. Each of the 52 ancient and veteran trees recorded within the Solar PV Sites and CRC should have been listed in a separate row in the Irreplaceable Habitats tab of the metric [PDA-008] in line with the User Guide. There is no explanation in the 'user comments' column in the metric to justify why the trees have been grouped together in one row and no explanation has been provided within paragraphs 1.3.6-1.3.7 or the Limitations section of the BNG Assessment Report [APP-273]. The number of ancient and veteran trees recorded isn't so large that it warrants deviation from the User Guide. 6.76. It is also not apparent how the veteran tree total area at baseline of 3.10 hectares has been derived given that all these trees have been grouped together and the Tree Helper tool on the Main Menu tab of the metric [PDA- 008] has not been	The total of area of 3.10 ha comprises a sum of the above area measurements, derived from the 'Tree Helper' within the Metric. A total of 52 veteran trees were identified within the Scheme; one very large veteran tree in 'Good' condition identified within Lime Down D was omitted from the Statutory Biodiversity Metric [REP1-091], which the Applicant acknowledges represents a minor error. This omission occurred on the basis that the tree was located within an existing block of woodland. The correct total habitat area occupied by veteran trees is therefore 3.1786 ha rather than 3.10 ha. This represents a very minor change in the overall net gain calculation for the Scheme and does not affect the total net change in biodiversity units (36.10% gain). An updated version of the Statutory Biodiversity Metric [REP1-091] and Biodiversity Net Gain (BNG) Assessment Report [REP1-

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			completed, as would have been expected. The council recommends that the ExA request these matters be addressed and for clarity and information, the User Guide states: "For individual trees, the biodiversity metric tool contains a 'tree helper' which generates an area value based on the tree's diameter at breast height (DBH)."	089] can nonetheless be provided, if necessary.
WC-072	Ecology and Biodiversity	Biodiversity Net Gain (BNG)	Observation 9 6.77. There are Individual Trees habitats for which the User Comments in the Metric [PDA-008] has been left blank. Three habitats are area habitats, spanning the area covered by the individual trees. The User Guide stipulates that Applicants are required to enter the number of trees contributing to the area habitat in the User Comments. Individual trees habitats without user comments comprise baseline habitat reference 46, 48 and 49 on the On-Site Habitat Baseline tab (A-1) and	For clarity, the Applicant can confirm that the number of individual trees corresponding to Baseline Habitat References 46, 48 and 49 within the Statutory Biodiversity Metric [REP1-091] are as follows: Habitat Reference 46: • 7 small trees in 'Good' condition (0.0285ha); • 21 medium trees in 'Good' condition (0.3420ha); • 36 large trees in 'Good' condition (1.3192ha); and • 19 very large trees in 'Good' condition (1.4526ha) Habitat Reference 48:

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			habitat reference 11 on the On-Site Habitat Creation tab (A-2).	• 2 medium trees in 'Moderate' condition (0.0326ha); and • 2 very large trees in 'Moderate' condition (0.1529ha). Habitat Reference 49: • 5 medium trees in 'Good' condition (0.0814ha); and • 1 large tree in 'Good' condition (0.0366ha). All proposed individual trees within the Scheme (659 total) have been prescribed a tree size class of 'small' and target condition of 'Moderate', as set out within Paragraph 1.7.38 of the BNG Assessment Report [REP1-089]. Classification of all proposed individual trees as 'small' in size is in line with best practice guidance set out on Page 61 of The Statutory Biodiversity Metric User Guide (Feb 2024; last updated July 2025).
WC-073	Ecology and Biodiversity	Biodiversity Net Gain (BNG)	Observation 10	Justification for the consolidation of habitat rows within the Statutory

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			6.78. There is one error in the metric [PDA-008] on account of the Trading Rules not having been satisfied in respect of area habitats. This is because there are net losses of medium distinctiveness area habitats in one broad habitat group, and too few gains at higher distinctiveness categories to offset these losses. The broad habitat group concerned is: Cropland, which loses 14.53 biodiversity units (BU), from "Cropland - Arable field margins game bird mix" (16.59 BU pre-intervention, and 0.0 BU post-intervention, so a loss of 16.59 BU) and "Cropland - Arable field margins pollen and nectar" (4.2 BU pre-intervention, and 0.0 BU post-intervention, so a loss of 4.2 BU). 6.79. In terms of how this Trading Rule error has been addressed in the BNG Assessment Report [APP-273], it states: "1.1.15 The permanent grassland	Biodiversity Metric [REP1-091] and subsequent omission of individual habitat parcel references is provided in the relevant response above. The Applicant welcomes the Council's conclusion regarding the rationale provided to address Trading Rule errors within the BNG Assessment Report [REP1-089].

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			habitats provided, particularly areas of ONG, will also create opportunities for similar species as arable field margins, such as for pollinators, birds, mammals, reptiles and amphibians, whilst suitable habitat for arable weed species present within the arable field margins will be provided in the fields of permanent set-aside. 1.11.16 In these instances, it is therefore considered that whilst the Metric reports a failure of the trading rules for 'Cropland' habitats, the proposed habitat creation on-Site will actually result in the real-world provision of equivalent habitats for this habitat type, and therefore, taking into account professional judgement, the BNG assessment is considered to be fully compliant with all trading rules." 6.80. In order to give a suitably informed view on the validity and robustness of the justification provided for how the Trading Rule	

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			error can be overcome, the reviewer should ideally be able to accurately cross reference between the metric and associated plans using habitat reference numbers. However, as already discussed, these have not been included in the metric and associated plans. In the absence of this level of information and detailed plans, the council's Ecology Officer advises the ExA that they may wish to seek further information, but also advises that the rationale provided sounds reasonable.	
WC-074	Ecology and Biodiversity	Biodiversity Net Gain (BNG)	Observation 11 6.81. As detailed in the Council's Relevant Representation [RR-4934] and discussed with the Applicant prior to the DCO application being submitted, the BNG Assessment Report and metric should be prepared on the basis that only modified grassland of poor condition will be attainable underneath and between the solar panels. Whilst the council has reviewed the plates in the BNG	The Applicant notes the Council's comment and can confirm that all grassland habitat beneath and between Solar PV panels is proposed as modified grassland of poor condition. Where grassland habitats exist within the Solar PV Sites at baseline, it has been assumed that this habitat will be lost within panel areas during construction and subsequently created set out within Paragraph 1.7.8 of the BNG Assessment Report [REP1-089]. As referenced by the Council,

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			Assessment Report [APP-273], this has not permitted a full review and verification of the habitats proposed because plans with habitat reference numbers that correspond with the metric have not been provided. 6.82. As such, the council's Ecology Officer is unable to confirm that across the entirety of the Solar PV Sites only modified grassland of poor condition has been proposed underneath and between the panels, although this does seem to be broadly shown on Plates 8-12 within the BNG Assessment Report. It isn't possible to verify this in detail. It is recognised however, that paragraph 1.7.33 of the BNG Assessment Report [APP-273] details the proposed grassland habitat types and conditions which aligns with the council's required approach.	proposals for grassland creation beneath and between the Solar PV panels are set out within Paragraph 1.7.33 of the BNG Assessment Report [REP1-089]. The BNG Assessment Report [REP1-089] therefore clarifies that only modified grassland of poor condition is proposed beneath and between Solar PV panels, based on the precautionary approach informed by Clarkson and Woods' extensive experience monitoring operational solar farms within the UK and in line with the expectations of the Council. It is recognised in Paragraph 1.2.8 of the BNG Assessment Report [REP1-089] that baseline and proposed habitat data have been consolidated within the Statutory Biodiversity Metric [REP1-091], in accordance with the Statutory Biodiversity Metric QGIS Template and GIS Import Tool – User Guide. Consolidation of data is recognised as a limitation to the assessment, however, in the Applicant's view, sufficient justification

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				for this decision has been provided. Consolidation of data within the Metric precludes assignment of individual parcel references between QGIS mapping and the Metric; further detailed on this matter is provided by the Applicant in the relevant response above. It is the Applicant's view that sufficient reassurance is provided with regards to grassland condition beneath and between the Solar PV panels within the BNG Assessment Report [REP1-089] and panels therein, without the need for specific parcel references. The proposals within the BNG Assessment Report [REP1-089] and Statutory Biodiversity Metric [REP1-091] will be secured via DCO Requirements.
WC-075	Hydrology, Flood Risk and Drainage	Executive Summary	2.15. From its role as Lead Local Flood Authority, Wiltshire Council cannot currently be satisfied that the scheme avoids increasing flood risk on-site or downstream. The core issue is the absence of quantitative, field-scale hydrological modelling capable of representing how solar	The request for comprehensive field-scale hydrological modelling proceeds from a misunderstanding of the hydrological effect of solar PV panels. Solar PV panels are elevated above ground and drain to the existing ground beneath them. They do not form a

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			arrays, access tracks, soil compaction and drainage infrastructure will interact across a very large and hydrologically connected area. 2.16. The council notes widespread local evidence of existing flooding problems, reinforced by community representations and expert observations, including during Storm Bert in November 2024. National Policy Statements (EN-1 and EN-3), Environment Agency standing advice, and precedent from other solar NSIPs all support the need for detailed modelling. Without this, the performance of proposed Sustainable Drainage Systems and exceedance routing cannot be verified. 2.17. Wiltshire Council therefore recommends that the Examining Authority require comprehensive hydrological modelling during the Examination or alternatively impose	connected impermeable surface and should not be assessed as if they were continuous hardstanding. That distinction is important. The hydrological risk pathway for panelled fields is not the presence of panels as an impermeable surface. It is the condition of the ground beneath and between panels, including vegetation cover, soil compaction and hydraulic connectivity to ditches or watercourses. The submitted assessment applies modelling and calculations where they are useful and reliable. This includes targeted hydraulic modelling for material watercourse interaction, Manning's/open channel assessment for smaller ordinary watercourses, and quantitative drainage design for impermeable infrastructure. The requested model would be driven by assumed future values for vegetation condition, soil compaction, surface roughness, infiltration and flow connectivity. Those are management-

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			a DCO Requirement preventing commencement until such evidence has been prepared, approved, and independently verified.	dependent variables, not fixed design parameters. A model based on assumed adverse ground conditions would not provide a more robust evidential basis than securing the controls that prevent those conditions arising. Existing flooding in the wider catchment, including during Storm Bert, is acknowledged. That is baseline context. It does not demonstrate that the Scheme would increase runoff or flood risk. The submitted application demonstrates that overland flow routes are retained, formal drainage areas are controlled, and the Scheme would not materially increase flood risk elsewhere. No additional DCO Requirement for blanket modelling is necessary, proportionate or justified.
WC-076	Hydrology, Flood Risk and Drainage	Flood Risk	7.1. On the information before the Examination, the Lead Local Flood Authority (LLFA) cannot be satisfied that the proposed development avoids an increase in surface water	The Applicant does not agree that the information before the Examination is insufficient for the LLFA to be satisfied that flood risk would not be increased on-site or off-site.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			runoff rates or volumes, nor that flood risk will not be exacerbated either on-site or off-site. 7.2. The core evidential gap is the absence of quantitative, field-scale hydrological modelling capable of representing: • Panel-row hydrology • Between-row channelisation • Access track preferential flow paths • Soil compaction from construction • Catchment connectivity across multiple parcels • SuDS performance under design storm conditions • Safe exceedance routing. 7.3. The Overarching National Policy Statement for Energy (EN-1) requires evidence-led assessment demonstrating that development does not increase flood risk elsewhere; the National Policy	The submitted assessment does not rely on a single qualitative proposition. It distinguishes between the different hydrological mechanisms relevant to the Scheme and assesses each using an appropriate method. Fluvial flood risk is assessed through published flood mapping, site-specific hydraulic modelling where material watercourse interaction exists, and Manning's/open channel assessment for smaller watercourses where proportionate. Surface water drainage from impermeable infrastructure is assessed quantitatively. Runoff from panelled fields is controlled through the management of ground condition, vegetation cover and flow connectivity. The alleged evidential gap at paragraph 7.2 is therefore not accepted. The matters listed by the LLFA are addressed, but not all through field-scale modelling because they are not all fixed hydraulic design parameters. Panel-row hydrology has been addressed through the solar-specific policy position in EN-3 and the evidence base on solar PV runoff.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			Statement for Renewable Energy Infrastructure (EN-3) reinforces this for solar PV schemes. The scheme's scale and hydrological sensitivity mean quantitative hydrological assessment is necessary. 7.4. Substantial flooding concerns have been raised by residents, organisations, parish councils and expert local stakeholders within the Relevant Representations submitted to the Planning Inspectorate for Lime Down Solar Park. These representations describe widespread flooding, rapid runoff, ditch overtopping, saturated land and repeated annual flood events across the catchment. 7.5. The LLFA considers that quantitative hydrological modelling is essential during the Examination to resolve flood risk uncertainties.	Panels are elevated above ground and rainfall drains to the existing ground beneath. The panels do not create a connected impermeable drainage catchment. Between-row channelisation is not an inherent consequence of solar PV development. It is a potential ground condition risk where bare or compacted soils are allowed to form connected flow pathways. That risk is controlled through vegetation establishment, retained ground cover and soil management secured through the Outline CEMP [REP1-096], Outline SRMP [APP-280] and Outline OEMP [REP1-098]. Access track preferential flow paths are addressed through the design approach. Tracks are to be permeable, constructed at existing ground levels, and provided with cross-drainage where required. They are not proposed as raised, impermeable channels that would divert catchment flows.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				Soil compaction from construction is recognised as the principal runoff risk for panelled land. The Applicant's position is not that this risk does not exist. The point is that it is a construction management and reinstatement issue, not a basis for treating panelled fields as hardstanding. It is secured through controlled trafficking, appropriate plant, soil protection and remediation measures in the Outline CEMP [REP1-096] and Outline SRMP [APP-280]. Catchment connectivity across parcels has been considered through the parcel-specific assessment of topography, watercourses, flow routes, flood extents and drainage receptors in ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [REP1-017] and ES Volume 3, Appendices 11-1 to 11-9: Flood Risk Assessment and Drainage Strategy [REP1-037 to REP1-054]. The LLFA has not identified a specific new uncontrolled discharge, catchment transfer or receptor pathway created by the Scheme.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				SuDS performance under design storm conditions is assessed where SuDS are required for formal drainage. That applies to impermeable infrastructure, including substations, the BESS and other hardstanding. These areas are assessed as discrete drainage catchments in ES Volume 3, Appendices 11-1 to 11-9: Flood Risk Assessment and Drainage Strategy [REP1-037 to REP1-054], with runoff rates, attenuation storage and controlled discharge addressed. It is incorrect to imply that SuDS performance across the Scheme is unverified because panelled fields have not been modelled as hardstanding. Safe exceedance routing has been considered through retention of existing overland flow routes, avoidance of unnecessary level changes, permeable at-grade access tracks, and the drainage design for formal infrastructure. The Scheme does not introduce a connected hard drainage network across the panelled fields that

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				would require exceedance modelling in the manner suggested by the LLFA. Paragraph 7.3 overstates the requirement in EN-1 and EN-3. EN-1 requires a proportionate assessment demonstrating that flood risk is understood, managed and not increased elsewhere. It does not prescribe field-scale hydrological modelling of all solar panel areas. EN-3 provides the solar-specific position that solar PV panels drain to the existing ground and that drainage impacts will not, in general, be significant. The LLFA's approach gives insufficient weight to that policy position. The Scheme's scale does not, by itself, make blanket modelling necessary. The relevant question is whether the Scheme creates a material hydrological change that requires such modelling. For panelled land, the controlling variables are ground condition, vegetation and connectivity. These are secured management controls, not fixed model inputs.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				The flooding concerns identified in paragraph 7.4 are acknowledged as local baseline context. They describe existing catchment conditions, including flooding, saturated ground, ditch overtopping and rapid runoff. They do not demonstrate that the Scheme would increase runoff rates or volumes, or exacerbate flood risk. Existing flooding is not a proxy for development impact. The submitted assessment considers the baseline flood risk context and then assesses how the Scheme would interact with that context. The Scheme retains overland flow routes, controls runoff from impermeable infrastructure, manages soil compaction, maintains vegetated cover and avoids treating panelled land as connected hardstanding. For the reasons above, the assertion at paragraph 7.5 that quantitative hydrological modelling is essential during the Examination is not accepted. The modelling requested would be

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				assumption-led rather than evidence-led. It would depend on assumed future values for vegetation condition, soil compaction, surface roughness, infiltration and flow connectivity across construction, operation and decommissioning. The more robust approach is to secure the controls that govern those variables in practice. That is already achieved through the submitted assessment, embedded mitigation and DCO-secured management plans. No further field-scale hydrological modelling is required.
WC-077	Hydrology, Flood Risk and Drainage	Policy and Legal Framework	7.6. National Policy Statement EN-1 requires applicants to present evidence-led assessments demonstrating that development: • Does not increase flood risk elsewhere • Manages surface water safely • Is supported by adequate environmental information.	Paragraphs 7.6 to 7.11 correctly identify that EN-1 requires flood risk to be assessed, surface water to be managed safely, and adequate environmental information to be provided. The Applicant has done this through ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [REP1-017] and ES Volume 3, Appendices 11-1 to 11-9: Flood Risk Assessment and Drainage Strategy [REP1-037 to REP1-054].

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			7.7. EN-1 requires assessment of flood risk "from all sources", including surface water, and requires quantitative evaluation where hydrological change is reasonably foreseeable. 7.8. EN-3 confirms EN-1 applies fully to renewable energy schemes. Solar PV arrays can modify infiltration, overland flow and catchment connectivity, requiring quantitative, proportionate modelling. 7.9. EN-1 requires the Secretary of State to be satisfied at the point of decision that flood risk impacts have been assessed and appropriately mitigated. Where impacts depend on flow behaviour, exceedance or downstream interaction, this assessment cannot be deferred. In the absence of appropriate modelling, compliance with EN-1 cannot be demonstrated.	The issue is not whether the Scheme triggers the need for a site-specific FRA, drainage assessment and LLFA consultation. It plainly does. The issue is whether EN-1, EN-3 or Environment Agency standing advice require the specific field-scale hydrological modelling now sought by the LLFA. They do not. EN-1 requires a proportionate assessment of flood risk from all relevant sources. It does not prescribe field-scale hydraulic or hydrological modelling of solar panel areas. It requires the Applicant to demonstrate that flood risk is understood, managed and not increased elsewhere. EN-3 provides the solar-specific policy context. It recognises that solar PV panels drain to the existing ground and that drainage impacts will not, in general, be significant. The LLFA's position gives insufficient weight to that policy statement and instead treats

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			7.10. Furthermore, Environment Agency Standing Advice – Check if a flood risk assessment is needed and one is provided (updated 2025) confirms that major development affecting surface water pathways or watercourses must provide: • A site-specific Flood Risk Assessment (FRA) • Surface water drainage assessment • LLFA consultation. 7.11. The council considers that the Lime Down Solar Park scheme clearly triggers these requirements.	panelled fields as if they are a connected impermeable drainage catchment. The assertion at paragraph 7.7 that quantitative evaluation is required wherever hydrological change is “reasonably foreseeable” does not support the LLFA’s conclusion. The submitted assessment has used quantitative methods where hydrological change is capable of reliable quantification: formal drainage areas, impermeable infrastructure, watercourse interactions and defined flood extents. For panelled fields, the controlling variables are vegetation condition, soil compaction, infiltration, surface roughness and hydraulic connectivity. Those variables are management-dependent. Modelling them would be assumption-led rather than evidence-led. The more robust approach is to secure the controls that govern those variables in practice.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				The statement at paragraph 7.8 that solar PV arrays can modify infiltration, overland flow and catchment connectivity is only partly correct. Panels can redistribute rainfall locally at drip-lines, but they do not create a continuous impermeable surface. Whether local redistribution translates into a material change at field boundary depends on ground condition and connectivity. Those matters are secured through the Outline CEMP [REP1-096], Outline SRMP [APP-280], Outline OEMP [REP1-098] and relevant DCO Requirements. Paragraph 7.9 is also not accepted. The Applicant is not seeking to defer assessment of acceptability in principle. The submitted FRA and drainage strategy assess the Scheme and identify the relevant controls. Detailed design and management plans then secure implementation, which is the normal function of DCO Requirements.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				Environment Agency standing advice does not create a blanket requirement for the modelling requested by the LLFA. It requires appropriate site-specific assessment. The submitted application provides that assessment.
WC-078	Hydrology, Flood Risk and Drainage	Evidence and Best Practice	7.12. Local Authority guidance, for example surface water drainage guidance from the Essex Design Guide and the Doncaster LLFA Solar Farm Drainage and Flood Risk Guidance identifies that large solar arrays: • Concentrate runoff beneath panels • Increase flow velocity downslope • Generate erosion / gullies • Increase runoff where soils are compacted • Require modelling-supported drainage strategies. 7.13. Wiltshire Council considers that these risks apply directly for the Lime Down Solar Park scheme as solar farms alter:	The local guidance cited by Wiltshire Council does not establish the blanket modelling requirement now sought. The Applicant has reviewed the guidance relied upon by the LLFA. It supports consideration of slope, soils, vegetation, access tracks and drainage behaviour. It does not require field-scale hydraulic modelling of all solar panel areas across the Order Limits. The point that solar arrays can concentrate rainfall beneath panel edges is understood. Panels can redistribute rainfall locally at drip-lines. They do not convert the field into an impermeable drainage catchment and they do not create a connected hard drainage network. The risks identified by the LLFA, including increased flow velocity, rilling,

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			• Interception • Infiltration • Sheetflow and channelised flow • Catchment boundaries • Track drainage behaviour. 7.14. Therefore, modelling is required to quantify these interactions across the scheme area, which is in excess of 1,000 hectares. 7.15. SuDS must be: • Sized using hydrological inflow modelling • Tested under 1:30, 1:100, and 1:100 + Climate Change (CC) storms • Assessed for exceedance routing. 7.16. Qualitative designs cannot verify performance as industry guidance emphasises risks of:	gully and runoff from compacted soils, are not ignored. They are ground condition risks. They arise where vegetation is poor, soils are compacted or local flow routes become connected to ditches and watercourses. That is why the Scheme controls the variables that actually govern runoff response: soil protection, controlled trafficking, reinstatement, permanent ground cover, permeable access tracks and cross-drainage where required. These are secured through the Outline CEMP [REP1-096], Outline SRMP [APP-280], Outline OEMP [REP1-098] and relevant DCO Requirements. The statement that solar farms alter interception, infiltration, sheetflow, catchment boundaries and track drainage behaviour overstates the effect. Interception and local drip-line distribution are affected. Infiltration and runoff response remain governed by ground condition. Catchment boundaries are not inherently altered by

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			• Dripline flow convergence • Track diversion of flows • Rill / gully erosion • Underestimated runoff peaks. 7.17. Therefore, a quantified hydrological assessment is justified.	panels. Tracks are to be permeable, at existing ground levels and designed so that they do not create preferential flow routes. It is therefore not accepted that modelling is required across more than 1,000 hectares to quantify these interactions. Such a model would be driven by assumed future values for vegetation condition, soil compaction, surface roughness, infiltration and flow connectivity. Those are management-dependent variables, not fixed hydraulic design parameters. SuDS requirements also need to be understood in the DCO context. The application establishes the drainage principles, parameters, discharge constraints, attenuation approach, climate change allowances and pollution control requirements for impermeable infrastructure. Final detailed drainage design will be developed post-consent once the detailed technology, layout and equipment specifications are fixed, and

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				will be secured through the relevant DCO Requirements and detailed management plans. The Council's reference to "qualitative designs" is therefore not accepted. The application does not rely on a single qualitative proposition. It distinguishes between different mechanisms and applies the appropriate level of assessment to each: watercourse flood risk, formal drainage from impermeable infrastructure, and ground condition controls for panelled fields. A quantified assessment is justified where there is a fixed hydraulic mechanism to assess. It is not justified as a blanket field-scale model of all panelled land.
WC-079	Description and DCO Process	NSIP Precedent	7.18. Large solar NSIPs, including Longfield Solar Farm (EN010118) and Green Hill Solar Farm (EN010170), were examined on the basis of quantitative modelling to inform decision-making under EN-1. In those examinations, quantitative modelling formed part of the	The reliance on Longfield Solar Farm and Green Hill Solar Farm is misplaced. The fact that other solar NSIPs included quantitative assessment does not mean that all panelled fields were modelled, or that field-scale

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			evidential base relied upon by the Examining Authority to assess flood risk and surface water impacts, including: • Flow modelling to define surface water behaviour during design and extreme events; • Exceedance mapping to identify flow paths, ponding areas, and interactions with adjacent land; • Climate change sensitivity testing to demonstrate scheme performance under projected future rainfall scenarios; and • Construction-phase hydrology assessment to evaluate temporary changes in runoff and drainage conditions. 7.19. In each case, this modelling was available at Examination stage and informed the Examining Authority's assessment, enabling the Secretary of State to be satisfied that flood risk impacts had been assessed in accordance with EN-1	hydrological modelling of solar arrays is an established NSIP requirement. There is an important distinction between quantitative assessment of watercourse interaction or impermeable infrastructure and field-scale modelling of panelled land. The former is appropriate where the hydraulic mechanism is fixed and capable of reliable assessment. The latter would depend on assumed future ground management conditions. At Green Hill, the submitted hydrology and drainage assessment follows the same core approach as Lime Down: targeted modelling where watercourse interaction justifies it, drainage principles and controls for impermeable infrastructure, and secured management controls for panel areas. The material relied upon by Wiltshire Council in relation to channelised flow, rilling and gully erosion at Green Hill is not an agreed applicant position, an Examining Authority finding or peer-reviewed evidence. It is a contested

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			(paragraph 7.9 above), rather than deferring assessment of acceptability in principle to post-consent discharge. 7.20. A consistent evidence standard across NSIPs therefore requires field-scale modelling for the Lime Down Solar Park scheme. 7.21. Furthermore, a very high proportion of the Relevant Representations received for the Lime Down Solar Park scheme reference flooding concerns. These include: • Repeated annual flooding of lanes, roads and fields • "Deep floodwaters" on local roads • Ditch overtopping following moderate rainfall • Surface water flowing into properties • Fast runoff from agricultural land into villages.	third-party representation. It does not establish expected practice and should not be treated as a basis for imposing a new requirement on Lime Down. Longfield also does not demonstrate that all solar panel areas must be modelled. Quantitative drainage assessment for substations, BESS, access roads or other infrastructure is not the same as field-scale modelling of runoff from solar arrays. Paragraph 7.20 therefore overstates the precedent position. There is no consistent NSIP evidence standard requiring field-scale modelling of solar panel areas. The Applicant is not aware of any comparable solar NSIP where the requirement now advanced by the LLFA has been required by an Examining Authority or the Secretary of State. The local flooding concerns cited at paragraphs 7.21 to 7.25 are acknowledged. They are material

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			7.22. Residents from Sherston, Hullavington, Easton Grey, Luckington, Malmesbury, Grittleton and Foxley have raised detailed concerns about: • Accelerated runoff from slopes • Soil saturation • Reduced infiltration capacity • High flows entering ditches and culverts that already struggle in storm conditions. 7.23. Storm Bert (23-24 November 2024) further intensified flooding concerns, with widespread flooding reported across the area, reinforcing existing evidence of catchment sensitivity to prolonged rainfall events. 7.24. Organisations, including the Environment Agency [RR-1394], Wiltshire Council (as the LLFA and LPA) [RR-4934] and numerous Town and Parish Councils (Sherston Parish Council [RR-	baseline context. They show that the existing catchment experiences flooding, saturated ground, ditch overtopping and rapid runoff under some conditions. They do not demonstrate that the Scheme would increase flood risk. Existing flooding is not a proxy for development impact. The relevant question is whether the Scheme would materially worsen runoff rates, runoff volumes, flow routes or flood risk receptors. The submitted application addresses that question 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], and the secured construction, operational and soil management controls. Storm Bert is also not a calibration dataset for the proposed development.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			4350], Luckington and Alderton Parish Council [RR-2873], Melksham Without Parish Council [RR-3141], Easton Grey Parish Meeting [RR-1220], Grittleton Parish Council [RR-1742], Kington St Michael Parish Council [RR-2701], Yatton Keynell Parish Council [RR-4941] and others) expressed flood risks concerns in their Relevant Representations. These bodies cited: • Saturated catchments • Recurrent flooding • Ditch and culvert limitations • Potential downstream impacts to Avon catchment towns • Need for proper hydrological modelling. 7.25. The council considers that the institutional evidence should carry significant weight and the concerns identified by residents and landowners should be considered as material evidence for the Examination.	It is an observed storm affecting the existing catchment. It does not provide calibration data for future panel-row behaviour, vegetation condition, construction compaction, reinstated ground cover or operational track drainage. Institutional and community concerns should be considered, but they do not displace the technical assessment. The submitted assessment demonstrates that the Scheme retains overland flow routes, controls runoff from formal drainage areas, manages construction compaction and does not treat panelled land as connected hardstanding.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
WC-080	Hydrology, Flood Risk and Drainage	Site-Specific Risk Pathways	7.26. The proposed Lime Down Solar Park development spans numerous hydrologically connected parcels, with varied slopes, overland flow paths and watercourses. 7.27. With regard to panel-row hydrology, the 6.1 Environmental Statement Volume 1, Chapter 11 Hydrology, Flood Risk and Drainage [APP-063] identifies slopes and soils that favour concentrated flow. Quantification of flow rates, velocities and erosion potential is required because EN-1 decision-stage assessment depends on demonstrable understanding of flow rates, velocities, depths and erosion potential, without which the scale and acceptability of flood risk impacts under exceedance and climate-change conditions cannot be evidenced. 7.28. The access tracks may divert flow, creating unintended catchment transfers. This risk is widely raised in	The Applicant agrees that the Scheme spans multiple parcels with varied slopes, overland flow paths and watercourses. That is why the assessment is parcel-specific and risk-led. Scale and hydrological connectivity do not automatically justify a single field-scale model. The correct approach is to identify the relevant mechanism in each location and assess or control it proportionately. The assertion at paragraph 7.27 that slopes and soils require quantified flow rates, velocities and erosion potential across all panelled land is not accepted. Slopes and soils are relevant to runoff risk, but they do not make solar panels impermeable and they do not require the panelled fields to be modelled as a connected hydraulic domain. Panel-row hydrology has been addressed through the solar-specific policy position in EN-3 and the evidence base on solar PV runoff.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			resident Relevant Representations. 7.29. In terms of catchment connectivity, ES Chapter 11 [APP-063] identifies multiple downstream ditches, culverts and watercourses. The Applicant's Flood Risk Assessment and Drainage Strategy [APP-210 to APP-218] includes mapping that overlay Environment Agency fluvial flood risk datasets onto the proposed development parcels, showing fluvial flood risk zones intersecting parts of the site; however, no quantitative modelling of hydrological connectivity or downstream flow propagation has been undertaken. 7.30. The council notes that the Applicant's SuDS are conceptual. Without modelling inflows, storage, spillway behaviour and exceedance routing, performance cannot be verified. 7.31. Furthermore, with regards to the Applicant's ES and FRA	Panels are elevated above ground and rainfall drains to the existing ground beneath. The panels do not create a connected impermeable drainage catchment. Where drip-line concentration could create local erosion risk, the relevant controls are ground cover, vegetation establishment, soil condition and prevention of connected bare flow routes. Those controls are secured through the Outline CEMP [REP1-096], Outline SRMP [APP-280] and Outline OEMP [REP1-098]. Paragraph 7.28 identifies that access tracks may divert flow. The submitted design approach directly responds to that risk. Tracks are to be permeable, constructed at existing ground levels and provided with cross-drainage where required. They are not proposed as raised impermeable channels. The LLFA has not identified a specific access track where a new uncontrolled catchment transfer would be created.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			sensitivity, overland flow cells identified in 6.1 Environmental Statement Volume 1, Chapter 11 Hydrology, Flood Risk and Drainage [APP-063] reinforce the need for quantitative data.	Paragraph 7.29 refers to multiple downstream ditches, culverts and watercourses. These have informed the assessment and layout. ES Volume 3, Appendices 11-1 to 11-9: Flood Risk Assessment and Drainage Strategy [REP1-037 to REP1-054] uses Environment Agency flood mapping, site-specific hydraulic modelling where material interaction exists, and Manning's/open channel assessment for smaller watercourses where proportionate. The absence of blanket modelling of downstream flow propagation does not mean catchment connectivity has been ignored. It means that the Applicant has not treated the entire Scheme as a single hard drainage catchment, because that would misrepresent how solar PV interacts with rainfall and runoff. Paragraph 7.30 states that the Applicant's SuDS are conceptual. That needs qualification. At this DCO stage the application establishes the drainage principles, parameters, discharge constraints, attenuation approach,

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				exceedance principles and pollution control requirements for formal drainage areas. Final detailed drainage design cannot sensibly be fixed before detailed technology, layout and equipment specifications are confirmed, particularly for the BESS and substations. That is not an assessment gap. It is the normal DCO approach. The application fixes the environmental parameters and securing mechanisms, while detailed design is finalised within those approved limits post-consent. Paragraph 7.31 refers to overland flow cells. The identification of overland flow routes supports the need to retain and manage flow routes. It does not justify field-scale modelling of all panelled land. The Scheme avoids unnecessary level changes, uses permeable at-grade tracks and secures drainage principles for formal infrastructure. The LLFA has not identified a specific omitted pathway, receptor, outfall or catchment transfer. It instead seeks a

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				different assessment method for the whole Scheme. That is not justified.
WC-081	Hydrology, Flood Risk and Drainage	Weight and Probative Value	7.32. Wiltshire Council considers that the combined weight of national policy requirements, including NPPF paragraphs 159-161 and the decision-stage requirements of EN-1 and EN-3, Environment Agency guidance on surface- water flood risk and exceedance flow routes, local authority drainage guidance as applied to large-scale solar developments, and established NSIP precedent, specifically Longfield Solar Farm (EN010118) and Green Hill Solar Farm (EN010170), which were examined on the basis of Flood Risk Assessments supported by quantitative surface-water assessment, establishes a clear need for quantitative hydrological modelling. This is further supported by community evidence contained within Relevant Representations and by the Applicant's own Flood Risk Assessment, contained within 6.3 Environmental Statement Volume 3, Appendix 11-8 Flood Risk	The combined weight argument at paragraphs 7.32 and 7.33 is not accepted. National policy does not require the modelling requested. EN-1 requires a proportionate assessment of flood risk. EN-3 recognises that solar PV panels drain to existing ground and that drainage impacts will not, in general, be significant. Environment Agency modelling guidance is conditional and risk-based. It does not create a mandatory requirement for field-scale modelling of solar panel areas. Local authority guidance from other administrative areas is not binding and does not override national policy. In any event, the cited guidance does not establish the blanket modelling requirement advanced by the LLFA. The cited NSIP precedent is overstated. Longfield and Green Hill do

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			Assessment and Drainage Strategy – Lime Down E2 [APP-217] together with associated flood-risk mapping presented in Environmental Statement Volume 2 figures and relied upon within that assessment. 7.33. Without modelling, the LLFA cannot determine that flood risk will not increase.	not establish an expectation that panel areas are modelled as field-scale hydraulic domains. The Green Hill assessment approach is materially consistent with Lime Down. Community evidence and Relevant Representations identify existing flood concerns. They are relevant to understanding baseline conditions. They are not evidence that the Scheme would increase flood risk. The LLFA's reliance on ES Volume 3, Appendix 11-8: Flood Risk Assessment and Drainage Strategy – Lime Down E2 [REP1-051] is also misplaced. That appendix addresses the relevant floodplain interaction at Lime Down E2. It does not support extending field-scale modelling across all panelled land. The Applicant has used quantitative assessment where the hydraulic mechanism is fixed and capable of meaningful assessment: watercourse

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				interaction, formal drainage infrastructure and impermeable areas. For panelled fields, the controlling factors are soil condition, vegetation cover and flow connectivity. Those are secured through management plans and DCO Requirements. Modelling them as assumed future states would not provide a more robust decision basis than securing the controls that manage them. The assertion that the LLFA cannot determine flood risk without the requested modelling is therefore not accepted. The submitted assessment provides sufficient information to determine whether the Scheme would materially increase flood risk.
WC-082	Hydrology, Flood Risk and Drainage	Recommendations to the Examining Authority	7.34. The LLFA requests that the ExA require the Applicant to submit field-scale hydrological modelling (see Appendix A for Modelling Parameters) during the Examination, to include:	The proposed Requirement should not be imposed. It is framed as if the absence of blanket field-scale modelling is an evidential failure. That is incorrect. The submitted

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			- Panel-row hydrology - Access track hydrology - Soil compaction effects - Construction and operational phases - Climate change sensitivity - SuDS performance - Exceedance routing - Calibration using Storm Bert observations (where practicable). 7.35. If modelling is not provided during the Examination, the council considers that a Requirement should prohibit commencement until modelling, drainage strategy, Construction Surface Water Management Plan (CSWMP) and FRA updates are approved, with post-construction verification. 7.36. The full legislative text of the Requirement should be as follows: Hydrological Modelling (1D-2D) and Exceedance Assessment	assessment is a deliberate, proportionate approach consistent with the hydrological behaviour of solar PV panels, EN-3, the research base and comparable solar NSIP practice. The request at paragraph 7.34 combines matters that require different treatment. Panel-row hydrology, access track behaviour, soil compaction, construction phase controls, operational drainage, climate change sensitivity, SuDS performance, exceedance routing and Storm Bert calibration should not be forced into a single modelling exercise. Panel-row behaviour, vegetation condition and soil compaction would require assumed future ground states. Such modelling would be assumption-led rather than evidence-led. The appropriate approach is to secure the controls that manage those variables in practice. Access track hydrology is addressed through design principles: permeable tracks, at-grade construction and cross-

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			No development shall commence until a single, integrated Hydraulic Modelling and Exceedance assessment has been submitted to and approved in writing by the local planning authority. 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 all hydrologically connected land within the Order limits, together with an appropriate buffer (minimum 100m), 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	drainage where required. It does not require whole-Scheme 2D modelling. Construction phase runoff and soil compaction are controlled through the Outline CEMP [REP1-096] and Outline SRMP [APP-280]. These matters depend on contractor methodology, phasing, plant selection, ground conditions and reinstatement. They are properly controlled through secured construction management, not a pre-commencement model of assumed temporary states. SuDS performance is already addressed at DCO stage through drainage principles and parameters for formal drainage areas. Final detailed drainage design will be developed post-consent within the secured parameters once technology, layout and equipment specifications are fixed. This is particularly relevant to the BESS and substations, where technology and equipment configuration may move on before construction.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			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 for pre-works, temporary works and operational states; (d) demonstrate how exceedance routes are identified and safeguarded 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 include depth, velocity, hazard mapping and flow vectors, together with GIS layers; and (f) include a quality assurance statement demonstrating compliance with the Environment Agency modelling standards, together with a Model Review Note responding to Environment Agency and Lead Local	Climate change allowances are already incorporated into the flood risk and drainage principles where relevant. Exceedance routing is addressed through retention of overland flow routes, avoidance of unnecessary level changes, at-grade permeable tracks and formal drainage principles for infrastructure. Storm Bert calibration would be inappropriate. A historical storm affecting the existing catchment does not provide calibration data for assumed future panel-row behaviour, vegetation condition, construction compaction, reinstated ground cover or access track cross-drainage. The proposed Requirement at paragraph 7.35 would prevent commencement until modelling, drainage strategy updates, a Construction Surface Water Management Plan, FRA updates and post-construction verification are approved. That would reopen the

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			Flood Authority's comments. Where the Applicant demonstrates that a specific parcel of land is hydraulically isolated and does not influence Flood Zone 3b definition or exceedance routing, the local planning authority may agree a proportionate reduction in model coverage for that parcel. Scope of the Scheme The Scheme must include, as a minimum: (a) Field-scale hydrological modelling representing, for construction and operation: (i) Panel-row hydrology (including dripline concentration and between-row routing), (ii) Access track hydrology (including preferential flow pathways), (iii) Soil compaction and ground	principle of acceptability post-consent, rather than securing implementation of mitigation already assessed and controlled through the DCO application. The draft Requirement at paragraph 7.36 is disproportionate. It would require 2D surface water modelling across every PV area and a 100 m buffer, including areas where there is no material floodplain interaction or uncontrolled discharge pathway. It would also require 1D-2D modelling of all ordinary watercourses to define Flood Zone 3b. That is not justified. Flood Zone 3b is relevant only where functional floodplain exists. Land outside Flood Zone 2 cannot logically form Flood Zone 3b. The proposed requirement for model outputs, GIS layers, quality assurance, revised FRA material, integrated drainage design, CSWMP, maintenance plans and pre-operation verification duplicates matters already

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			condition changes from construction and maintenance activities, (iv) Catchment connectivity to ditches, culverts and watercourses, (v) SuDS performance (conveyance, attenuation, treatment and drain- down), and (vi) Exceedance routing for the 1 in 100 year event with climate change, using survey-grade topographic data. (b) Climate change and storm sets: assessment of multiple critical storm durations (short, medium and long duration events) for the 1 in 30 year, 1 in 100 year and 1 in 100 year + climate change scenarios, with allowances consistent with current policy and guidance at the time of submission. (c) Control points and performance targets: demonstration that there is no increase in greenfield runoff rates and volumes at all agreed control points for the operational phase, and that	addressed through the ES Volume 3, Appendices 11-1 to 11-9: Flood Risk Assessment and Drainage Strategy [REP1-037 to REP1-054], Outline CEMP [REP1-096], Outline OEMP [REP1-098], Outline Decommissioning Strategy [REP1-100], Outline SRMP [APP-280] and relevant DCO Requirements. The suggested pre-operation hold point is also unnecessary. It would tie operation to a modelling exercise that is not required for the assessment of the Scheme. Detailed drainage and management controls are already secured through the DCO framework. The Requirement would impose disproportionate obligations without a clear technical benefit and should not be included. It is therefore not accepted that modelling is required across more than 1,000 hectares to quantify these interactions. Such a model would be driven by assumed future values for vegetation condition, soil compaction,

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			exceedance routes avoid sensitive receptors and critical infrastructure. (d) A Revised Flood Risk Assessment and Integrated Drainage Strategy: integrating modelling outputs into final SuDS sizing, layout, exceedance pathways, spillway behaviour, and (where relevant) watercourse crossing hydraulics, with plans, long-sections, and details sufficient for technical approval. (e) A Construction Surface Water Management Plan (CSWMP): covering temporary drainage, sediment and pollution control, earthworks phasing, haul-route management, wheel-wash, emergency contingencies and inspection / maintenance during construction. (f) Maintenance and management: a SuDS maintenance plan identifying asset ownership, access, inspection frequencies,	surface roughness, infiltration and flow connectivity. Those are management-dependent variables, not fixed hydraulic design parameters.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			performance monitoring and funding arrangements for construction, operation and decommissioning. (g) Verification and monitoring: proposals for pre-operation verification (including survey and performance checks) and an approach to post- construction monitoring and remediation if required, proportionate to risk. (h) Consents interface: confirmation of the Applicant's strategy for any ordinary watercourse consents or other approvals required by law for works affecting ordinary watercourses, culverts or their by-pass / overflow arrangements, and how those will interface with the Scheme. Implementation The authorised development must be constructed and maintained in	

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			accordance with the approved Scheme. Any variation must be approved in writing by the relevant planning authority, following consultation with the Lead Local Flood Authority and the Environment Agency. Pre-operation Verification Prior to first operation, the undertaker must submit an as-built verification report to the relevant planning authority confirming: (a) SuDS assets and watercourse works have been constructed as approved (as-built plans and levels); (b) Storage volumes, hydraulic controls and outfalls accord with the Scheme; (c) Exceedance routes are in place and free from obstruction; and (d) Maintenance responsibilities have been transferred / established. Operation must not commence until the verification report is approved in writing by the relevant planning authority, following consultation with	

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			the Lead Local Flood Authority. Purpose and Interpretation This Requirement secures evidence-led hydrology and drainage outcomes consistent with EN-1 (no increase in flood risk elsewhere; adequate environmental information) and EN-3 (renewables must demonstrate robust assessment and resilience), and with the Environment Agency's standing advice for major development and surface water drainage management.	
WC-083	Cultural Heritage	Built Heritage Considerations	8. Built Heritage Considerations 8.1. From a built heritage perspective, the council's position remains as advised in its Relevant Representation [RR-4934]. However, following on from the council's review of Interested Party Relevant Representations, and specifically [RR-3086], a further potential issue was identified: 8.2. The potential impact on its setting from the temporary	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

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			construction compound and cable route (Works No. 5A) to the east of the Grade II* listed Grittleton House appears to have been insufficiently assessed. The current assessment focuses on the impact of Lime Down Solar Park Site C to the north and on the impact of the cable route on the Conservation Area. However, it does not assess impact on the significance of Grittleton House specifically. 8.3. The council considers this merits further assessment and it has been agreed with the Applicant's heritage team that a site visit would be useful to inform the assessment. It is understood that this is to be arranged for April 2026. 8.4. Furthermore, the council's Built Heritage and Conservation officer is aware that the Applicant is proposing some changes to the outline management plans to address comments in the council's Relevant Representation and will also be providing additional analysis	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 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]. A site visit to Grittleton House was undertaken on the 5th of May with the Conservation Officer. While it was noted that there are some limited views between the Grittleton House and agricultural land within the cable route corridor, including the southern part of a compound area, the Applicant considers that existing screening provided by existing hedgerow and trees, along with temporary nature of works as a result of the installation of cabling would

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			in respect of the impact from the scheme on views from Bradfield Manor. The council will review and provide comment on these documents once they have been submitted into the examination.	not effect how the asset is experienced within its wider agricultural setting. There are ongoing discussions between the Applicant and WC 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 WC Conservation Officer should be consulted on the approval of design for the access Works Number 8b. The Applicant submitted a technical note at Deadline 1A '9.20 ES Technical Addendum to Chapter 12 Cultural Heritage - Bradfield Manor Visualisations' [REP1A-014], which included the visualisations as requested by WC and Historic England, which support the results of the assessment of harm on Bradfield Manor Farmhouse.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
WC-084	Transport and Access	Protective Provisions	9.1. As will be clear from the Highways Development Management concerns raised in both the council's Relevant Representation [RR-4934] and Local Impact Report, the potential damage to the local highway asset because of the regular HGV trafficking which will ensue over the two-year construction period is a major concern. Following a further site visit made since the submission of the council's Relevant Representation, it was readily noted that many of the very minor narrow lanes in the area are in a relatively poor condition. However, the carriageway along the Alderton Road / Fosse Way route and the unnamed road between the end of the Fosse Way and Sherston (so the Lime Down Solar Park sites A-C access route) did not seem to be in a poor structural condition now, or indeed the minor road between Dyson Roundabout and Bradfield Cottages (Lime Down Solar Park site D access route). However, these carriageways are not currently	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 Wiltshire Council might have, the Applicant intends to include these protective provisions in the draft DCO at Deadline 2. The Applicant has also updated the Outline CTMP [REP1-112] at Deadline 1 to provide further detail on matters requested by Wiltshire Council. As set out in the Outline CTMP [REP1-112], pre-construction road condition survey will be carried out on the local highway network via video two weeks before the construction phase commences. Interim surveys will be undertaken every 6 months during the Construction Phase, and a completion survey will be carried out in order to identify any additional defects that can reasonably be attributable to

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			subject to a lot of HGV usage, so how they will stand up to the high axle loadings from regular articulated and rigid HGV construction trafficking during the build-out of the Lime Down Solar Park sites is a big unknown and concern. As such, the level of damage risk could include areas of total structural pavement failure, where the construction depth of these minor roads is relatively thin and not potentially designed or adequate for sustained heavy vehicle axle loadings. 9.2. In short, highway damage and remedial costs could be very substantive and widespread and not necessarily limited to verge over-run or edge damage caused by passage issues for two HGVs, or even a car / HGV along specific lengths. It is accepted that the submitted 7.22 Outline Construction Traffic Management Plan (OCTMP) [APP-287] proposes that pre-construction condition surveys would be undertaken, albeit the extents are	construction activities at the Site. Any identified highways defects or carriageway structural failures resulting from construction activities associated with the Site will be corrected to the satisfaction of the local highway authority either on the completion of the Construction Phase or, if required for safety reasons, during the Construction Phase. Further details of these surveys will be confirmed as part of the Final CTMP.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			still to be agreed. However, if defects picked up show that the baseline condition is poor in certain locations, then it is not inconceivable that an unacceptable level of damage might well occur with HGV trafficking during the construction phase. It is thus 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.	
WC-085	Transport and Access	Protective Provisions	9.3. Within the Local Impact Report, and mindful of the above, the council has made clear its view that a formal s59 Agreement (Highways Act 1980) should be included as a DCO Requirement to cover highway damage liability, so not something the Applicant 'might' be prepared to entertain or agree to. Furthermore, a set of pre-construction and post-construction surveys won't cover what may need to be done to address unacceptable damage and potential safety issues should this	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 Wiltshire Council might have, the Applicant intends to include these protective provisions in the draft DCO [REP1-007] at a future examination deadline.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			happen during the construction period. "Exceptional traffic" on a highway, often legally referred to as extraordinary traffic under UK law (Section 59 of the Highways Act 1980), refers to traffic that is so exceptional in quality or quantity, or so unusual in ordinary occurrence, that it causes damage to the road beyond what is common. It is not defined by a specific vehicle type, but rather by the damage it causes and how it differs from the average traffic on that specific road. It is clearly a question of fact to be determined for each case, but it would seem to the council that it would be difficult for the Applicant to argue that the level of HGV trafficking needed to construct the Lime Down Solar Park sites would be anything other than 'extraordinary' on the minor roads being used for proposed construction access. 9.4. It is not the purpose of the Written Representation to set out the precise content to be covered in a	The Applicant has also updated the Outline CTMP [REP1-112] at Deadline 1 to provide further detail on matters requested by Wiltshire Council. As set out in the Outline CTMP [REP1-112], pre-construction road condition survey will be carried out on the local highway network via video two weeks before the construction phase commences. Interim surveys will be undertaken every 6 months during the Construction Phase, and a completion survey will be carried out in order to identify any additional defects that can reasonably be attributable to construction activities at the Site. Any identified highways defects or carriageway structural failures resulting from construction activities associated with the Site will be corrected to the satisfaction of the local highway authority either on the completion of the Construction Phase or, if required for safety reasons, during the Construction Phase. Further details of these surveys will be confirmed as part of the Final CTMP.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			s59 Agreement for the Lime Down Solar Park scheme. However, it is considered the following should be covered as a minimum: • The required network extent of comprehensive 'independent' highway pre-condition surveys. Road lengths considered as a necessary 'minimum' by Wiltshire Council have been set out in its Local Impact Report. • Agreement to do some pre-emptive works if necessary if the said pre- condition surveys reveal defects which could lead to early failure with the level of HGV construction traffic envisaged. • Linked to the above, a mechanism to do necessary repairs at no cost to the council during the construction / decommissioning phase. This would require details of remedial works proposed to be firstly approved by the council, and the completed works subject to an inspection regime. • Agreement to return the roads	

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			covered and used for HGV construction trafficking to 'at least' as good a condition as they were at outset after the construction / decommissioning phase.	
WC-086	Transport and Access	Protective Provisions	9.5. The council is also in discussions with the Applicant regarding the inclusion of bespoke Protective Provisions within the draft DCO [APP-016] for the benefit of the local highway authority and other amendments required to address the council's concerns with current DCO drafting as raised within its Relevant Representation [RR-4934]. 9.6. One specific point made by other respondents on the OCTMP [APP-287] and expressly access to Lime Down Solar Park areas A-C, is how it will be 'policed' and 'managed' and any potential HGV construction routing non-compliance dealt with. The very valid concern, which is recognised and supported by Wiltshire Council [PDA-014], is with access from the east to the Lime Down Solar Park sites A-C areas.	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 Wiltshire Council might have, the Applicant intends to include these protective provisions in the draft DCO [REP1-007] at a future examination deadline. The Applicant has also updated the Outline CTMP [REP1-112] at Deadline 1 to provide further detail on matters requested by Wiltshire Council. Section 6.14 includes further clarifications as to what monitoring/reporting/actions would be implemented in cases where proposed construction routes are not followed.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			This is because the prescribed route westwards to M4 Junction 18 and then back eastwards along the B4040 / B4039 to Grittleton is considerably longer than exiting at M4 Junction 17 and using either 'The Street' through Hullavington to get to Grittleton or the Lime Down Solar Park site D route beyond Bradfield Cottages to Fosse Way via Norton. Given the significant reduction in mileage with exiting at M4 Junction 17, it is considered there could be considerable incentive for HGV drivers seeking to access the Lime Down Solar Park A-C sites from this direction to do it. Whilst the council will inevitably be alerted to any noticeable increase in HGV trafficking along 'The Street' through Hullavington by residents, it may be more difficult to pick this up on the route up to Bradfield Cottages where a lot of HGV trafficking linked to Lime Down Solar Park site D will be expected anyway. However, it is equally likely that residents in Norton will be equally quick to identify any	Drivers will receive training and be made aware of the routes to each access in advance of driving to the Site. The requirements of the DCO and Final CTMPs are legally binding and measures to enforce drivers to use construction routes will be set out in the Final CTMPs. Any drivers not following construction routes will receive retraining. Suppliers and subcontractors will be required to book delivery slots via a secure online portal or app. The booking system will also be used as a means to monitor that drivers are using the appropriate routes.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			HGV construction traffic routing via the village to reach Lime Down Solar Park sites A-C. Notwithstanding dealing with the level of complaints which will inevitably ensue if this non-compliance routing occurs, it would also introduce HGV trafficking onto minor roads which are unsuitable and in potentially a poorer existing condition than those set out in the OCTMP. Therefore, the council will require regular monitoring of flows at Norton and through Hullavington by the Applicant.	
WC-087	Description and DCO Process	Draft DCO Provisions	9.7. As noted at the start of this Section, these comments are additional to the detailed highway comments made in the council's Relevant Representation [RR-4934]. The latter covers the main key issues of concerns with 'Highways and Transport'. These may be broadly summarised as follows: Draft DCO Provisions: 1) The council's Highway	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 Construction Traffic Management Plan under Requirement 15. The Applicant has also updated the Outline CTMP [REP1-112] at

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			Development Management (HDM) team remain concerned over the ability of the council to control works being undertaken within the public highway, notably its normal powers to assure that proposed site access and other construction works will meet the council's adoptable standard. Other concerns have also been raised by the council's Network Management team about the powers conferred by the DCO to enter onto the public highway and the Permit scheme, so how Traffic Regulation Matters and expressly temporary Orders necessary to execute the works are proposed to be administered under the DCO.	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 stringent monitoring and enforcement regime for construction routes, and a clearer process for addressing local road repairs during the construction phase. The updated Outline CTMP [REP1-112] submitted at Deadline 1 also 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 more condensed timeframes 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.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				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 Wiltshire Council might have, the Applicant intends to include these protective provisions in the draft DCO [EN010188/APP/3.1 (Rev 3)] at Deadline 2.
WC-088	Transport and Access	HGV Construction Routes and Two-Way Passage	HGV Construction Routes and Two-Way Passage 2) There remain major concerns over potential highway operating and safety issues associated with the inability to pass two HGVs on most of the minor roads proposed for construction access to the Lime Down Solar Farm sites, notably as the existing passing point opportunities have not even been assessed or any mitigation proposed. The highway damage consequences of this where verges	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]

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			are regularly over-run is also a concern, which as submitted analysis show, could happen with HGV / car passage along many sections where the carriageway width is inadequate to accommodate even this. The additional comments in this Written Representation expand and re-iterate the concerns over highway damage risk, which could in the council's view be very significant.	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-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. With regard to Lime Down A, excessive widening of the existing rural route to allow two HGVs to pass would be over

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				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], where all sites are not constructed concurrently, the maximum average daily number of HGV movements along the route to Lime Down A is only

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				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; • 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

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				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

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				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; • 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).

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				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

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				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].

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				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 the highway and verges during the construction period. The details of these surveys will be confirmed as part of the Final CTMP.
WC-089	Transport and Access	HGV Volumes – Solar Farm Sites (Construction Phase)	3) The predicted volumes of HGVs expected during the construction phases for each of the Lime Down SF sites (A-E) is still a point of discussion, with some clarification sought on these estimates following DCO application document review. The supporting calculations undertaken for Modules and Mounting Structures for each Lime Down site have not been fully	The trip generation for the construction phase has been calculated based on a detailed and realistic breakdown of the likely quantities and material volumes required to build out the various sites and cable routes. A breakdown of Solar PV Sites Trip Generation Calculations is provided at Annex E of ES Volume 3, Appendix 13-1: Transport Assessment [REP1-

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			provided or verified by evidence from existing solar farm sites. For example, whilst the total number of assumed PV Modules for each of the Lime Down sites (A-E) has been provided, it is unclear how these quantities have been derived. The area occupied by panels on each site will be known (Works Area 1), but the density / ha assumed and how this compares with the assumptions adopted for other consented solar farm sites or those in operation is unknown. The same query applies to module mounting structures, as assumptions made regarding the type of mounting structures or foundations / supports are also absent. Similarly, aggregate volumes are not determined on a Lime Down site-by-site basis, or on what basis, so the total access track lengths and their width / depth of construction. It is further noted the 'waste' calculations account for only removal of packaging, so seemingly exclude any allowance for removal of excavated 'spoil' material associated	057 and REP1-059]. 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. The calculations show the proposed trip generations for each Solar PV site. The calculated daily and hourly flows for the proposed construction routes are based upon the proposed construction programme and are presented in Annex F of ES Volume 3, Appendix 13-1: Transport Assessment [REP1-057 and REP1-059]. In relation to modules and mounting structures a 1.2 'Ratio' factor is included, and this figure represents a reduced loading factor per HGV, based on the difference in size between a High Cube and a standard container. The assessments assume standard sized containers, presenting a reasonable-worst case assessment. In practice a majority of modules and

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			with the construction of the access trackways, the construction compounds and the foundation bases for the BESS and 440kV and 132KV substations. Clearly, any under-estimates in components or need for the export of spoil could significantly increase the volume of predicted HGV movements needed over the construction period, so adding to the highway safety and damage concerns.	mounting structures will be delivered by HQ containers, reducing the assumed number of HGVs, with the exception of Lime Down Site E and the eastern section of Site D, which are accessible via the low bridge on the A429. Aggregate volumes for access tracks for example have been assessed on a site-by site basis in accordance with each sites relative size. This is included within the calculations at Annex E to ES Volume 3, Appendix 13-1: Transport Assessment [REP1-057 and REP1-059]. As a reasonable worst-case it has been assumed that all internal access tracks will be constructed using aggregate, when in practice a number of internal access tracks will remain as grass tracks. 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.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				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 comfortable buffer for general construction activities, including the removal of spoil, other construction waste and the installation and removal of construction compounds. A breakdown of Solar PV Sites Trip Generation Calculations is provided at Annex E to ES Volume 3, Appendix 13-1 Transport Assessment [REP1-057 and REP1-059]. This presents specific assessed quantities of material volumes and component type/numbers for each Lime Down Solar PV Site. Includes fencing, aggregates for access tracks, PV modules and mounting structures substation equipment. The impact of these trips in the ES and Transport Assessment has been assessed based on worst case assumptions, including all phases and

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				Solar PV Sites being constructed simultaneously and a 50% uplift to represent a peak day. This approach overestimates the trip generation in the construction period. The worked example below illustrates this: • The construction route to Lime Down A-C included in ES Volume 3, Appendix 13-1: Transport Assessment [REP1-057 and REP1-059] includes a peak day trip generation of 50 HGVs based on the worst-case assumptions, assuming all phases and Solar PV Sites being constructed simultaneously, plus a 50% uplift; • 50 HGVs represents an estimate of the deliveries on a peak day, so does not represent a daily average; • The daily average number of HGV construction movements is only 32 per day/7 per hour/one every 8 minutes (less than the

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				journey time along the route); assuming a realistic construction programme, the average number of HGV construction movements along the route to Lime Down A-C is only 17 per day/less than 3 per hour/one every 25 minutes (less than the journey time along the route) In summary, the trip generation and assessment work included in the DCO application is robust.
WC-090	Socio-Economics, Tourism and Recreation	Economic Considerations	10.1. Wiltshire Council disagrees with the Applicant on whether the Lime Down Solar Park scheme will have a significant or an adverse effect on the local economy. This is as set out within the council's Relevant Representation [RR-4934] and its Local Impact Report, which will also be submitted at Deadline 1. 10.2. Whilst the impact on the whole of Wiltshire resulting from the scheme may only be adverse, for the	The Applicant has responded to the council's Relevant Representation [RR-4934] in the Applicant's Response to Relevant Representations (Part 1) [PDA-009] and the Applicant's Response to the Local Impact Report (Rev 1) [EN010168/EXAM/9.21] submitted at Deadline 2. Therein, the Applicant sets out that the assessment in ES Volume 1, Chapter 16: Socio-Economics, Tourism and

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			local area in which the scheme is situated, Wiltshire Council maintains that the impact will be significant, particularly during the construction and decommissioning phases.	Recreation [APP-068] found an overall beneficial (albeit not significant) effect to the economy of the Study Area at all phases of the Scheme. Within this assessment, it is recognised that there are adverse effects to the tourism and agriculture industries in a localised area, but that these effects are not significant, even locally. The Applicant has kept this matter under discussion during conversations with Wiltshire Council through the process of agreeing a Statement of Common Ground (to be submitted at Deadline 2) and hopes that this matter can be resolved during the examination process.
WC-091	Climate Change and Energy Need	Climate Change Considerations	11.1. Further to the Wiltshire Council's Relevant Representation [RR-4934] and Local Impact Report, the council has sought independent advice on the proposal for Lime Down Solar Park and the associated carbon emissions. The council commissioned University of Exeter, Centre for Energy and the Environment (CEE) to review the	The Applicant notes this comment and intends to respond in a Technical Note to be submitted at Deadline 3 to address the University of Exeter's findings.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			greenhouse gas (GHG) emissions calculations and methodology submitted by the Applicant as part of its DCO application (6.1 Environmental Statement Volume 1, Chapter 7 Climate Change [APP-059]). 11.2. This independent report produced by the University of Exeter CEE has been appended to the council's Written Representation at Appendix B.	
WC-092	Climate Change and Energy Need	Carbon Payback Time	11.3. The commissioned University of Exeter CEE report has confirmed the council's previous representation that the carbon emissions of the scheme would take a long time to be offset by the emissions saved by the scheme, if they are able to break even at all. The independent report has appraised the methodology and calculations used by the Applicant and finds that the estimated carbon emissions are likely to be underestimated, and that the project may not break even in terms of carbon emissions during the project lifetime.	The Applicant notes this comment and is planning to respond in a separate Technical Note submitted at Deadline 3 to address the University of Exeter's findings.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			11.4. The Applicant's projected carbon savings from the project were based on the premise that grid emissions are frozen at 2029 levels for the following 60 years. This was not considered realistic and does not reflect current trends in grid emissions or the direction of successive government policies. In addition, the review questioned elements of the methodology in terms of its completeness and found a number of inconsistencies and numerical errors. 11.5. The 6.1 Environmental Statement Volume 1, Chapter 7 on Climate Change [APP-059] should provide a transparent assessment of greenhouse gas emissions and assessment of significance, using an approach aligned with the Institute of Environmental Management and Assessment (IEMA) (Table 7-1, ES Chapter 7). The assessment of significance used by the Applicant is limited. It is accepted that it is	

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			appropriate to consider the national Carbon Budgets, however IEMA guidance also recommends drawing on multiple sources of evidence to come to a 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, which has led to questioning whether the project pays back in terms of carbon. 11.6. Notwithstanding this, it is important to state that ground-mounted solar still has a role to play in decarbonisation of the electricity grid, which in turn enables deeper	

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			carbon emissions reductions for example by enabling low carbon heating of homes and electrification of transport. 11.7. This reiterates the point made that, the scheme has potentially significant net benefits in terms of carbon emissions reduction, when looking at the bigger picture. It is acknowledged that acceleration of solar farm delivery is part of the government's plans to achieve clean electricity generation and are part of wider transition to a low carbon future. The existing national and local planning policy does not require renewable energy projects to demonstrate need or demand as the need for renewable and low-carbon energy is already established nationally and does not need to be considered at the level of individual development proposals. National independent analysis (CCC 6th carbon budget) and national government plans (Solar Roadmap and Land Use	

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			Framework) make it clear that renewable energy will not take more than 1-2% of land area, and that this will not threaten food security.	
WC-093	Climate Change and Energy Need	Impact versus Benefits	11.8. The key issue that remains is whether an infrastructure project of this scale is suitable at this location, given the local impacts. In the absence of a Strategic Spatial Energy Plan, it is not clear how the Examining Authority (ExA) will come to a decision as to whether this part of Wiltshire is to be prioritised as a strategic location, and whether this project is a priority use of the 4th and 5th Carbon Budget. 11.9. The independent report looks at the methodology used by the Applicant to determine significance of the scheme's emissions in comparison to the national Carbon Budget for the electricity sector during the relevant period. Section 6.1 of the report at Appendix B states: <i>"The determination of significance on the basis of these national</i>	Section 2.9 of the Statement of Need [REP1-085] describes that the Clean Power 2030 Action Plan provided a framework to support re-prioritisation of the connections queue through 'readiness' (project-led) and 'strategic alignment' (connections-led) criteria. The Scheme has been notified that it has secured a Gate 2 Phase 1 prioritisation as part of NESO's work. Further, it is described that as part of the Clean Power 2030 Action Plan, NESO has been tasked with developing a national-level Strategic Spatial Energy Plan (SSEP), a Centralised Strategic Network Plan (CSNP), and eleven Regional Energy Strategic Plans RESPs). Ofgem approved NESO's methodology for developing the SSEP in May 2025. Once approved, the SSEP itself will inform the requirements of the transmission network set out in the first CSNP and RESPs.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			<i>percentages alone is subjective and should probably be presented in terms of the contribution to the national demand for electricity. For reference, UK electricity demand in 2024 according to DUKES was 284,986 GWh, if we assume for a moment that demand is broadly similar in 2029 (it will more than likely increase), the maximum generation of 438,000 MWh by the project in 2029 would provide about 0.15% of the power for 0.49% of the sector emissions. Whether this is significant may also be subjective but perhaps looks like less good value. The IEMA guidance suggests that good practice entails drawing on multiple sources of evidence (Figure 6) so the question of significance should be based on consideration of emissions in a range of context including for instance local emissions targets and contributions to policy objectives (Figure 6)."</i>	It is therefore the case that the expert body responsible for advising Government on the establishment of capacity ranges for low-carbon technologies, which is also responsible for assessing projects and prioritising them according to their readiness and strategic alignment, is also responsible for developing longer-term strategic plans for electricity generation and energy use, including the SSEP and others. The Connections Action Plan (see Section 2.8 of the Statement of Need [REP1-085]) 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 (p62). 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

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				net zero. Therefore prioritisations already made by NESO are not likely to be de-prioritised through any future and as yet unpublished strategic planning exercise by the same expert body. National Policy Statement EN-1 (2023) explains the urgent need for significant amounts of energy developments in meeting government's energy objectives, stating at Paragraph 3.3.63 that "there is an urgent need for new (and particularly low carbon) electricity NSIPs to be brought forward as soon as possible, given the crucial role of electricity as the UK decarbonises its economy"; and at Paragraph 3.3.20 that "a secure, reliable, affordable, net zero consistent system in 2050 is likely to be composed predominantly of wind and solar."
WC-094	Climate Change and Energy Need	Impact of Land Use Change	11.10. Representations have been submitted by Interested Parties, which ask for an assessment of the impacts of change of land use in terms of carbon emissions. The Applicant has	The Council's reference to "qualitative designs" is therefore not accepted. The application does not rely on a single qualitative proposition. It distinguishes between different mechanisms and applies the appropriate level of

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			not provided this as part of the 6.1 Environmental Statement Volume 1, Chapter 7 Climate Change [APP-059], and the council's commissioned independent report makes some comments as to the potential for a change of use from arable farmed land to unimproved grassland to have a net benefit for carbon sequestration, with additional net benefits if there is currently livestock being farmed. The report at Appendix B also makes some suggestions of the implications of different densities of hedgerows on the carbon sequestration potential. If the scheme removes substantial hedgerows (and associated significant trees), this will impact on the carbon sequestration potential of the land. However, the current proposals are not specific in the extent of hedgerows which will be removed, so the impact on carbon sequestration is unknown.	assessment to each: watercourse flood risk, formal drainage from impermeable infrastructure, and ground condition controls for panelled fields.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
WC-095	Description and DCO Process	Conclusion	11.11. The council's position in relation to climate change impacts of the Lime Down Solar Park scheme remain, that it is clear that solar has a role to play in the decarbonisation of the electricity grid and to enable deep carbon emissions reductions. However, the greenhouse gas emissions assessment submitted by the Applicant shows significant greenhouse gas emissions resulting from this project, which will impact on both local and national carbon budgets, and the significance of this is assessed in a narrow context. 11.12. The appropriateness of the scale and location of this scheme could be informed by the emerging Strategic Spatial Energy Plan. However, in its absence, the council urges the ExA to seek additional evidence about the appropriateness of scale and location of this scheme in relation to national strategic plans for renewables deployment, for example from the National Energy	The Applicant refers to its response given in to WC-092.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			System Operator (NESO) or the Climate Change Committee, in order to inform a decision and to determine the significance of the scheme's emissions in the context of multiple factors, including local area carbon emissions targets, national carbon budgets and sector-based emissions to weigh the overall benefit against the impacts (please see report at Appendix B, especially Section 6.1).	
WC-096	Climate Change and Energy Need	Applicant's Response to Wiltshire Council Relevant Representation	11.13. The 9.1 Applicant's Response to Relevant Representations (Part 1) [PDA-009] submitted at Procedural Deadline A, implies at reference WC-002 that the council's Relevant Representation has double counted the carbon emissions. This is a misunderstanding of the council's representation. The point being made is that even though the scheme has long-term net carbon savings, the short-term emissions are significant (during the first two years of construction), at a time when the county and the nation need to be reducing emissions at pace.	The Applicant notes this comment and is planning to respond in a separate Technical Note submitted at Deadline 3 to address the University of Exeter's findings.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			11.14. The University of Exeter report (appended at Appendix B to this submission), discusses the carbon emissions in more detail, including a comparison of the potential for emissions savings over time at projected grid carbon intensity figures. The analysis shows that, even over its full lifetime, the project does not save enough carbon through the electricity it generates to make up for the carbon emissions created during its construction and operation, when compared against expected future electricity grid emissions. 11.15. The Applicant's point on the impact on Wiltshire's territorial emissions is accepted. The overall project emissions were stated by the council to be approximately 4% of Wiltshire annual emissions, and it is acknowledged that not all of these emissions would occur in Wiltshire. However, it is still a significant comparison to make, to provide a sense of scale of the emissions of	

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			the project. As the independent report states (in Section 6), good practice in determining significance of impacts entails drawing on multiple sources of evidence, including a consideration of emissions in a range of contexts including local emissions targets. 11.16. The council's point about the date that the scheme would break even in terms of carbon was made to highlight the fact that the carbon payback time (CPBT) had not been discussed in the submission, and regardless of the precise payback period, the fact remains that embodied carbon and accurate net carbon emissions savings are of public interest and a key piece of evidence that should be published as part of transparent decision-making. 11.17. With respect to the Applicant's comment at WC-028, the council welcomes the establishment of a community benefit fund.	

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			11.18. Regarding the Applicant's response at WC-032, it was already understood that the figures for net saving of tCO₂e represent cumulative benefit across the entire 60-year lifecycle. 11.19. In response to the point made that "the GHG emissions during construction, operation and decommissioning of the Scheme can be considered to be 'offset' by the net positive impact of the Scheme on GHG emissions and the UK's ability to meet its carbon targets", the council draws on the independent review where it suggests that the carbon benefit from electricity generated by the scheme through the construction and operation phases is insufficient to repay the carbon debt incurred, based on figures submitted by the Applicant. However, it acknowledges that renewable energy, including utility-scale solar schemes such as this scheme, are established in national policy as part of the necessary	

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			transition towards the decarbonisation of grid electricity which in turn will provide a route to net zero, in particular through the electrification of energy demands associated with heat and transport. As established in national policy, schemes of this type are considered to be a benefit, despite their contribution to carbon emissions. Based on the submitted figures, however, this scheme appears to have unusually high carbon emissions, compared to similar schemes and it is therefore unclear whether this is an accurate assessment or whether a different methodology or accounting boundary would lead to a different conclusion in relation to the amount of carbon emissions or the ability of the scheme to offset them. 11.20. The Applicant's response to the council's Relevant Representation paragraph 7.5 (WC-033) states that most of the scheme's emissions are likely to take	

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			place outside of Wiltshire's borders, whilst the energy generated and carbon emissions saved will be within Wiltshire. It is, however, incorrect to suggest that using global rather than UK territorial emissions represents a conservative approach to emissions accounting. It is simply a different metric and accounting boundary. Territorial emissions estimates (based on geographical borders) and consumption emissions (used in carbon footprinting) which include overseas emissions and those from shipping, are simply different metrics designed to highlight different aspects of emissions patterns (see for example 'Measuring UK greenhouse gas emissions' from the Office for National Statistics'.	
WC-097	Human Health	Public Health Considerations	12.1. 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	The Applicant has responded to the council's Relevant Representation [RR-4934] in the Applicant's Response to Relevant Representations (Part 1) [PDA-009] and the Applicant's Response to Local Impact Reports (Rev 1)

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			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 effective on mental health and social cohesion are considered material and have the potential to cause harm. 12.2. 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. 12.3. Public Health have focused	[EN010168/EXAM/9.21] submitted at Deadline 2. The Applicant sought pre-application engagement with Wiltshire Council's Public Health team with the aim of ensuring the assessment methodology and relevant mitigation measures for protecting health and wellbeing are sufficient. The Applicant is therefore keeping this matter under discussion during conversations with Wiltshire Council through the process of agreeing a Statement of Common Ground (Rev 1) [EN010168/EXAM/8.2] (to be submitted at Deadline 2) and hopes that this matter can be resolved during the examination process. 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, across all phases of the Scheme. This assessment identifies no significant

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			on the human health aspects of the application but recognise that the proposals will significantly impact the amenity of the countryside including public rights of way, recreational pace, general environmental change and 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 and 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.	adverse effects to any assessed aspect of physical or mental health and wellbeing at any phase of the Scheme. 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]. Additional mitigation measures specific to health and wellbeing include the provision of a Community Liaison Group (Requirement 4), and integrated design and landscape measures secured through the Design Principles and Parameters [REP1A-008] (Requirement 5), and Outline LEMP [APP-283] (Requirement 7).

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
WC-098	Construction and Decommissioning	Scheme Commencement and Commissioning	13. Other Matters Scheme Commencement and Commissioning 13.1. Wiltshire Council has been in discussions with the Applicant regarding the issues raised within its Relevant Representation [RR-4934] on the 3.1 Draft Development Consent Order [APP-016], and specifically with regards to Requirements to address Scheme commencement, phasing and the date of final commissioning. 13.2. However, as a result of information relayed by the Applicant at Issue Specific Hearing 1 on 22 April 2026, the council's previously requested wording is considered insufficient to suitably mitigate against the two grid connection timeframes and the resultant impact this could have on scheme implementation and the associated environmental effects, of which the council was previously unaware.	The Scheme's scale does not, by itself, make blanket modelling necessary. The relevant question is whether the Scheme creates a material hydrological change that requires such modelling. For panelled land, the controlling variables are ground condition, vegetation and connectivity. These are secured management controls, not fixed model inputs.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			13.3. Whilst the council reserves the right to comment further on this matter, once it has had a chance to review the Applicant's response at Deadline 1A as requested by the ExA, based on the information currently available, the council considers that the following Requirements should be included within the Draft DCO [APP-016]. "Commencement of the authorised development 2. —(1) The authorised development, or any part thereof, must not be commenced after the expiration of the period of five years beginning with the day this Order comes into force. Phasing of the authorised development and date of final commissioning 3. —(1) No part of the authorised development may commence until a written	

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			scheme setting out the phase or phases of construction of the authorised development has been submitted to and approved by the relevant planning authority. (2) The scheme submitted pursuant to sub-paragraph (1) must include a timetable for the construction of the phase or phases of the authorised development and a plan identifying the phasing areas. (3) The scheme timetable and plan submitted pursuant to sub-paragraph (2) must correspond with confirmed grid connection date(s) and the required construction timeframe of that phase or phases of the authorised development. (4) The scheme submitted and approved pursuant to sub-paragraph (1) must be implemented as approved.	

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			(5) The undertaker must notify the relevant planning authority within fourteen days of the date of final commissioning for a part or parts of the authorised development that the final commissioning of that part or parts has taken place."	
WC-099	Construction and Decommissioning	Decommissioning and Land Restoration	13.4. Wiltshire Council has previously raised concerns regarding decommissioning and land restoration, including the need for a financial bond and / or charge on the land to be secured, in its correspondence with the Applicant on the 3.1 Draft Development Consent Order [APP-016] and as contained within its Relevant Representation [RR-4934]. 13.5. However, as a result of information relayed by the Applicant at Issue Specific Hearing 1 on 22 April 2026 regarding the potential for scheme elements to be decommissioned significantly in advance of the proposed 60-year scheme life as result of differences in the length of scheme land leases,	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.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			the council has identified additional concerns than those previously raised. A phased decommissioning approach in this manner could result in additional environmental effects than had previously been identified and mitigation proposed for. The council wishes to advise the ExA that it was previously unaware that decommissioning in the above manner had the potential to occur. 13.6. Whilst the council reserves the right to comment further on this matter, once it has had a chance to review the Applicant's response at Deadline 1A as requested by the ExA, based on the information currently available, the council considers that Requirement 20 of the 3.1 Draft Development Consent Order [APP-016] should be amended as follows. "Decommissioning and restoration 20. —(1) The authorised	

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			development, or any part thereof, must not commence until a Decommissioning Financial Security Scheme which has a duration of the scheme's lifetime, has been submitted to and approved in writing by the relevant planning authority, in consultation with the Secretary of State. (2) The date of decommissioning for any part of the authorised development must be no later than 60 years following the first date of final commissioning for the authorised development as a whole. (3) Unless otherwise agreed with the relevant planning authority, no later than 12 months prior to the date the undertaker intends to decommission any part of the authorised development, the undertaker must notify the relevant planning authority of the intended date of decommissioning for that part of the authorised development.	

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			(4) Unless otherwise agreed with the relevant planning authority, no later than 12 weeks prior to the intended date of decommissioning or any part of the authorised development notified pursuant to sub-paragraph (3), the undertaker must submit to the relevant planning authority for that part a decommissioning plan for approval. (5) The decommissioning plan must be substantially in accordance with the outline decommissioning strategy and must include a timetable for its implementation. (6) The decommissioning plan referred to in sub-paragraph (5) must demonstrate that the decommissioning of the authorised development, or any part thereof, would not give rise to any materially new or materially different environmental effects in comparison to those reported in the environmental statement.	

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			(7) No decommissioning works must be carried out until the relevant planning authority has approved the decommissioning plan submitted in relation to those works, in consultation with South Gloucestershire Council and the Environment Agency. (8) The decommissioning plan must be implemented as approved. (9) Within 14 days of any part of the authorised development permanently ceasing to generate electricity on a commercial basis, the undertaker must notify the relevant planning authority. (10) This requirement is without prejudice to any other consents or permissions that may be required to decommission any part of the authorised development." 13.7. The council is also concerned regarding the potential adverse impacts that a phased	

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			approach to decommissioning could have on the Applicant's benefit assessment and considers that this should be explored further during the Examination.	
WC-100	Description and DCO Process	Book of Reference and Land Matters	13.8. The 4.3 Book of Reference [APP-020] and 3.1 draft Development Consent Order [APP-016] do not clearly specify the nature, extent, or duration of the rights sought over land owned by the council or vested in the council as local highway authority, or the implications for the council's statutory functions and property interests: a) The entries highlighted yellow in the table at Appendix C (based on the information provided in the Book of Reference) are those where the council have been unable to confirm whether the land is or, is likely to form part of the maintainable highway (based on the local highway authority's records) and where the council has been unable to verify what rights or interests the council	Schedule 9 (Land in which only new rights etc. may be acquired) and Schedule 11 (Land of which temporary possession may be taken) to the Draft Development Consent Order [REP1-007] list the specific plot numbers against the rights sought (both permanent and temporary respectively). In respect of Wiltshire Council's concerns in relation to highway works, the Applicant is progressing Protective Provisions for the protection of Wiltshire Council in its capacity as local highway authority. Negotiations as to the form of Protective Provisions are ongoing and, once agreed, these will be contained within Schedule 15 (Protective Provisions) to the Draft DCO [REP1-007]. The Applicant anticipates that Protective Provisions will be agreed prior to the close of Examination.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			may have in the land; b) Land parcels 03-004, 03-007 and 03-009 (highlighted orange in the table at Appendix C) are not mentioned in the Book of Reference at all, and appear to comprise, in part, an adopted footpath, so it is assumed that additional rights are sought over those parcels; and c) Land parcel 03-049 in which the council is stated to have an interest is in fact part of the railway and therefore likely owned by Network Rail or derivative party. 13.9. Clarification is required in order for the council to understand whether the inclusion of land within the Order Land, and the acquisition of rights over that land, satisfies the established necessity and proportionality tests under the draft DCO regime. In particularly, the Book of Reference and draft DCO do not clearly identify the specific rights sought, whether those rights are temporary or permanent, or the	

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			extent to which they are required to deliver the Proposed Development. Without this information, the council is unable to assess whether the proposed acquisition of rights over highway land and other affected parcels is no more than is reasonably necessary, or whether the scope of the Order land could be reduced or refined without prejudice to the scheme. 13.10. Wiltshire Council therefore requests that the Book of Reference [APP-020] and associated land plans be reviewed and amended to provide greater clarity as to the rights sought over each parcel of land, including their nature, extent and duration, and to ensure that only land which is demonstrably necessary and proportionate to the delivery of the Proposed Development is included within the Order Land. Where the acquisition of rights over adopted highway land is proposed, the council considers that this should be limited to what is	

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			strictly required and, where appropriate, addressed through bespoke side agreements or protective provisions rather than through the compulsory acquisition powers of the DCO.	
WC-101	Description and DCO Process	Conclusion	14.1. As the primary Host Authority for the scheme, the council submitted a Relevant Representation [RR-4934] which set out its key areas of concern in relation to the Lime Down Solar Park proposal, including where there were outstanding questions that require answers during this process, and where there is a requirement for additional mitigation and compensation to be forthcoming in order to address or seek to address the council's concerns. The council's Relevant Representation also identified some additional or strengthened Requirements that are considered to be necessary. 14.2. Given the comprehensive nature of the council's Relevant Representation, this Written	The Applicant notes this comment.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			Representation does not repeat aspects raised within the Relevant Representation, instead the council has used this submission to provide additional detail and information, where appropriate, on those identified areas of concern. This Written Representation supplements rather than replaces the council's Relevant Representation. 14.3. However, Wiltshire Council hopes that the information contained within its Written Representation is helpful to the Examining Authority in identifying some of the issues, which the council considers should be explored further during the Examination. 14.4. This response is without prejudice to any further representations the council will make throughout the examination process, and it should be read in conjunction with the council's Relevant Representation [RR-4934] and its	

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			Local Impact Report, which will also be submitted into Examination at Deadline 1. 14.5. It is also important to note that Wiltshire Council's administration is opposed to this proposed development due to its significant scale and adverse environmental impacts, which would result in the industrialisation of the countryside. Therefore, as a result of the issues identified, Wiltshire Council does not support the proposal as it stands and considers that development consent should not be granted for the Scheme as submitted.	

3 The Applicant's responses to statutory consultees, undertakers and notable parties with whom the Applicant has undertaken a Statement of Common Ground

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
Environment Agency REP1-151				
EA-001	Ecology and Biodiversity	BNG	PDA-008 7.9 Biodiversity Net Gain Assessment Appendix Statutory Biodiversity Metric Calculation We do not have any comments to make on this document.	The Applicant notes this comment.
EA-002	Hydrology, Flood Risk and Drainage Other Environmental Matters: MADs	Draft DCO	APP-016 Draft Development Consent Order (dDCO) Requirements 6: Battery safety management; 11: Surface and foul water drainage; 13 Construction environmental management plan; 14 Operational environmental management plan and 20 Decommissioning and restoration We are proposed to be a consultee on the above requirements. The use of the word 'substantially' in the dDCO requirements undermines the enforceability of proposals and/or may erode the environmental protections put in place. The overarching plans provide a large	The inclusion of the provision that the final management plans must be 'substantially in accordance' with the various outline management plans is not to reduce the level of environmental protection or create uncertainty as to compliance. Rather, it is intended to allow for minor, non-material deviations in the final form of management plans and associated documentation, recognising that these documents are typically refined through consultation at the discharge stage. It would be open to the relevant planning authority, in consultation with the EA, to refuse to approve a detailed management plan under Schedule 16 where it would

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			scope for the detail to come later, and the Rochdale envelope applies – thus flexibility is built into the process. To resolve this matter, we request the words 'substantially' be removed from the requirements identified.	result in new or materially different effects. This approach has been taken on previously made solar DCOs including The Fenwick Solar Farm Order 2026, The Tillbridge Solar Order 2025, The East Yorkshire Solar Farm Order 2025, The West Burton Solar Project Order 2025 and The Cottam Solar Project Order 2024.
EA-003	Soils and Agriculture Hydrology, Flood Risk and Drainage	Soil Management	Requirement 17: Soil Management Following further consideration we agree not to be a consultees on requirement 17. We are listed as a consultee in relation to the surface water drainage scheme to be approved under Requirement 11, so this provides appropriate oversight of matters within our remit that may affect ground conditions and soil quality.	The Applicant notes this comment and welcomes ongoing engagement with the Environment Agency.
EA-004	Scheme Description and DCO Process	Procedure for Discharge of Requirements	Schedule 16 Procedure for Discharge of Requirements As a named consultee on the discharge of several Requirements, we request the provision of at least 21 calendar/ 15 business days in which to respond to the discharge	The Applicant considers that the drafting of Schedule 16 (Procedure for the discharge of Requirements) already provides an appropriate and proportionate framework for consultation.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			authority. This should be reflected in the dDCO.	Paragraph 3 of Schedule 16 (Further information and consultation) requires the relevant planning authority to initiate consultation with requirement consultees within a defined timeframe following receipt of an application. These timeframes have been increased by 5 working days at the request of Wiltshire Council in the revised version of the Draft Development Consent Order [REP1-007] submitted at Deadline 1. This ensures that any requests for further information, including those arising from consultees, are captured and communicated within clearly defined periods so as not to impede the delivery of the Scheme. The Applicant notes that, as drafted, Schedule 16 does not prescribe a fixed consultee response period. This approach allows the relevant planning authority to manage the discharge process flexibly as they see fit, proportionate to the matter to be consulted on. This approach has been taken on previously made solar DCOs including

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				The Fenwick Solar Farm Order 2026, The Tillbridge Solar Order 2025, The East Yorkshire Solar Farm Order 2025, The West Burton Solar Project Order 2025 and The Cottam Solar Project Order 2024.
EA-005	Hydrology, Flood Risk and Drainage Ground Conditions	Water Quality	Water Quality In addition to our Relevant Representation (RR-1394), we would like to make the following comments following further discussion with the Applicant to improve document consistency and clarify construction mitigation for water quality. Document reference: • APP-063 EN010168-000598-6.1 Chapter 11 Hydrology, Flood Risk and Drainage.pdf • APP-279 EN010168-000551-7.14 Outline Decommissioning Strategy.pdf (ODS) In APP-063 section 11.10.64 suggests that welfare facilities in operation could be self-contained septic tanks. The Applicant should	Addressed at Deadline 1 in ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [REP1-017], paragraphs 11.4.1, 11.10.27, 11.10.64 and 11.10.67, ES Volume 3, Appendix 11-1: Flood Risk Assessment and Drainage Strategy Covering Report [REP1-037], Section 6.6, paragraphs 6.6.1 to 6.6.3, Outline Operational Environmental Management Plan [REP1-098], paragraphs 2.13.1 to 2.13.2, and Outline Decommissioning Strategy [REP1-100], Section 3.6, Table 5 and Section 3.16, Table 15. Operational welfare/foul drainage will be contained in sealed systems, with no drainage connection and no discharge to ground, surface water or watercourse. Foul waste will be removed off-site by licensed contractor. The same principle is confirmed for construction and decommissioning. Off-site transport and disposal of foul waste

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			make it clear that there will be no discharge to the environment. We note that section 11.4.1 says "there will be no ongoing foul water discharge from the Scheme" and section 11.10.27 on welfare facilities for construction says that the "units are sealed, require no connection to on-site drainage infrastructure". We recommend that this phrasing is repeated for operation. Section 11.10.67 and Table 5 in the ODS does not include any mention of welfare facilities during decommissioning so this should be updated for consistency. If road transport to an offsite disposal facility is required, there should be regard for this within the waste management procedures.	is addressed through the waste management procedures, including use of licensed contractors and appropriately licensed disposal facilities.
EA-006	Hydrology, Flood Risk and Drainage Ground Conditions	Water Quality	Document reference: APP-063 EN010168-000598-6.1 Chapter 11 Hydrology, Flood Risk and Drainage.pdf	Addressed at Deadline 1 in ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [REP1-017] , Table 11-1 and paragraph 11.9.2, Outline CEMP [REP1-096] , Section 3.6, Table 5, Outline OEMP [REP1-098] , Section 3.6, Table 5, and Outline

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			• APP-276 EN010168-000548-7.11 Water Framework Directive Assessment.pdf (WFD) • APP-277 EN010168-000549-7.12 Outline Construction Environmental Management Plan.pdf (OCEMP) • APP-278 EN010168-000550-7.13 Outline Operational Environmental Management Plan.pdf (OOEMP) • APP-279 EN010168-000551-7.14 Outline Decommissioning Strategy.pdf (ODS) Construction water quality monitoring will be based on "visual observations and reviews of Environment Agency's automatic water quality monitoring network". The Applicant should confirm if any onsite measurements and samples, for the purposes of water quality monitoring is intended. We note that Table 5 of the OOEMP and ODS, also say in their Monitoring requirements "A Water Management Plan (which will form part of a detailed CEMP) will include	Decommissioning Strategy [REP1-100], Section 3.6, Table 5. Water quality monitoring will be set out in the relevant Water Management Plan and will include visual inspections and risk-based on-site measurements and sampling where appropriate. Where sampling is undertaken, MCERTS methods will be used where applicable, with analysis by UKAS accredited laboratories. Frequency, locations, parameters, trigger levels and methods will be confirmed in the detailed plan, proportionate to the receiving environment and the works being undertaken.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			details of pre-construction, construction, and post-construction water quality monitoring." We ask the Applicant to consider if water quality monitoring is intended in all phases, then the wording should be updated to include the OEMP and DS to reflect all phases. We support water quality monitoring being included in the OOEMP, as the Applicant has already committed to a 'post-construction' phase. As the impacts of Decommissioning are expected to be similar to Construction, we support water quality monitoring being included in the ODS. We recommend a frequency of at least once per month, which should start at least six months prior to construction. During construction, we suggest the frequency of sampling should increase, i.e. every two weeks during the first three months of construction, and during any earthworks or concrete work. Monitoring should continue all throughout construction, and for six months after construction. The monitoring plan will include enough	

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			monitoring samples to detect any variation as a result of seasons or weather conditions. The methodology is to be determined by the Applicant and their contractors. We recommend a commitment that any water samples collected use Monitoring Emissions to Air, Land and Water (MCERTS) accredited methods, where applicable. These would be sent to a United Kingdom Accreditation Body (UKAS) accredited laboratory for analysis.	
EA-007	Hydrology, Flood Risk and Drainage Ground Conditions	Water Quality	Document reference: • APP-063 EN010168-000598-6.1 Chapter 11 Hydrology, Flood Risk and Drainage.pdf • APP-277 EN010168-000549-7.12 Outline Construction Environmental Management Plan.pdf (OCEMP) • APP-279 EN010168-000551-7.14 Outline Decommissioning Strategy.pdf (ODS) • Water Quality Mitigation during construction	Addressed at Deadline 1 in ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [REP1-017], Table 11-1 and paragraphs 11.9.3 to 11.9.4, Outline Construction Environmental Management Plan [REP1-096], Section 3.6, Table 5, and Outline Decommissioning Strategy [REP1-100], Section 3.6, Table 5. Equipment and plant washout will be undertaken in designated areas at least 10 m from watercourses, where runoff can be contained, isolated and treated before disposal. Vehicle washdown and refuelling will be carried

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			1. Vehicle washdown and refuelling was specified to be carried out in designated areas, we request that this is committed to being in an impermeable area, at least 10m away from the top of bank of watercourses. We note that Table 5 of the OCEMP says that "Equipment and plant are to be washed out and cleaned in designated areas within the Sites' compound where runoff can be isolated for treatment before disposal." However, the method of disposal is unknown.	out only in designated areas, with no uncontrolled discharge.
EA-008	Hydrology, Flood Risk and Drainage Ground Conditions	Water Quality	2. Concrete can be a risk to water quality as it is a known source of hazardous substances, particularly during the curing phase. We have identified that Table 5 of the OCEMP says "Suitable facilities for concrete wash water (e.g. geotextile wrapped sealed skip, container or earth bunded area) will be adequately contained, prevented from entering any drain, and removed from the Sites for appropriate disposal at a suitably licenced waste facility." The second	Addressed at Deadline 1 in ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [REP1-017], paragraph 11.9.4, Outline Construction Environmental Management Plan [REP1-096], Section 3.6, Table 5, and Water Framework Directive Assessment [REP1-094], Section 7.1. Concrete wash water will be contained in suitable facilities, prevented from entering any drain or watercourse, and removed from site for disposal at a suitably licensed waste facility. Detailed concrete controls, including working

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			part of this could be copied into Chapter 11 for consistency. Concrete mitigation measures during concrete laying should: - Identify all areas where concrete works are proposed - Specify whether any of these will be cast in situ or precast and delivered For in situ concrete pours, suggest timing, weather conditions, and runoff control. These construction works should be minimised during heavy precipitation events and carried out during dry months where practicable.	areas, methods, timing, weather considerations and runoff management, will be set out in the detailed CEMP.
EA-009	Hydrology, Flood Risk and Drainage Ground Conditions	Water Quality	3. Where previous advice said, sediment capture methods should be used on tracks and compounds, we request that further information on Sustainable Drainage Systems (SuDS) types are provided. There should also be a commitment to SuDS maintenance throughout all phases to ensure that they remain in good condition and can provide sufficient water quality treatment.	Addressed at Deadline 1 in ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [REP1-017], paragraphs 11.9.2 to 11.9.3, ES Volume 3, Appendix 11-1: Flood Risk Assessment and Drainage Strategy Covering Report [REP1-037], Section 3.2, paragraph 3.2.1 and Section 6.4, Outline Construction Environmental Management Plan [REP1-096], Section 3.6, Table

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				5, Outline Operational Environmental Management Plan [REP1-098], paragraphs 2.14.1 to 2.14.3 and Section 3.6, Table 5, and Outline Decommissioning Strategy [REP1-100], Section 3.6, Table 5. Sediment control and SuDS measures will be confirmed in the relevant detailed management plans. Measures may include earth bunds, silt fences, straw bales, settlement features, temporary attenuation, gravel-filled trenches, French drains or equivalent controls. SuDS and sediment control features will be inspected and maintained through construction, operation and decommissioning.
EA-010	Ground Conditions	Water Quality	4. Fuels, oils and chemical advice previously stated they should be in impermeable ground and sufficiently bunded. However, we acknowledge that this is already committed to in section 11.9.4. We request using containers which are covered (to prevent rainfall getting into them) and in bunded areas which can retain 110% of the	Addressed at Deadline 1 in ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [REP1-017], paragraph 11.9.4, Outline Construction Environmental Management Plan [REP1-096], Section 3.6, Table 5 and Section 3.14, Table 13, and Commitments Register [REP1-114], Table 1, Hydrology, Flood Risk and Drainage entries.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			volume. Oil interceptors and double-skinned tanks could be used.	Fuel, oils and chemicals will be stored in secure impermeable and bunded areas, or in self-bunded leakproof containers. Bunding will provide a minimum capacity of 110% of the stored volume where applicable. Drip trays, plant nappies and double-skinned tanks will be used where appropriate. Refuelling will take place off-site where practicable, or only in designated areas.
EA-011	Hydrology, Flood Risk and Drainage Ground Conditions	Water Quality	5. In addition to these construction activities mentioned in our Relevant Representation we request that the Applicant provides more information on wheel wash water disposal. It is unclear how wash water will be contained and disposed of. It should be ensured by the Applicant that these activities will be undertaken within a designated impermeable or lined area and should not be allowed to discharge into a watercourse. Any Sustainable Drainage Systems (SuDS) incorporated around wheel washing facilities should provide sufficient treatment for suspended	Addressed at Deadline 1 in ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [REP1-017], paragraph 11.9.3, and Outline Construction Environmental Management Plan [REP1-096], Section 3.6, Table 5. Where wheel washing is required, it will be undertaken in designated impermeable or lined areas. Wash water will be contained and either recycled or removed off-site by a licensed contractor, with no uncontrolled discharge to ground or surface water. No discharge from self-contained or localised wheel wash facilities will be made directly to any surface water system.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			sediment, metals and hydrocarbons. We note that Table 5 of the CEMP says "No discharges from any self-contained wheel wash and localised wheel wash will be permitted to discharge directly into any surface water system." However, the Applicant should confirm if they intend for them to be treated by SuDS first, before onsite discharge.	
EA-012	Hydrology, Flood Risk and Drainage Ground Conditions	Water Quality	6. We recommend the ODS states that all measures of Storage of Materials, Discharge/Disposal of Site Runoff, Temporary Drainage, and Spillage Risk included in the OCEMP are also included for the Decommissioning Phase.	Addressed at Deadline 1 in ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [REP1-017] , paragraph 11.10.67, and Outline Decommissioning Strategy [REP1-100] , paragraph 1.1.7, Section 3.6, Table 5, Section 3.16, Table 15 and paragraph 4.1.1. Decommissioning effects are assessed as similar to or less than construction. The ODS includes equivalent decommissioning controls for water management, site runoff, temporary drainage, sediment control, SuDS maintenance, washdown, refuelling, spill response and foul water disposal.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
EA-013	Ground Conditions Ecology and Biodiversity	Watercourse Buffers	Document reference: • APP-063 EN010168-000598-6.1 Chapter 11 Hydrology, Flood Risk and Drainage.pdf • APP-276 EN010168-000548-7.11 Water Framework Directive Assessment.pdf (WFD) Watercourse buffers We support the use of 10m watercourse buffers as this is in line with best practice. If distances are not sufficiently away from the edge of the watercourse, then it can increase the risk of contamination in the event of a pollution incident.	Addressed at Deadline 1 in ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [REP1-017], Table 11-2 and paragraphs 11.9.2 to 11.9.3, ES Volume 3, Appendix 11-1: Flood Risk Assessment and Drainage Strategy Covering Report [REP1-037], Section 3.2, paragraph 3.2.1, Outline Construction Environmental Management Plan [REP1-096], Section 3.6, Table 5, Outline Operational Environmental Management Plan [REP1-098], paragraph 2.14.2 and Section 3.6, Table 5, Outline Decommissioning Strategy [REP1-100], Section 3.6, Table 5, and Commitments Register [REP1-114], Table 1, Design Principles and Parameters and Hydrology, Flood Risk and Drainage entries. The Scheme includes embedded watercourse offset controls, including 8 m infrastructure buffers around Main Rivers and Ordinary Watercourses and a precautionary 10 m stand-off for construction and decommissioning pollution-risk activities adjacent to watercourses, unless a specific

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				crossing or agreed constraint requires otherwise.
EA-014	Ground Conditions Ecology and Biodiversity	Watercourse Buffers	Document reference: APP-063 EN010168-000598-6.1 Chapter 11 Hydrology, Flood Risk and Drainage.pdf Horizontal Directional Drilling (HDD) We request that the Applicant commits to ensuring that entry and exit pits are at least 10m away from the top of bank of watercourses. Additionally, where bentonite pellets are used for the drilling fluid the Applicant should commit to PFAS (per- and polyfluoroalkyl substances)-free pellets.	Addressed at Deadline 1 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 11-1: Flood Risk Assessment and Drainage Strategy Covering Report [REP1-037], Section 4, paragraphs 4.1.1 to 4.1.3 and Table 5, ES Volume 3, Appendix 11-9: Flood Risk Assessment and Drainage Strategy - Cable Route Corridor [REP1-053], paragraphs 2.3.2, 2.3.6 and 2.11.1, Outline Construction Environmental Management Plan [REP1-096], Section 3.6, Table 5 and Section 3.14, Table 13, and Water Framework Directive Assessment [REP1-094], Section 7.1. HDD launch and reception pits will be located at least 10 m from the top of bank of watercourses, where practicable. HDD works will be controlled through the detailed CEMP, including drilling fluid risk management, breakout contingency procedures and clean-up measures. Where drilling

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				additives are used, PFAS-free products will be specified where practicable.
EA-015	Consultation and Engagement	Statement of Common Ground	Current Position We are working with the applicant on a Statement of Common Ground which will set out our latest position on the issues raised in our Relevant Representation (RR-1394). Should you have any queries regarding this response, please contact me.	The Applicant confirms that engagement with the Environment Agency for the preparation of the Statement of Common Ground [EN010168/EXAM/8.6] ahead of the submission of the first draft at Deadline 2 is ongoing. An update on the progress and current position of the Statement of Common Ground with the Environment Agency is provided in the Statement of Commonality [REP1-116].
National Highways REP1-154 and REP1-155				
NH-001	Consultation and Engagement	Introduction	1. Introduction 1.1. This Written Representation is made on behalf of National Highways ("NH") in respect of an application by Lime Down Solar Ltd ("Applicant") for an order granting development consent for the Lime Down Solar Project ("DCO"). The Applicant seeks development consent for proposed authorised development described in Schedule 1 of the draft DCO ("Authorised Development").	The Applicant confirms that there is ongoing negotiations with National Highways. A draft Statement of Common Ground [EN010168/EXAM/8.8] has been prepared and shared with National Highways based on Relevant Representation, ahead of submission at Deadline 2. An update on the progress and current position of the Statement of Common Ground with the National Highways is provided in the Statement of Commonality [REP1A-010].

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			1.2. NH and the Applicant are engaged in ongoing negotiations and continue to work constructively together with a view to resolving and/or narrowing the outstanding issues between them as far as possible. To the extent that any issues remain unresolved at this stage, NH does not seek to rehearse those matters in this Written Representation but instead continues to rely on the positions advanced in its Relevant Representation [RR-3426], which are maintained in full. This Written Representation supplements and updates NH's Relevant Representation in light of the Applicant's comments thereon [PDA-009].	
NH-002	Transport and Access	Protective Provisions	Protective Provisions — Overarching Position 2.1. The Protective Provisions on the face of the order are not yet agreed, and an updated draft of the Protective Provisions is awaited. NH has provided a full set of proposed protective provisions at Appendix 1	The Applicant notes this comment and confirms that updated Protected Provisions for the protection of National Highways have been agreed and are included at Part 5 of Schedule 15 (Protective Provisions) to the revised Draft Development Consent Order [REP1-007] submitted at Deadline 1.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			to its Relevant Representation and has set out detailed justifications for each provision (paragraphs 1 through to 21 of the proposed protective provisions). The Applicant's response to NH's Relevant Representations indicates that it is "progressing discussions" on the Protective Provisions and that draft Protective Provisions are already included in the DCO (Part 5 of Schedule 15). In response, and whilst discussions are progressing, NH maintains the draft Protective Provisions included in the Order are not agreed and that its own proposed Protective Provisions (at Appendix 1 of NH's Relevant Representation [RR- 3426]) should be adopted.	The Applicant welcomes ongoing engagement with National Highways.
NH-003	Transport and Access	Land and Book of Reference Issues	3. Land and Book of Reference Issues Technical Works (Works Nos. 5a and HDD under M4) and plots 09-018, 09-019, 09-020 and to 09-021) (subsoil to the M4) 3.1. In relation to the cable route crossing beneath the M4 via	The Applicant notes this comment and confirms that the M4 crossing is proposed as a fully trenchless HDD installation at a minimum depth to cover of 11.6 metres below the M4 carriageway. The Applicant also confirms that discussions are underway with National

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			Horizontal Directional Drilling (HDD), the Applicant has confirmed the M4 crossing is proposed as a fully trenchless HDD installation at a minimum depth to cover of 11.6 metres below the M4 carriageway and refers to NH to ES Volume 1: Chapter 3 [APP-055]. Work No 5a affects plots 09-018, 09-019, 09-020 and 09-021) (subsoil to the M4). 3.2. Discussions with National Highways technical teams about the geotechnical specification for directional drilling are still underway. Any proposed directional drilling under NH's network will require compliance with The Design Manual for Roads and Bridges ("DMRB") Chapter CD622 (Managing Geotechnical Risk).	Highways about the geotechnical specification for directional drilling and that any proposed directional drilling under NH's network will require compliance with The Design Manual for Roads and Bridges ("DMRB") Chapter CD622 (Managing Geotechnical Risk).
NH-004	Transport and Access	Land and Book of Reference Issues	Detrunked Roads (Plots 13-005 to 13-016, 20-001 to 20-003) 3.3. There are a significant number of plots where NH originally noted that the roads had been detrunked and transferred to the Local Highway Authority (LHA).	The Applicant acknowledges the explanation of National Highways interests in relation to the Side Road Order for the M4 Scheme affecting plots 13-005 to 13-016, and 20-001 to 20-003. The Applicant can confirm National Highways have been removed as the highway

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			The Applicant has confirmed it will update the Book of Reference to remove NH's listed interests.	authority over these plots but retained as the subsoil owner due to HM Land Registry titles GR324123 and WT274108, at last edition, still being registered to National Highways.
NH-005	Transport and Access	Land and Book of Reference Issues	Side Roads Order Plots (Plots 21-004 to 21-007) 3.4. For plots forming part of a Side Roads Order for the M4 scheme, NH confirms that the LHA is responsible, not NH, given the Side Road Order. Accordingly, for these plots, provided works are not in subsoil, NH have no interest. If works are in the subsoil then agreement is required from NH. The Applicant is requested to provide NH details confirming the depth of the works.	The Applicant acknowledges the explanation of National Highways interests in relation to the Side Road Order for the M4 Scheme affecting plots 21-004 to 21-007, and will update the plots accordingly at the Deadline 3 to show the local highways authority as the interest holder
NH-006	Hydrology, Flood Risk and Drainage	Land and Book of Reference Issues	Outstanding Information Requests 3.5. Several plots are included in the Book of Reference as a consequence of drainage and gully apparatus, easements, and conveyances. In relation to these plots, NH's position is that the additional information requested is still required. NH asked the	The Applicant during diligent inquiry research, has identified drainage and gully apparatus related to the road network in plots 09-018, 09-020, 09-021, which as the highway authority, have been defined as a National Highways interest. These interests are not contained on HM Land Registry titles related to the land,

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			Applicant for copies of the following to evaluate how the scheme affects its interest: - Plot 13-003 (Conveyance dated 14 February 1958) - Plot 09-018 (Drainage and gully apparatus) (easement/private right) - Plot 09-020 (Drainage and gully apparatus) (easement/private right) - Plot 09-021 (Drainage and gully apparatus) (easement or private right) - Plot 13-003 (Conveyance dated 14 February 1958 — Part 3 interest)	these are interests that relate to physical apparatus identified during research, and as such no supporting document rights documents can be provided. The Applicant can provide a shapefile of known National highways apparatus. The Applicant has identified National Highways as the successor of a Conveyance dated 14 February 1958 listed on title NT435341. The Applicant is unable to provide the Conveyance document as it is unavailable for purchase at HM Land Registry, potentially due to documents not being shared with HM Land Registry upon registration, or the original document has been lost. The title register can be provided to National highways to provide some further details of conveyance that is shown on register.
NH-007	Transport and Access	Protective Provisions	4. Draft DCO Articles 4.1. NH's extensive concerns regarding individual DCO articles (Articles 8, 10, 11, 12, 16, 17, 19,	The Applicant notes this comment and confirms that updated Protected Provisions for the protection of National Highways have been agreed and are included at Part 5 of Schedule 15

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			20, 21, 24, 25, 27, 29, 30, 31, 32, 33, 34, 38, 40, 41, 42, and 47) as set out in its Relevant Representations [RR-3426] remain outstanding. NH's concerns are re-iterated in summary below. The Applicant's response to NH's Relevant Representations [PDA -009] consistently refers to ongoing discussions on the Protective Provisions. Whilst this is the position, the Protective Provisions on the face of the order are not yet agreed and an updated draft of Protective Provisions is awaited.	(Protective Provisions) to the revised Draft Development Consent Order [REP1-007] submitted at Deadline 1. The Applicant welcomes ongoing engagement with National Highways.
NH-008	Transport and Access	Street Works	Article 8 – Street Works: NH has received no information regarding the nature and scope of proposed works beneath the M4 at points 9i and 9j on the Streets Plan. NH seeks confirmation that any apparatus installed under the SRN will be carried out by HDD rather than open cut method, and the programme for the cable works has not been provided. The Applicant must obtain NH's prior approval for any works undertaken in connection with the SRN. Such consent should	As set out within ES Volume 1, Chapter 3: The Scheme [APP-055] and ES Volume 3, Appendix 3-2: Cable Route Construction Method Statement [APP-183] , a number of Avoidance Areas have been identified, including at the M4 and Great Western Railway, where non-intrusive installation methods will be used to avoid direct impacts (refer to ES Volume 2, Figure 3-2 Key Construction Phase Features [APP-082]). The Cable Route corridor crossing of the M4 is proposed as a fully trenchless HDD installation, with

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			not be subject to deemed consent under article 47.	launch and reception pits located South and North of the carriageway. The motorway runs east-west through the site with the HDD crossing passing beneath both the eastbound and westbound carriageways. The HDD will be located at a minimum depth to cover of 11.6m below the M4 carriageway. No excavation, pavement breaking, or physical works are required within the M4 carriageway. Surface monitoring will be undertaken using reflector-less total stations positioned off carriageway, meaning no lane access is required. The Applicant confirms that updated Protected Provisions for the protection of National Highways have been agreed and are included at Part 5 of Schedule 15 (Protective Provisions) to the revised Draft Development Consent Order [REP1-007] submitted at Deadline 1.
NH-009	Transport and Access	Power to Alter Layout	Article 10 – Power to Alter Layout etc. of Streets: NH has no interest in the streets specified in Schedule 5. However, subsection (2) contains non-street-specific	The Applicant notes this comment and confirms that updated Protected Provisions for the protection of National Highways have been agreed and are included at Part 5 of Schedule 15

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			powers that may affect NH's interests. Consent under article 10(4) should not be subject to deemed consent under article 47. The Applicant must obtain NH's prior approval for any works undertaken in connection with the SRN.	(Protective Provisions) to the revised Draft Development Consent Order [REP1-007] submitted at Deadline 1.
NH-010	Transport and Access	Construction and Maintenance of Altered Streets	Article 11 – Construction and Maintenance of Altered Streets: NH objects to the deemed adoption mechanism under this article. Article 11 should expressly exclude the SRN. NH does not agree that works on its network should be subject to deemed adoption provisions. The Applicant must obtain NH's prior approval for any works undertaken in connection with the SRN.	The Applicant notes this comment and refers National Highways to the response given to NH-009. The Applicant does however welcome ongoing engagement with National Highways.
NH-011	Transport and Access Socio-Economics, Recreation and Tourism	Public Rights of Way	Article 12 – Temporary Closure, Restriction or Prohibition of Use of Streets and Public Rights of Way: NH has no interest in the streets or public rights of way listed in Schedule 6. However, subsection (1) contains a general power that may affect NH's interests. NH is concerned that the article only requires the Applicant to consult NH, not obtain its consent. Applicant	The Applicant notes this comment and refers National Highways to the response given to NH-009. The Applicant does however welcome ongoing engagement with National Highways.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			should be required to obtain NH's consent in the event the activities affect the SRN or any land in which NH has an interest.	
NH-012	Transport and Access	Traffic Regulation	Article 16 – Traffic Regulation Measures: NH has no interest in the roads specified in Schedule 8, but subsection (1) contains a wider power which may affect NH's interests. NH requires that consent from the traffic authority should not be subject to deemed consent under article 47. The draft order also allows the Applicant to exercise powers under article 16(1) with deemed approval under section 65 of the Road Traffic Regulation Act 1984, which NH opposes — NH must have control over the placing of signage on its network. All signage must be designed in accordance with the Traffic Signs Manual Chapter 8 and the DMRB, and NH seeks clarity on why the Applicant seeks wording deeming compliance with the Traffic Signs Regulations and General Directions 2016. The Applicant must obtain NH's prior approval for any works undertaken in connection with the SRN. Such consent should not	The Applicant notes this comment and refers National Highways to the response given to NH-009. The Applicant does however welcome ongoing engagement with National Highways.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			be subject to deemed consent under article 47.	
NH-013	Transport and Access Hydrology, Flood Risk and Drainage	Discharge of Water	Article 17 – Discharge of Water: NH's drainage system is not a public drain, and it is unclear whether the article is intended to apply to NH's drainage infrastructure. NH requires the Applicant to confirm the scope of this article in relation to NH's drains. Although the article requires consent from the owner of the watercourse, drain or sewer, that consent is subject to deemed consent under article 47, which National Highways considers inappropriate in respect of its drainage infrastructure. In addition, if the article is intended to apply to NH's drainage infrastructure this would conflict with government policy. Paragraph 59 of DfT Circular 01/2022 (with which National Highways must comply) provides that no new connections into the highway drainage system from third party development will be accepted. Existing connections may continue only where flow, rate and quality of discharge remain unaltered or are bettered, and may be subject to	The Applicant notes this comment and refers National Highways to the response given to NH-009. The Applicant does however welcome ongoing engagement with National Highways.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			a drainage management and maintenance agreement in perpetuity. National Highways' objection would be addressed by incorporating paragraph 7(2) of its proposed protective provisions (Appendix 1), which requires the Applicant to obtain National Highways' consent before exercising the right under this article.	
NH-014	Transport and Access	Protective Works to Buildings	Article 19 – Protective Works to Buildings: NH does not have any buildings within the order limits. However, sub-paragraph (4) provides the Applicant with the power to enter land adjacent to a building to carry out protective works, and such adjacent land may form part of the SRN or land in which NH has an interest. The Applicant is requested to clarify whether Article 19(5) includes obtaining the consent of an owner of adjacent building. NH requires that the Applicant obtain NH's consent before exercising any access or works under this article affecting the SRN. Such consent should not be subject to deemed consent under article 47.	The Applicant notes this comment and refers National Highways to the response given to NH-009. The Applicant does however welcome ongoing engagement with National Highways.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
NH-015	Transport and Access	Authority to Survey and Investigate Land	Article 20 – Authority to Survey and Investigate Land: Whilst consent is required from the highway authority for trial holes, boreholes and trenches within the highway boundary, consent is not required for the wider use of the powers (e.g., access to land for surveys). Consent is also not required for any land NH owns outside the highway boundary, and the right extends beyond the order limits. The Applicant should be required to obtain NH's consent in the event any access or works under this article affect the SRN or any land in which NH has an interest. Such consent should not be subject to deemed consent under article 47.	The Applicant notes this comment and refers National Highways to the response given to NH-009. The Applicant does however welcome ongoing engagement with National Highways.
NH-016	Transport and Access	Compulsory Acquisition	Article 21 – Compulsory Acquisition of Land: This article enables the Applicant to compulsorily acquire so much of the Order land as is required for the authorised development. If any part of the SRN is included, NH must have control over operations on its network. The Applicant should be required to obtain NH's consent in the event any access or works under this article	The Applicant notes this comment and refers National Highways to the response given to NH-009. The Applicant does however welcome ongoing engagement with National Highways.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			affect the SRN or any land in which NH has an interest.	
NH-017	Transport and Access	Compulsory Acquisition	Article 24 – Compulsory Acquisition of Rights/Article 25 – Private Rights: NH object to the power to compulsory acquire rights/private rights without its consent. NH must have control over operations on its network for safety purposes. The Applicant should be required to obtain NH's consent in the event any access or works under this article affect the SRN or any land in which NH has an interest.	The Applicant notes this comment and refers National Highways to the response given to NH-009. The Applicant does however welcome ongoing engagement with National Highways.
NH-018	Transport and Access	Power to Override Easements and Other Rights	Article 27 – Power to Override Easements and Other Rights: NH is unclear whether the effect of this article would be a temporary interference with or a permanent extinguishment of NH's existing interests. The Applicant should confirm how this article is intended to operate in relation to NH's rights. The Applicant should be required to obtain NH's consent in the event any access or works under this article affect the SRN or any land in which NH has an interest.	The Applicant notes this comment and refers National Highways to the response given to NH-009. The Applicant does however welcome ongoing engagement with National Highways.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
NH-019	Transport and Access	Rights Under or Over Streets	Article 30 – Rights Under or Over Streets: NH would not permit uncontrolled oversailing or works underneath its network, which would ordinarily have the protection of a section 50 notice under the New Roads and Street Works Act 1991. NH requires an approval role and control over both the subsoil vested in it and airspace over the SRN. The Applicant must obtain NH's prior approval for any works undertaken in connection with the SRN.	The Applicant notes this comment and refers National Highways to the response given to NH-009. The Applicant does however welcome ongoing engagement with National Highways.
NH-020	Transport and Access	Temporary Use of Land for Constructing the Authorised Development	Article 31 – Temporary Use of Land for Constructing the Authorised Development: Schedule 11 does not include land in which NH has an operational interest, but the article also applies to other Order land. The Applicant should be required to obtain NH's consent before taking temporary possession of any land affecting the SRN or land in which NH has an interest.	The Applicant notes this comment and refers National Highways to the response given to NH-009. The Applicant does however welcome ongoing engagement with National Highways.
NH-021	Transport and Access	Temporary Use of Land for Constructing the Authorised Development	Article 32 – Temporary Use of Land for Maintaining the Authorised Development: This article grants the Applicant the right to take temporary possession of any land within the order limits without NH's consent	The Applicant notes this comment and refers National Highways to the response given to NH-009.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			during the maintenance period (five years from final commissioning). NH must have control over operations on its network. The Applicant must obtain NH's consent in the event the activities affect the SRN.	The Applicant does however welcome ongoing engagement with National Highways.
NH-022	Transport and Access	Statutory Undertakers	Article 33 – Statutory Undertakers: NH maintains that the Applicant should be required to obtain NH's consent in the event the activities affect the SRN or any land in which NH has an interest.	The Applicant notes this comment and refers National Highways to the response given to NH-009. The Applicant does however welcome ongoing engagement with National Highways.
NH-023	Transport and Access	Apparatus and Rights of Statutory Undertakers in Closed or Restricted Streets	Article 34 – Apparatus and Rights of Statutory Undertakers in Closed or Restricted Streets: This article cross-refers to articles 8, 10, 11 and 12. NH's requires further information to assess the impact of the scheme on its interests in relation to those articles. The Applicant should obtain NH's consent before exercising any powers that affect the SRN.	The Applicant notes this comment and refers National Highways to the response given to NH-009. The Applicant does however welcome ongoing engagement with National Highways.
NH-024	Transport and Access	Application of Landlord and Tenant Law	Article 38 – Application of Landlord and Tenant Law: NH does not have sufficient information to assess whether this article is likely to affect its interests and has asked the Applicant to clarify the position	Article 38 is included in order to override landlord and tenant law so far as it would prejudice the operation of any agreement for leasing the whole of the Authorised Development or the right to operate the same or any agreement entered into by the

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				undertaker for the construction, maintenance, use or operation of the Authorised Development. This provision is required to ensure that landlord and tenant law does not impede the construction, use or maintenance of the Authorised Development. The is a model provision and has been included within numerous made solar DCOs including The Fenwick Solar Farm Order 2026, The Tillbridge Solar Order 2025, The East Yorkshire Solar Farm Order 2025, The West Burton Solar Project Order 2025 and The Cottam Solar Project Order 2024. The Applicant also confirms that updated Protected Provisions for the protection of National Highways have been agreed and are included at Part 5 of Schedule 15 (Protective Provisions) to the revised Draft Development Consent Order [REP1-007] submitted at Deadline 1.
NH-025	Transport and Access Arboriculture	Felling or Lopping of Trees and Removal of Hedgerows	Article 40 – Felling or Lopping of Trees and Removal of Hedgerows: NH has environmental mitigation commitments that may be affected	The Applicant refers to the response provided to National Highways Relevant Representation comments on this

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			by this article and which may put NH in breach of its own statutory obligations. Hedgerows CRH170, CRH173 and CRH172 are located on or near the boundary of the network. NH requires further clarity on the works within Works No. 5a that may impact these hedgerows so it can assess the cumulative impact. If works affect NH's BNG commitments, replacement trees must be provided at a location to be agreed. NH notes the Applicant's response to NH's Written Representations which relate to this Article. NH is unable to locate the information referred to (ES Volume 2 Appendix 3-2 Cable Installation Method [APP-183] and the Ecological Protection and Mitigation Strategy [APP-284]) and therefore is unable to comment further at the moment. Please also see NH's comments in relation to Requirement 7 and 8.	matter. Hedgerows CRH170 and CRH173 both lie within an 'Avoidance Area' which are described in ES Volume 2, Appendix 3-2: Cable Installation Method Statement [APP-183] and are where trenchless technologies (such as Horizontal Directional Drilling (HDD)) will be employed for cable installation works. As such CRH170 and CRH172 will not be impacted by the Scheme. Up to a 12m wide section of CRH172 may be removed temporarily for cable route installation works, to enable construction of a cable trench and temporary haul route as described in Section 2.4 of the Outline Ecological Protection and Mitigation Strategy [REP1-106]. On completion of temporary construction works, any section of hedgerow removed at CRH173 will be reinstated or replanted in accordance with Section 6.3 of the Outline Ecological Protection and Mitigation Strategy [REP1-106]. The Applicant also confirms that matters relating to acquisition of new or existing rights in land are

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				addressed through the updated Protected Provisions for the protection of National Highways have been agreed and are included at Part 5 of Schedule 15 (Protective Provisions) to the revised Draft Development Consent Order [REP1-007] submitted at Deadline 1.
NH-026	Transport and Access Arboriculture	Trees Subject to Tree Preservation Orders	Article 41 – Trees Subject to Tree Preservation Orders: NH notes a potential reference error (Part 4 of Schedule 12 is cited but only Parts 1–3 exist). TPO42 is in close proximity to NH's network and NH's comments on cumulative impact apply. TPO7 is not referred to in Schedule 12 but is adjacent to the SRN, and the Applicant is requested to review Schedule 12 in light of the TPO and Hedgerow Plan (sheet 9 of 23). NH also has environmental mitigation commitments that may be affected. NH notes the comments on the reference error and will confirm agreement once NH has considered the updated Draft Development Consent Order submitted at Deadline 1.	The Applicant notes this comment and confirms that the typographical error identified by National Highways has been corrected within the revised Draft Development Consent Order [REP1-007] submitted at Deadline 1.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
NH-027	Transport and Access	Certification of Plans and Documents	Article 42 – Certification of Plans and Documents: NH reserves the ability to request the addition of any required plans or documents to those identified in Schedule 12. The Applicant's position is that the list in Schedule 13 is fixed and cannot be amended unilaterally. NH may have comments on those certified documents during the course of the examination, and the matter is to be kept under review.	Where relevant and proportionate National Highways, as the relevant highway authority, has been included as a named consultee in the Requirements contained within Schedule 2 (Requirements) to the Draft Development Consent Order. The Applicant has also added National Highways as a named consultee to Requirement 20 (Decommissioning and restoration) within the revised Draft Development Consent Order [REP1-007] submitted at Deadline 1. As a result, National Highways will be consulted by the relevant planning authority on the final Construction Traffic Management Plan, Public Rights of Way and Permissive Paths Management Plan and Decommissioning Plan, all of which are contained at Schedule 13 (Documents and plans to be certified) to the Draft Development Consent Order [REP1-007]. The Applicant has also added wording to paragraph 1 (Interpretation) of Schedule 16 (Procedure for the discharge of requirements) to the revised Draft Development Consent

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				Order [REP1-007] submitted at Deadline 1 which provides that, where an approved document is amended as per Requirement 3 (Approved documents and amendments to them) within Schedule 2 (Requirements), National Highways will also be consulted. As such, the Applicant considers that National Highways will have sufficient opportunity to comment on the certified documents relevant to it and therefore does not consider it proportionate to include any further provision in respect of Schedule 13.
NH-028	Transport and Access	Deemed Consent	Article 47 – Deemed Consent:- NH objects to the principle of deemed consent applying to any works on or under the SRN, given the safety implications of unreviewed works affecting the strategic road network.	The Applicant notes this comment and confirms that updated Protected Provisions for the protection of National Highways have been agreed and are included at Part 5 of Schedule 15 (Protective Provisions) to the revised Draft Development Consent Order [REP1-007] submitted at Deadline 1.
NH-029	Transport and Access	Schedule 2 Requirements	5. Schedule 2 Requirements 5.1. NH's position is that it should be given the opportunity not merely to be consulted, but to review and agree the relevant documents and	The Applicant notes this comment and confirms that updated Protected Provisions for the protection of National Highways have been agreed and are included at Part 5 of Schedule 15 (Protective Provisions) to the

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			plans before they are discharged, to ensure that any changes do not adversely impact the Strategic Road Network (SRN). NH maintains that inclusion of its proposed drafting (shown in red in its Relevant Representations) would address its concerns in each case. 5.2. The Applicant's overarching response is that NH will already be a consultee where it is the relevant highway authority for the discharge of certain Requirements (namely Requirements 15 and 16), and that NH's involvement where its interests may be affected will be controlled by the Protective Provisions for its benefit contained in Part 5 of Schedule 15 to the draft DCO. The Applicant has stated that the management plans with the potential to impact the SRN are already captured. As set out above, the parties are progressing discussions in respect of the form of Protective Provisions.	revised Draft Development Consent Order [REP1-007] submitted at Deadline 1. The Applicant has also added National Highways, in its capacity as relevant highway authority, as a named consultee within Requirement 20 (Decommissioning and restoration) within the revised Draft Development Consent Order [REP1-007] submitted at Deadline 1 following discussions with National Highways. The Applicant maintains that these measures are proportionate and sufficient in protecting the SRN but welcomes ongoing engagement with National Highways.
NH-030	Transport and Access	Requirement-Specific Positions	5.3. Requirement-Specific Positions	Following discussions with National Highways, The Applicant has added wording to paragraph 1 (Interpretation)

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			Requirement 3 (Approved Documents and Plans): Requirement 3 permits the undertaker to submit any amendments to any approved document to the relevant planning authority for approval and, following approval, the relevant approved document is to be taken to include the amendments approved under that Requirement. The relevant planning authority must not approve any amendments to any approved document unless it has been demonstrated to the satisfaction of the relevant planning authority that the subject matter of the approval sought is unlikely to give rise to any materially new or materially different environmental effects in comparison with those reported in the environmental statement. Sub-paragraph (3) indicates that "approved document" means any document certified under article 42 (certification of plans and documents, etc.) and any plans, details or schemes which have been approved pursuant to any requirement.	of Schedule 16 (Procedure for the discharge of requirements) to the revised Draft Development Consent Order [REP1-007] submitted at Deadline 1 which provides that, where an approved document is amended as per Requirement 3 (Approved documents and amendments to them) within Schedule 2 (Requirements), National Highways will also be consulted. As noted, this is in line with the same provision made in respect of the draft Green Hill Solar Farm Order 202. That Applicant considers that this, in combination with the updated Protected Provisions for the protection of National Highways which have been agreed and are included at Part 5 of Schedule 15 (Protective Provisions) to the revised Draft Development Consent Order [REP1-007] submitted at Deadline 1, are proportionate and sufficient in protecting National Highways' interests.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			This could involve changes to the work plans and it is left to the planning authority to determine whether those changes will give rise to a materially new or materially different environmental effect. National Highways would expect to be consulted on that decision. This issue was raised in the Green Hill Solar Farm dDCO examination (Planning Inspectorate DCO Reference EN010170) which closed on 13 April 2026 and for which the Applicant is the same as for the Lime Down DCO. During the Green Hill Farm dDCO examination, the Applicant agreed to update Paragraph 1 of Schedule 16. The revised text of Schedule 16 is provided in Appendix 1 to this Written Representation. The revised wording means that in relation to an application made under requirement 3 to amend an approved document, any body or authority that was required to be consulted in relation to the approval of that approved document is required	

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			again to be consulted. NH require the same amendment to the Lime Down dDCO. The inclusion of such wording would mean that should an application be made to amend the Construction Traffic Management Plan, highway authorities are consultees and would need to be consulted on any application to amend. This change alone, however, does not meet NH's concerns regarding certified documents being amended and hence NH also require to be listed as a consultee in Requirement 3 itself.	
NH-031	Transport and Access	Requirement-Specific Positions	5.4. Additionally, NH seeks to be consulted on the discharge of a wide range of Requirements, including Requirements 3, 7, 8, 10, 11, 13, 14, in relation to matters relating to NH's statutory function. Requirement 5 (Details of Works Nos. 1, 2, 3 and 5a). NH requires amendments to Requirement 5 as set out in its Relevant Representations.	National Highways, in its capacity as relevant highway authority, is named as a consultee for Requirements 15 (Construction traffic management plan), 16 (Public rights of way and permissive paths) and 20 (Decommissioning and restoration) within Schedule 2 (Requirements) to the Draft Development Consent Order [REP1-007]. In addition to this, the Applicant has included updated and agreed Protected Provisions for the protection of National Highways at Part 5 of Schedule 15 (Protective

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				Provisions) to the revised Draft Development Consent Order [REP1-007] submitted at Deadline 1. The Applicant therefore considers these measures to be proportionate and sufficient in protecting National Highways' interests without including unnecessary consultee requirements which may delay discharge of Requirements and impede the future delivery of the Scheme. The Applicant does however welcome ongoing engagement with National Highways.
NH-032	Transport and Access Ecology and Biodiversity Landscape and Visual Arboriculture	Landscape and Ecological Management Plan	Requirement 7 (Landscape and Ecological Management Plan)- NH requires the opportunity to review the landscape and ecological management plan, arboricultural assessment/tree protection measures, and any replanting proposals in respect of NH's soft estate.	The Applicant notes this comment and refers National Highways to the response given to NH-031. The Applicant does however welcome ongoing engagement with National Highways.
NH-033	Transport and Access Ecology and Biodiversity	Ecological Protection and Mitigation Strategy	Requirement 8 (Ecological Protection and Mitigation Strategy): NH requires the opportunity to review the details proposed in the ecological protection and mitigation strategy.	The Applicant notes this comment and refers National Highways to the response given to NH-031.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				The Applicant does however welcome ongoing engagement with National Highways.
NH-034	Transport and Access	Means of Enclosure	Requirement 10 (Fencing and other eans of Enclosure): NH requires the opportunity to review the details of any proposed fences, walls, or enclosures if within the vicinity of the SRN, for reasons of safety, liability, and maintenance, and to ensure compliance with paragraph 57 of DfT Circular 01/2022.	The Applicant notes this comment and refers National Highways to the response given to NH-031. The Applicant does however welcome ongoing engagement with National Highways.
NH-035	Transport and Access Hydrology, Flood Risk and Drainage	Surface Water Drainage Scheme	Requirement 11 (Surface and foul water drainage): NH requires the opportunity to review the details of the surface water and foul water drainage system to ensure the integrity of the SRN drainage infrastructure is not interfered with, and that plans accord with DfT Circular 01/2022. NH emphasises that no surface water run-off from the development shall be discharged into the SRN drainage systems and no new third-party drainage connections will be permitted.	The Applicant notes this comment and refers National Highways to the response given to NH-031. The Applicant does however welcome ongoing engagement with National Highways.
NH-036	Transport and Access	Construction Environmental	Requirement 13 (Construction Environmental Management Plan): NH requires the opportunity to	The Applicant notes this comment and refers National Highways to the response given to NH-031.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
	Construction and Decommissioning	Management Plan	review the CEMP to ensure appropriate safeguards are implemented and maintained, with consideration of potential impacts on the SRN.	The Applicant does however welcome ongoing engagement with National Highways.
NH-037	Transport and Access	Operational Environmental Management Plan	Requirement 14 (Operational Environmental Management Plan): NH requires the opportunity to review the operational environmental management plan to ensure the management of long-term environmental risks associated with the site and ongoing protection of the SRN.	The Applicant notes this comment and refers National Highways to the response given to NH-031. The Applicant does however welcome ongoing engagement with National Highways.
NH-038	Transport and Access	Construction Traffic Management Plan	Requirement 15 (Construction Traffic Management Plan): NH requires the opportunity to review the details of the construction traffic management plan. The Applicant notes that NH was involved as a consultee during the preparation of the outline Construction Traffic Management Plan [APP-287]. NH's position is that it also needs to be a consultee on the final Construction Traffic Management Plan, rather than just the outline, as matters may change. It is understood this has now been agreed with the Applicant.	Requirement 15 (Construction traffic management plan) of Schedule 2 (Requirements) to the Draft Development Consent Order [REP1-007] provides that, before approving the final construction traffic management plan the relevant planning authority must consult with National Highways in its capacity as relevant highway authority. As such, National Highways will be consulted in respect of the final construction traffic management plan (which must be substantially in accordance with the outline version) as

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				part of the discharge of Requirement 15 in accordance with Schedule 16 (Procedure for the discharge of Requirements).
NH-039	Transport and Access Socio-Economics, Recreation and Tourism	Public Rights of Way and Permissive Paths	Requirement 16 (Public Rights of Way and Permissive Paths): Whilst not included in NH's Relevant Representation, it has been agreed with the Applicant that NH as relevant highway authority will be consulted on the discharge of this requirement.	The Applicant notes this comment and welcomes ongoing engagement with National Highways.
NH-040	Transport and Access Construction and Decommissioning	Decommissioning Plan	Requirement 20 (Decommissioning and Restoration): NH requires the opportunity to review the decommissioning plan, including a transport assessment and construction environmental impacts, to ensure the decommissioning process will not adversely affect the SRN. The Applicant referred to its position on NH's involvement as a consultee on the various management plans, including the outline Decommissioning Strategy. NH's position is that it also needs to be a consultee on the final Decommissioning Strategy, rather than just the outline, since matters	Requirement 20 (Decommissioning and restoration) of Schedule 2 (Requirements) to the revised Draft Development Consent Order [REP1-007] submitted at Deadline 1 provides that, before approving the final decommissioning plan the relevant planning authority must consult with National Highways in its capacity as relevant highway authority. As such, National Highways will be consulted in respect of the final decommissioning plan (which must be substantially in accordance with the Outline Decommissioning Strategy [REP1-100]) as part of the discharge of Requirement 20 in

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			may have changed. It is understood this has now been agreed with the Applicant.	accordance with Schedule 16 (Procedure for the discharge of Requirements).
NH-041	Transport and Access	Discharge of Requirements	6.Schedule 16 (Discharge of Requirements) 6.1. NH's concerns in relation to Schedule 16 as set out in its Relevant Representation remains.	Following discussions with National Highways, The Applicant has added wording to paragraph 1 (Interpretation) of Schedule 16 (Procedure for the discharge of requirements) to the revised Draft Development Consent Order [REP1-007] submitted at Deadline 1 which provides that, where an approved document is amended as per Requirement 3 (Approved documents and amendments to them) within Schedule 2 (Requirements), National Highways will also be consulted. As noted, this is in line with the same provision made in respect of the draft Green Hill Solar Farm Order 202[*]. That Applicant considers that this, in combination with the updated Protected Provisions for the protection of National Highways which have been agreed and are included at Part 5 of Schedule 15 (Protective Provisions) to the revised Draft Development Consent Order [REP1-007] submitted at Deadline 1, are proportionate and

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				sufficient in protecting National Highways' interests.
NH-042	Transport and Access	Construction Traffic Management Plan	7. Traffic and Transport 7.1. NH note and accept that no further capacity assessment of the SRN is required. However, NH maintain the need for the Construction Traffic Management Plan (CTMP) under Requirement 15 and the rationale for changes to that requirement which NH considers necessary.	The Applicant notes this comment. Requirement 15 (Construction traffic management plan) of Schedule 2 (Requirements) to the Draft Development Consent Order [REP1-007] provides that, before approving the final construction traffic management plan the relevant planning authority must consult with National Highways in its capacity as relevant highway authority. That Applicant considers that this, in combination with the updated Protected Provisions for the protection of National Highways which have been agreed and are included at Part 5 of Schedule 15 (Protective Provisions) to the revised Draft Development Consent Order [REP1-007] submitted at Deadline 1, are proportionate and sufficient in protecting National Highways' interests. The Applicant also welcomes ongoing engagement with National Highways.
NH-043	Consultation and Engagement	Statement of Common Ground	8. Statement of Common Ground	The Applicant notes this comment.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
	Transport and Access		8.1. A draft Statement of Common Ground has been provided by the Applicant. NH have reviewed the same and have responded to the Applicant noting where matters are and are not agreed. Further discussions are ongoing.	
Cotswolds National Landscape Board REP1-160				
CNL-001	Consultation and Engagement	Introduction	This response comprises the Cotswolds National Landscape Board's ('the Board's') Written Representations for submission at Examination Deadline 1- 1 May 2026. The Board submitted Relevant Representations (ref. RR-0944) and these Written Representations should be considered as supplementary to our previous Relevant Representations. The Board understands that there will also be an opportunity, if required, to provide further comments, including in response to the Examining Authority's questions as the Examination period	The Applicant notes that the Cotswolds National Landscape Board's Written Representation supplements its Relevant Representation (ref. RR-0944). The Applicant welcomes the Board's confirmation that four of the Potential Main Issues for Examination identified by the Board had been resolved prior to submission of its Relevant Representation, and that a further issue had been partly resolved. The Applicant will continue to engage constructively with the Board during the Examination, including through the Statement of Common Ground process. A draft of the Statement of Common Ground [EN010168/EXAM/8.7] has

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			progresses. Update on the Board's position regarding the Potential Main Issues for Examination (PMIEs) Our Relevant Representations outlined that eight PMIEs had been identified by the Board following Statutory Consultation on the Project and ongoing liaison with the Applicant. The Board considered that four of these (PMIEs 2, 3, 5 and 7) had been resolved before the submission of the Board's Relevant Representations and PMIE 6 had been partly resolved.	been prepared and submitted to Cotswolds National Landscape Board ahead of its first submission at Deadline 2.
CNL-002	Landscape and Visual	Summary	The four outstanding PMIEs are as follows: 1. Whether the Scheme has the potential to give rise to significant adverse environmental effects upon the Cotswolds National Landscape ('CNL') designation and its setting. In addition, whether the Scheme would seek to further the purpose of CNL designation in respect of the statutory duty outlined at s.85 of the Countryside and Rights of Way Act 2000 (as amended).	The Applicant notes this comment.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			4. Routing of construction traffic for sites A, B and C and the potential impact upon the tranquillity and landscape and scenic beauty of the CNL. 6. Potential removal of panels from fields C7 and C9 pending the results of further assessment. 8. Details regarding potential appropriate measures to compensate for any assessed residual adverse effects of the development on the natural beauty of the CNL and its setting to enable the statutory duty to seek to further the conservation and enhancement of its natural beauty (Section 85 of the Countryside and Rights of Way Act 2000, as amended) to be discharged. Our update on these PMIEs is outlined below, taking PMIEs 4 and 6 first, before the overarching PMIEs 1 and 8.	
CNL-003	Transport and Access Landscape and Visual	Construction Traffic and Tranquillity	PMIE 4 This PMIE concerns the routing of construction traffic for sites A, B and C. The Board's current position is	The Applicant notes this comment.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			that this should be routed outside of the CNL to avoid any potentially significant adverse impacts upon its tranquillity and landscape and scenic beauty. This would align with the mitigation hierarchy underpinning the Project, the first step of which is 'prevent / avoid' to reduce development impacts and control any negative effects on the environment. The Board notes and welcomes the Applicant's submission of a Tranquillity Technical Note (PDA-010, dated March 2026), submitted on 9 March 2026. Following an online meeting between the Applicant and the Board's Planning Officer on 30 March 2026, the Board understands that the Applicant intends to submit a further Technical Note at Deadline 1 – 1 May explaining the reasons why construction traffic for sites A, B and C cannot be routed outside the CNL. This Technical Note therefore directly addresses the first 'prevent/avoid' step of the mitigation	

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			hierarchy in respect of construction traffic routing and potential resultant impacts upon the CNL. Therefore, and in the interests of providing a comprehensive and definitive response to the Examining Authority on this matter, the Board intends on providing our comments on this PMIE at Deadline 2 – 22 May, having reviewed the contents of the forthcoming Technical Note as well as the Tranquillity Technical Note.	
CNL-004	Landscape and Visual	Nature and Scale of Visual Effects	PMIE 6 This specific PMIE concerns the nature and scale of visual effects of the Scheme on receptors located on Alderton Road (viewpoint reference VP CNL G). The Board notes the Rule 8 letter issued by the Examining Authority on 24 April 2026 which includes a request to the Applicant to provide further photomontages from all viewpoints by Deadline 3 -15 June. Currently the Applicant has provided photomontages for most viewpoints showing the development in winter at	The Applicant notes this comment.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			year 1 and summer at year 15, but critically not for winter at year 15. This would have been a request of the Board in these representations and is important in assessing the effectiveness of the proposed screening planting in winter months once it has matured and the impacts on views to and from the CNL. Assessment of this important additional information may affect the Board's conclusions on this PMIE, as well as PMIE 1 and also, by extension, PMIE 8. Again, in the interests of providing a comprehensive and definitive response to the Examining Authority, the Board intends on providing our further comments on this PMIE having reviewed this additional information, ideally at Deadline 2 – 22 May, but failing that by Deadline 3 – 15 June (dependent on when the photomontages are submitted).	
CNL-005	Landscape and Visual	Overall Assessment of Scheme and Scale	PMIE 1 This overarching PMIE essentially comprises the Board's overall assessment of the impacts of the	The Applicant notes this comment.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			Scheme on the CNL and its setting and whether the Scheme would seek to further the purpose of CNL designation. As outlined above, important additional information has been requested both by the Board and the Examining Authority which needs to be assessed by the Board and considered alongside the rest of the submission to inform a further response on this PMIE. Again, in the interests of providing a comprehensive and definitive response to the Examining Authority, the Board intends on providing our comments on this PMIE ideally at Deadline 2 – 22 May, but failing that by Deadline 3 – 15 June once this information has been submitted by the Applicant.	
CNL-006	Landscape and Visual Consultation and Engagement	Examination	PMIE 8 Once the Board has had an opportunity to consider the additional information outlined above and come to a view on PMIEs 1, 4 and 6 including on the nature and scale of	The Applicant notes this comment.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			residual adverse effects of the development on the natural beauty of the CNL and its setting we will then be able to provide further recommendations on this PMIE, again ideally at Deadline 2 – 22 May, but failing that by Deadline 3 – 15 June. Please do not hesitate to contact me if you wish to discuss this response further.	
Natural England REP1-156				
NE-001	Consultation and Engagement	Introduction	Deadline 1 – Natural England's Written Representations Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.	The Applicant notes this comment.
NE-002	Consultation and Engagement	Purpose	1. Purpose and structure of these representations 1.1 These Written Representations are submitted in pursuance of rule 10(1) of the Infrastructure Planning	The Applicant confirms that discussions with Natural England to are ongoing. A draft Statement of Common Ground [EN010168/EXAM/8.4] has been prepared based on the Natural

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			(Examination Procedure) Rules 2010 ('ExPR') in relation to an application under the Planning Act 2008 for a Development Consent Order ('DCO') for Lime Down Solar Project ('the Project') submitted by Lime Down Solar Park Limited ('the Applicant') to the Secretary of State. 1.2. Natural England has already provided a detailed description of its principal concerns in its Relevant Representations, submitted to the Planning Inspectorate on 12 January 2026. This document comprises an updated summary of Natural England's views, as they have developed in view of the common ground discussions that have taken place with the Applicant to date. 1.3 Natural England is continuing in discussion with the applicant to resolve remaining issues and is in the process of preparing a Statement of Common Ground with the applicant.	England's Relevant Representation and has been shared with them for comment. The first draft of the Statement of Common Ground will be submitted at Deadline 2.
NE-003	Ecology and Biodiversity	Principal Issues	2. Natural England's concerns and advice	The Applicant notes Natural England's comment and provides issue-specific

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
	Landscape and Visual Site Selection and Alternatives Soils and Agriculture		2.1. The principal issues 2.1.1. Natural England identified the following main issues in its Relevant Representations: a) Impacts to internationally designated sites b) Impacts to nationally designated sites c) Impacts to protected species d) Impacts to nationally designated landscapes e) Impacts to soils and best and most versatile agricultural land - f) These issues will be discussed in corresponding sections below along with any updates on the progress or resolution of issues.	responses in relevant responses NE-004 to NE-008 below.
NE-004	Ecology and Biodiversity	Designated Sites	2.2. Impacts on internationally designated sites 2.2.1. Following Natural England's Relevant Representations, Natural England and the applicants ecological consultant's have engaged in further	The Applicant notes this comment and will continue to engage constructively with Natural England on this matter. Following a meeting held with Natural England on 18 May 2026, the Applicant has concurred with Natural England on this matter and has agreed to assess Lime Down C as

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			discussions regarding the potential for Lime Down C to provide functionally linked land for lesser horseshoe bats associated with the Bath and Bradford on Avon Bats SAC and proposed mitigation measures. Natural England and the applicant have not yet been able to reach agreement on whether this area should be classified as functionally linked. As set out in Natural England's Relevant Representations, we maintain that the area should be classified as functionally linked land due to the reasons highlighted in our Relevant Representations. 2.2.2 Despite not reaching agreement on the above point, Natural England and the applicant have reached agreement on the mitigation measures which would need to be included within Lime Down C to ensure that significant impacts to SAC lesser horseshoe bats resulting from fragmentation could be avoided. These measures comprise:	potentially representing functionally-linked land for lesser horseshoe bats associated with the Bath and Bradford-on-Avon Bats SAC. An updated version of the Habitat Regulations Assessment (HRA) Report [APP-275] will be prepared accordingly and submitted at Deadline 3. The agreed mitigation measures described in order to avoid significant adverse effects on lesser horseshoe bats associated with the Bath and Bradford on Avon Bats SAC through fragmentation are already designed into the Scheme and will be secured through the DCO process. As such, the Applicant confirms this change will not materially change the outcome assessment of significant effects presented in the HRA Report [APP-275], which concludes that no adverse effects on site integrity of the Bath and Bradford-on-Avon Bats SAC are anticipated as a result of the Scheme. The Outline EPMS [REP1-106] details how sections of hedgerow to be

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			a. Retention of hedgerows across Lime Down C with any required new gaps in hedgerows to be limited to a maximum of 10m (it is understood that a majority will be limited to 3.5 – 6m) with the exception of one larger gap of 12 – 14m for the proposed access off the Fosse Way b. Construction Lighting will be controlled to prevent light spill onto suitable commuting habitats. 2.2.3. Provided the above measures are secured through the DCO and reflected in necessary documentation, Natural England consider that significant fragmentation impacts to lesser horseshoe bats could be avoided. 2.2.4. There are no further changes to Natural England's advice provided on internationally designated sites in our Relevant Representations.	permanently removed for new internal access tracks where no existing gap is present will typically be between 3.5 m to 6 m wide, with a maximum of 10 m of hedgerow to be removed in any one location for this element of the Scheme. It also details how sections of hedgerow to be removed to provide access from the existing highway network, including for Abnormal Indivisible Loads (AIL) will require a maximum of 18 m of hedgerow loss at any one access point, although would typically be less than this at most access points. At Lime Down C one AIL Location is expected to comprise a gap of 12 – 14 m in width, at Solar PV Access Location 19 (ES Volume 2, Figure 13-11 Construction Access Locations: Solar PV Sites [APP-156] refers). 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].

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				Measures set out within the Outline EPMS [REP1-106] and the Outline CEMP [REP1-096] are secured by Requirements 8 and 13 respectively within the Draft Development Consent Order [REP1-007] .
NE-005	Ecology and Biodiversity	Nationally Designated Sites	2.3. Impacts to nationally designated sites 2.3.1. There is no change to Natural England's advice provided on nationally designated sites in our Relevant Representations	The Applicant notes Natural England's comment and provided response to Relevant Representations RR-3427 relating to nationally designated sites. It is noted that Natural England advised that the proposed development is unlikely to result in significant adverse effects to nationally designated site in their Relevant Representations.
NE-006	Ecology and Biodiversity	Protected Species	2.4. Impacts to protected species 2.4.1. Following Natural England's Relevant Representations, the applicant's ecological consultants have provided further information and explanation relating to potential impacts arising to protected species as a result of the scheme. Discussions are ongoing between the applicant and Natural England on this matter.	The Applicant notes Natural England's comment and confirms that there is ongoing discussion regarding potential impacts to protected species.
NE-007	Landscape and Visual	Landscapes	2.5. Impacts to nationally designated landscapes	The Applicant notes this comment.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			2.5.1. Following Natural England's Relevant Representations, Natural England and the applicants landscape consultants have met to discuss Natural England's comments provided regarding nationally designated landscapes, specifically in relation to Natural England's request for an assessment of inter project cumulative effects on the National Landscape. 2.5.2. Following the further information provided in The Applicant's Response to Relevant Representations (Part 1) (Document Ref EXAM/9.1), providing that there are no proposed developments within the area of the setting of the Cotswolds National Landscape within the 10km Cumulative Study Area, Natural England have no further comments to make on this point.	
NE-008	Soils and Agriculture Site Selection and Alternatives	Soils and BMV Land	2.6. Impacts to soils and best and most versatile agricultural land 2.6.1. Following Natural England's Relevant Representations, Natural England and the applicants	The Applicant notes this comment.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			landscape consultants have met to discuss Natural England's comments provided regarding best and most versatile agricultural land and soil. 2.6.2. Natural England consider that the sampling density within the Solar PV Panel Area is acceptable. 2.6.3. As stated in Natural England's Relevant Representations, it is best practice to complete all surveys pre-consent. 2.6.4. Whilst the requested changes to the assessment matrix/significant criteria were accepted by the applicant, it is agreed that following these changes effects to best and most versatile agricultural land will remain significant. 2.6.5. It is noted from the The Applicant's Response to Relevant Representations (Part 1) (Document Ref EXAM/9.1) that an updates version of ES Volume 1, Chapter 17: Soils and Agriculture will be submitted at Deadline 1 which it is stated will provide further	

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			information on the land take across the Solar PV areas, cable route corridor, and associated infrastructure. Further comments regarding to potential impacts to best and most versatile agricultural land can be provided by Natural England following the submission of this document.	
National Grid Electricity Transmission AS-013				
NGET-001	Description and DCO Process	Protective Provisions	1 SUMMARY OF WRITTEN REPRESENTATION 1.1 Lime Down Solar Project (the "Project") will connect into NGET's Melksham substation and will affect NGET's existing infrastructure and land interests, which are located within and in close proximity to the proposed Order Limits. Future works planned by NGET could also be impacted by the Project. 1.2 Discussions on the Protective Provisions are ongoing between NGET and the Applicant, and these are not yet agreed. NGET will provide a version of Protective	The Applicant notes this comment and responds to the detailed comments raised below.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			Provisions it requires to be included in the Order at Deadline 3 identifying the difference of position with the Applicant, if agreement has not been reached by that deadline. 1.3 NGET needs to ensure the safety and integrity of its existing assets within the proposed Order Limits. It is also essential that NGET has continued access to its tower bases which fall within the proposed Order Limits to maintain and inspect the towers and overhead lines. Currently, it is not clear whether or how this access will be maintained. 1.4 Provision must also be made to ensure that the Project does not prevent it from carrying out its future works. 1.5 Until these issues are resolved to NGET's satisfaction, they amount to a material detriment to NGET's undertaking pursuant to section 127 of the Planning Act 2008.	
NGET-002	Description and DCO Process	Introduction	INTRODUCTION 2.1 This written representation is submitted on behalf of National Grid	The Applicant notes these comments.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			Electricity Transmission Plc ("NGET") in respect of Lime Down Solar Project (the "Project"), and in particular the interface with NGET's existing and future infrastructure and land which is within or in close proximity to the proposed Order Limits. 2.2 The Project will connect into NGET's existing Melksham substation. The Applicant is seeking temporary and permanent rights over several plots owned by, or containing, NGET rights and assets particularly those shown on sheet 16 of the Land Plan [APP-006] and Works Plans [APP007]. 2.3 As set out below, there are a number of issues, on which NGET is liaising with the Applicant, which remain outstanding, and until these are resolved to NGET's satisfaction, these issues amount to a material detriment to NGET's undertaking pursuant to section 127 of the Planning Act 2008. 2.4 We apologise that this written representation was submitted after	

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			Deadline 1 but note that much of the below is a restatement of NGET's relevant representation along with an updated position with regards to discussions with the Applicant. We hope the Examining Authority exercises its discretion to accept given the importance of NGET's statutory obligations.	
NGET-003	Description and DCO Process	NGET apparatus	3 NGET'S STATUTORY DUTIES 3.1 As a responsible statutory undertaker, NGET's primary concern is to meet its statutory obligations and to ensure that any development does not adversely affect those statutory obligations. NGET has a duty to protect its position in relation to infrastructure and land which is within or in close proximity to the proposed Order Limits. Additionally, NGET must protect any future proposed infrastructure. 3.2 NGET will therefore require appropriate protection for retained apparatus, including compliance with relevant standards for works proposed	Draft protective provisions for the benefit of NGET have been included within Schedule 15 of the Draft DCO [REP1-007]. As noted at Issue Specific Hearing 1 (see page 17 and 18 of the Written Summary of the Applicant's Oral Submissions and Responses at Issue Specific Hearing 1 and Responses to Action Points [REP1A-012]), related entities of Island Green Power are promoting a number of other solar DCOs at varying stages of the consenting process, namely Green Hill Solar Farm. As the Applicant is a subsidiary of Island Green Power, where possible it is seeking a consistent approach with statutory

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			within close proximity of its apparatus. 3.3 NGET's rights of access to inspect, maintain, renew and repair such apparatus must be maintained at all times and access to inspect and maintain such apparatus must not be restricted. Further, where the Applicant intends to acquire land or rights, or interfere with any of NGET's interests in land or NGET's apparatus, NGET will require appropriate protection. Further discussion and agreement with the Applicant is required in relation to the impact on its apparatus and rights.	undertakers to protective provisions across its projects. This includes protective provisions for the benefit of NGET. The Applicant understands that protective provisions are close to being agreed with NGET for Green Hill Solar Farm, and once agreed anticipates that agreement of protective provisions with NGET for the Scheme will follow soon thereafter. Once agreed, these will be incorporated into the draft DCO at a future deadline.
NGET-004	Description and DCO Process	Existing NGET Apparatus	EXISTING NGET APPARATUS 4.1 As set out in NGET's relevant representation dated 9 January 2026 [RR-3425] NGET owns and operates the following assets that are located within or in close proximity to the proposed Order Limits for the Project. These assets form an essential part of the electricity transmission network in England and Wales. The details of	Please see the response to NGET-003.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			the electricity assets impacted are as follows: 4.2 Substations: (a) Melksham 400kV/275kV Substation (b) Melksham 132kV Substation (c) Associated overhead and underground apparatus including cables 4.3 Overhead Lines ("OHL"): (a) ZG 400 kV OHL Hinkley Point - Melksham 1/Hinkley Point - Melksham 2 (b) 4YX 400 kV OHL Melksham – Seabank/Imperial Park – Melksham (c) ZF 400 kV OHL Melksham - Minety 1/Melksham - Minety 2 (d) YYM 400 kV OHL Bramley - Melksham 1/ Bramley - Melksham 2 (e) XL 275 kV OHL Iron Acton - Melksham 1/ Iron Acton - Melksham 2 (f) Associated cable fibre 4.4 Cable Apparatus: (a) Melksham - Thingley: 33 kV Commissioned Cable	

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
NGET-005	Description and DCO Process	Future NGET Apparatus	5 FUTURE NGET APPARATUS 5.1 The proposed Order Limits overlap with land required for the following NGET Future Projects: 5.2 Cotswolds Visual Impact Mitigation Project (Cotswolds VIP) 5.2.1 The Cotswolds VIP project will remove a net amount of 16 pylons and approximately 7.4 km of overhead electricity transmission line from within the Cotswolds National Landscape and replace them with approximately 7km of underground cable, significantly reducing visual impact in this protected area. To support the undergrounding of the transmission line, two shunt reactors will also be installed at Feckenham and Melksham substations, ensuring system stability and ongoing network performance. The Cotswolds VIP project is scheduled for delivery by 31 December 2030 and will extend the Melksham 400kV substation westward. The extension works include the installation of a new 400kV 200MVar shunt reactor, cooler bank and new bay will be built within the extended area. The development will be consented via the Town and	Please see the response to NGET-003. The discussions taking place in respect of Green Hill Solar Farm also cover future NGET apparatus.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			Country Planning Act and NGET are in negotiations to secure the required land to the west from the existing landowner. An existing stone track running north south outside the existing western substation fence line, serving a third-party battery storage facility, is required to be diverted to a position further away from the substation to make space for the site extension.	
NGET-006	Description and DCO Process	Future NGET Apparatus	5.3 Hinkley Point C Connection 5.3.1 As part of the broader Hinkley Connection Project (which was granted consent in 2016 by the Secretary of State), an overhead 400 kV line and underground cable route is being installed from Shurton/Bridgwater to Horsey, with a tee-in connection via T pylons to Melksham Substation. To facilitate the high loads from Hinkley Point C Power Station, Bramley Circuit 2 and Bridgwater/Shurton Circuit 1 will be swapped via an overhead Line diversion that requires 3 new towers to be built. Two of these towers are located to the east of the substation in fields 16-014 and 16-	Please see the response to NGET-003 and NGET-005.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			019. While initial completion was scheduled for 2024, shifting timelines mean that Melksham's modifications are now due by 2028.	
NGET-007	Description and DCO Process	Future NGET Apparatus	5.4 YYM OHL Reconductoring, Bramley-Melksham 2026 5.4.1 Reconductoring of the 82 km double-circuit 400 kV overhead line between Bramley (Hampshire) and Melksham (Wiltshire) began in 2024 and construction is expected to continue throughout 2026 and 2027. These works will boost line capacity bringing in more electricity into Melksham substation from the southwest, aiding connection of new low-carbon projects. 5.5 NGET must ensure adequate protection for its future projects both in terms of protection for future assets and future land and rights for the delivery of these projects. 5.6 NGET will co-operate on co-ordination in respect of any future projects and would request that the Applicant does likewise in line with good practice and the policy considerations in the updated Energy National Policy Statements.	Please see the response to NGET-003 and NGET-005.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
NGET-008	Description and DCO Process	Compulsory Acquisition	6 COMPULSORY ACQUISITION POWERS IN RESPECT OF NGET INFRASTRUCTURE 6.1 The Applicant is seeking compulsory powers over plots 16-014, 16-016, 16-017, 16-018 and 16-019 which form part of NGET's substation at Melksham. Plots 16-014 and 16-019 are required by NGET for the reconfiguration works noted above and any delays to programme could have a detrimental impact to NGET's statutory undertaking by way of delays to energisation and the potential for constraints on the distribution of loads at this location. 6.2 NGET objects strongly to the compulsory acquisition of its assets, land or rights over its land in the absence of an agreed form of Protective Provisions. It is essential that nothing contained within the Order prevents NGET from continuing to deliver future plans or from accommodating other electricity connection customers.	The Applicant notes the comments made and the Applicant's land agent is in discussions with NGET's professional representative. Updates on a seeking a voluntary agreement with the respondent's representative can be found in the Land and Rights Negotiation Tracker [REP1-246]. Paragraph 23 of the draft protective provisions for the benefit of NGET included within Schedule 15 of the Draft DCO [REP1-007] ensures that compulsory acquisition powers affecting NGET's rights and interests cannot be exercised without NGET's agreement.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			6.3 NGET notes that the Book of Reference and Land Plans indicate that the Applicant is seeking permanent acquisition of rights and temporary possession over several land plots which contain NGET apparatus and are subject to rights held by NGET or over plots required for access to maintain its apparatus. 6.4 In order to protect the above listed NGET projects and NGET's statutory undertaking, the Applicant must not be permitted to acquire or extinguish the rights of NGET in respect of land associated with existing or future NGET apparatus or interests.	
NGET-009	Description and DCO Process	Protective Provisions	7 PROTECTIVE PROVISIONS 7.1 A form of protective provisions for the benefit of NGET (the "Protective Provisions") has been included by the Applicant in Part 3 of Schedule 15 to the draft Development Consent Order (the "Order") for the Project [APP-016]. 7.2 NGET has been liaising with the Applicant in relation to the Protective Provisions and	Please see the response to NGET-003.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			discussions on these are ongoing, however there are a number of aspects that are not considered acceptable and that do not reflect NGET's standard approach and, as such, the Protective Provisions are not yet agreed. 7.3 NGET requests that the Applicant continues to engage with it in relation to how the Applicant's works pursuant to the Order (if made) will ensure protection for retained NGET assets, along with facilitating all future access and other rights as are necessary to allow NGET to properly discharge its statutory obligations. 7.4 Without inclusion of acceptable protective provisions, serious detriment would be caused to NGET's undertaking as well as to other third-party projects that are reliant on NGET's infrastructure, including the Project itself. NGET will keep the Examining Authority updated and NGET will provide a version of Protective Provisions it requires to be included in the Order at Deadline 3 identifying the	

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			difference of position with the Applicant, if agreement has not been reached by that deadline.	
NGET-010	Description and DCO Process	Works within Melksham Substation	8 WORKS WITHIN MELKSHAM SUBSTATION 8.1 Work No.4 in the dDCO allows works to be undertaken within the NGET substation at Melksham to facilitate the connection of the project. NGET and the Applicant have the benefit of these works due to article 36(2). 8.2 NGET is considering these works with its connections team and will provide further comment on the proposed works in due course but NGET must be able to protect its existing assets.	The Applicant notes this comment. The Applicant understands that works within the NGET substation at Melksham will be undertaken pursuant to the terms of the Connection Agreement.
NGET-011	Description and DCO Process	NGET Access Rights	9 NGET ACCESS TO TOWER BASES 9.1 It is essential that NGET has continued access to its tower bases which fall within the proposed Order Limits to maintain and inspect the towers and overhead lines and that this is maintained during the construction and ongoing operation of the Project. Currently, it is not	Please see the response to NGET-003. Paragraph 31 of the draft protective provisions for the benefit of NGET included within Schedule 15 of the Draft DCO [REP1-007] ensures that access to NGET's apparatus is retained.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			clear whether or how this access will be maintained. For example, Sheet 16 of the Works Plans [APP-007] appears to show works surrounding NGET's substation and existing OHL infrastructure (Works No. 5A). It is essential that these works are undertaken in accordance with NGET requirements for safe working around its infrastructure and with NGET consent via the NGET Use of Land process. 9.2 NGET requests that the Applicant continues to liaise with it to ensure the necessary access rights will be available to NGET throughout the construction and ongoing operation of the Project.	
NGET-012	Description and DCO Process	Next Steps	10 NEXT STEPS 10.1 Until the issues highlighted above are resolved to NGET's satisfaction, these issues amount to a material detriment to NGET's undertaking pursuant to section 127 of the Planning Act 2008. 10.2 NGET notes that it has had some discussions with the Applicant in relation to the Project but this has	Please see the response to NGET-003.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			not resulted in any meaningful advancement of terms. 10.3 NGET will continue to liaise with the Applicant on the matters above with a view to reaching a satisfactory agreement during the Examination process and will keep the Examining Authority updated in relation to these discussions. 10.4 NGET reserves the right to make further representations as part of the Examination process in relation to specific interactions with any NGET assets or projects identified during the Examination process, and as negotiations continue, and in respect of the Protective Provisions. NGET also reserves the right to request to attend a Compulsory Acquisition hearing.	
Network Rail Infrastructure Limited REP1-157				
NRIL-001	Description and DCO Process	Protected Provisions	1.2 Network Rail objects to any compulsory acquisition of rights over, under and across operational railway land and its assets or extinguishment of the rights held by Network Rail over operation railway land or any of	The Draft DCO [REP1-007] currently contains draft Protective Provisions for the protection of railway interests at Part 6 of Schedule 15 (Protective Provisions) to the Order. These provisions ensure that

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			its assets. Network Rail also objects to the seeking of powers to carry out works in the vicinity of the operational railway without first securing appropriate protections for Network Rail's statutory undertaking.	Network Rail's approval is required for any works that may affect the railway or any of Network Rail's apparatus or property. As a result, there will be no serious detriment to Network Rail's undertaking. Network Rail has requested provisions that place a restriction on a significant number of powers in the Draft DCO (including the power to maintain the authorised development, compulsory acquisition of land and the power to temporarily use land to carry out the authorised development) in respect to any railway property (as defined within the protective provisions) without the prior consent of Network Rail. These restrictions are in addition to the requirement for the Applicant to obtain approval from Network Rail on the technical aspects of any works. The Applicant and Network Rail have not yet negotiated or completed a voluntary property agreement for the necessary rights to construct, use and maintain the Scheme on, or in respect of, railway property. In the

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				absence of a voluntary agreement, any restriction on the use of the compulsory acquisition powers and other powers under the Draft DCO [REP1-007] would result in a material impediment to the delivery of the Scheme. As mentioned above, the protective provisions require the technical details to be approved by Network Rail prior to carrying out any works that may affect railway property. Accordingly, the Applicant's position is that the use of compulsory acquisition powers and other relevant powers under the draft DCO will not result in any serious detriment to Network Rail's undertaking. The Secretary of State has previously determined that the use of compulsory acquisition powers in respect of statutory undertakers' land and rights can be acceptable to ensure the deliverability of a NSIP where it has not been possible to reach agreement on the terms of a voluntary property

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				agreement provided that the technical details of any works are approved by the statutory undertaker (see, for example, paragraphs 6.6 to 6.23 of the Secretary of State's decision letter for the Immingham Open Cycle Gas Turbine Order 2020). The Applicant and Network Rail are continuing to negotiate the form of bespoke Protective Provisions to be contained within the Draft DCO [REP1-007] and the Applicant is confident that these will be agreed prior to the close of the Examination.
NRIL-002	Description and DCO Process	Protected Provisions	1.3 Network Rail considers there is no compelling case in the public interest for the compulsory acquisition of rights over its land and the Applicant should negotiate matters by private agreement to secure the necessary powers.	Please see the response to NRIL-001.
NRIL-003	Description and DCO Process	Protected Provisions	1.4 Network Rail has provided the Applicant with draft protective provisions, but no comments have been received. Network Rail's standard protective provisions have	Please see the response to NRIL-001. The Applicant cannot agree to any restriction on the use of compulsory acquisition powers until a voluntary property agreement has been agreed.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			been widely incorporated in other Development Consent Order and provide the necessary protections for Network Rail's statutory undertaking ensuring the Applicant does not exercise any rights under the DCO until the necessary agreements and consents are in place.	
NRIL-004	Description and DCO Process	Protected Provisions	1.5 The current protective provisions do not adequately safeguard Network Rail's rights or operational land. A comparison of the provisions is appended to this response. Though the main differences are: • Omits paragraph 4 which requires Network Rail's consent prior to exercising the rights under the Order. • Omits paragraph 5 which requires the undertaker not to do anything which would or results in the railway property being incapable of being used or maintained or affect the safe running of trains. This provision is imperative to the safe running of the railway.	Please see the response to NRIL-001.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			Obligation to seek NR consent when using or acquiring a new right or imposing a restrictive covenant is deleted. The above amendments along with other changes have been made without an explanation. The deleted provisions are included in the Network Rail's standard protective provisions as they are imperative to safe operation of the railway.	
NRIL-005	Description and DCO Process	Protected Provisions	1.6 If the DCO is granted, it would permit the Applicant to acquire rights over operational railway or Network Rail's land and extinguish any rights Network Rail has over land which the Applicant seeks to acquire permanently. Under the book of reference Network Rail has an interest in over 50 plots.	The Applicant notes Network Rail's comments in respect of their interests within the Order Limits and confirms that these comprise over 50 plots. This includes land that comprises the operational railway and third-party land over which Network Rail has rights (such as rights of access). The Applicant is not seeking to acquire any operational land belonging to Network Rail but instead seeks the rights necessary to install cabling under the railway.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				Please see the response to NRIL-001 in respect of the status of discussion on protective provisions and NRIL-006 in respect of the status of discussions on the voluntary property agreement.
NRIL-006	Description and DCO Process	Protected Provisions	1.7.1 Cable Route Corridor & Site Access Via NR infrastructure 1.7.1.1 Network Rail is content to grant an easement (subject to agreed Heads of Terms and any other consents or approvals that may be required) to the Applicant to lay cables under Network Rail's property or for any rights of access that required during the construction phase. 1.7.1.2 Network Rail would welcome further engagement from the Applicant to progress the property agreements so that the rights can be acquired via a private agreement instead of the use of compulsorily acquisition powers under the proposed DCO.	The Applicant also welcomes further engagement regarding property agreements for rights to be acquired via a private agreement and confirms that draft Heads of Terms have been issued to Network Rail. The Applicant is awaiting feedback on this and is committed to further engaging to reach agreement. The applicant confirms that an active Basic Asset Protection Agreement (BAPA) is in place to facilitate these negotiations alongside Protective Provisions.
NRIL-007	Transport and Access	Freight	1.7.2 Freight 1.7.2.1 Network Rail has raised this issue previously with the Applicant	The Applicant confirms its awareness and consideration of the potential for a need to extend the down freight loop at

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			as it has concerns with need to extend the down freight loop at Hullavington as any future works may impact Network Rail's ability to extend its freights operation (should it need to). 1.7.2.2 Network Rail is currently reviewing the impact on freight and will liaise with the Applicant in due course.	Hullavington which could intersect with the Scheme's Order Limits. The request by Network Rail in the letter dated 18 March 2025 states that: "<i>Whilst there are currently no proposals in place for how this would be implemented, should the proposals look to develop right up to the current rail boundary at this location, this could hinder future freight expansion.</i>" The Applicant is unaware of any advancement on this matter but welcomes further updates on this and seeks to engage on this matter further. Should any advancement in plans indicate a definitive interaction, the Applicant is open to reaching an agreed position privately in line with negotiations on property agreement and/or Protective Provisions.
NRIL-008	Construction and Decommissioning	Security of Railway	1.7.3 Fencing and Security of the railway 1.7.3.1 Network Rail require the Applicant to ensure that railway boundaries remain secure during the construction and operation of the development to prevent unauthorised access to railway land.	As set out within ES Volume 1, Chapter 3: The Scheme [APP-055], the Scheme will implement security measures during the construction and operation and maintenance of the Scheme. ES Volume 1, Chapter 3: The Scheme [APP-055] sets out at paragraph 3.3.59 that during operation, following

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				installation of the cables, the construction working area would be fully reinstated back to its original condition, including where it intersects with railway land. Framework security measures in the Solar PV Sites are set out within Section 2.16 of the Outline OEMP [REP1-098] which is secured by Requirement 14 within Schedule 2 to the Draft DCO [REP1-007] . These measures include security for the boundary of the Solar PV Sites which will be secured both by fencing and by the provision of Closed-Circuit Television (CCTV) equipment, including where the Scheme abuts Solar PV Sites.
NRIL-009	Other Environmental Matters	BESS Safety	1.7.4 Fire Safety 1.7.4.1 Given the presence of Battery Energy Storage Systems (BESS) within the proposed development, it is essential that robust fire safety measures are in place to prevent potential hazards to railway operations.	The Applicant confirms that robust fire safety measures are inherent in the BESS design plans to fully mitigate any potential impacts on railway operations. The Applicant has submitted an Outline BSMP [REP 1-110] which has been prepared for the Scheme using guidance from Dorset and Wiltshire Fire and Rescue Service and incorporating recommendations of the National Fire Chiefs

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				Council. The Outline BSMP [REP1-110] is secured by Requirement 6 within Schedule 2 to the Draft DCO [REP1-007]. The safety objectives for the design of the BESS site are listed in Section 2.4 of the Outline BSMP [REP1-110]. The Outline BSMP [REP1-110] has been amended at Deadline 1 to fully accommodate the latest BESS safety requirements contained in NFPA 855 (2026) ensuring that any credible risks associated with battery storage are either prevented or fully mitigated if a BESS failure occurs. As now mandated under NFPA 855 (2026) the Applicant will only be able to select a BESS system that has undertaken Large Scale Fire Testing (LSFT). At the detailed design stage, the selected BESS LSFT data will be leveraged to fully inform inputs for risk assessment tools which will be utilised together with detailed consequence modelling to provide a comprehensive site operations and emergency

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				response safety audit, this is stipulated in the Outline BSMP [REP1-110] pre-construction requirements (Section 6). The Applicant has also committed to commissioning an additional Plume Analysis Study at the detailed design stage as stipulated in Section 5.5.9 of the Outline BSMP [REP1-110] and secured through the DCO: <i>"...at the detailed design stage a BESS system and site specific Plume Analysis study will be conducted to assess the environmental impact of a site incident to sensitive receptors within a 1 km radius. Toxic gas emissions to sensitive receptors must be below relevant public health exposure limit guidelines when the battery system of a BESS is fully consumed (burnt out), production of Particulate Matter (PM) and a visibility impact assessment on any transport links within a 1 km radius of the BESS area will also be included. The ERP produced at the detailed design stage (template outlined in Section 5.4.4) will incorporate all necessary emergency response procedures and actions</i>

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				<i>based upon thermal runaway test data supplied by the BESS system provider."</i> The Applicant also commissioned BESS fire emissions assessment (as detailed in ES Volume 3, Appendix 15-2: BESS Fire Emissions Modelling [EN010168/APP/6.3 (Rev 2)]) to ensure the selected BESS area would have no significant off-site impacts if credible BESS failure scenarios occurred. The study has been undertaken using professional judgement in the absence of specific regulatory guidance, and adopts a conservative, worst case approach throughout. The assessment demonstrates that, even under worst case assumptions, a BESS fire would not result in significant effects on human health or safety. The modelling assumes: • Worst case BESS fire locations within the BESS area closest to sensitive receptors;

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				• Worst case release height, temperature and plume parameters; and • Use of five years of hourly meteorological data, with the maximum predicted concentration extracted at each receptor, assuming the fire coincides with the poorest dispersion conditions. Given the inherent uncertainty in available BESS fire emissions data, a sensitivity test was also undertaken whereby emission rates were doubled. Even under this highly conservative sensitivity test, predicted concentrations remained well below the relevant health-based thresholds. Six worst case BESS fire locations (i.e. locations within the BESS Area closest to sensitive receptors) have been modelled as depicted in ES Volume 2, Figure 15-5: Battery Energy Storage System Fire Emissions Study Area [APP-166]. The Concentrations of carbon monoxide (CO), formaldehyde, hydrogen chloride (HCl), hydrogen

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				cyanide (HCN), hydrogen fluoride (HF), ammonia (NH₃), nitrogen dioxide (NO₂) and particulates from a potential BESS fire have been modelled using an air quality dispersion model to determine the likely effects on human health. A high-level visibility assessment has also been undertaken using the modelled particulates results to determine the effect of BESS fire emissions on visibility on the local road and rail network to inform the Outline BSMP [REP1-110]. ES Volume 3, Appendix 15-2: BESS Fire Emissions Modelling [APP-239] concludes that there would be no significant air quality effects as a result of a BESS fire incident and visibility issues were not predicted.
NRIL-010	Hydrology, Flood Risk and Drainage	Drainage	1.7.5 Drainage 1.7.5.1 Network Rail has concerns in respect of the drainage infrastructure for the 132KV substation adjacent to the railway. Network Rail will need further details to assess the impact	Network Rail's request for further detail on the drainage infrastructure for the 132 kV substation adjacent to the railway is noted. The final drainage layout for the substation will be developed post-

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			of any surface water run off onto the railway.	consent. Requirement 5 within Schedule 2 to the Draft DCO [REP1-007] secures the design principles and parameters that will govern the design, while Requirement 11 within Schedule 2 to the Draft DCO [REP1-007] secures the outline drainage strategy. The substation drainage strategy will follow the drainage hierarchy, with the final discharge location confirmed through detailed design having regard to ground conditions, available receiving drainage features, watercourse constraints and third-party assets, including the railway. Surface water runoff from the substation compound will be managed through a formal drainage strategy. Runoff will be attenuated and controlled so that discharge does not exceed the agreed greenfield-equivalent rate, with attenuation provided for the relevant design storm up to and including the 1 in 100-year event plus climate change allowance. Exceedance routes will also

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				be considered as part of the detailed drainage design. The drainage design will include appropriate pollution prevention, treatment and isolation measures. This is particularly relevant to substation infrastructure, where the final design will need to manage potentially contaminated runoff, spills, leaks or incident water in accordance with the secured drainage and containment principles. The detailed drainage design will therefore be required to demonstrate that uncontrolled surface water runoff would not be directed towards Network Rail land or railway infrastructure. Where required, design measures may include controlled outfalls, attenuation, cut-off drainage, exceedance routing, containment, treatment and isolation arrangements. The relevant principles for drainage design of the 132 kV

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				Substation are detailed within ES Volume 3, Appendix 11-1 to 11-9: Flood Risk Assessment and Drainage Strategy [REP1-037 to REP1-054], the Commitments Register [REP1-114], Outline CEMP [REP1-096], and Outline OEMP [REP1-098]. Substation containment and release principles are also addressed through 9.8 Firewater Containment and Drainage Strategy – Lime Down Substation [REP1-124] submitted at Deadline 1. Drainage design measures for the 132 kV Substation are secured in Requirement 11 of Schedule 2 of the Draft DCO [REP1-007] and the Outline CEMP [REP1-096] and Outline OEMP [REP1-098] which are secured by Requirements 13 and 14 of Schedule 2 of the Draft DCO [REP1-007], respectively. Further detail can be provided to Network Rail at detailed design stage as part of the technical approval set out in the protective provisions.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
NRIL-011	Description and DCO Process	Protected Provisions	1.7.6 Loss of access rights 1.7.6.1 Network Rail have a right to maintain Alderton Tunnel ("the Tunnel"). Though, this right of access wouldn't be exercised unless a problem regarding the structure of the Tunnel was identified during a Tunnel inspection, Network Rail need to maintain this right. 1.7.6.2 There are also hidden ventilation shafts in the tunnel, these shafts were sunk to facilitate the boring of the tunnel at the time of construction. The shafts may have been filled and compacted and therefore liable to subsidence or settlement over the passage of time. Network Rail would have a responsibility if a surface issue arose due to the reduction of support for the land or the shafts due to a defect in the tunnel structure (otherwise landowner responsible). 1.7.6.3 It is therefore imperative, that Network Rail's rights of access are not extinguished.	The Applicant notes Network Rail's comments in respect of the Alderton Tunnel. The Applicant understand that Network Rail is referring to plot 03-078 in respect of the Alderton Tunnel. The Applicant has specifically excluded Network Rail's interests in this plot as set out in the Book of Reference [REP1-011] and therefore any rights to inspect the structure will not be extinguished.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
NRIL-012	Description and DCO Process	Protected Provisions	1.8 In order to facilitate the works, Network Rail will require the following agreements to be in place: Network Rail's standard protective provisions for inclusion in the DCO, to ensure the relevant protections are in place and agreements are entered into; a. Property agreement(s): any easements, licences, and/or transfers for acquisition of freehold land and/or rights (subject to Network Rail's clearance process). The form of agreements is yet to be negotiated between the parties and will be required to regulate the grant of the required rights from Network Rail to the Applicant. b. Asset protection agreements: These will be in the form of a basic asset protection agreement (BAPA), asset protection agreement, structures agreement or other engineering documents required for the benefit and	The Applicant notes this comment and agrees that a property agreement, BAPA and Framework Agreement will be required.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			protection of Network Rail's assets. c. Framework agreement: which describes and attaches the documents referred to above including any clearance conditions. Network Rail considers a Framework Agreement to be the most effective way of; agreeing the inclusion of Protective Provisions required by Network Rail, asset protection agreement, providing for the grant of rights through an option for an easement, providing Network Rail with the comfort of retaining its existing rights, providing for the recovery of Network Rail costs and governing the relationship between the parties.	
NRIL-013	Description and DCO Process	Protected Provisions	1.9 Network Rail is trying to engage with the Applicant to enter into private agreements to govern the carrying out of the proposed works.	Please see the response to NRIL-001 and NRIL-006. The Applicant welcomes ongoing engagement with Network Rail.
NRIL-014	Description and DCO Process	Protected Provisions	1.10 Without those agreements and satisfactory protective provisions being in place Network Rail considers the proposed	Please see the response to NRIL-001.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			development, if carried out, would have a detrimental impact on the safe, efficient, and economic operation of the railway and in accordance with its Network Licence. Until such agreements are in place, Network Rail is unable to withdraw its objection to the DCO.	
NRIL-015	Description and DCO Process	Protected Provisions	1.11 In relation to the acquisition of rights only, section 127 (5) and (6) of the Planning Act 2008 apply. As you are aware compulsory acquisition of rights over statutory undertaker's land can only be acquired if the Secretary of State is satisfied there will not be any serious detriment to the undertaker's carrying on of its undertaking. Network Rail strongly maintains that the works proposed will impede Network Rail's ability to ensure the continued safe, efficient and economical operation of the operational railway, if the works are carried out with the necessary protections in place. As such Network Rail requires robust Protective Provisions and protections	Please see the response to NRIL-001.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			in additional agreements as discussed above.	
NRIL-016	Description and DCO Process	Protected Provisions	1.12 Similarly, under section 138 of the Planning Act, compulsory acquisition powers over Network Rail's rights or apparatus can only be granted where the Secretary of State is satisfied that the removal or relocation will not impair Network Rail from carrying out its statutory functions. The current protective provisions do not provide for sufficient safeguards to be put in place before such rights are extinguished.	Please see the response to NRIL-001.
NRIL-017	Description and DCO Process	Protected Provisions	1.1 Given the national significance of the railway network, Network Rail require their standard provisions to ensure compliance with its licence conditions. Without the relevant provisions, Network Rail does not consider that the draft DCO as currently drafted satisfies the requirements of sections 127 and 138 of the Planning Act 2008, and consequently, compulsorily powers should not be exercised without further safeguards being	Please see the response to NRIL-001.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			incorporated. 1.14 Network Rail hopes to have all the necessary agreements in place prior to the end of the Examination.	
NRIL-018	Description and DCO Process	Protected Provisions	1.15 Network Rail has also undertaken a two-stage clearance process; business clearances and technical clearances have been granted for this scheme, subject to conditions, which will need to be complied with by the Applicant.	The Applicant notes this comment.
NRIL-019	Description and DCO Process	Protected Provisions	2.1 Network Rail does not object to the project in principle. However, Network Rail is under a statutory duty to protect the operational railway and associated railway infrastructure. Network Rail wishes to continue to seek an agreement on the protections and agreements in a form that is well precedented and acceptable to Network Rail before the close of the examination.	The Applicant notes this comment and welcomes ongoing engagement with Network Rail in respect of Protective Provisions and a Framework Agreement between the parties.
NRIL-020	Description and DCO Process	Protected Provisions	2.2 In the event, that insufficient progress is made regarding the protective provisions and private agreements, Network Rail would like to reserve its position to request to be heard in an appropriate hearing to	The Applicant notes this comment and anticipates that Protective Provisions will be agreed between the parties prior to the close of the Examination.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			explain the impact of the proposals on its railway undertaking.	
Historic England REP1-152				
HE-001	Landscape and Visual	Visualisations	The visualisations demonstrate what would be visible from Bradfield Manor. This does not include the profiles of the individual PV panels themselves, but rather areas of land visible from the Manor that would include the proposed development. The primary impact would be the view to the north-west from Bradfield Manor, where the development would be visible within the fields just below the horizon, including parts of D2, D3, D4, D5, D20 and D21. The photo was taken on the 22nd May 2025, and therefore this includes maximum vegetation screening. We advise that winter views may reveal more visibility of the development.	The Applicant submitted a technical note at Deadline 1 (9.20 ES Technical Addendum to Chapter 12 Cultural Heritage - Bradfield Manor Visualisations [REP1A-014]), which included the visualisations of the individual PV panels within Fields D2, D3, D4, D5, D20 and D21 to the north-west of the manor.
HE-002	Landscape and Visual	Visualisations	The visualisation provided to the north-east would include some visibility of D11 and D12, but a reduced impact to that shown in the northwest view.	The Applicant welcomes the comment that the views of the panels in fields D11 and D12, to the north-east of Bradfield Manor Farmhouse would have a reduced impact.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
HE-003	Landscape and Visual	Visual Impact	The rural views from a principal first floor room are designed to be experienced as part of the principal outlook from the Manor. The proposed development would introduce an engineered and markedly incongruous appearance to the wider setting of the Manor, which we advise would cause a small degree of harm to its heritage significance.	The Applicant submitted a technical note at Deadline 1 (9.20 ES Technical Addendum to Chapter 12 Cultural Heritage - Bradfield Manor Visualisations [REP1A-014]), which included the visualisations as requested by WC and Historic England, which support the results of the assessment of harm on Bradfield Manor Farmhouse as less than substantial at the lower end of the scale.
HE-004	Landscape and Visual	Mitigation	We advise that there is potential for the harm to be minimised and mitigated through some additional planting along southern boundaries of the application site, which may potentially provide screening of the visible areas of D2 and D3, D5. It seems unlikely that D20 on rising topography would be able to be screened, but as this site is further from the Manor, the harm would be minimised.	The Applicant notes the comment and Outline LEMP [APP-283] provides a framework for the proposed planting. Planting is already implemented in the mitigation strategy, but we can look to add additional planting along the southern boundaries of the application site.
Ministry of Defence REP1-153				
MOD-001	Description and DCO Process	Introduction	Proposal: Lime Down Solar Park Limited (the Applicant) seeks	The Applicant notes this comment.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			development consent, under the Planning Act 2008, to construct, operate, maintain and decommission a solar photovoltaic (PV) generating station, with a generating capacity of more than 50 megawatts (MW) and associated infrastructure on land largely within the administrative area of Wiltshire Council, with small areas of existing highway within the administrative area of South Gloucestershire Council. The proposal, subject of our application for development consent (the Application), is called Lime Down Solar Park (the Scheme).	
MOD-002	Description and DCO Process	Introduction	Further to our most recent response letter dated 09 January 2026, MOD is now in a position to update our response to the above consultation. The Defence Infrastructure Organisation (DIO) Safeguarding Team represents the Ministry of Defence (MOD) as a consultee in UK planning and energy consenting systems to ensure that development	The Applicant notes this comment.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			does not compromise or degrade the operation of defence sites such as aerodromes, explosives storage sites, air weapon ranges, and technical sites or training resources such as the Military Low Flying System. This application is a Development Consent Order with the applicant seeking approval for the installation of solar photovoltaic (PV) panels and an on-site battery energy storage system (BESS) which will include an underground cable connection to the national grid at Melksham Substation. Elements of the proposed development occupy the statutory height and birdstrike safeguarding zones that surround RAF Keevil as well as the statutory technical safeguarding zones that surround the Central Wide Area Multilateration (WAM) Network.	

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
MOD-003	Site Selection and Alternatives	Safeguarding Zones	Technical site safeguarding zones Technical safeguarding zones define areas surrounding radars, radio transmitter/ receiver sites and other types of technical installations supporting operational defence or national security requirements within which the heights of development, materials used in construction and introduction of sources of electro-magnetic fields are regulated. As mentioned in our previous letter, it was noted that part of the preferred routes for the proposed cable route corridor occupies the technical safeguarding zone in place to protect the Central WAM Network. In this area the MOD must be consulted on any development or change of land use. The section of the cable route corridor that intersects with the Central WAM Network safeguarding zone is the section shown within document Works Plan September	The Applicant is pleased the MOD is in agreement that there are no safeguarding concerns and has responded to comments relating to technical site safeguarding zones in detail in Table 3-7, Section 3.7 on Page 753 of the Applicant's Response to Relevant Representations (Part 1) [PDA-009].

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			2025 Rev 1 Sheet 13 of 25. Since our last letter, a technical assessment has been carried out and concluded that the laying of a cable within this section of the Works Plan and the use of tall construction equipment will not affect the performance of the Central WAM Network. The MOD therefore has no WAM safeguarding concerns with this development and does not require to be consulted on the detailed design (unless the design extends outside of the cable corridor) or the use of cranes or other tall construction equipment.	
MOD-004	Site Selection and Alternatives	Safeguarding Zones	Aerodrome height safeguarding zones Parts of the cable route corridor occupy the RAF Keevil statutory aerodrome height safeguarding zone. Aerodrome height safeguarding zones define areas surrounding aerodromes within	The Applicant is pleased the MOD is in agreement there are no safeguarding concerns and has responded to comments relating to aerodrome height safeguarding zones in detail in Table 3-7, Section 3.7 on Page 754 of the Applicant's Response to Relevant Representations (Part 1) [PDA-009].

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			which the heights of buildings and structures are regulated to prevent the obstruction of the critical air space encompassing the aerodrome within which the principal take-off, landing and circuiting procedures are contained. This protected airspace is known as the Obstacle Limitation Surface (OLS). The MOD has no height safeguarding concerns with this development.	
MOD-005	Site Selection and Alternatives Ecology and Biodiversity	Safeguarding Zones	Birdstrike safeguarding zone Parts of the cable route corridor occupy the RAF Keevil statutory birdstrike safeguarding zone Within this zone, the principal concern of the MOD is that the creation of new habitats, such as open bodies of water, wetland habitats or other forms of habitat creation both temporary or permanent that may attract and support populations of large and/or flocking birds hazardous to air	The Applicant is pleased the MOD is in agreement there are no safeguarding concerns and has responded to comments relating to bird strike safeguarding zones in detail in Table 3-7, Section 3.7 on Page 755 of the Applicant's Response to Relevant Representations (Part 1) [PDA-009]. The Applicant confirms consultation with the MOD will take place should any BNG habitats be considered within the bird strike zone.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			traffic. The applicant has provided information on how the affected land will be managed and proposed new habitats. The development will not introduce new bird attractants within the birdstrike safeguarding zone so we have no birdstrike safeguarding concerns. I can also confirm that no further engagement on birdstrike safeguarding is required. However, should any BNG habitats be considered to be located within a MOD birdstrike safeguarding zone, the MOD would wish to be consulted on such proposals.	
MOD-006	Description and DCO Process	Summary	Summary In summary, the MOD has no objection to the proposed Lime Down Solar Park development and does not require to be consulted on the detailed design of the cable route unless the design goes beyond the cable route corridor.	The Applicant welcomes the confirmation no consultation is required on the detailed design of the Cable Route Corridor. All works are anticipated to take place within the identified Order Limits and therefore further consultation on this matter is not anticipated.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			The MOD must emphasise that the advice provided within this letter is in response to the data and/or information detailed on the Planning Inspectorate website as of the date of this letter. Any variation of the parameters (which include the location, dimensions, form, and finishing materials) detailed may significantly alter how the development relates to MOD safeguarding requirements and cause adverse impacts to safeguarded defence assets or capabilities. In the event that any amendment, whether considered material or not by the determining authority, is submitted for approval, the MOD should be consulted and provided with adequate time to carry out assessments and provide a formal response. I trust this is clear however should you have any questions please do not hesitate to contact me.	The Applicant will continue to engage with the DIO safeguarding team as necessary should any design refinements require further review.

Stop Lime Down REP1-167				
SLD-001	Description and DCO Process	Introduction - Background	1.1.1. This representation and its appendixes comprise the Written Representation of Stop Lime Down ("SLD") against the application by Lime Down Solar Park Ltd ("the Applicant") for a development consent order ("DCO") for the Lime Down Solar Project ("the Scheme"). It is made pursuant to s.90 of the Planning Act 2008 ("PA 2008") It expands and supplements the Relevant Representation made by SLD [RR-4495], which should be read alongside it.	The Applicant notes this comment.
SLD-002	Description and DCO Process	Introduction - Background	1.1.2. SLD are a non-profit community campaign group comprised of local residents of Wiltshire and South Gloucestershire who oppose the Scheme. SLD operates through SLD Wiltshire Limited, a company limited by guarantee (company number 16326693). It is supported by both legal advisors, and a number of experts in different fields, that have assisted in the production of this Written Representation.	The Applicant notes this comment.

SLD-003	Description and DCO Process	Introduction - Background	1.1.3. SLD supports renewable energy in principle, but consider that this Scheme in the proposed location causes too much harm to local communities and the environment. SLD welcomes the opportunity to submit this Written Representation to assist the Examining Authority ("ExA") in its examination of the Scheme. SLD continue to encourage the ExA to make a recommendation to the Secretary of State for Energy Security and Net Zero ("SoS") that development consent not be granted for the Scheme.	The Applicant notes this comment.
SLD-004	Description and DCO Process	Introduction - Background	1.1.4. SLD has already taken part at the Preliminary Meeting and Issue Specific Hearing 1. It will continue to take part throughout the process to ensure that community concerns are clearly heard and properly considered, so that local voices and knowledge carry real weight in decisions affecting their future. That is particularly important given the unprecedented number of Relevant Representations submitted by Interested Parties in the Examination. SLD are grateful	The Applicant recognises SLD's participation in the PM and ISH1 and welcomes its intention to participate fully throughout the remainder of the Examination process.

			for the opportunity to take up this role.	
SLD-005	Description and DCO Process	Structure of this Written Representation	1.2.1. This Written Representation is produced with a number of Appendices detailed in the table below. These Appendices comprise the main evidence base for the Written Representation, and are where most of the detail of SLD's case is to be found. Many of these Appendices are either directly produced by, or produced with the assistance of, SLD's legal advisors and experts.	The Applicant notes that Stop Lime Down's Written Representation summarises the technical appendices, which themselves comprise the main evidence base.
SLD-006	Description and DCO Process	Structure of this Written Representation	1.2.2. This Written Representation comprises a covering submission for these Appendices, and makes extensive cross-references to them. As a result, the Written Representation does not attempt to repeat the detail of the Appendices, but rather to collate headline points and to provide an overarching position statement. In addition, the Planning Report appended as Appendix A (produced by Marrons) similarly has an overview function, and considers the planning balance for the Scheme.	The Applicant notes that Stop Lime Down's Written Representation summarises the technical appendices, which themselves comprise the main evidence base. Furthermore, the Applicant notes that the Planning Report similarly summarises the technical information contained in the appendices, alongside the planning balance.

SLD-007	Description and DCO Process	Structure of this Written Representation	1.2.3. The Written Representation also provides SLD's current comments on the draft Development Consent Order. SLD will continue to review the Development Consent Order and provide comments to the Applicant and the ExA as appropriate.	The Applicant notes this comment.
SLD-008	Description and DCO Process	Structure of this Written Representation	1.2.4. Appendix Z to this Written Representation provides an interactive layered map which SLD has used to assist its understanding of how various environmental effects overlap. An explanatory note of how to use the map is at Annex 1 at the end of this document. SLD hope it is of assistance to parties and the ExA, and will update it over the course of the Examination.	The Applicant notes this comment.
SLD-009	Description and DCO Process	Structure of this Written Representation	1.2.5. Alongside this Written Representation, SLD is engaging with the Applicant to produce a Statement of Common Ground (as was explored at the Preliminary Meeting, and ultimately directed by the ExA). As part of that process SLD expect that it will provide comments on the outline plans proposed within the application documentation on a without	The Applicant notes this comment.

			prejudice basis. As appropriate, and in light of the Applicant's response to this Written Representation and Local Impact Report, SLD will progress those comments (noting that a number of comments on those outline plans are already made in the Appendices).	
SLD-010	Description and DCO Process	Structure of this Written Representation	1.2.6. SLD welcome any questions that the ExA, or any other party (including the Applicant), may have about this Written Representation. SLD will continue to take steps assist the ExA, and advance its case, throughout the remainder of the Examination.	The Applicant notes this comment.
SLD-011	Description and DCO Process	Appendices	1.3.1. This Written Representation is accompanied by the following reports and papers: • Issue – Planning Author – Marrons (Sandra Ford, Joshua Mellor) Report/paper – Planning Report Appendix – A	The Applicant has considered the contents of the Planning Report in providing responses to the issues raised, noting that it in part summarises the technical appendices provided by other consultants working on behalf of Stop Lime Down.
SLD-012	Description and DCO Process	Appendices	• Issue – Landscape Author – Carly Tinkler	The Applicant has reviewed Appendix B in response to the Written

			Report/paper – Landscape and Visual Impact Report Appendix – B	Representations on Landscape and Visual Impact set out within this Written Representation documentation and in the Applicant's Response to Stop Lime Down Written Representation Appendix B Landscape and Visual Report [EN010168/EXAM/9.27] submitted at Deadline 2.
SLD-013	Description and DCO Process	Appendices	Issue – Heritage Author – Marrons (Lucy Nicholson, Tom Linington) Report/paper – Heritage and Archaeology Report Appendix – C	The Applicant has reviewed Appendix C in response to the Written Representations on Heritage.
SLD-014	Description and DCO Process	Appendices	Issue – Traffic and Transport Author – Railton TPC Ltd (Bruce Bamber) Report/paper – Transport Report Appendix – D	The Applicant has reviewed Appendix D in response to the Written Representations on Transport and will provide a technical response note to be submitted at Deadline 3.
SLD-015	Description and DCO Process	Appendices	Issue – Ecology Author – Nicholas Valori Report/paper – Ecology Report Appendix – E	The Applicant has reviewed Appendix E in response to the Written Representations on Ecology and Biodiversity

SLD-016	Description and DCO Process	Appendices	Issue – Flooding Author – Prof Richard Skeffington Report/paper – Critique of Flood Risk Assessment Appendix – F1	The Applicant has reviewed Appendix F1 in response to the Written Representations on Hydrology, Flood Risk and Drainage. The substantive matters raised are addressed in Section 8 below.
SLD-017	Description and DCO Process	Appendices	Issue – Flooding Author – Prof Richard Skeffington Report/paper – Runoff from Solar Panels at Lime Down Appendix – F2	The Applicant has reviewed Appendix F2 in response to the Written Representations on Hydrology, Flood Risk and Drainage. The substantive matters raised in relation to solar panel runoff are addressed in Section 8 below.
SLD-018	Description and DCO Process	Appendices	Issue – Flooding Author – Prof Richard Skeffington Report/paper – Observations of Flood Extent above Corston Appendix – F3	The Applicant has reviewed Appendix F3 in response to the Written Representations on Hydrology, Flood Risk and Drainage. The photographs show flooding within the known Gauze Brook floodplain, which is addressed in ES Volume 3, Appendix 11-6 Flood Risk Assessment and Drainage Strategy - Lime Down D BESS [REP1-047] and in Section 8 below.
SLD-019	Description and DCO Process	Appendices	Issue – Flooding Author – Prof Richard Skeffington Report/paper – Flood Risk at Lime Down due to Reduced Evaporation Appendix – F4	The Applicant has reviewed Appendix F4 in response to the Written Representations on Hydrology, Flood Risk and Drainage. The substantive matters raised in relation to reduced evaporation and flood risk are addressed in Section 8 below.

SLD-020	Description and DCO Process	Appendices	<u>Issue – Glint and Glare</u> <u>Author – Straten Consulting Services Ltd (John van Hoogstraten)</u> <u>Report/paper – Glint and Glare Report</u> <u>Appendix – G</u>	The Applicant has reviewed Appendix G in response to the Written Representations on Glint and Glare.
SLD-021	Description and DCO Process	Appendices	<u>Issue – Noise/Vibration Impacts</u> <u>Author – Clark Saunders Associates (Ian MacArthur)</u> <u>Report/paper – Acoustic Report</u> <u>Appendix – H</u>	The Applicant has reviewed Appendix H in response to the Written Representations on Noise and Vibration.
SLD-022	Description and DCO Process	Appendices	<u>Issue – Health</u> <u>Author – Claire Maxwell</u> <u>Report/paper – Health Effects Paper</u> <u>Appendix – I1</u>	The Applicant has reviewed the Appendix in response to the Written Representations on Human Health.
SLD-023	Description and DCO Process	Appendices	<u>Issue – Health</u> <u>Author – Prof Richard Skeffington and Professor Peter Dobson</u> <u>Report/paper – Air Quality</u> <u>Appendix – I2</u>	The Applicant has reviewed the Appendix in response to the Written Representations on Air Quality. Please refer to Applicant's Detailed Response to Stop Lime Down Deadline 1 Submission on BESS Fire Emissions [EN010168/EXAM/9.25] , submitted at Deadline 2.
SLD-024	Description and DCO Process	Appendices	<u>Issue – Climate</u> <u>Author – University of Derby</u>	The Applicant has reviewed Appendix J1 in response to the Written

			<u>(Prof Chris Sansom, Dr. Heather Almond, Zaharaddeen Hussaini) Report/paper – Climate Change Report Appendix – J1</u>	Representations on Climate and will provide a separate technical response note to be submitted at Deadline 3.
SLD-025	Description and DCO Process	Appendices	• <u>Issue – Climate Author – Prof Richard Skeffington Report/paper – Rainfall Amounts used in the Climate Change Risk Review at Lime Down Appendix – J2</u>	The Applicant has reviewed Appendix J1 in response to the Written Representations on Climate and will provide a technical response note to be submitted at Deadline 3.
SLD-026	Description and DCO Process	Appendices	• <u>Issue – Soil and Agricultural Land Author – Sam Franklin Report/paper – Soils and Agricultural Impact Report Appendix – K1</u>	The Applicant has reviewed Appendix K1 in response to the Written Representations on Soils and Agriculture.
SLD-027	Description and DCO Process	Appendices	• <u>Issue – Soil and Agricultural Land Author – Cranfield Environment and Agrifood Report/paper – Soil Site Report Appendix – K2</u>	The Applicant has reviewed Appendix K2 in response to the Written Representations on Soils and Agriculture.
SLD-028	Description and DCO Process	Appendices	• <u>Issue – Site Selection and Alternatives Author – Sir Mike Pitt</u>	The Applicant has considered the contents of the Site Selection and Alternatives Paper at Appendix L in providing responses to the issues

			Report/paper – Site Selections and Alternatives Paper Appendix – L	raised. The Technical Note on Site Selection [EN010168/EXAM/9.26] provides further analysis of the points raised.
SLD-029	Description and DCO Process	Appendices	Issue – PRoWs Survey Author – SLD Report/paper – Public Right of Way Survey Appendix – Y	The Applicant will provide a technical response note to be submitted at Deadline 3. The Applicant notes the submission of this survey and notes that this survey has been compiled from Stop Lime Down supporters and social media followers who are likely to be viewing the Scheme from a negative perspective and does not necessarily represent the views of all users of the PRoW.
SLD-030	Description and DCO Process	Appendices	Issue – Map Author – James Verschoyle Report/paper – Combined Baseline and Project Information Plan Appendix – Z	The Applicant notes this comment.
SLD-031	Description and DCO Process	Administrative Matters	1.4.1. SLD note that the Applicant's draft agenda for the accompanied site visit is provided at [PDB-005]. Some, but not all, of SLD's suggestions have been accepted. For those which were not accepted, this was primarily because of them being accessible to the public. SLD invite the ExA to attend those viewpoints (insofar as	The Applicant confirms that the choice of locations proposed for the Draft Itinerary for an Accompanied Site Inspection [REP1-119] took into account whether they were publicly accessible or not, noting also that the Examining authority has undertaken an Unaccompanied Site Inspection [EV1-001] . Table 2-3 of the Draft Itinerary for an Accompanied Site

			they have not already done so as part of their unaccompanied site visit [EV1-001]).	Inspection [REP1-119] tabulates the locations proposed by Stop Lime Down and whether they were either included or not. The Draft Itinerary for an Accompanied Site Inspection [REP1-119] is submitted at Deadline 3 to include an additional location, as requested by the Examining Authority.
SLD-032	Description and DCO Process	Administrative Matters	1.4.2. SLD will seek to speak on topics contained in its Written Representation at OFH2. It will continue to participate at all ISHs and otherwise assist the ExA insofar as it can do.	The Applicant notes this comment.
SLD-033	Description and DCO Process	Administrative Matters	1.4.3. This Written Representation has not been produced with the use of AI. Expert reports address the use of AI where appropriate.	The Applicant notes this comment.
SLD-034	Site Selection and Alternatives	Introduction	2.1.1. As the remainder of this Written Representation addresses, the location chosen for the Scheme is a sensitive one. Many of the harms, and significant adverse effects identified, come from the starting point of a failure to identify that sensitivity. SLD are of the view that there are critical flaws within the Applicant's approach which make it defective	The Applicant maintains that the mitigation hierarchy has been correctly applied. The mitigation hierarchy is a sequential approach that firstly seeks to avoid or prevent an adverse effect at source and if the effect is unavoidable the provision of mitigation measures to reduce the significance of the effect, and lastly if the effect cannot be avoided or

			and which weigh against the grant of development consent. Importantly, it demonstrates a failure by the Applicant to meet the directive to “avoid”, the first key step in the mitigation hierarchy.	reduced, the implementation of measures to offset the effect. In terms of site selection, the process set out in ES Volume 3, Appendix 4-1 Site Selection Assessment Report [APP-185] reflects how the mitigation hierarchy has been applied. In order to avoid or prevent an adverse effect, all constraints were removed from the area of search, in order to ascertain if an unconstrained site could be identified; this is Step 1 of the process. Following site selection, embedded mitigation measures in the form of buffers between receptors and solar infrastructure were identified from an early stage in order to reduce and minimise impacts. Table 4-1 of ES Volume 1, Chapter 4: Alternatives and Design Evolution [APP-056] sets out the buffers that were applied, such as 15m from all hedgerows and woodland and 30m from major watercourses.
SLD-035	Site Selection and Alternatives	Introduction	2.1.2. SLD has produced a report (Appendix L) addressing the process of site selection with the input of its experts addressing the effects of the Scheme, and with the	The Applicant has considered the contents of the Site Selection and Alternatives Paper at Appendix L in providing responses to the issues raised. The Technical Note on Site

			input of its legal advisors. The report has been authored by Sir Michael Pitt. References in this section to pages or paragraph numbers are to that report, unless otherwise specified.	Selection [EN010168/EXAM/9.26] provides further analysis of the points raised.
SLD-036	Site Selection and Alternatives	Introduction	2.2.1. As the report addresses from [2/§5], the requirement to consider alternatives is set out in NPS EN-1 but arises out of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 ("EIA Regulations"). This provides the requirement on the Applicant to (in the words of para 4.3.15 of NPS EN-1) include "information about the reasonable alternatives they have studied" and to give "an indication of the main reasons for the applicant's choice, taking into account the environmental, social and economic effects and including, where relevant, technical and commercial feasibility".	The Applicant notes the reference to NPS EN-1 and EIA Regulations in the context of alternatives. As explained at Issue Specific Hearing 1, and summarised in the Written Summary of the Applicant's Oral Submissions and Responses at Issue Specific Hearing 1 and Responses to Action Points [REP1A-012], there is no general requirement in NPS EN-1 to consider alternatives or to demonstrate that a proposed project represents the best option from a policy perspective (paragraph 4.3.9 of NPS EN-1). Regulation 14(2)(d) of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 requires an applicant to provide a description of the reasonable alternatives studied and an indication of the main reasons for the options chosen. The

				Applicant's consideration of alternatives has been focussed on meeting this requirement. ES Volume 1, Chapter 4: Alternatives and Design Evolution [APP-056] explain the alternatives considered and ES Volume 3, Appendix 4-1: Site Selection Assessment Report [APP-185] sets out the alternatives sites that have been considered.
SLD-037	Site Selection and Alternatives	Introduction	2.2.2. It is an important requirement of the EIA Regulations that the Environmental Statement be adequate. Adequacy is a threshold requirement before one addresses the question of the decision maker reaching a conclusion on the information contained in the Environmental Statement. To conclude the Environmental Statement is adequate in law, the information contained therein must be such that to accept it would not disclose a demonstrable flaw of logic or otherwise be irrational. That is a requirement applying to the assessment of alternatives	The Applicant's position is that the Environmental Statement supporting the DCO application for the Scheme is adequate and meets the requirements of Regulation 14 (including in the provision of an assessment of alternatives) of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017, and was accepted for Examination in accordance with the requirements of Section 55 of the Planning Act 2008.

			contained within the Environmental Statement [4/§9].	
SLD-038	Site Selection and Alternatives	Introduction	2.2.3. NPS EN-1 goes on to explain that a consideration of alternatives “should be carried out in a proportionate manner” [4/§11]. The significant scale of the Scheme in this case is noted in that regard.	The Applicant notes that the consideration of alternatives should be carried out in a proportionate manner. The Applicant considers that the site selection assessment undertaken and set out at ES Volume 3, Appendix 4-1: Site Selection Assessment Report [APP-185] is comparable to, and in some cases provides more detail than other nationally significant solar projects of a similar size and scale.
SLD-039	Site Selection and Alternatives	Introduction	2.2.4. The Applicant places particular reliance on para 4.3.24 of NPS EN-1. That paragraph explains that development consent should not be refused “simply because fewer adverse impacts would result from developing similar infrastructure on another site” [4/§12]. However, the word “simply” is important; it recognises that the existence of an alternative site may become a reason to refuse in combination with other aspects of policy and law. That includes where there is a defect in	The Applicant does not disagree that paragraph 4.3.24 of NPS EN-1 recognises there can be situations where an alternative site <i>could</i> be a reason to refuse where considered in combination with other aspects of policy and law. That is not the case here. A robust alternatives assessment has been carried out, the Environmental Statement is adequate, and the mitigation hierarchy has been appropriately applied.

			the assessment such that the Environmental Statement is not adequate, or where there has been a failure to comply with the mitigation hierarchy, or where alternatives are taken into account in the overall planning balance [5/§14].	Critically, paragraph 4.3.24 also says that the Secretary of State " <i>Should have regard as appropriate to the possibility that all suitable sites for energy infrastructure of the type proposed may be needed for future proposals</i> ".
SLD-040	Site Selection and Alternatives	Policy and law	2.2.5. The Applicant has recognised that the s.85 Countryside and Rights of Way Act 2000 ("CROW 2000") duty to "seek to further the purpose of conserving and enhancing the natural beauty of" National Landscapes is relevant to site selection and alternatives. SLD not only agrees, but considers the Applicant's approach underplays how important s.85 is in requiring the Applicant to "avoid" harms pursuant to the mitigation hierarchy. Importantly, and as is emphasised elsewhere in this Written Representation, the requirement to "avoid" harms comes before the application of the CNP Infrastructure presumption in NPS EN-1. A failure of avoidance means the test in para 4.2.14 of NPS EN-1 is not met, and the CNP	The Applicant disagrees with this interpretation of the policies set out in NPS EN-1. Section 85 of the CROW 2000 does not require all harm to be avoided. The Applicant has applied the mitigation hierarchy as part of the design evolution of the Scheme (in accordance with paragraphs 4.2.10 to 4.2.12 of NPS EN-1) and sought to minimise adverse effects through sensitive design and reasonable and appropriate mitigation. The Applicant therefore considers that the CNP presumption applies.

			Infrastructure presumption does not apply [6/§16].	
SLD-041	Site Selection and Alternatives	Defects in methodology	2.3.1. Two key errors in the methodology adopted by the Applicant have been identified by SLD. These both go to the sufficiency of the information contained in the alternative sites assessment (which cannot be accepted on a proper exercise of planning judgment), and indicate that the Applicant has failed at this stage in properly avoiding environmental effects [9/§20].	The Applicant disagrees that the methodology used is defective. The Applicant's approach to consideration of alternatives is not novel and has been carried out in accordance with the policy requirements to consider alternatives (including that the consideration of alternatives should be carried out in a proportionate manner). The Applicant has considered the contents of the Site Selection and Alternatives Paper at Appendix L. The Technical Note on Site Selection [EN010168/EXAM/9.26] provides further analysis in response to the specific points raised regarding suggested errors in the methodology.
SLD-042	Site Selection and Alternatives	Defects in methodology	2.3.2. The first error is that the Applicant has used a selection process for its Potential Development Areas (PDAs) which has failed to apply consistent criteria when identifying those Areas. The overall effect is that PDAs identified earlier in the process were selected against more constrained parameters, meaning they were smaller than	The Applicant has carried out a proportionate approach to its site selection assessment, in line with NPS EN-1 paragraph 4.3.22. The Applicant does not consider it proportionate to assess all sites in various combinations, or to redraw previously discounted PDAs. It is considered that this goes beyond the policy requirements for the consideration of alternatives.

			they would have been if they were identified later in the process (and selected against more relaxed parameters) [9/§21]. This failure means that PDAs 1-4, identified earlier in the process (and, therefore, considered more acceptable as a starting point), were never appropriately assessed with the benefit of the loosened selection parameters. They were not identified on a like-for-like basis [11/§22-23]. Similarly, PDAs identified at different stages of the process were identified as two separate areas and considered separately (rather than together) [12/§26]. This is a clear logical failing in the assessment [12/§27].	However, in order to address the comment, the Applicant has further considered whether any of PDAs 1-4 could have been enlarged to incorporate land that was introduced at the later stages of the site selection assessment. This is set out in the Technical Note on Site Selection [EN010168/EXAM/9.26]. The conclusion of that further analysis is that PDAs 1-4 would remain unsuitable and therefore the conclusions of the Site Selection Assessment Report [APP-185] in relation to PDAs 1-4 remain unchanged.
SLD-043	Site Selection and Alternatives	Defects in methodology	2.3.3. The second error is that the Applicant has failed to systematically consider the combination parts of PDAs or entire PDAs as part of the selection process [12/§28]. The significance of this failing is immediately apparent if PDAs 5, 6 and 11 are considered. These are proximate PDAs giving a combined 1,482ha and ample opportunity for mitigation (around 400ha) of the limited number of problematic	As noted above, the Applicant has carried out a proportionate approach to its site selection assessment, in line with NPS EN-1 paragraph 4.3.22. The Applicant does not consider it proportionate to assess all sites in various combinations, or to redraw previously discounted PDAs. It is considered that this goes beyond the policy requirements for the consideration of alternatives.

			environmental effects identified by the Applicant [14/§29]. The Applicant clearly understood the feasibility and relevance of the combination of PDAs but failed to conduct this analysis. That is a significant flaw in the analysis [14/§30]. Given the limited number of PDAs, and the context of the Scheme, this would not only have been proportionate to consider but is material to assessing the adequacy of the assessment [15/§32].	However, in order to address the comment, the Applicant has further considered whether any of the PDAs could have been redrawn to remove constraints and then combined in order to create new PDAs or “clusters”. This is set out in the Technical Note on Site Selection [EN010168/EXAM/9.26]. This further analysis has resulted in three “clusters” of PDAs being considered. However, none of the clusters are considered to be reasonable alternatives for the Scheme. Therefore the conclusions of the Site Selection Assessment Report [APP-185] remain unchanged.
SLD-044	Site Selection and Alternatives	Defects in the SSAR assessment	2.4.1. Aside from those methodological concerns, SLD disagree with the outcome of the alternative sites assessment itself [15/§33].	The Applicant notes this comment and maintains that its approach and conclusions on site selection are valid.
SLD-045	Site Selection and Alternatives	Defects in the SSAR assessment	2.4.2. SLD note the Applicant's reliance in its assessment on the use of land agents and the proffering of “entire land parcels suggested by land agents” at Stage 5 of the analysis. SLD considers that selection on that	The Applicant's response remains as stated in response to SLD's relevant representation SLD-013. The Applicant's site selection assessment takes into consideration a range of planning, environmental

			basis puts ownership at the forefront of the analysis without having regard to the wide range of unconstrained land at Stage 5. Practicalities of delivery are not a substitute for avoidance and mitigation of environmental effects [15/§35].	and operational factors. The potential availability of large-scale land holdings within the search area was a consideration, however it is not the only consideration in the site selection process. It is important that the Scheme should be capable of delivery, and the commercial feasibility of a development proposal is recognised as a factor in site selection within NPS EN-3 paragraphs 2.10.22-24.
SLD-046	Site Selection and Alternatives	Defects in the SSAR assessment	2.4.3. In the report, SLD sets out an analysis of the process conducted by the Applicant. By comparing [Appendix B, 26] and [Appendix C, 27] to that report, it is apparent that the Applicant has substantially overestimated the perceived merits of the PDA which became the Scheme. In particular: (1) landscape and visual was downgraded as a result of impacts on the Cotswolds National Landscape; (2) land use was downgraded to amber to reflect the location in the Cotswolds, the various uses around the fragmented development; (3) access for construction traffic downgraded to red to reflect routing along inappropriate roads	The Applicant disagrees with SLD's assessment. The assessment set out in ES Volume 3, Appendix 4-1: Site Selection Assessment Report [APP-185] sets out the initial high-level constraints and rates them against defined assessment indicators and evaluation criteria. The assessment indicators and evaluation criteria adopted by the Applicant are set out in Annex A of ES Volume 3, Appendix 4-1: Site Selection Assessment Report [APP-185]. It is considered that the conclusions of the RAG rating applied by the Applicant accord with the assessment

			and through the National Landscape; (4) grid connection downgraded from amber to red to reflect the inappropriate and damaging length of the cable; and, (5) site size downgraded due to the Applicant's recognition that it was smaller than the parameter it chose to apply [16/§37].	indicators and evaluation criteria adopted. It is important to note that the assessment carried out is not intended to assess the PDAs to the same level of detail as required in an environmental impact assessment. Whilst further information is known about PDA 10 because of its development as the proposed site for the Scheme, the same level of detail is not known about the other PDAs assessed. To address some of the specific points of challenge raised by SLD in their re-assessment of the RAG ratings: 1) Landscape and visual for PDA10 has been assessed as amber to acknowledge that PDA 10 has the potential to have some adverse impacts on the CNL. This is considered to be a reasonable conclusion given that PDA 10 (as drawn for site selection assessment), is outside of the Cotswolds National Landscape (noting

				that Highways Improvement Areas were added to the Order Limits later). Whilst the further landscape assessment for the environmental statement was not considered in the site selection assessment, the conclusions of that assessment do reflect the conclusions of the RAG rating on landscape in the site selection assessment (ES Volume 3, Appendix 8-6: Assessment of Effects on the Cotswolds National Landscape and its Special Qualities [APP-197] identifies that there are no direct significant effects on the CNL or its special qualities). This can be contrasted with PDA 9, which had more obvious landscape constraints on a high-level review, given that the North Wessex Downs National Landscape adjoined the PDA and was at a significantly higher elevation; 2) Land use for PDA10 has been assessed as green by the Applicant because the PDA

				has no land use conflicts. The presence of the CNL adjacent to the PDA is not considered in relation to land use based on the assessment indicators and evaluation criteria adopted, but is considered in relation to landscape and visual as discussed above. Therefore SLD's downgrading of land use to amber on the basis of the presence of the CNL is not accepted by the Applicant. 3) Access to construction traffic for PDA 10 was rated amber by the Applicant on the basis that, on a high level review of the distance to the primary road network, and physical engineering constraints, the road network has some constraints to HGV access, but these were not considered to be significant (which would result in a red rating). 4) Grid connection for PDA 10 was rated amber by the Applicant on the basis that

				PDA 10 was considered to have the potential to have some constraints to achieve its grid connection. This is based on the evaluation criteria of type and number of constraints (e.g road and river crossings), and length of connection. Based on the evaluation criteria, a red rating would have been given if there was considered to be significant constraints to achieving the grid connection that would be very difficult to mitigate/overcome, and the Applicant considers that PDA 10 does not meet this threshold. 5) Site size for PDA 10 was rated green by the Applicant based on its evaluation criteria, because it is considered to provide sufficient land required to accommodate a 500 MW scheme. The Applicant acknowledges in its assessment that this is smaller than the initial 1,100 ha site sized adopted in the search for

				sites, however, it is not accepted that this has affected the level of mitigation that can be accommodated for the Scheme. Noting the related comments on design evolution in Appendix L of SLD's WR, it is not accepted that the changes made by the Applicant go beyond a typical design evolution process. In all cases, the design has developed in response to ongoing consultation and feedback from the environmental assessment process, for example <i>"Removal of panels on fields to reduce the impact on the CNL, Fosse Way and properties"</i>. This is a normal part of design evolution, where the Scheme has been adapted in line with the design principles to account for consultation feedback and ongoing discussions, including discussions with the CNL Board regarding what is considered to be the setting of the CNL (which is not defined and therefore requires detailed consultation and engagement). The Design Approach Document [APP-268] provides an

				explanation of design evolution in relation to the CNL.
SLD-047	Site Selection and Alternatives	Defects in the SSAR assessment	2.4.4. Assessed either by reference to the number of red scores (3), or by reference to the overall weighted score (18 – note lower is worse and the range is 18-22), the PDA for the Scheme is the least appropriate site for development.	The Applicant does not agree with SLD's assessment for the reasons set out above.
SLD-048	Site Selection and Alternatives	Conclusion	2.5.1. SLD has significant concerns about the approach to the assessment of alternatives in this case. There are demonstrable flaws in logic in the methodology of the assessment, and the omission of obviously material considerations. There is also a clear failure to properly to assess the environmental effects of PDA 10, and as a result a selection of a manifestly inappropriate site for the proposed development. These errors underpin many of the significant negative environmental effects of the proposed development.	For the reasons set out above, the Applicant disagrees that the site selection assessment is flawed. It is considered that the site selection assessment satisfies the requirement to consider alternatives as set out in policy and the approach adopted is not novel. The Applicant considers that the site selection assessment undertaken and set out at ES Volume 3, Appendix 4-1: Site Selection Assessment Report [APP-185] is comparable to, and in some cases provides more detail than, other nationally significant solar projects of a similar size and scale.
SLD-049	Landscape and Visual	Introduction	3.1.1. SLD consider landscape and visual impact a critical issue in this Examination. For those who live in the area, the Scheme will be	The Applicant has reviewed the points relating to Landscape and Visual in section 3 and Appendix B within the Applicant's Response to

			extremely impactful and convert what is a pleasant rural landscape with one which is industrialised and devoted to energy generation. The Order Limits about the National Landscape, an area with the highest policy protection subject to the s.85 CROW 2000 duty, and is itself crossed by many PRowS and routes enjoyed by walkers, cyclists and equestrians. The Scheme is placed close to dwellings and surrounds villages, giving the effect that the landscape has changed in most if not all directions. SLD consider the Scheme to be particularly harmful when properly assessed, and consider the Applicant to have considerably underestimated how significant and damaging the Scheme will be in this location.	Stop Lime Down Written Representation Appendix B Landscape and Visual Report [EN010168/EXAM/9.27] submitted at Deadline 2.
SLD-050	Landscape and Visual	Introduction	3.1.2. On behalf of SLD, a landscape and visual impact report has been produced by Carly Tinkler BA, CMLI, FRSA, MIALE (Appendix B). Where references are made to pages or paragraphs, they are to that report unless otherwise stated. Alongside giving a detailed review of the Scheme and its impact, the report also	The Applicant has reviewed the points relating to Landscape and Visual in section 3 and Appendix B within the Applicant's Response to Stop Lime Down Written Representation Appendix B Landscape and Visual Report [EN010168/EXAM/9.27] submitted at Deadline 2.

			includes a number of detailed queries which SLD invites the Applicant to consider.	
SLD-051	Landscape and Visual	Policy	3.2.1. Section 5.10 of NPS EN-1 addresses landscape and visual issues. The policy recognises that "Virtually all nationally significant energy infrastructure projects will have adverse effects on the landscape" (para 5.10.5), but requires schemes to be "designed carefully, taking account of the potential impact on the landscape" (para 5.10.6). It notes that, having regard to siting and constraints, "the aim should be to minimise harm to the landscape, providing reasonable mitigation where possible and appropriate" (para 5.10.6).	The Applicant has reviewed the points relating to Landscape and Visual in section 3 and Appendix B within the Applicant's Response to Stop Lime Down Written Representation Appendix B Landscape and Visual Report [EN010168/EXAM/9.27] submitted at Deadline 2.
SLD-052	Landscape and Visual	Policy	3.2.2. The NPS recognises that National Landscapes have the highest status of protection, and schemes should be "designed sensitively given the various siting, operational, and other relevant constraints" (para 5.10.7). The policy recognises the duty to "further the purposes of nationally designated landscapes", and that this applies in the setting. The SoS	The Applicant has reviewed the points relating to Landscape and Visual in section 3 and Appendix B within the Applicant's Response to Stop Lime Down Written Representation Appendix B Landscape and Visual Report [EN010168/EXAM/9.27] submitted at Deadline 2.

			should be "satisfied that measures which seek to further the purposes of the designation are sufficient, appropriate and proportionate to the type and scale of the development" (para 5.10.8).	
SLD-053	Landscape and Visual	Policy	3.2.3. Locally valued landscapes are also recognised, but "should not be used in themselves to refuse consent, as this may unduly restrict acceptable development" (para 5.10.12). the words "in themselves" recognises that such harm to locally valued landscape may, in combination with other factors, still be enough.	The Applicant has reviewed the points relating to Landscape and Visual in section 3 and Appendix B within the Applicant's Response to Stop Lime Down Written Representation Appendix B Landscape and Visual Report [EN010168/EXAM/9.27] submitted at Deadline 2.
SLD-054	Landscape and Visual	Policy	3.2.4. As to visual effects, it is likewise recognised that all proposed energy infrastructure "is likely to have visual effects for many receptors" and that the SoS will "judge whether the visual effects, such as local residents, and other receptors, such as visitors to the local area, outweigh the benefits of the project".	The Applicant has reviewed the points relating to Landscape and Visual in section 3 and Appendix B within the Applicant's Response to Stop Lime Down Written Representation Appendix B Landscape and Visual Report [EN010168/EXAM/9.27] submitted at Deadline 2.
SLD-055	Landscape and Visual	Policy	3.2.5. Applicants are required to carry out an Land and Visual Impact Assessment ("LVIA"), including a cumulative effects assessment (para 5.10.16). They	The Applicant has reviewed the points relating to Landscape and Visual in section 3 and Appendix B within the Applicant's Response to Stop Lime Down Written

			are enjoined to “consider landscape and visual matters in the early stages of siting and design” when site choice and design principles are being picked. This is because this contributes to showing how “negative effects have been minimised and opportunities for creating positive benefits or enhancements have been recognised and incorporated” (para 5.10.19). A similar point is made in NPS EN-3 at para 2.10.96. This should include assessments relevant to National Landscapes when present (para 5.10.20), and should look at effects from “noise and light pollution, and other emissions” (para 5.10.22). The NPS suggests that the SoS may be assisted by being directed to other permitting decisions of a similar magnitude of impact when assessing a project (para 5.10.25).	Representation Appendix B Landscape and Visual Report [EN010168/EXAM/9.27] submitted at Deadline 2.
SLD-056	Landscape and Visual	Policy	3.2.6. The policy recognises that reducing scale can help mitigate effects. However, it notes that reducing scale or amending design may result in significant operational constraints and reduction in function. The policy recognises, however, that there may be	The Applicant has reviewed the points relating to Landscape and Visual in section 3 and Appendix B within the Applicant's Response to Stop Lime Down Written Representation Appendix B Landscape and Visual Report

			exceptional circumstances where mitigation could have a very significant benefit and “warrant a small reduction in function”. Where that is the case, the SoS may decide “that the benefits of the mitigation to reduce the landscape and/or visual effects outweigh that marginal loss of function” (para 5.10.26).	[EN010168/EXAM/9.27] submitted at Deadline 2.
SLD-057	Landscape and Visual	Policy	3.2.7. Of mitigation, adverse effects may be minimised through appropriate siting within the development site and wider setting, and also various choices of detailed design, and sympathetic landscaping and management of immediate surroundings (para 5.10.27).	The Applicant has reviewed the points relating to Landscape and Visual in section 3 and Appendix B within the Applicant's Response to Stop Lime Down Written Representation Appendix B Landscape and Visual Report [EN010168/EXAM/9.27] submitted at Deadline 2.
SLD-058	Landscape and Visual	Policy	3.2.8. For Secretary of State decision-making, key in this case is para 5.10.34 which addresses setting effects of NSIPs on National Landscapes. The duty to further the purposes applies to these areas, and the “aim should be to avoid harming the purposes of designation or to minimise adverse effects on designated landscapes, and such projects should be designed sensitively	The Applicant has reviewed the points relating to Landscape and Visual in section 3 and Appendix B within the Applicant's Response to Stop Lime Down Written Representation Appendix B Landscape and Visual Report [EN010168/EXAM/9.27] submitted at Deadline 2.

			given the various siting, operational and other relevant constraints". The policy recognises that "The fact that a proposed project will be visible from a designated area should not in itself be a reason for the Secretary of State to refuse consent". That is clearly the case; however, visibility and other effects which have a significant harmful effect on the National Landscape and its setting may well give such a reason.	
SLD-059	Landscape and Visual	Policy	3.2.9. The policy notes that projects of this scale "will often be visible across a very wide area" and that the SoS should judge "whether any adverse impact on the landscape would be so damaging that it is not offset by the benefits (including need) of the project" (para 5.10.35). When reaching a judgment, the SoS should "consider whether any adverse impact is temporary" and whether the impact "will be capable of being reversed in a timescale that the Secretary of State considers reasonable" (para 5.10.36).	The Applicant has reviewed the points relating to Landscape and Visual in section 3 and Appendix B within the Applicant's Response to Stop Lime Down Written Representation Appendix B Landscape and Visual Report [EN010168/EXAM/9.27] submitted at Deadline 2.

SLD-060	Landscape and Visual	Policy	3.2.10. The SoS is directed to consider whether the project has “been designed carefully, taking account of environmental effects on the landscape and siting, operational and other relevant constraints, to minimise harm to the landscape, including by appropriate mitigation” (para 5.10.37).	The Applicant has reviewed the points relating to Landscape and Visual in section 3 and Appendix B within the Applicant's Response to Stop Lime Down Written Representation Appendix B Landscape and Visual Report [EN010168/EXAM/9.27] submitted at Deadline 2.
SLD-061	Landscape and Visual	Policy	3.2.11. NPS EN-3 recognises that, due to their scale, solar farms will “inevitably have impacts, particularly if sited in rural areas” (para 2.10.17). They have a significant zone of influence, so visual amenity and glint and glare may be particular impacts (para 2.10.27). That zone of influence is also recognised in para 2.10.94.	The Applicant has reviewed the points relating to Landscape and Visual in section 3 and Appendix B within the Applicant's Response to Stop Lime Down Written Representation Appendix B Landscape and Visual Report [EN010168/EXAM/9.27] submitted at Deadline 2.
SLD-062	Landscape and Visual	Policy	3.2.12. The policy goes on to recognise ground-mounted solar may have their zone of visual affect appropriately minimised with effective screening and appropriate land topography (para 2.10.95). Applicants are required to follow “good design” and to “direct considerable effort towards minimising the landscape and	The Applicant has reviewed the points relating to Landscape and Visual in section 3 and Appendix B within the Applicant's Response to Stop Lime Down Written Representation Appendix B Landscape and Visual Report [EN010168/EXAM/9.27] submitted at Deadline 2.

			visual impact of solar PV arrays" (para 2.10.98).	
SLD-063	Landscape and Visual	Policy	3.2.13. Para 2.10.157 recognises that the SoS will consider landscape and visual impact of a scheme, taking account of sensitive visual receptors, the effect of development on the landscape character, together with the possible cumulative effects. This para again notes that National Landscapes "are afforded extra protection due to their statutory purpose".	The Applicant has reviewed the points relating to Landscape and Visual in section 3 and Appendix B within the Applicant's Response to Stop Lime Down Written Representation Appendix B Landscape and Visual Report [EN010168/EXAM/9.27] submitted at Deadline 2.
SLD-064	Landscape and Visual	Policy	3.2.14. NPS EN-3 also has specific policy on effects on PRoWs. Applicants are "encouraged to design the layout and appearance of the site to ensure continued recreational use of public rights of way where possible during construction, and in particular during operation of the site" (para 2.10.42). Where "possible" they are required to "minimise the visual impacts of the development for those using existing public rights of way, considering the impact this may have on any other visual amenities	The Applicant has reviewed the points relating to Landscape and Visual in section 3 and Appendix B within the Applicant's Response to Stop Lime Down Written Representation Appendix B Landscape and Visual Report [EN010168/EXAM/9.27] submitted at Deadline 2.

			in the surrounding landscape" (para 2.10.43.) Footnote 89 recognises that screening may "impact on the ability of users to appreciate the surrounding landscapes". Applicants are also directed to "consider and maximise opportunities to facilitate enhancement to the public rights of way" and inclusion of new public access (para 2.10.44).	
SLD-065	Landscape and Visual	LVIA Method and Process	3.3.1. The report identifies a number of methodological flaws in the LVIA conducted by the Applicant. Among other things, it notes that the LVIA does not factor in the notable localised variations in character which occur across the study area, omitting important value and susceptibility factors. There is also a distinct concern, present throughout the report, that the Applicant has placed an over-reliance on existing and proposed vegetation screening, which leads to a failure to address the reasonable worst case. That screening will itself give rise to adverse landscape and visual effects [8/§3.1.3].	The Applicant has reviewed the points relating to Landscape and Visual in section 3 and Appendix B within the Applicant's Response to Stop Lime Down Written Representation Appendix B Landscape and Visual Report [EN010168/EXAM/9.27] submitted at Deadline 2.

SLD-066	Landscape and Visual	LVIA Method and Process	3.3.1. The report identifies a number of methodological flaws in the LVIA conducted by the Applicant. Among other things, it notes that the LVIA does not factor in the notable localised variations in character which occur across the study area, omitting important value and susceptibility factors. There is also a distinct concern, present throughout the report, that the Applicant has placed an over-reliance on existing and proposed vegetation screening, which leads to a failure to address the reasonable worst case. That screening will itself give rise to adverse landscape and visual effects [8/§3.1.3].	The Applicant has reviewed the points relating to Landscape and Visual in section 3 and Appendix B within the Applicant's Response to Stop Lime Down Written Representation Appendix B Landscape and Visual Report [EN010168/EXAM/9.27] submitted at Deadline 2.
SLD-067	Landscape and Visual	LVIA Method and Process	3.3.2. A key feature of this section of the report is the identification of a conflation of landscape "fabric" and "overall character" [9/§3.3.7]. While "fabric" contributes to a landscape's overall character, it is not interchangeable [10/§3.3.14]. This would appear to be a departure from GLVIA3, and also leads to the underestimation of the adverse effect of the Scheme on the sites' overall character; that is because "fabric" is only one of	The Applicant has reviewed the points relating to Landscape and Visual in section 3 and Appendix B within the Applicant's Response to Stop Lime Down Written Representation Appendix B Landscape and Visual Report [EN010168/EXAM/9.27] submitted at Deadline 2.

			many aspects of overall character [10/§3.3.18]. In addition, another running issue through the LVIA identified in the report for SLD is that the LVIA often identifies benefit because it double counts landscape/visual enhancements [10/§3.3.19]. That is because of a conflation of measures to mitigate and measures to enhance (and, even then, both types of measure can have a significant adverse effect – for example, where the proposal is uncharacteristic) [11/§3.3.20]. The report's position, which appears to now align with the Applicant, is that the Scheme would result in significant adverse direct effects on the overall character of the sites [11/§3.3.21].	
SLD-068	Landscape and Visual	LVIA Method and Process	3.3.3. Section 3.4 identifies various technical matters with the LVIA conducted by the Applicant [11/§3.4.1]. In this section there is disagreement with the criteria identified by the Applicant for assessing landscape sensitivity and susceptibility, and also visual receptor susceptibility. The result is an underestimation of sensitivity for both landscapes [13/§3.4.17] and also visual receptors	The Applicant has reviewed the points relating to Landscape and Visual in section 3 and Appendix B within the Applicant's Response to Stop Lime Down Written Representation Appendix B Landscape and Visual Report [EN010168/EXAM/9.27] submitted at Deadline 2.

			[13/§3.4.21]. The report also doubts that a four-point scale for levels of value, susceptibility and sensitivity is insufficiently granular, and imbalanced in that moderate is not identified as the centre of the scale [13/§3.4.26].	
SLD-069	Landscape and Visual	LVIA Method and Process	3.3.4. Finally, this part of the report identifies a failure to identify notable localised variations in landscape character, leading to a broad-brush approach which misses areas of high sensitivity within wider moderate sensitivity landscapes [15/§3.4.30]. This results in a failure identify the diversity and complexity of the receiving landscape [15/§3.4.40].	The Applicant has reviewed the points relating to Landscape and Visual in section 3 and Appendix B within the Applicant's Response to Stop Lime Down Written Representation Appendix B Landscape and Visual Report [EN010168/EXAM/9.27] submitted at Deadline 2.
SLD-070	Landscape and Visual	Landscape Character Effects	3.4. Landscape Character Effects: Introduction 3.4.1. It is widely recognised that effects on character should be given as much consideration as effects on views, if not more. Indeed, when considering what is landscape, only part of the consideration is sight [16/§4.5]. A key feature identified in the report is the inadequate consideration of	The Applicant has reviewed the points relating to Landscape and Visual in section 3 and Appendix B within the Applicant's Response to Stop Lime Down Written Representation Appendix B Landscape and Visual Report [EN010168/EXAM/9.27] submitted at Deadline 2.

			non-visual effects in the LVIA as part of the assessment [17/§4.11].	
SLD-071	Landscape and Visual	Landscape Character Effects	3.5. Landscape and Visual Sensitivity 3.5.1. The report considers that, in terms of overall character, the LVIA only assesses the solar sites' levels of value. Levels of susceptibility to change and (thus) sensitivity are not stated [20/§5.1.3]. As a result, the report assumes that the sensitivity for this in the LVIA is that identified for the Scheme's host LCAs [20/§5.1.4].	The Applicant has reviewed the points relating to Landscape and Visual in section 3 and Appendix B within the Applicant's Response to Stop Lime Down Written Representation Appendix B Landscape and Visual Report [EN010168/EXAM/9.27] submitted at Deadline 2.
SLD-072	Landscape and Visual	Landscape Character Effects	3.5.2. An important feature of the use of LCAs is that the landscapes in the study area do not all conform to the host landscape areas, and the LVIA does not factor this variation into its judgment about sensitivity levels. This means sensitivity has been set in a homogenous way and leads to misidentification of sensitivity (and thus effects) [21/§5.1.13]. This approach has, for example, set landscapes within 1km and 2km of the Order Limits to a sensitivity of High to Medium value, Medium susceptibility to change, and thus	The Applicant has reviewed the points relating to Landscape and Visual in section 3 and Appendix B within the Applicant's Response to Stop Lime Down Written Representation Appendix B Landscape and Visual Report [EN010168/EXAM/9.27] submitted at Deadline 2.

			High to Medium sensitivity [21/§5.1.14]. Even if the LVIA does recognise it, this is the judgment made notwithstanding that part of those areas is within the Cotswolds National Landscape itself [21/§5.1.15].	
SLD-073	Landscape and Visual	Landscape Character Effects	3.5.3. A common theme in the LVIA is the identification of sensitivity of landscapes by using a broad-brush averaging approach. On some occasions, this leads to areas not within the National Landscape being assessed as having the same sensitivity as the CNL [21/§§5.1.17-5.1.20]. However, in others, it leads to an underestimation of sensitivity, including (apparently) in relation to the CNL [21-22/§§5.1.20-5.1.21]. The conclusion that all landscape within 2km of the Order Limits are of High-Medium sensitivity is clearly wrong [22/§5.1.23], and (among other things) underassesses the CNL [22/§5.1.22]. This same effect is also identified in respect of NCA 117 [22/§5.1.24].	The Applicant has reviewed the points relating to Landscape and Visual in section 3 and Appendix B within the Applicant's Response to Stop Lime Down Written Representation Appendix B Landscape and Visual Report [EN010168/EXAM/9.27] submitted at Deadline 2.

SLD-074	Landscape and Visual	Landscape Character Effects	3.5.4. Overall, the Scheme's host (North Wiltshire) LCA 8 is highly susceptible to the form of change proposed here. As identified in the North Wiltshire assessment, the whole area is of an essentially tranquil and pastoral character [25/§5.1.37]. The report notes that the Scheme, a large-scale industrial installation, would be at odds with that character [25/§5.1.38]. Wiltshire Council's own Renewable Energy Study Landscape Sensitivity Assessment Final Report from 2023 identified that for the host (Wiltshire) LCA 16 that "Landscape sensitivity to these very large schemes would be characterised as 'high' regardless of location" [25/§5.1.40].	The Applicant has reviewed the points relating to Landscape and Visual in section 3 and Appendix B within the Applicant's Response to Stop Lime Down Written Representation Appendix B Landscape and Visual Report [EN010168/EXAM/9.27] submitted at Deadline 2.
SLD-075	Landscape and Visual	Landscape Character Effects	3.5.5. Overall, using a five point scale for granularity, the report identifies that the CNL would be Very High landscape value susceptibility and sensitivity, with then the sensitivity falling across the site from west to east (with landscape closest to the CNL being high sensitivity, and those beyond either High-Medium or Medium) [25/§5.1.43]. For the remainder of the report reviewing	The Applicant has reviewed the points relating to Landscape and Visual in section 3 and Appendix B within the Applicant's Response to Stop Lime Down Written Representation Appendix B Landscape and Visual Report [EN010168/EXAM/9.27] submitted at Deadline 2.

			the LVIA however, High was assumed for the CNL and its setting [25/§5.1.44].	
SLD-076	Landscape and Visual	Landscape Character Effects	3.5.6. As to visual receptor sensitivity, the report begins by noting that it is unclear whether the LVIA has assessed visual receptor sensitivity based on the specific changes proposed (which would be an error) [26/§5.2.3]. It also notes that the LVIA's criteria for visual susceptibility conflates criteria related to landscape/visual value (which is itself an error) [26/§5.2.4]. It is, ultimately, the occupation or activity of people experiencing the view at a given location which determines susceptibility [27/§5.2.6]. The report concludes that the LVIA underestimates visual effects as a result [27/§5.2.9], and that a proper approach would be to take a reasonable worst-case and apply a High sensitivity for visual receptors who are travelling to and from the CNL through landscapes of High sensitivity (with the main purpose of such receptors being to enjoy views and experiences) [27/§5.2.10].	The Applicant has reviewed the points relating to Landscape and Visual in section 3 and Appendix B within the Applicant's Response to Stop Lime Down Written Representation Appendix B Landscape and Visual Report [EN010168/EXAM/9.27] submitted at Deadline 2.

SLD-077	Landscape and Visual	Cause and Nature of Effects	3.6. Cause and Nature of Effects 3.6.1. The report notes the importance of identifying the cause and nature of effects so that there can be a proper approach to design adjustments, mitigation and requirements [28/§6.2.3]. Such effects should be considered in detail and with a particular focus on in-combination effects [28/§6.2.2]. The report identifies a large number of potential effects at all phases of the Scheme beginning at [28/§6.2.4].	The Applicant has reviewed the points relating to Landscape and Visual in section 3 and Appendix B within the Applicant's Response to Stop Lime Down Written Representation Appendix B Landscape and Visual Report [EN010168/EXAM/9.27] submitted at Deadline 2.
SLD-078	Landscape and Visual	Cause and Nature of Effects	3.6.2. A key consideration in relation to the Scheme is effects on tranquillity. Not only is it one of the CNL's Special Qualities, but much of the remainder of the study area also benefits from high levels of tranquillity [30/§6.2.7]. This is not merely a question of quiet areas, but includes the absence of unwanted intrusions, the presence of nature, feeling safe, visually pleasing surroundings, and a relaxing atmosphere [30-31/§§6.2.12-6.2.18].	The Applicant has reviewed the points relating to Landscape and Visual in section 3 and Appendix B within the Applicant's Response to Stop Lime Down Written Representation Appendix B Landscape and Visual Report [EN010168/EXAM/9.27] submitted at Deadline 2.
SLD-079	Landscape and Visual	Mitigation and Enhancement	3.7.1. A key feature and error of the LVIA is the double counting of	The Applicant has reviewed the points relating to Landscape and

			mitigation as enhancement. This is because of the incorrect identification of proposed mitigation measures as enhancement measures [32/§7.2.1] (something GLVIA3 specifically warns against [32/§7.2.2]). A key example of this is tree and hedgerow planting which is required mitigation to screen the Scheme [32/§§7.2.5-7.2.6].	Visual in section 3 and Appendix B within the Applicant's Response to Stop Lime Down Written Representation Appendix B Landscape and Visual Report [EN010168/EXAM/9.27] submitted at Deadline 2.
SLD-080	Landscape and Visual	Mitigation and Enhancement	3.7.2. Part of the difficulty is that the LVIA is often unclear what a specific measure is identified as [33/§7.2.9]. However, this issue goes beyond this. The Applicant has maintained that measures can be both mitigation and enhancement at the same time [33/§7.2.17], and there are various examples of it in the Commitments Register for the Scheme [34/§7.2.23]. This has important effects of overestimating benefits and underestimating harms. For example, the report disagrees with the LVIA conclusion of beneficial effects on the setting of the CNL for (among other reasons) the fact that this relies upon such double counting [34/§7.2.20]. The double	The Applicant has reviewed the points relating to Landscape and Visual in section 3 and Appendix B within the Applicant's Response to Stop Lime Down Written Representation Appendix B Landscape and Visual Report [EN010168/EXAM/9.27] submitted at Deadline 2.

			counted aspects of the mitigation measures are the very things relied upon (erroneously) as furthering the CNL purpose [35/§7.2.26]. However, the difficulty in identifying whether a measure is mitigation or enhancement goes far beyond this [35/§7.3.5].	
SLD-081	Landscape and Visual	Mitigation and Enhancement	3.7.3. In respect of double counting, it is noted that the Applicant points to para 5.10.5 of NPS EN-1, and the direction that “there may also be beneficial landscape character impacts arising from mitigation”. However, as is apparent from GLVIA3, it is a mistake to double count mitigation as enhancement. Thus, it appears likely what para 5.10.5 is getting at is the distinct issue of when mitigation no longer becomes necessary but remains in situ (i.e. on decommissioning). The report considers this does not answer the general double counting point [34/§7.2.18]	The Applicant has reviewed the points relating to Landscape and Visual in section 3 and Appendix B within the Applicant's Response to Stop Lime Down Written Representation Appendix B Landscape and Visual Report [EN010168/EXAM/9.27] submitted at Deadline 2.
SLD-082	Landscape and Visual	Mitigation and Enhancement	3.7.4. A further feature of the mitigation proposed is that new landscape “fabric” planting (such as hedges and woodlands) would itself give rise to adverse	The Applicant has reviewed the points relating to Landscape and Visual in section 3 and Appendix B within the Applicant's Response to Stop Lime Down Written

			landscape and visual effects [36/§7.4.1]. For example, the use of 4.5m tall hedges, which are very tall and generally uncharacteristic of the area [36/§7.4.4]. Such hedges also block various open views which produces a high level of adverse visual effect (something that the LVIA fails to identify) [40/§7.4.6]. This is implicitly recognised in the limitation of hedgerows bordering the CNL to 1.5m [40/§7.4.7].	Representation Appendix B Landscape and Visual Report [EN010168/EXAM/9.27] submitted at Deadline 2.
SLD-083	Landscape and Visual	Mitigation and Enhancement	3.7.5. The report also notes an over-reliance on vegetation to screen views, and recognises that this is not a precautionous approach and relies upon the unlikely scenario that all such screening will be effective [42/§7.5.3]. Rather, a reasonable worst case should have been adopted in assessing effects [42/§7.5.4]. That is particularly so given the recognition (by Wiltshire Council) of significant pests and diseases for such screening vegetation in the area [43/§7.5.9].	The Applicant has reviewed the points relating to Landscape and Visual in section 3 and Appendix B within the Applicant's Response to Stop Lime Down Written Representation Appendix B Landscape and Visual Report [EN010168/EXAM/9.27] submitted at Deadline 2.
SLD-084	Landscape and Visual	Landscape Effects	3.8.1. As a starting point, the Applicant identifies significant adverse effects on landscape	The Applicant has reviewed the points relating to Landscape and Visual in section 3 and Appendix B

			character in the form of direct effects on landscapes within the Order Limits during construction operation and decommissioning, including on the setting of the CNL. The significant adverse direct effects arising within the Order limits would cause significant adverse indirect effects on landscapes within the CNL, and on the CNL's special qualities [46/§8.1.3]. Further, the LVIA concludes that not all views can be screened, so many public and private viewpoint receptors would experience significant adverse effects on view during construction operation and decommissioning which could not be mitigated [46/§8.1.4]. The report agrees with these conclusions but goes further on the predicted levels identified [46/§§8.1.5-8.1.6].	within the Applicant's Response to Stop Lime Down Written Representation Appendix B Landscape and Visual Report [EN010168/EXAM/9.27] submitted at Deadline 2.
SLD-085	Landscape and Visual	Landscape Effects	3.8.2. The report also notes the LVIA's approach to "temporary" effects. While the LVIA concludes such effects (on the proposed construction route running through the CNL) would not be significant, the report disagrees. That an effect is "short-term" does not change that, through the duration of the	The Applicant has reviewed the points relating to Landscape and Visual in section 3 and Appendix B within the Applicant's Response to Stop Lime Down Written Representation Appendix B Landscape and Visual Report [EN010168/EXAM/9.27] submitted at Deadline 2.

			works, the effect would be significant [46/§8.1.7]. It is for this reason it would seem that the CNL Board object to construction traffic being routed through the CNL [46/§8.1.7].	
SLD-086	Landscape and Visual	Landscape Effects	3.8.3. The report identifies that the LVIA underestimates the overall level of landscape effects due to an array of methodological reasons [46/§8.2.1], and reasons related to magnitude of effect (which should be judged using appropriate criteria [47/§8.2.2]).	The Applicant has reviewed the points relating to Landscape and Visual in section 3 and Appendix B within the Applicant's Response to Stop Lime Down Written Representation Appendix B Landscape and Visual Report [EN010168/EXAM/9.27] submitted at Deadline 2.
SLD-087	Landscape and Visual	Landscape Effects	3.8.4. The report identifies that the nature of the change proposed by the Scheme is in the nature of an industrial installation to generate electricity. This is a stark change from the existing rural setting [47/§8.2.4]. Further, at 1,237ha the scheme is one of the largest solar NSIPs in the UK [48/§8.2.11] and is broken into separate areas. This breaking-up of the Scheme amplifies its effects (e.g. by requiring a much larger number of access points) [48/§§8.2.10-8.2.17].	The Applicant has reviewed the points relating to Landscape and Visual in section 3 and Appendix B within the Applicant's Response to Stop Lime Down Written Representation Appendix B Landscape and Visual Report [EN010168/EXAM/9.27] submitted at Deadline 2.

SLD-088	Landscape and Visual	Landscape Effects	3.8.5. In respect of direct effects on the landscape fabric, the report again notes that the Applicant conflates fabric with overall landscape character [49/§8.3.3]. The LVIA also unduly focuses on fabric without identifying other changes to character, including both tangible and intangible qualities [49-50/§8.3.5]. The report goes on to raise concerns about inconsistencies in the approach adopted in the LVIA to addressing fabric and overall character [50/§8.3.7]. This extends to a Moderate Beneficial Effect on the sites' landscape fabric identified in the LVIA, which clearly arises from double counting mitigation measures (i.e. counting them once to mitigate to neutral, and again to enhance to a beneficial effect) [51/§8.3.17].	The Applicant has reviewed the points relating to Landscape and Visual in section 3 and Appendix B within the Applicant's Response to Stop Lime Down Written Representation Appendix B Landscape and Visual Report [EN010168/EXAM/9.27] submitted at Deadline 2.
SLD-089	Landscape and Visual	Landscape Effects	3.8.6. In respect of direct effects on landscape character, the report again notes that the LVIA failed to assess the direct effects that would occur on the overall landscape character of the sites at all stages [52/§8.4.3]. However, the Applicant in [PDA-009] SLD-024 does now appear to accept that at site level	The Applicant has reviewed the points relating to Landscape and Visual in section 3 and Appendix B within the Applicant's Response to Stop Lime Down Written Representation Appendix B Landscape and Visual Report

			the character of the site would be significantly adversely affected. The report recognises a Major Adverse (significant) effect on landscape character for the sites in the operational phase [52/§8.4.6], with a similar such effect in the construction phase [53/§8.4.10]. As to decommissioning, the report identifies the effects as Major Adverse (significant) for High sensitivity receptors, gradually reducing down to Neutral as industrialising elements are removed [56/§8.4.36]. It should, however, be recognised that some effects are permanent and will not be decommissioned (or will not be remediable) [54/§8.4.20].	[EN010168/EXAM/9.27] submitted at Deadline 2.
SLD-090	Landscape and Visual	Landscape Effects	3.8.7. As to post-Scheme effects on landscape character, the report notes some effects (e.g. loss of irreplaceable habitats) will be permanent [56/§8.4.40]. The lack of security that various measures will remain, on a reasonable worst-case basis is noted [56/§8.4.43], as is the apparent double counting of mitigation. However, it is noted that in theory benefits can arise from measures which are likely to	The Applicant has reviewed the points relating to Landscape and Visual in section 3 and Appendix B within the Applicant's Response to Stop Lime Down Written Representation Appendix B Landscape and Visual Report [EN010168/EXAM/9.27] submitted at Deadline 2.

			remain [56/§8.4.46], and more information is sought [57/§8.4.47].	
SLD-091	Landscape and Visual	Landscape Effects	3.8.8. Turning from direct to indirect effects on landscape character, the report notes a range of indirect effects including on the CNL and its setting [57/§8.5.3]. Of effects from construction up to Year 15, the report agrees that there will be significant adverse effects, but considers the concentrating of construction effects, Year 1 effects, and Year 15 effects into one overall assessed effect to be inappropriate. It may be because construction effects have been inappropriately minimised on the basis that they are “temporary” [57/§§8.5.5-8.5.8].	The Applicant has reviewed the points relating to Landscape and Visual in section 3 and Appendix B within the Applicant's Response to Stop Lime Down Written Representation Appendix B Landscape and Visual Report [EN010168/EXAM/9.27] submitted at Deadline 2.
SLD-092	Landscape and Visual	Landscape Effects	3.8.9. As to effects in Year 15-60, the report does not agree with the assessment of non-significant effects up to the 5km Order Limits. Given the size and scale of the scheme, it is inevitable indirect effects on character will be experienced over large distances. As a result, the report concludes that at and just beyond the 1km study area there would be Major-	The Applicant has reviewed the points relating to Landscape and Visual in section 3 and Appendix B within the Applicant's Response to Stop Lime Down Written Representation Appendix B Landscape and Visual Report [EN010168/EXAM/9.27] submitted at Deadline 2.

			Moderate Adverse (significant) effects, which would then reduce as the distance increases to 5km [58/§8.5.10].	
SLD-093	Landscape and Visual	Landscape Effects	3.8.10. As to decommissioning, the same considerations as with direct effects apply. Thus, the report notes that the highest level of indirect decommissioning effect would be Major-Moderate (significant), but that this would reduce over time [58/§8.5.13].	The Applicant has reviewed the points relating to Landscape and Visual in section 3 and Appendix B within the Applicant's Response to Stop Lime Down Written Representation Appendix B Landscape and Visual Report [EN010168/EXAM/9.27] submitted at Deadline 2.
SLD-094	Landscape and Visual	Landscape Effects	3.8.11. Concerning mitigation, the report notes that not all indirect adverse effects on landscape character can be screened [58/§8.5.17]. It also notes that the LVIA fails to identify with effects aside from visual effects which are still relevant to the assessment of effects on character [58/§8.5.19] leading to underestimation. Non-visual effects are also much more difficult to mitigate [59/§8.5.21]. Given much of the mitigation does rely on screening, it is inappropriate for the LVIA to rely on summer views in Years 15 to 60 [59/§8.5.24].	The Applicant has reviewed the points relating to Landscape and Visual in section 3 and Appendix B within the Applicant's Response to Stop Lime Down Written Representation Appendix B Landscape and Visual Report [EN010168/EXAM/9.27] submitted at Deadline 2.

SLD-095	Landscape and Visual	Landscape Effects	3.8.12. An important further effect, impacting in particular the CNL and its setting, is construction route landscape character effects. While the LVIA only makes brief mention of this issue, it would appear that the Applicant considers such effects not to be significant (using their "temporary" nature to minimise their significance) [60/§8.6.4-8.6.5]. In contrast, the CNL Board consider that the effect on the CNL will be significant given (particularly) effects on tranquillity, landscape and scenic beauty [61/§8.6.7].	The Applicant has reviewed the points relating to Landscape and Visual in section 3 and Appendix B within the Applicant's Response to Stop Lime Down Written Representation Appendix B Landscape and Visual Report [EN010168/EXAM/9.27] submitted at Deadline 2.
SLD-096	Landscape and Visual	Landscape Effects	3.8.13. The report refers to the various uses made of the highways in the area, and the many receptors that use those routes (including equestrians, cyclists, and pedestrians) [64/§8.6.27]. It goes on to consider the Primary Construction Route through the CNL, and characterise the route (from [64/§8.6.30]). The report concludes by agreeing that the landscapes through which this access route runs (both in the CNL and its setting) is High sensitivity [71/§8.6.48].	The Applicant has reviewed the points relating to Landscape and Visual in section 3 and Appendix B within the Applicant's Response to Stop Lime Down Written Representation Appendix B Landscape and Visual Report [EN010168/EXAM/9.27] submitted at Deadline 2. Regarding the concerns on traffic routing through the Cotswold National Landscape (CNL) Construction Routes in the Cotswold National Landscape Technical Note [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.
SLD-097	Landscape and Visual	Landscape Effects	3.8.14. The report disagrees that landscape and visual effects along the construction route are not significant [72/§8.6.57]. Given its routing through the CNL, use recreationally, and (at various point) inappropriate characteristics for HGV, the Primary Construction Route is wholly unsuitable for such large vehicles [73/§8.6.61]. In that regard the report makes reference to conclusions of the SLD highways expert (see further in this Written Representation below) [73/§8.6.61]. The overall conclusion of the report is that the construction route will have significant direct and indirect adverse effects in the construction phase [72/§8.6.65].	The Applicant has reviewed the points relating to Landscape and Visual in section 3 and Appendix B within the Applicant's Response to Stop Lime Down Written Representation Appendix B Landscape and Visual Report [EN010168/EXAM/9.27] submitted at Deadline 2. Regarding the concerns on traffic routing through the CNL, Construction Routes in the Cotswold National Landscape Technical Note [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. As concluded in Section 5 of the report, the primary construction routes chosen are the most suitable for construction traffic when accounting for the mitigation hierarchy and the avoidance of identified sensitive receptors and locations.
SLD-098	Landscape and Visual	Landscape Effects	3.8.15. Given the significant indirect effect on character of the Scheme, this extends to the CNL itself. Similarly, significant direct adverse effects on character occur in the CNL setting [78/8.7.2]. These effects would be highest closest to the Order limits, and decrease with distance [78/8.7.3]. The report considers there would be significant direct and indirect adverse effects on the CNL due to the construction route [78/8.7.4].	The Applicant has reviewed the points relating to Landscape and Visual in section 3 and Appendix B within the Applicant's Response to Stop Lime Down Written Representation Appendix B Landscape and Visual Report [EN010168/EXAM/9.27] submitted at Deadline 2.
SLD-099	Landscape and Visual	Landscape Effects	3.8.16. Amongst various flaws leading to the underestimation of harm on the CNL, key is the double counting of landscape / visual mitigation measures as enhancements. This	The Applicant has reviewed the points relating to Landscape and Visual in section 3 and Appendix B within the Applicant's Response to Stop Lime Down Written Representation Appendix B

			has led to an inappropriate approach to the s.85 duty to “further the purpose of conserving and enhancing the natural beauty” of the CNL [79/§8.7.11]. Much stems from the work that the Applicant proposes to do to the landscape fabric by way of mitigation, which is double counted as enhancement. Once properly understood as mitigation, the best it can provide is a neutral effect. And, indeed, it can give rise to significant adverse effects due to it being inappropriate” [79/§8.7.14].	Landscape and Visual Report [EN010168/EXAM/9.27] submitted at Deadline 2.
SLD-100	Landscape and Visual	Landscape Effects	3.8.17. Given the Applicant now accepts significant adverse effects to the site itself, the report concludes that the benefit of any fabric enhancement that might be identified is fully outweighed by the harm to the overall character [79/§8.7.16]. Indeed, most proposed fabric works related to the CNL is to mitigate effects upon it, which is key in understanding furthering of its purposes [80/§8.7.18-8.7.19]. That the furthering is predicated on mitigation measures being counted as enhancement is clear from the Applicant's documentation	The Applicant has reviewed the points relating to Landscape and Visual in section 3 and Appendix B within the Applicant's Response to Stop Lime Down Written Representation Appendix B Landscape and Visual Report [EN010168/EXAM/9.27] submitted at Deadline 2.

			[80/§8.7.22]. Indeed, the CNL Board is concerned by this, and (for example) identifies maintaining hedgerows at 1.5m should “not be considered as enhancement” [80/§8.7.26].	
SLD-101	Transport and Access Landscape and Visual	Landscape Effects	3.8.18. As to tranquillity, this is a key recognised feature of the CNL, including in the CNL Management Plan. [81/§8.7.29]. Policy CE5 of the Plan identifies concerns about noise and increased traffic as relevant to that tranquillity [81/§8.7.30]. The Plan also identifies “major development” in the setting of the CNL to be a particular concern (especially due to visual and tranquillity impacts) [81/§8.7.31]. It is for this reason that the increased traffic (which SLD considers may be an increase of 158%) is not appropriate [81/§8.7.32].	The Applicant has reviewed the points relating to Landscape and Visual in section 3 and Appendix B within the Applicant's Response to Stop Lime Down Written Representation Appendix B Landscape and Visual Report [EN010168/EXAM/9.27] submitted at Deadline 2.
SLD-102	Transport and Access Landscape and Visual	Landscape Effects	3.8.19. The Applicant produced a Tranquillity Technical Note [PDA-010]. The report disagrees with its conclusions [81/§8.7.34]. The conclusion that tranquillity remains intact with only negligible minor localised changes is wrong, but also only focuses on	The Applicant has reviewed the points relating to Landscape and Visual in section 3 and Appendix B within the Applicant's Response to Stop Lime Down Written Representation Appendix B Landscape and Visual Report

			visual effects which is inappropriate (and, even in doing that, did not consider sequential visual effects) [82/§8.7.37]. The report goes on to note noise effects on the CNL and its setting, and also the disruption of recreational routes into and out of the CNL by the cable route works. [82/§8.7.45].	[EN010168/EXAM/9.27] submitted at Deadline 2.
SLD-103	Transport and Access Landscape and Visual	Landscape Effects	3.8.20. Overall, the report concludes that the Scheme should not be understood as furthering the purposes of the CNL [81/§8.7.47].	The Applicant has reviewed the points relating to Landscape and Visual in section 3 and Appendix B within the Applicant's Response to Stop Lime Down Written Representation Appendix B Landscape and Visual Report [EN010168/EXAM/9.27] submitted at Deadline 2.
SLD-104	Socio-Economics, Recreation and Tourism	Amenity Effects	3.9.1. The report explains that the highest sensitivity amenity receptors would experience significant adverse effects during all phases of the Scheme, albeit the worst would be in construction and decommissioning. The long operational phase is likely to deter people from travelling through and visiting the area for recreation [84/§9.2]. In part this conclusion is based on the Applicant itself	The Applicant has reviewed the points relating to Landscape and Visual in section 3 and Appendix B within the Applicant's Response to Stop Lime Down Written Representation Appendix B Landscape and Visual Report [EN010168/EXAM/9.27] submitted at Deadline 2. Impacts on tourism, visitors and recreation have been assessed in ES

			identifying significant adverse effects on landscape character and visual amenity within the Order Limits and in the landscapes at least 1km beyond the limits [84/§9.3]. Various policies recognise the impact that negative amenity effects can have on health and wellbeing, and the desire to live or be somewhere [85/§9.13].	Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068] and supporting ES Volume 3, Appendix 16-2: Tourism and Recreation Reception Tables [APP-241]. Whilst this recognises construction and decommissioning effects are greater than those during operation, and that there are some residual significant adverse effects to individual receptors (PRoWs and unsurfaced roads, and regionally important long-distance recreation routes), the Applicant is confident there is no significant adverse effect on tourism and visitor amenity overall at any phase of the Scheme. Amenity effects on health and wellbeing (both in respect to physical and mental health) have been assessed in ES Volume 1, Chapter 18: Human Health [APP-070], which finds no significant adverse effects to population or social health and wellbeing at any phase of the Scheme.
SLD-105	Socio-Economics,	Amenity Effects	3.9.2. The report recognises a number of amenity effects, including residential effects. Noise	The Applicant has reviewed the points relating to Landscape and Visual in section 3 and Appendix B

	Recreation and Tourism		is noted particularly in relation to the tranquillity in the CNL and also its setting and the notable effect of the Scheme both in construction but also in operation (due to electrical buzzing) [86/§9.20]. This will be a change from a very (sometimes extremely) quiet rural environment to one with sounds of a more industrial nature [86/§9.21].	within the Applicant's Response to Stop Lime Down Written Representation Appendix B Landscape and Visual Report [EN010168/EXAM/9.27] submitted at Deadline 2. Impacts on tourism, visitors and recreation have been assessed in ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068] and supporting ES Volume 3, Appendix 16-2: Tourism and Recreation Reception Tables [APP-241]. Whilst construction and operational noise have been considered as contributing factors in changes to the use and experience of recreation receptors such as PRow, it is not considered to have a significant adverse effect in its own right, nor is there any significant adverse effect anticipated to the setting of the CNL as a tourism and visitor destination.
SLD-106	Socio-Economics, Recreation and Tourism	Amenity Effects	3.9.3. An important consideration is that high quality landscape increases wellbeing [86/§9.25], including through the use of PRow. SLD conducted an informal survey of some PRow users	The Applicant has reviewed the points relating to Landscape and Visual in section 3 and Appendix B within the Applicant's Response to Stop Lime Down Written Representation Appendix B

			[Appendix Y], and the contribution of the landscape was captured. Ultimately, the high levels of tranquillity, combined with high quality landscapes and informal recreational resources, including the Fosse Way, and long-distance trails and BOATs, means that the area is of high amenity value. This is further contributed to as a route to and from the CNL [88/§9.41].	Landscape and Visual Report [EN010168/EXAM/9.27] submitted at Deadline 2. Access to the countryside and open space for recreation has been assessed as a determinant of physical and mental health and wellbeing (under the category 'open space, leisure and play') in ES Volume 1, Chapter 18: Human Health [APP-070]. This assessment finds no greater than a minor adverse effect, which is not a significant adverse effect, to health and wellbeing at any phase of the Scheme as a result of changes to the use and enjoyment of access to the countryside.
SLD-107	Socio-Economics, Recreation and Tourism	Amenity Effects	3.9.4. The report notes that landscapes occupied by the sites form an important and integral part of the recreational experience, for example when using PRowS. For such routes, the most profound negative changes to people's experiences would be on PRowS across the site where visual and other amenity effects would be very high [90/§9.44]. This is due to proximity to large industrialising	The Applicant has reviewed the points relating to Landscape and Visual in section 3 and Appendix B within the Applicant's Response to Stop Lime Down Written Representation Appendix B Landscape and Visual Report [EN010168/EXAM/9.27] submitted at Deadline 2. Impacts on tourism, visitors and recreation have been assessed in ES

			elements, their visibility, but also screening which causes the loss of pleasant open views (particularly through the use of tall hedges) [90/§9.45] and thus loss of tranquillity [90/§9.46].	Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068] and supporting ES Volume 3, Appendix 16-2: Tourism and Recreation Reception Tables [APP-241] . This has directly considered the impacts to visual experience, and the effect of proposed planting as contributing factors in changes to the use and experience of recreation receptors such as PRowS. Whilst the impacts are recognised, it is not considered that these impacts will have a significant adverse effect to any individual assessed PRow during the operational lifetime of the Scheme. The Applicant recognises there is a long-term residual significant adverse effect to the Fosse Way, specifically as a result of its historical significance and importance as a recreational route. This matter will have to be considered in the planning balance when the DCO is determined.
SLD-108	Socio-Economics, Recreation and Tourism	Amenity Effects	3.9.5. The report disagrees with the Applicant not finding significant adverse effects on amenity. It recommends more granularity is required to properly capture effects [91/§9.54]. It requires consideration of how individual	The Applicant has reviewed the points relating to Landscape and Visual in section 3 and Appendix B within the Applicant's Response to Stop Lime Down Written Representation Appendix B Landscape and Visual Report

			effects combine [91/§9.55]. The report ultimately concludes that a wide range of effects, and some will be significant due to the disruption and particularly high levels of visual and other amenity effects [92/§9.58].	[EN010168/EXAM/9.27] submitted at Deadline 2. Where impacts on amenity have been considered as contributing factors to effects on tourism and recreation or on health and wellbeing, the Applicant is confident that the assessments in ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068] and ES Volume 1, Chapter 18: Human Health [APP-070] are robust and have been undertaken at a proportionate level of granularity.
SLD-109	Landscape and Visual	Visual Effects	3.10.1. The report notes that many of the technical issues addressed in the remainder of the report bleed through into the assessment of visual effects [93/§10.2.1]. This includes the over-reliance on vegetation to screen views, which is indicative of the inappropriateness of the location [94/§10.2.4]. In any event, the Applicant itself accepts not all views could be screened by vegetation [94/§10.2.5].	The Applicant has reviewed the points relating to Landscape and Visual in section 3 and Appendix B within the Applicant's Response to Stop Lime Down Written Representation Appendix B Landscape and Visual Report [EN010168/EXAM/9.27] submitted at Deadline 2.
SLD-110	Landscape and Visual	Visual Effects	3.10.2. A particular reason for the significant effects of the Scheme is the size of the panels:	The Applicant has reviewed the points relating to Landscape and Visual in section 3 and Appendix B

			while not completely novel, 4.5m panels are unusual, harder to mitigate, and have a more considerable effect on landscape and visual amenity impacts [94/§10.2.6]. Other schemes have utilised substantially smaller panels to reduce such effects (see, for example, the 2.5m panels proposed to be used in the Sunnica DCO [94/§10.2.10]).	within the Applicant's Response to Stop Lime Down Written Representation Appendix B Landscape and Visual Report [EN010168/EXAM/9.27] submitted at Deadline 2.
SLD-111	Landscape and Visual	Visual Effects	3.10.3. The report agrees with the visual study boundary, however, it considers it to be likely that there will be significant adverse effects along the construction route (including in the CNL and its setting) [94/§10.2.12].	The Applicant has reviewed the points relating to Landscape and Visual in section 3 and Appendix B within the Applicant's Response to Stop Lime Down Written Representation Appendix B Landscape and Visual Report [EN010168/EXAM/9.27] submitted at Deadline 2.
SLD-112	Landscape and Visual	Visual Effects	3.10.4. It also notes of susceptibility that there has been underestimation as it has been assumed to be on the basis of the change being proposed [83/§10.2.19], and also because of the use of visual susceptibility criteria related to value. For example, numerous visual receptors using transport routes are described as Medium visual	The Applicant has reviewed the points relating to Landscape and Visual in section 3 and Appendix B within the Applicant's Response to Stop Lime Down Written Representation Appendix B Landscape and Visual Report [EN010168/EXAM/9.27] submitted at Deadline 2.

			value, yet the landscape the routes pass through is the CNL and its setting which is of High Value. As such, the visual value should be reported as High not High-Medium [96/§10.2.23]. The LVIA also failed to consider the height of some receptors such as people on horseback [96/§10.2.25].	
SLD-113	Landscape and Visual	Visual Effects	3.10.5. As has been noted, the use of high hedges is not consistently successful, uncharacteristic, and results in the total loss of views. This results in the identification of High adverse magnitudes of change, and is particularly of note in the CNL (for which some mitigation, in the form of limiting hedge height to 1.5m, is provided). However, wide views over the area are an important feature of LCA 8 and many of these views will be lost [96-97/§§10.2.26-10.2.32]. As was already noted above, the LVIA also does not consistently present the reasonable worst case [98/§10.2.33]. It is also noted that Year 15 winter is not illustrated and reported [101/§10.2.39].	The Applicant has reviewed the points relating to Landscape and Visual in section 3 and Appendix B within the Applicant's Response to Stop Lime Down Written Representation Appendix B Landscape and Visual Report [EN010168/EXAM/9.27] submitted at Deadline 2.

SLD-114	Landscape and Visual	Visual Effects	3.10.6. There are also various flaws with the photomontages and visualisations, including the limited (one) example of changes of views of people travelling on PRoWs [101/§10.2.44], and a failure to characterise the visualisations with the effects of reality in the field (e.g. glint, proper colour etc) [101/§10.2.45].	The Applicant has reviewed the points relating to Landscape and Visual in section 3 and Appendix B within the Applicant's Response to Stop Lime Down Written Representation Appendix B Landscape and Visual Report [EN010168/EXAM/9.27] submitted at Deadline 2.
SLD-115	Landscape and Visual	Visual Effects	3.10.7. Of public views, the report agrees with the Applicant that numerous visual receptors would experience significant adverse effects during construction and Years 1-15. However, it goes on to consider that there has been underestimation of effects at all stages of the life of the Scheme [105/§10.3.3].	The Applicant has reviewed the points relating to Landscape and Visual in section 3 and Appendix B within the Applicant's Response to Stop Lime Down Written Representation Appendix B Landscape and Visual Report [EN010168/EXAM/9.27] submitted at Deadline 2.
SLD-116	Landscape and Visual	Visual Effects	3.10.8. As to the visual effects on public views in the CNL, the LVIA does not reflect the effects identified elsewhere in that assessment which predicts significant adverse residual effects on landscape character and certain views including the CNL and its setting. Many landscapes and visual receptors are of High	The Applicant has reviewed the points relating to Landscape and Visual in section 3 and Appendix B within the Applicant's Response to Stop Lime Down Written Representation Appendix B Landscape and Visual Report [EN010168/EXAM/9.27] submitted at Deadline 2.

			sensitivity [106/§10.3.10]. Again, there is the reliance on hedges but these are proposed to be up to 4.5m tall and thus result in loss of views [106/§10.3.11]. Effect on visual receptors from views in the CNL would ultimately be Major adverse [106/§10.3.13].	
SLD-117	Landscape and Visual	Visual Effects	3.10.9. Significant and detrimental changes will be felt by the PRoWs crossing the Scheme site. Again, these are High sensitivity receptors [106/§10.3.16]. The effect of the Scheme on these PRoWs would be to sterilise the landscape [107/§10.3.18] and create long inescapable corridors [107/§10.3.19]. The 30m width for such corridors is noted, however, it is likely that this is provided because of the significant size of the solar panels [107/§§10.3.22-10.3.23]. When assessing such PRoWs it is important to recognise and consider that views are not static but rather there are sequential views as people travel down PRoWs. At least one PRoW is surrounded by the Scheme for circa 1.5km [108/§10.3.28]. Given the limited visualisations for	The Applicant has reviewed the points relating to Landscape and Visual in section 3 and Appendix B within the Applicant's Response to Stop Lime Down Written Representation Appendix B Landscape and Visual Report [EN010168/EXAM/9.27] submitted at Deadline 2.

			PRoWs, the report requests that further such visualisations be provided [109/§10.3.38].	
SLD-118	Landscape and Visual	Visual Effects	3.10.10. As to private views, the Applicant itself identifies significant effects up to Year 15. However, the report considers the effects are underestimated as a result of classification of visual value as Low (notwithstanding the High value landscapes in which properties are found) [110/§§10.4.4-10.4.5]. Considering the particularly impacted Grain Store Barn, the report identifies Major Adverse to Year 15 and then Major-Moderate Adverse to Year 60 [111/§§10.4.7-10.4.8]. This mistaken approach to landscape value that means many visual receptors are likely to experience significant adverse visual effects for the duration of operation [111/§10.4.10]. In addition, the effect on locations with full screening of views for High sensitivity receptors would be Major Adverse as well [111/§10.4.12].	The Applicant has reviewed the points relating to Landscape and Visual in section 3 and Appendix B within the Applicant's Response to Stop Lime Down Written Representation Appendix B Landscape and Visual Report [EN010168/EXAM/9.27] submitted at Deadline 2.
SLD-119	Landscape and Visual	Visual Effects	3.10.11. The report also considers the need for a residential	The Applicant has reviewed the points relating to Landscape and

			visual amenity assessment ("RVAA"). It is apparent that the test for a stage 4 assessment is whether there is the "largest" magnitude of effect [112/§10.4.18]. The report notes that there is no guidance on how to identify such effects [112/§10.4.20]. Considering whether to include mitigation [112/§10.4.25] and the propensity for foliage mitigation to be ineffective [112/§10.4.26], the report concludes that a RVAA should be conducted for Grain Store Barn as in an exercise of judgment the report identifying Major Adverse (significant) effects was considered to pass into the stage 4 test [112/§10.4.27].	Visual in section 3 and Appendix B within the Applicant's Response to Stop Lime Down Written Representation Appendix B Landscape and Visual Report [EN010168/EXAM/9.27] submitted at Deadline 2.
SLD-120	Other Environmental Matters – Glint and Glare	Glint and Glare Effects	3.11.1. In respect of glint and glare effects, the report notes the negative impact that such effects can have on many aspects of a person's life. This goes past simply visual effects to effects on residential amenity and recreational use [114/§11.6]. The Applicant fails to assess various of these impacts from a landscape perspective [114/§11.8]. It also does not address the issue of residential visual amenity	The Applicant has reviewed the points relating to Landscape and Visual in section 3 and Appendix B within the Applicant's Response to Stop Lime Down Written Representation Appendix B Landscape and Visual Report [EN010168/EXAM/9.27] submitted at Deadline 2. ES Volume 3, Appendix 20-4: Solar Photovoltaic Glint and Glare Study [APP-261] has considered effects upon residential amenity, road

			[115/§11.20]. Noting the evidence of SLD's expert on glint and glare, the report considers that there are potentially significant adverse effects from glint and glare on PRowS, local roads, and private land. The report also notes that glint and glare is likely to contribute to the reason why people cease visiting an area [107/§11.39].	receptors and public rights of way from glint and glare, where no significant impact is predicted. This assessment uses the methodology outlined in Pager Power's Glint and Glare Guidance (Fourth Edition), which has been used and accepted widely in the UK, including for previous DCO applications. ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068] has also considered glint and glare impact on users. The assessment methodology confirms glint and glare impacts are anticipated to be limited to times of day around sunrise and sunset where low sun angle is already a consideration for PRow users, including equestrians.
SLD-121	Cumulative and In-Combination Effects Landscape and Visual	Cumulative Effects	3.12.1. The report overall disagrees with the conclusions on inter and intra project cumulative effects for the Scheme, and concludes that they should have been assessed at a greater and higher level than the LVIA predicts [118/§12.2].	The Applicant has reviewed the points relating to Landscape and Visual in section 3 and Appendix B within the Applicant's Response to Stop Lime Down Written Representation Appendix B Landscape and Visual Report [EN010168/EXAM/9.27] submitted at Deadline 2.

SLD-122	Cumulative and In-Combination Effects Landscape and Visual	Cumulative Effects	3.12.2. The report does not agree with the conclusions, partly because the report identifies larger effects than those identified by the Applicant [118/§12.5]. It also identifies methodological concerns with the LVIA, most importantly the apparent focus on intervisibility (to the detriment of other considerations) and the failure to focus on sequential views [118/§§12.7-12.9].	The Applicant has reviewed the points relating to Landscape and Visual in section 3 and Appendix B within the Applicant's Response to Stop Lime Down Written Representation Appendix B Landscape and Visual Report [EN010168/EXAM/9.27] submitted at Deadline 2.
SLD-123	Cumulative and In-Combination Effects Landscape and Visual	Cumulative Effects	3.12.3. This is all further amplified by the use of 4.5m panels [119/§12.18]. Overall the inter and intra-project effects would be significant [119/§12.18].	The Applicant has reviewed the points relating to Landscape and Visual in section 3 and Appendix B within the Applicant's Response to Stop Lime Down Written Representation Appendix B Landscape and Visual Report [EN010168/EXAM/9.27] submitted at Deadline 2.
SLD-124	Landscape and Visual	Conclusion	3.13.1. It is recognised that all NSIP scale infrastructure have landscape and visual effects (NPS EN-1 para 5.10.5). However, the report has identified significant effects both within and outside the Cotswolds National Landscape at the highest level. It has also identified a host of other effects which the Applicant failed to	The Applicant has reviewed the points relating to Landscape and Visual in section 3 and Appendix B within the Applicant's Response to Stop Lime Down Written Representation Appendix B Landscape and Visual Report [EN010168/EXAM/9.27] submitted at Deadline 2.

			assess, themselves significant. This cannot but weigh against the Scheme, and seriously challenges (as other sections of this Written Representation do as well) suggestions of compliance with the s.85 CROW 2000 duty.	
SLD-125	Cultural Heritage	Introduction	4.1.1. On behalf of SLD, a heritage report has been prepared by Lucy Nicholson LLB, MA, Pg Cert, MRTPI, IHBC (who has focussed on built heritage) and Tom Linnington, BA, MCiFA (who has focussed on archaeology) (Appendix C). Where references are made to pages or paragraphs, they are to the Report unless otherwise stated.	The Applicant has reviewed Appendix C in response to the Written Representations on Heritage and has responded to detailed matters raised below.
SLD-126	Cultural Heritage	Introduction	4.1.2. The report provides a critical assessment of the built heritage and archaeological elements of the application for the scheme at Lime Down Solar Park and has provided a further assessment as required of the Scheme's impact on built heritage and archaeology. The report has conducted a proportionate review of the Applicant's submission, focussing on those areas which the authors	The Applicant has reviewed Appendix C in response to the Written Representations on Heritage and has responded to detailed matters raised below.

			identify as having been omitted from the Applicant's assessment.	
SLD-127	Cultural Heritage	Policy	4.2.1. NPS EN-1 requires the Applicant to assess likely significant heritage impacts as part of the ES, including an application of the mitigation hierarchy and consideration of possible impacts, including cumulative, on the wider historic environment. NPS EN-1 provides further details of what the Applicant should assess at paragraphs 5.9.9 to 5.9.21.	The Applicant agrees with the requirements of NPS EN-1 and the assessment work which has been used to inform ES Volume 1, Chapter 12: Cultural Heritage [APP-064] , meets the criteria set out by the Overarching NPS for Energy (EN-1) (January 2024).
SLD-128	Cultural Heritage	Policy	4.2.2. EN-1 provides guidance on how the Secretary of State should approach decision-making: 4.2.2.1. The Secretary of State should seek to identify and assess the particular significance of any heritage asset that may be affected by the proposed development (either directly or through an effect on its setting), taking into account the relevant information in the application and the other information sources set out in paragraph 5.9.22.	The Applicant agrees with the requirements of NPS EN-1 and the assessment work which has been used to inform ES Volume 1, Chapter 12: Cultural Heritage [APP-064] , meets the criteria set out by Overarching NPS for Energy (EN-1) (January 2024).

SLD-129	Cultural Heritage	Policy	4.2.2.2. When considering the impact of a proposed development on the significance of a designated heritage asset, the Secretary of State should give great weight to the asset's conservation. The more important the asset, the greater the weight should be. This is irrespective of whether any potential harm amounts to substantial harm, total loss, or less than substantial harm to its significance.	The Applicant agrees with the requirements of NPS EN-1 and the assessment work which has been used to inform ES Volume 1, Chapter 12: Cultural Heritage [APP-064] , meets the criteria set out by Overarching NPS for Energy (EN-1) (January 2024).
SLD-130	Cultural Heritage	Policy	4.2.2.3. The Secretary of State should give considerable importance and weight to the desirability of preserving all heritage assets. Any harm or loss of significance of a designated heritage asset (from its alteration or destruction, or from development within its setting) should require clear and convincing justification.	The Applicant agrees with the requirements of NPS EN-1 and the assessment work which has been used to inform ES Volume 1, Chapter 12: Cultural Heritage [APP-064] , meets the criteria set out by Overarching NPS for Energy (EN-1) (January 2024).
SLD-131	Cultural Heritage	Policy	4.2.2.4. Where a proposed development will lead to substantial harm to or loss of significance of a designated heritage asset, the Secretary of State should refuse consent unless	The Applicant agrees with the requirements of NPS EN-1 and the assessment work which has been used to inform ES Volume 1, Chapter 12: Cultural Heritage [APP-064] , meets the criteria set out by

			the tests set out in paragraph 5.9.31 can be met (for instance, that the harm is outweighed by the substantial public benefits of the development).	Overarching NPS for Energy (EN-1) (January 2024).
SLD-132	Cultural Heritage	Policy	4.2.2.5. For non-designated heritage assets, a balanced judgment will be required, having regard to the scale of harm or loss and the significance of the heritage asset.	The Applicant agrees with the requirements of NPS EN-1 and the assessment work which has been used to inform ES Volume 1, Chapter 12: Cultural Heritage [APP-064] , meets the criteria set out by Overarching NPS for Energy (EN-1) (January 2024).
SLD-133	Cultural Heritage	Policy	4.2.2.6. When considering applications for development affecting the setting of a designated heritage asset, the Secretary of State should give appropriate weight to the desirability of preserving the setting of such assets and treat favourably applications that preserve those elements of the setting that make a positive contribution to, or better reveal the significance of, the asset. When considering applications that do not do this, the Secretary of State should give great weight to any negative effects, when weighing	The Applicant agrees with the requirements of NPS EN-1 and the assessment work which has been used to inform ES Volume 1, Chapter 12: Cultural Heritage [APP-064] , meets the criteria set out by Overarching NPS for Energy (EN-1) (January 2024).

			them against the wider benefits of the application. The greater the negative impact on the significance of the designated heritage asset, the greater the benefits that will be needed to justify approval.	
SLD-134	Cultural Heritage	Archaeology	4.3.1. In relation to archaeology, Appendix C concludes that the following points have not been adequately addressed in the Applicant's submission [14/§3.3]: • Heritage significance of the Roman Fosse Way and its relationship with contemporary settlement sites and the impact thereupon by the Solar PV; • Inconsistency in impact assessment regarding areas of 'non-intrusive construction methodology'; • The lack of appropriate impact assessment of proposed intrusive landscape and ecological mitigation; • The lack of appropriate briefing arrangements ahead of archaeological works to non-archaeological personnel; and • The appropriateness of horizontal directional drilling ('HDD') in proximity to scheduled	The Applicant respectfully disagrees with the comment. The potential effects of the Scheme on the Roman Roads (i.e. the Fosse Way), as well as other Roman archaeological assets and designated assets such as listed buildings are fully assessed in ES Volume 1, Chapter 12: Cultural Heritage [APP-064], supported by detailed technical appendices in ES Volume 3, Appendices 12-1 to 12-7 [APP-219 to APP-231]. Where an adverse effect has been identified to Roman archaeological assets appropriate mitigation is proposed. See Section 12.9 of ES Volume 1, Chapter 12: Cultural Heritage [APP-064] for embedded mitigation and Section 12.11 for additional mitigation. An overarching archaeological mitigation strategy is provided in ES Volume 3,

			monument 1018610 (Pillow mound 280m southwest of Surrendell Farm).	Appendix 12-6 Archaeological Mitigation Strategy [APP-230]. Since the design presented at PEIR stage, Field C26, the westernmost part of Field C25, and the majority of Field C13 have been entirely removed from the Order Limits. Solar PV Panels have also been removed entirely from within Fields B1-B5, C24-C25, and C13. A number of fields abutting the Fosse Way within which Solar PV Panels will be erected have had offsets established with their boundaries with Fosse Way, including Fields B6, C10-C12, and C22-C23. Appendix 12-1: Heritage Statement [APP-219] identified that the overall setting and significance of the Fosse Way will remain intact, and the asset will retain its legibility as a roadway within a largely agrarian landscape. Consequently no significant effects were identified to the asset. Likewise, no impact was identified as a result of the Scheme to the Scheduled Romano-British settlement, earthwork enclosure and a section of the Fosse Way, 415m

				west of Whatley Manor (NHLE reference 1013354). The Applicant and WC are in discussion regarding the suitability of non-intrusive construction techniques and as stated in Paragraph 1.1.8 of ES Volume 3, Appendix 12-6: Outline Archaeological Mitigation Strategy (AMS) [APP-230], the AMS includes for mitigation in the form of preservation of archaeological remains in situ, 'strip, map and sample', and archaeological monitoring. As stated in paragraph 1.1.3 of the AMS [APP-230], Written Schemes of Investigations (WSIs) that detail site-specific mitigation measures will be appended to the AMS in advance of each phase of mitigation works.
SLD-135	Cultural Heritage	Archaeology	4.3.2. In particular, the report notes that the Fosse Way, being one of the principal Roman routeways, could be considered to be non-designated heritage of national significance [15/§3.7]. The report considers that it ought to be assigned a heritage sensitivity of	The potential effects of the Scheme on the Roman Roads (i.e. the Fosse Way), as well as other Roman archaeological assets and designated assets such as listed buildings are fully assessed in ES Volume 1, Chapter 12: Cultural Heritage [APP-064], supported by detailed technical

			"Medium" if not "High" [15/§3.7]. It is observed that, given the likely loss of archaeological remains and the visual disruption caused by the introduction of the solar panels, there would be harm to the ability to appreciate the historical and fictional relationship between the Fosse Way and associated archaeological remains. As a consequence, the magnitude of effect is "Low" [15/§3.9]. This would result in Moderate adverse effect, which is significant [16/§3.10].	appendices in ES Volume 3, Appendices 12-1 to 12-7 [APP-219 to APP-231]. Where an adverse effect has been identified to Roman archaeological assets appropriate mitigation is proposed. See Section 12.9 of ES Volume 1, Chapter 12: Cultural Heritage [APP-064] for embedded mitigation and Section 12.11 for additional mitigation. An overarching archaeological mitigation strategy is provided in ES Volume 3, Appendix 12-6 Archaeological Mitigation Strategy [APP-230]. Since the design presented at PEIR stage, Field C26, the westernmost part of Field C25, and the majority of Field C13 have been entirely removed from the Order Limits. Solar PV Panels have also been removed entirely from within Fields B1-B5, C24-C25, and C13. A number of fields abutting the Fosse Way within which Solar PV Panels will be erected have had offsets established with their boundaries with Fosse Way, including Fields B6, C10-C12, and C22-C23. Appendix 12-1: Heritage Statement [APP-219] identified that

				the overall setting and significance of the Fosse Way will remain intact, and the asset will retain its legibility as a roadway within a largely agrarian landscape. Consequently, no significant effects were identified to the asset. Likewise, no impact was identified as a result of the Scheme to the Scheduled Romano-British settlement, earthwork enclosure and a section of the Fosse Way, 415m west of Whatley Manor (NHLE reference 1013354).
SLD-136	Cultural Heritage	Archaeology	4.3.3. The report further highlights the lack of appropriate assessment of potential impacts on buried archaeological remains in areas selected for intrusive landscape and ecological mitigation [16/§§3.13-3.16]. The Applicant further appears to consider the employment of strip map and sample excavation to be sufficient to substantially eliminate the harm [17/§3.20]. The report observes that the SMS does not reduce the magnitude to Negligible, but rather Low. As a consequence the residual adverse effect will be	The Outline LEMP [APP-283] details ecological mitigation and indicative locations are shown on ES Volume 2, Figure 3-4: Landscape and Ecology Mitigation Plan [REP1-029 to REP1-032]. Ecological mitigation that may affect archaeological remains is covered in the Table 6.1.1 of the Outline AMS [APP-230]. The approach to the assessment has been agreed with Wiltshire Council and the methodology for the mitigation strategy is being discussed with Wiltshire Council. Including strip map and sample (SMS) which is a

			Moderate adverse, which is a significant effect, for D24-01 [18/§3.21]. For receptors C13-01 and C29-01, the residual effect will be moderate/minor [17/§3.21].	preferred approach, once the areas have been excavated and the archaeology recorded in situ, there will be no further impact to remains, therefore a Negligible residual effect stands.
SLD-137	Cultural Heritage	Archaeology	4.3.4. Marrons remain concerned that, at this stage, it has not been determined whether horizontal directional drilling will be appropriate at the sites – which the Applicant has proposed to prevent impacting highly sensitive archaeological remains in the Outline Archaeological Mitigation Strategy [APP-230]. In the event of trenchless cabling techniques, such as HDD, not being a viable in this location, the proposed solution by the Applicant is to undertake a program of strip, map and sample excavation along within mitigation area. However, excavation, through its nature is a destructive process, the harm of which, as noted above, is mitigated through the preservation by record [17/§3.22].	The Applicant notes this comment. As set out within ES Volume 3, Appendix 12-6: Outline Archaeological Mitigation Strategy [APP-230], trenchless cabling techniques within identified avoidance areas are secured mitigation measures embedded in the Scheme design. Where preservation in situ is not required or feasible, preservation by record through an agreed programme of archaeological investigation and recording is an established and appropriate form of mitigation in accordance with national policy and professional practice. Detailed methodologies will continue to be refined and discussed with WC through the detailed design process and secured through the Written Scheme of Investigation.

SLD-138	Cultural Heritage	Archaeology	4.3.5. It is considered by Marrons that in the event of SMS is employed within the mitigation area F120, the residual effect on the Scheduled Monument 'Pillow mound 280m southwest of Surrendell Farm' (NHLE: 1018610), should be reassessed, as it will not be Neutral, as concluded by the applicant in Cultural Heritage Impact Assessment Tables [APP-232]. Applying the approach to SMS set out above, and recognising that a reasonable worst case is such HDD failing, the residual effect of SMS on this Receptor would be Moderate (a significant adverse effect) [17-18/§3.25].	Discussion regarding other mitigation approaches to continue through the examination process and will be reviewed following the final design for the Scheme. Detailed methodologies will continue to be refined and discussed with WC through the detailed design process and secured through the Written Scheme of Investigation.
SLD-139	Cultural Heritage	Indirect Impacts on Built Heritage	4.4.1. In relation to built heritage, Appendix C concludes that the Applicant's assessment is insufficient in regard to the following issues [19/§3.26]: Lack of adequate assessment in relation to the contribution of the Site to the setting of Bradfield Manor and associated listed buildings and	The Applicant respectfully disagrees with the comment. ES Volume 1, Chapter 12: Cultural Heritage [APP-064], supported by Volume 3, Appendix 12-1: Heritage Statement [APP-219], has assessed the potential impact of the scheme on built heritage assets. No direct impacts have been identified to built heritage assets. Identified impacts to

			omission of consideration of the impact of the increase of noise on the assets; • Omission of the consideration of the impact of the increase of traffic to the group of assets at Alderton; and • Omission of the consideration of the impact of noise on the asset group at Norton and Advil's Farmhouse, as well as the Rodbourne Conservation area. Bradfield Manor Group	built heritage assets would be indirect and related to elements of their setting that contribute to their significance, which although not limited to includes a consideration of the intervisibility between the asset and the Scheme. As stated in Appendix 12-1: Heritage Statement [APP-219] when considering the contribution of setting to the significance of the Grade I Listed Bradfield Manor (NHLE: 1198808), the asset is largely defined and experienced from within the Bradfield Manor grounds, in particular the walled courtyard to the south-west of the asset, where the full architectural interest of its south-facing primary elevation can be appreciated. Lime Down D is located within agricultural land to the north of asset. Following advice provided by Historic England panels in Field D5 were set back away from Grade I Listed Bradfield Manor and enhanced screening is proposed along existing hedgerows. Views of the proposed BESS and 400 kV Substation from Bradfield Manor Farmhouse will be largely mitigated by the proposed new woodland belt along the south-

				eastern boundary of Field D3 which, in combination with the existing woodland block west of D1 and south of D22, provides extensive screening in views to and from Bradfield Manor Farmhouse. It was identified that there would be a moderate / minor (not significant) adverse effect to the asset (less than substantial harm at the lower end in NPPF terms) as a result of indirect (i.e. setting) impacts. It is also stated in Appendix 12-1: Heritage Statement [APP-219] that the character and appearance of Alderton Conservation Area is defined by the development of the village during the medieval and post-medieval periods around its primary industry, agriculture, with the surrounding agrarian landscape an important element in the significance of the Conservation Area, as it highlights its character as a rural village. The design of Lime Down C has taken this into account, and the agrarian setting of Alderton will largely be sustained by the Scheme. Increased traffic will be a temporary construction impact and will not have lasting harm on the setting of the Conservation Area.

				The asset group at Norton have a historic connection with a number of fields within Lime Down B; however, Solar PV Panels have been entirely removed from within Fields B1-B5. Instead, the alignment of the Cable Route Corridor will pass through these fields. Construction works associated with the installation of the cables will result in some limited impact, largely due to the movement of plant and construction noise. However, these impacts are considered to be temporary in nature, as the land will be reinstated. Avils Farmhouse is screened by woodland around the farm and whilst there is a minor shared spatial relationship between Lime Down E and Avil's Farm, the proposed Scheme would not undermine its appreciation as an 18th century Farmstead within a wider agrarian landscape on the outskirts of Lower Stanton St. Quintin. With consideration to Rodbourne Conservation Area, embedded mitigation including the removal of Fields E5 and E8 from the Scheme

				Order Limits, removal of panels from Fields E7, E9 and E10, offsets to the PROW and enhanced screening of existing hedgerows are considered sufficient mitigation to remove any adverse impacts to the Conservation Area. As stated in Section 3.7 of the Outline CEMP [REP1-096] , construction traffic routes have been identified to avoid large increases in HGV movements near to heritage assets. Highway improvement works would cause at most temporary construction effects and would not result in harm to the Conservation Area's significance. Therefore a neutral effect was identified as a result of the Scheme to the Conservation Area.
SLD-140	Cultural Heritage	Bradfield Manor	4.4.2. The high national significance of Bradfield Manor as a Grade I asset, combined with the proposed close proximity (180m) of the solar panels as well as the noise implications of the proximity of the BESS, means the impact on this asset and the wider group must be carefully considered by the Secretary of State [21/§3.29].	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 terms). The Applicant submitted a technical note at Deadline 1A (ES Technical Addendum to Chapter 12 Cultural

				Heritage - Bradfield Manor Visualisations (Rev 1) [REP1A-014] , which included the visualisations as requested by WC and Historic England, which support the results of the assessment of harm on Bradfield Manor Farmhouse. Site visits were undertaken with Historic England on the 28th March 2025 and the Wiltshire County Council Conservation Officer on the 11th April 2025, which included visiting land adjacent to Grade I Listed Bradfield Manor and Rodbourne Conservation Area. A second site visit with Historic England was undertaken in the grounds of Bradfield Manor on the 22nd May 2025 and the impact to the manor was agreed.
SLD-141	Cultural Heritage	Bradfield Manor	4.4.3. The report queries the level of detail provided to support the Applicant's assessment of the Grade I Manor. The setting analysis presented by the Applicant in the Heritage Statement simply states "Bradfield Manor has a historic relationship with much of the land within Lime Down D". The Applicant omits to	As above, the Applicant respectfully disagrees with the comment and feels the Manor has been fully assessed within the ES Volume 3, Appendix 12-1: Heritage Statement [APP-219] and supporting technical note.

			provide any analysis of the contribution this historic relationship makes to the significance of the Grade I asset. [20/§3.32-3.36].	
SLD-142	Cultural Heritage	Bradfield Manor	4.4.4. The report undertakes the necessary setting analysis and assesses the impact of the introduction of the BESS into the eastern part of the asset's setting and the panels to the north of the asset. In summary, it concludes that the Site contributes to the understanding of the asset group in four direct ways: • through the historic functional relationship [22/§§3.42-3.43]; • through the existing agrarian landscaping [22-23/§§3.44-3.45]; • through the appearance of the Site within the designed views from the Parlor of the Manor (specifically to the Grade I Manor) [23/§§3.46-3.47]; and • through the experience of the tranquil, rural setting [23-24/§3.48-3.51].	The Applicant has reviewed Appendix C in response to the Written Representations on Heritage. The Applicant considers that these matters were appropriately assessed within ES Volume 1, Chapter 12: Cultural Heritage [APP-064] and ES Volume 3, Appendix 12-1: Heritage Statement [APP-219] .
SLD-143	Cultural Heritage	Bradfield Manor	4.4.5. The report identifies the impact of the solar panels on the	The Applicant respectfully disagrees with the comment and maintains that

			Manor is fourfold [24/§3.53]; first the erosion of the agrarian land with which the Manor has a historic functional relationship with and secondly, the change in character within those identified designed views from the Parlour, third the ability to appreciate the asset within its rural setting. And finally, the noise implications from the BESS and panels. Indeed, it is considered that the four elements of the Site which contribute to the understanding of the significance of the asset are materially impacted as a result of the Scheme. The panels of Lime Down Area D would constitute a wholesale change of the northern setting of the Manor, comprising almost 180 degrees of the asset's setting.	the assessment of Bradfield Manor Farmhouse in ES Volume 3, Appendix 12-1: Heritage Statement [APP-219] is robust and engagement and site visits with Historic England identified a less than substantial harm impact. The assessment recognised that views from the three-storey parlour block appear to have been designed to provide views across the surrounding agricultural landscape and that parts of Lime Down D would remain partially visible from this location. The assessment also considered the historic agricultural relationship between the Manor and the surrounding landscape, alongside the contribution made by the wider rural setting to the appreciation of the asset. These considerations informed the evolution of the Scheme design and embedded mitigation, including the removal of Solar PV Panels from the southernmost part of Field D5 closest to the asset, the creation of landscape offsets, enhancement of existing hedgerows, establishment of wildflower meadow planting and the provision of new woodland belts and blocks, including the recreation of a

				former woodland block identified on the 1841 Hullavington Tithe Plan. The assessment concluded that, whilst the Scheme would introduce some change within the wider agricultural setting of the asset and there would remain some partial intervisibility from the upper floors of the parlour block, the wider rural and agrarian character surrounding Bradfield Manor Farmhouse would be retained. The proposed mitigation would also reduce intervisibility over time and substantially screen views of the BESS and 400 kV Substation. Regarding the concerns on noise implications on Bradfield Manor, while the Applicant accepts that there would be an adverse impact at the Manor as a result of operational noise, with reference to Table 8 in Appendix 14-4 Noise Modelling [REP1-061], such levels would be very close to the typical existing background sound and therefore not constitute a significant adverse impact on health and quality of life.

				The Outline OEMP [REP1-098] commits to such noise levels being achieved in practice. The preparation, approval and implementation of the detailed OEMP, substantially in accordance with the outline plan, are secured through Requirement 14 of Schedule 2 of the Draft Development Consent Order [REP1-007], ensuring operational noise is appropriately controlled throughout the lifetime of the Scheme.
SLD-144	Cultural Heritage	Bradfield Manor	4.4.6. As a consequence, the magnitude of the impact is considered to be Medium [27/§3.61]. This results in a Major/Moderate effect which is significant in EIA terms, but less than substantial harm [27/3.62].	The Applicant agrees that the impact to Bradfield Manor would be less than substantial harm, which is not significant in EIA terms.
SLD-145	Cultural Heritage	Bradfield Manor	4.4.7. A summary of the impacts on the Bradfield Manor assets is set out below: Receptor – Bradfield Manor (Grade I) Sensitivity of receptor / magnitude of impact – Sensitivity: High. Impact: Medium. The Scheme would result in a	The Applicant has reviewed Appendix C in response to the Written Representations on Heritage but respectfully disagrees with the summary of impacts. ES Volume 1, Chapter 12: Cultural Heritage [APP-064] , supported by ES Volume 3, Appendix 12-1: Heritage Statement [APP-219] , assessed the contribution made by the surrounding agrarian landscape, designed views and wider

			noticeably different change to the setting of the asset and would result in an erosion of our ability to understand the asset as a rural Manor at the centre of its farmland. Major/Moderate Adverse (significant effect). • Receptor – Courtyard to the South East of Bradfield Manor (Grade II, NHLE: 1023202) Sensitivity of receptor / magnitude of impact – Sensitivity: Medium. Impact: Low. The Scheme would result in a slight change to the setting of this asset which would result in a change in our ability to understand and appreciate the asset. Moderate/Minor Adverse Effect. • Receptor – Barn to the South West of Bradfield Manor Farmhouse (Grade II, NHLE: 1198869) Sensitivity of receptor / magnitude of impact – Sensitivity: Medium. Impact: Low. The Scheme would	rural setting to the significance of Bradfield Manor Farmhouse and its associated listed buildings. The assessment recognised that the Scheme would introduce some change within the wider agricultural setting of the asset group and that partial intervisibility from the upper floors of the parlour block would remain. However, the assessment also identified that the immediate setting of the assets would remain largely unchanged and that the wider rural and agricultural character of the landscape surrounding Bradfield Manor would be retained. The Scheme design has also evolved to reduce effects on the asset group, including the removal of Solar PV Panels from the southernmost part of Field D5, the introduction of landscape offsets, enhancement of existing hedgerows, establishment of wildflower meadow planting and the creation of new woodland belts and blocks to reduce intervisibility over time.

			result in a slight change to the setting of this asset which would result in a change in our ability to understand and appreciate the asset. Moderate/Minor Adverse Effect. • Receptor – Barn to East of Bradfield Manor Farmhouse (Grade II, NHLE: 1356036) Sensitivity of receptor / magnitude of impact – Sensitivity: Medium. Impact: Low. The Scheme would result in a slight change to the setting of this asset which would result in a change in our ability to understand and appreciate the asset. Moderate/Minor Adverse Effect.	The Applicant therefore maintains the assessment conclusions set out within the Environmental Statement that effects on Bradfield Manor Farmhouse would result in less than substantial harm at the lower end of the scale, with lesser effects identified for the associated Grade II listed buildings.
SLD-146	Cultural Heritage	Alderton Group	Alderton Group 4.4.8. The Applicant's assessment fails to consider the impact of the increase of traffic associated with the access point at Alderton and the impact of this on the tranquil character of the setting .The report identifies that the location of the access to the Scheme being located within close proximity to these assets would cause an	The Applicant notes this comment. Appendix 12-1: Heritage Statement [APP-219] identifies that the character and appearance of Alderton Conservation Area is informed by the historic development of the village during the medieval and post-medieval periods, centred on its agricultural origins, with the surrounding agrarian landscape making an important contribution to

			adverse impact to the tranquillity and understanding of the agrarian setting [29/§3.67].	its significance. The design of Lime Down C has taken this into account and the wider rural and agricultural setting of Alderton would largely be retained. The Applicant also notes that whilst the access point at Alderton would be retained for operational maintenance access to the Solar PV Panels, operational vehicle movements associated with the Scheme would be limited in frequency. As such, whilst there may be temporary effects on the tranquillity of the Conservation Area during construction and decommissioning, operational effects would be limited and would not result in lasting harm to its significance or setting.
SLD-147	Cultural Heritage	Alderton Group	4.4.9. That impact is particularly important in relation to the Church of St Giles (Grade II*). The Scheme layout positions the operational maintenance access at the existing field entrance which is located 140m to the east of the Churchyard boundary. The Applicant omits to consider the impact of this Scheme layout on	The Applicant notes that the operational maintenance access would utilise an existing field entrance and that operational traffic associated with the Scheme would be limited in frequency. The wider rural character of the surrounding landscape would also be largely retained. Accordingly, the Applicant considers that any effects on the tranquillity and calm

			the contribution of the rural setting to the tranquillity and calm character of the Churchyard [30/§3.72]. The Report identifies Moderate/Minor adverse effects.	character of the Churchyard would be limited and would not result in significant harm to the significance of the asset.
SLD-148	Cultural Heritage	Alderton Group	4.4.10. The report further identifies Negligible adverse effects on the Alderton Conservation Area and the Manor Farmhouse (Grade II) as a consequence of the change to noise levels and the ability to appreciate the asset [30/§3.72].	The Applicant welcomes the conclusion of a negligible effect to the Conservation Area.
SLD-149	Cultural Heritage	Norton Group and Avil's Farmhouse	4.4.11. The Heritage Statements fails to adequately assess the impact of the noise effects of the proposed Scheme on the heritage assets [31/§3.73].	The Applicant respectfully disagrees with this comment, whilst the operation of the Scheme may introduce perceptible operational noise within the wider landscape, the assets would retain their rural context and understanding within the surrounding agrarian landscape.
SLD-150	Cultural Heritage	Norton Group and Avil's Farmhouse	4.4.12. Norton currently experiences very low background noise levels during the daytime and night-time periods, characterised by the absence of industrial noise sources. The predicted noise levels from the	The Applicant notes the comment, whilst the operation of the BESS may introduce perceptible operational noise within the wider landscape, the assets would retain their rural context

			BESS container area would be clearly distinguishable and perceptible within Norton as a continuous industrial sound (described as a hum by the applicant) [32/§3.78]. The considerable change in background noise would have a direct impact on the tranquil character of the setting of these assets. The quiet of the countryside is a key part of the factors that contribute to the sense of place, and the increase of the background noise is a material factor which should be considered.	and understanding within the surrounding agrarian landscape. With reference to receptors R16, R42, R43 and R44 in Table 8 and Table 9 of ES Volume 3, Appendix 14-4 Noise Modelling [REP1-061], noise levels from the Scheme would be typical of existing background sound levels in the area. While this would make the BESS container area audible on occasion it would not constitute a considerable change in background sound level. The Outline OEMP [REP1-098] commits to such noise levels being achieved in practice. The preparation, approval and implementation of the detailed OEMP, substantially in accordance with the outline plan, are secured through Requirement 14 of Schedule 2 of the Draft Development Consent Order [REP1-007], ensuring operational noise is appropriately controlled throughout the lifetime of the Scheme.

SLD-151	Cultural Heritage	Norton Group and Avil's Farmhouse	4.4.13. The report identifies a Moderate adverse effect on Norton Manor (Grade II*), as a consequence of the impact of the noise on the setting of the Manor and the industrial character introduced to the setting as a consequence of the proposed development [33-34/§3.79]. That is a significant adverse effect.	The Applicant notes the comment, whilst the operation of the BESS may introduce perceptible operational noise within the wider landscape; the asset would retain its rural context and understanding within the wider landscape. Appendix 12-1: Heritage Statement [APP-219] also notes that existing and proposed vegetation screening would prevent intervisibility between Norton Manor and the Solar PV Panels and that the setting of Norton would largely be sustained by the Scheme.
SLD-152	Cultural Heritage	Norton Group and Avil's Farmhouse	4.4.14. Further Moderate/Minor adverse effects are identified in respect of [34-35/§3.79]: • Gateway Boundary Wall to the South of Norton Manor (NHLE: 1023216) • Gateway and Boundary Wall to Kitchen Garden, South of Norton Manor (NHLE: 1023218) • Wellhead in Courtyard to the East of Norton Manor (NHLE: 1199011) • Barn to the South West of Norton Manor (NHLE: 1199030) • Church of All Saints (Grade II) and	The Applicant respectfully disagrees with this assessment. ES Volume 1, Chapter 12: Cultural Heritage [APP-064] , supported by ES Volume 3, Appendix 12-1: Heritage Statement [APP-219] , assessed the impacts to the group of assets associated with Norton Farm including the Church of All Saints. Norton as a whole is very well screened from the surrounding landscape, which will prevent any intervisibility between the assets and the Solar PV Panels within the Scheme. Construction impacts are also considered to be temporary in nature, and it is considered that there will be no harm to the setting and

			Unidentified Monument in the Churchyard, 3 Metres North of Porch, Church of All Saints	significance of this group of designated assets at Norton Farm.
SLD-153	Cultural Heritage	Norton Group and Avil's Farmhouse	4.4.15. The resulting significant effect on Avil's Farmhouse is identified to be Negligible adverse as a consequence of the considerable change in background which would have a direct impact on the tranquil character of the setting of the asset during the day [34-35/§3.79].	The Applicant welcomes the conclusion of a negligible effect on Avil Farmhouse.
SLD-154	Cultural Heritage	Rodbourn Conservation Area	4.4.16. Rodbourne Conservation Area is located to the east of Lime Down Area E. The Applicant has presented an assessment on the Conservation Area which we have reviewed as part of the preparation of this report. In this review, we have noted that the Applicant has failed to consider the impact of the positioning of the access way to the immediate west of the Conservation Area. 4.4.17. The resulting significant effect on the Conservation Area would be Negligible adverse [36/§3.81].	There are ongoing discussions between the Applicant and WC 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 updated the Outline CEMP [REP1-096] at Deadline 1 to include provision that the WC Conservation Officer should be consulted on the approval of the design for the access Works Number 8b.

SLD-155	Cultural Heritage	Conclusion	4.5.1. In relation to built heritage, Appendix C identifies a significant adverse effect in relation to Grade 1 Bradfield Manor as a result of the impacts of the Scheme. The impact arises from the erosion of the historic agrarian landscape, the change in the character of the views from the Parlour and the erosion of the agricultural setting and tranquil character of the Site.	The Applicant respectfully disagrees with the comment and feels the Manor has been fully assessed within the ES Volume 3, Appendix 12-1: Heritage Statement [APP-219] and supporting technical note.
SLD-156	Cultural Heritage	Conclusion	4.5.2. In addition, this report has found adverse impacts to the group of assets at Alderton and the Conservation Area at Rodbourne as a result of the increase of traffic in the setting of the assets. Adverse impacts have also been found as a result of the noise impacts of the Scheme to the asset group at Norton and Avil's Farmhouse. In respect of Norton, the effect to Norton Manor is identified as significant, due to the noise effects changing the character of the setting.	The Applicant respectfully disagrees with this comment and notes that any increase in traffic associated with the Scheme would primarily occur during the construction phase and would therefore be temporary in nature. Whilst operational access would be required following construction, operational vehicle movements associated with the Scheme would be limited in frequency. In relation to Norton Manor, whilst the operation of the BESS may introduce perceptible operational noise within the wider landscape, the asset would retain its rural context and understanding within the surrounding agrarian landscape.
SLD-157	Cultural Heritage	Conclusion	4.5.3. In relation to archaeology, Marrons concludes that the	The Applicant respectfully disagrees with the comment and believes the

			impacts of the Scheme on the archaeological resource have not been fully and comprehensively assessed. Multiple significant effects are identified as a result of the underassessment of the Fosse Way, and overreliance on SMS. The report demonstrates that impacts on the archaeological resource associated with the Scheme are higher than those concluded by the Applicant and that the present mitigation measures are not sufficiently effective or proportionate to the asset's individual or collective significance.	assessment in ES Volume 1, Chapter 12: Cultural Heritage [APP-064] , supported by Volume 3, Appendix 12-2: Archaeological Desk-Based Assessment [APP-220-221] is robust and the approach to the assessment has also been agreed with Wiltshire Council and the methodology for the mitigation strategy is being discussed with Wiltshire Council.
SLD-158	Transport and Access	Introduction	5.1.1. The area in which the Scheme is situated is notable for its narrow rural lanes, which are well-used by pedestrians, cyclists and equestrians not only from the local communities, but also visitors from further afield. Many people are extremely concerned about the traffic implications of the Scheme, which poses a risk of significant disruption, and potential injury / fatality.	The Applicant notes this comment and has responded to the detailed points made in relation to this in the response to paragraph 5.3.1.
SLD-159	Transport and Access	Introduction	5.1.2. Railton TPC Ltd has been commissioned by SLD to prepare a	Applicant notes this comment

			report for submission to the ExA with regard to the transport and highway impacts during construction of Lime Down Solar Park. The report is authored by the director of Railton TPC Ltd, Bruce Bamber and is listed at Appendix D. References in this section to pages or paragraph numbers are to that report, unless otherwise specified.	
SLD-160	Transport and Access	Policy	5.2.1. Relevant national policy is set out in NPS EN-1 and EN-3. Paragraph 5.14.21 of EN-1 sets out the key policy considerations relation to transport against which the concerns set out below should be judged: “5.14.21 The Secretary of State should only consider refusing development on highways grounds if there would be an unacceptable impact on highway safety, residual cumulative impacts on the road network would be severe, or it does not show how consideration has been given to the provision of adequate active public or shared transport access and provision.’	The comment refers to paragraph 5.14.21 of EN-1 (January 2024) and the contents are agreed.

SLD-161	Transport and Access	Policy	5.2.2. Paragraph 4.3.12 further requires the Applicant to assess the likely worst-case effects of development. “Where some details are still to be finalised, the ES should, to the best of the applicant's knowledge, assess the likely worst-case environmental, social and economic effects of the proposed development to ensure that the impacts of the project as it may be constructed have been properly assessed.”	Applicant agrees with the text
SLD-162	Transport and Access	Impact on Rural Lanes	5.3.1. The applicant's assessment of transport environmental impacts is deficient as it fails to recognise the sensitivity of narrow rural lanes to increases in HGV movements and it underplays the magnitude of impact of construction vehicles on the most sensitive areas [12/§2.53]. These lanes are particularly sensitive as a consequence of safety concerns for other drivers and vulnerable groups, such as pedestrians, cyclists, and equestrians. The transport and highways impact report produced by Railton Ltd on	Annex J of ES Volume 3, Appendix 13-1: Transport Assessment [REP1-057 and REP1-058] 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

			behalf of SLD identifies the following rural lanes as being of insufficient width for vehicles to pass [4/§2.5]: • Alderton Road; • Fosse Way; • Road East of Hullavington and Bradfield Cottages; • Road between Fosse Way and Sherston; • Unnamed Road, Sevington; • Neeld Court; • Fowlswick Lane; • Chippenham Lane; • Stowell Lane; • Corsham Road.	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. With regard to the road between Fosse Way and Sherston that sits on the construction route 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; 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 Alderton Road and Fosse Way which are on 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); - 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-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 road East of Hullavington and Bradfield Cottages sit on the construction route to Lime Down D West. In regard to 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 REP1-096] 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. The following roads are on the cable construction route; • Unnamed Road, Sevington; • Neeld Court; • Fowlswick Lane; • Chippenham Lane; • Stowell Lane; • Corsham Road. Cable route will be constructed in four separate 5.5km sections. One access in operation in each section at any one time as rolling construction. Each access will only be operation for 90 days over the full construction period. However, our assessment assumes all 28 accesses in use at once and assumed AADT based on the average over 90 days not 365. This is described is Paragraph 13.10.73 of the ES Volume 1, Chapter 13: Transport and Access [REP1-019].

				In regard to Non motorised users, Fear and Intimidation for other NMU's can be assessed. Highway widths of construction routes have been assessed ES Volume 3, Appendix 13-1: Transport Assessment [REP1-057 and REP1-059] and provide sufficient width for HGV traffic to comfortably pass cyclists. ES Volume 1, Appendix 13-1: Transport Assessment [REP1-057 and REP1-059] concludes that the level of flow change will not result in a step change in fear and intimidation as defined in the IEMA guidance at Tables 3.1, 3.2 and 3.3. ES Volume 1, Appendix 13-1: Transport Assessment [REP1-057 and REP1-059] concludes that on all links in the study area the significance of effect is Minor Adverse (temporary).
SLD-163	Transport and Access	Impact on Rural Lanes	5.3.2. Likewise, forward visibility is highly constrained in many places due to tight bends, hedgerows, trees and other structures located close to the carriageway edge [9/§2.35]. While the Applicant	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

			suggests that passing bays could be introduced, the ability to deliver passing bays of sufficient size is constrained by roadside vegetation, ditches and embankments [10/§2.38].	routes.
SLD-164	Transport and Access	Impact on Rural Lanes	5.3.3. The Applicant dismisses the magnitude of impact on rural lanes on the basis of low existing HGV flows – but does not appear to consider this in the context of safety [7/§2.20-2.21]. It is doubtful that any of this could be effectively mitigated through the proposed HGV booking system. The level of coordination this would require, given there would be multiple construction sites operating every day, has been downplayed [8/§2.24-2.25]. Moreover, the Applicant will have no control over the movement of other large vehicles on the local highway network.	The HGV booking system is common on construction sites and will work by suppliers and subcontractors booking delivery slots via a secure online portal or app before arriving on-site. The system prevents "double-booking" and ensures that the number of deliveries is limited to what the site can handle at any one time (e.g., only one HGV on-site, or specific time slots). Lime Down D East is a standalone site. Lime Down A B C will only have a predicted two month overlap according to the submitted construction programme making it easier to book in deliveries minimising conflicts.
SLD-165	Transport and Access	Impact on Rural Lanes	5.3.4. The impact of HGVs on the highway network during the construction of the cable route has not been properly assessed, despite the Applicant's suggestion that it will generate 77% of the	The cable route HGV trips have been assessed in the ES based on the worst-case assumption that all 28 access junctions will attract 8 vehicles per day every day for two years. This is an overestimation as the Cable

			HGVs predicted [11/§2.40]. SLD's report demonstrates that there are likely to be impacts on the following locations as a consequence of compound access points [11/§2.45]: • Grittleton village; • Fowlwisk Lane • Sheldon village; • South of railway, east of Corsham; • Substation site.	route will likely be constructed in four separate 5.5km sections. One access in operation in each section at any one time as rolling construction. Each access will only be operation for 90 days over the full construction period.
SLD-166	Transport and Access	Impact on Rural Lanes	5.3.5. Examination of the construction access strategy reveals that many construction vehicle routes are not of a standard capable of safely accommodating construction traffic. The applicant's proposed Highway Improvement Areas exclude many of the most sensitive highway links in both the solar array and cable route areas. Where improvements could be identified at a later stage, a reasonable worst case environmental impact is not assessed [12/§2.54].	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 safely. It is concluded that further highway improvements outside of the Order Limits will not be required at a later stage.

SLD-167	Transport and Access	Access Points	5.4.1. The applicant has not identified the amount of roadside vegetation and trees that would be required to be removed to achieve safe visibility splays and remove the need for banksmen. Since the acceptability of the widespread use of banksmen is not certain, a reasonable worst case for assessment would include the removal of roadside vegetation and trees to allow safe visibility splays. The applicant has not assessed this reasonable worst case [14/§3.6].	Banksmen have been provided to reduce the need for removal of vegetation or tree loss and is a commitment in the CTMP. It is normal to provide security personnel at each access during construction. Any banksmen will have the necessary training. The Banksmen will not stand in the road all the time but will direct traffic at HGV arrival or departures
SLD-168	Transport and Access	Access Points	5.4.2. The report identifies the following access locations as being particularly problematic [14-15/§3.7]: accesses 4, 9, 101 and 102, 109, 110 and 111, 118 to 122, 123 and 124, and 125.	Banksmen have been provided to reduce the need for removal of vegetation or tree loss, is a commitment in the CTMP and will be provided at accesses 4, 9, 101 and 102, 109, 110 and 111, 118 to 122, 123 and 124, and 125.
SLD-169	Transport and Access	Under-estimation of HGV Trip Generation	5.5.1. The Applicant, in response to Relevant Representations, has suggested that further information will be submitted on construction vehicle trip generation. Should this be forthcoming, SLD reserves its right to comment.	A further breakdown of Trip Generation Calculations is provided at Annex E of ES Volume 3, Appendix 13-1: Transport Assessment [REP1-057 and REP1-059] and submitted at Deadline 1.
SLD-170	Transport and Access	Under-estimation of	5.5.2. The report concludes that the applicant has not adopted a	The assessment includes a reasonable worst-case assessment

		HGV Trip Generation	reasonable worst case when assessing the impacts of construction HGVs and the assessments do not, therefore, comply with the requirements of EN-1. There is substantial under-estimation of the number of HGV trips involved in the proposed development, even approaching the matter on a conservative assessment. The Report recalculates the Applicant's estimates of HGV movements during construction. In summary, they are: 5.5.2.1. A revised assessment of 65,813 movements as a result of construction trip generation for the solar array areas (+152% difference to the Applicant's estimation of 26,086) [25/§4.62, Table 4]. 5.5.2.2. A revised assessment of 12,714 movements as a result of construction trip generation in the cable route corridor [26/ §4.68].	as the AADT's are calculated by assuming all PV sites and cable route is built concurrently for two years. It assumes a peak day by increasing the predicted trip numbers by 50% then assumes that the peak day occurs every day for the two-year construction period. A technical note will be submitted for Deadline 3 which provides a review and comparison of the SLD calculations as they look to factor up the already inflated numbers with extra assumptions rather than remove the 50% uplift and concurrent assumption prior to uplifting the numbers.

SLD-171	Transport and Access	Under-estimation of HGV Trip Generation	5.5.3. The applicant has also failed to assess the combined effects of solar array and cable route construction contrary to the Government's advice.	This will be responded to in the technical response note due to be submitted at Deadline 3.
SLD-172	Transport and Access	Magnitude of Impact of Construction Traffic	5.6.1. The Applicant provides a table showing the assignment of construction vehicles associated with the solar array areas but does not provide a flow diagram representing this spatially [28/§5.1]. Appendix 5 contains a flow diagram translating the Applicant's estimates into daily HGV flows on the surrounding highway network, but the figures only include HGVs associated with the solar arrays. When cable route construction is added, a substantial impact is also shown on the B4039 [29/§5.7]. On the basis of the revised assessment of HGV trip generation the levels of impact increase significantly. The Fosse Way experiences more than a four-fold increase in HGV movements [29/§5.8].	Flow diagrams were submitted in Annex F of ES Volume 3, Appendix 13.1: Transport Assessment [REP1-057 and REP1-059] at Deadline 1. A technical response note to Appendix D will be submitted at Deadline 3.
SLD-173	Transport and Access	Magnitude of Impact of Construction Traffic	5.6.2. Table 5 in the Report illustrates changes in daily HGV movements on links [28/§5.4].	A technical response note to Appendix D will be submitted at Deadline 3.

SLD-174	Transport and Access	Magnitude of Impact of Construction Traffic	5.6.3. The Applicant judges the impact of HGVs in relation to the 'capacity' of the roads. Capacity refers to only one aspect of transport environmental assessment; driver delay. The applicant's statement suggests that the significance of the increases in HGV movements is dismissed on the basis of link capacity. This approach is not reliable or justifiable.	The impact of HGVs on the highway network has been assessed in line with the ISEP transport and Access Guidance. The development of construction routes for the Scheme includes the consideration of the following transport factors: • Severance of communities; • Road 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 load. In practical terms, this meant that the Applicant avoided selecting construction routes which had all, or, some of the following characteristics: • Extensive limited forward visibility; • Accident Hotspots; • Schools;

				• Village/Residential Centres; • Extensive lengths of single lane carriageway; • The requirement for extensive highway mitigation and engineering works; • The requirement for extensive vegetation removal; and • Narrow or weak bridge structures.
SLD-175	Transport and Access	Magnitude of Impact of Construction Traffic	5.6.4. The relevance of low base flows should also be considered in the context of the absolute increase in HGV movements that is predicted [30/§5.13]. This will be significant and will be well above the threshold where a change in the road environment will be perceived by, and will affect, highway users. For example, an increase of 93 HGV movements per day (Bradfield Cottages) would constitute an average of 13 HGVs per hour or one HGV every 4.6 minutes. Despite the obvious significance of the increases in HGV flows, the Applicant concludes that, "The effect of these changes in traffic flows, which are spread out across local highway	IEMA/ISEP Guidance Transport and Access Para 3.16 warns that low baseline flows unlikely to experience severance impacts even with high percentages changes in traffic. Trip generation of 56 HGVs on the route to Lime Down D (west) through Bradfield Cottages is an estimate of the deliveries on a peak day, so does not represent a daily average; Trip generation of 56 HGV's on the route to Lime Down D (west) is based on worst-case assumptions, including but not limited to, all phases and Solar PV Sites being constructed simultaneously and a 50% uplift.

			network surrounding the scheme, is not forecast to have any significant effect over the course of the working day" [APP-065/§1.9.9].	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 and one every 14 minutes (less than the journey time along the route); Mitigation includes restricted delivery times that are limited to those times set out in the Outline CTMP [REP1-112].
SLD-176	Transport and Access	Impact on Vulnerable Highway Users	5.7.1. The Applicant has not undertaken any surveys of vulnerable highway users who have the potential to be adversely affected by construction traffic [34/§7.2]. The Applicant makes an assumption that because of a lack of dedicated infrastructure, impacts on walkers, cyclists and equestrians are likely to be low.	An HGV can pass a pedestrian / horse or cyclist along all construction routes. In addition, roads such as Fosse Way have wide verges that can be utilised. A technical response note to Appendix D will be submitted at Deadline 3 that covers this point further.

SLD-177	Transport and Access	Impact on Vulnerable Highway Users	5.7.2. HGVs on rural lanes that are used by vulnerable highway users leads to unacceptable impacts on highway safety, both an environmental impact that has not been adequately assessed by the applicant and a planning matter that EN-1 identifies as a reason for the Secretary of State to consider refusing development.	ES Volume 1, Appendix 13-1: Transport Assessment [REP1-057 and REP1-059] assess the impact on Non-motorised user (NMU) delay and amenity, including Fear and Intimidation from Paragraph 13.10.42. NMU Delay NMU delay is considered negligible given there is no existing pedestrian or cycle infrastructure on the construction routes and likely low numbers of existing NMU users. It is anticipated that PRow which cross the Order Limits will generally remain open during the construction phase of the Scheme. There may be some slight perceptible delay to NMU movement if a construction vehicle is crossing a PRow within the Order Limits. An Outline PRowPPMP [REP1-104] forms an embedded mitigation and will provide measures to ensure the effects of the construction phase on PRow users is minimised. The Outline PRowPPMP [REP1-104] contains specific measures for

				the temporary diversion of footpath WT GRIT 20 and bridleway WT MALW 54, where access to Cable Route Corridor works east of Grittleton, and HGV access to Lime Down E are taken respectively. These diversions are proposed to ensure unreasonable effects to PROW users are not experienced during construction, replacement and decommissioning. NMU Amenity Pedestrian amenity is broadly defined as the relative pleasantness of a journey, and is considered to be affected by traffic flow, traffic composition and pavement width/separation from traffic. The construction routes on the road network have little existing pedestrian infrastructure and no footways, making them already unattractive as walking routes with no pedestrian amenity so this cannot be assessed. Fear and Intimidation for other NMU's can be assessed. Highway widths of construction routes have been assessed ES Volume 3, Appendix

				13-1: Transport Assessment [REP1-057 and REP1-059] and provide sufficient width for HGV traffic to comfortably pass cyclists. ES Volume 3, Appendix 13-1: Transport Assessment [REP1-057 and REP1-059] concludes that the level of flow change will not result in a step change in fear and intimidation as defined in the IEMA guidance at Tables 3.1, 3.2 and 3.3. ES Volume 3, Appendix 13-1: Transport Assessment [REP1-057 and REP1-059] concludes that on all links in the study area the significance of effect is Minor Adverse (temporary). On the 12th March 2025 it was agreed in a scoping meeting with WC that PRow surveys were not required, due to likely low numbers of PRow users and the proposed mitigation during the construction period Mitigation An Outline CTMP [REP1-112] supports the DCO Application and presents outline measures which

				restrict construction deliveries to the proposed construction routes and separates the public and recreational users from hazards, including, traffic management measures such as signage and banksmen, fencing, and dust and noise control. A technical response note to Appendix D will be submitted at Deadline 3 that covers this point further.
SLD-178	Transport and Access	Impact on Pedestrians	5.7.3. Country lanes are often used by local residents either to access local facilities or to access PRowS [35/§7.6]. In the absence of footways, pedestrians must walk within the carriageway. When there is no verge, pedestrians are particularly vulnerable to large vehicles since the opportunities to step out of the carriageway may be limited. Where the lane is bounded by a steep embankment, a pedestrian is at heightened risk as they may try to step onto the embankment and lose their footing.	An HGV can pass a pedestrian / horse or cyclist along all construction routes. In addition, roads such as the Fosse Way have wide verges that can be utilised. A technical response note to Appendix D will be submitted at Deadline 3 that covers this point further.

SLD-179	Transport and Access	Impact on Pedestrians	5.7.4. The Applicant has undertaken no assessment of the potential of construction traffic to conflict with pedestrian use on country lanes.	An HGV can pass a pedestrian / horse or cyclist along all construction routes. A swept path assessment of all construction routes has been produced at Annex K in ES Volume 3, Appendix 13-1: Transport Assessment [REP1-057 and REP1-059] illustrating the relative width of roads that make up the construction routes in relation to an HGV. The Outline CTMP [REP1-112] commits to delivery times for HGVs to site are outside of peak hours with none on Sunday and only until 12:00 on a Saturday with the aim of reducing HGV movements during peak and leisure times. A technical response note to Appendix D will be submitted at Deadline 3 that covers this point further
SLD-180	Transport and Access	Impact on Pedestrians	5.7.5. The report notes, by way of example, that there could be a 190% increase along a section of "Walk 8" from Hullavington (Bradfield Wood and Malmesbury	Along this route the trip generation is 56 HGV's AADT and is based on the worst-case assumptions, including but not limited to, all phases and Solar PV Sites being

			Common). The distance between the point where the southern PRow connects with the lane and the point where the northernmost PRow connects with the lane is 450m. A pedestrian would take around 5 minutes to walk this distance. On average the pedestrian would be passed by a construction HGV every time they walked this route [35-38, §7.11-7.12].	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.
SLD-181	Transport and Access	Impact on Cyclists	5.7.6. Cyclists are also put at risk by HGVs on country lanes. It is evident from site visits that the area is used by a significant number of cyclists. The Wiltshire Cycleway is a 160 miles circular route around the county that links to Sustrans National cycle routes and the South West Historical National Byway.	The Wiltshire cycle route shares the following roads with the construction route, Alderton Road and Fosse Way. Annex E of ES Volume 3, Appendix 13-1: Transport Assessment [REP1-057 and REP1-059] includes swept paths showing a car passing an HGV along the majority of the route. A cyclist is able to pass an HGV along the entire route.
SLD-182	Transport and Access	Impact on Cyclists	5.7.7. The report concludes that the proposed development would have an adverse impact on cyclists on the Fosse Way, on the road east of Hullavington, on the road to Sherston, and potentially on other parts of the local highway network	Annex E of ES Volume 3, Appendix 13-1: Transport Assessment [REP1-057 and REP1-059] includes swept paths showing a car passing an HGV along the majority of the route. A cyclist is able to pass an HGV along the entire route.

			used regularly by cyclists [41/§7.33]. It is further concluded that cyclists using designated routes and surrounding links are put at severe risk of injury or death in the presence of HGVs on narrow and winding rural lanes. This leads to an unacceptable impact on highway safety contrary to para 5.14.21 of EN-1, an effect that has not been properly assessed by the applicant [42/§7.35].	A technical response note to Appendix D will be submitted at Deadline 3 that covers this point further.
SLD-183	Transport and Access	Impact on Equestrians	5.7.8. Likewise, equestrians are vulnerable to HGVs on narrow rural lanes. The Applicant provides no information relating to the locations of stables/liveries or any survey data focused on equestrian movements. The assessment is therefore cursory, deficient and dismissive of the possibility that these vulnerable highway users could be adversely affected by the proposals [42/§7.38].	Measures relating to bridleways and the management of impacts on existing users is set out in the Outline CTMP [REP1-112] and Outline PRoWPPMP [REP1-104] . The provision of new non-vehicular permissive paths on each of the Solar PV Sites. These permissive paths are shown on the Works Plan [REP1-005] as demarcated by Work No.10 . These routes will provide pedestrians and horse riders improved accessibility to the countryside and improved connectivity to the wider PROW network. These permissive paths are to remain open up to 365 days per year throughout the proposed 60-year operational lifetime of the Scheme. These permissive

				paths will provide a beneficial impact on PROW use for local users and visitors through mitigating adverse impacts on other PROW and providing alternative access routes to the use of the local highway network. These measures, when implemented, will enhance connectivity in the local area; A technical response note to Appendix D will be submitted at Deadline 3 that covers this point further.
SLD-184	Transport and Access	Impact on Villages	5.8.1. The Report identifies a number of villages that are directly affected by the proposed construction traffic routes: 5.8.1.1. Hullavington [44/§§8.2-8.4]: Although construction traffic is not proposed to passthrough the village, the road to the east of Hullavington is predicted, on the basis of the applicant's calculations, to experience a 56% increase in HGV movements and Bradfield Cottages to experience a 143% increase in HGV movements. The road should properly be described as high sensitivity and therefore there	The development of construction routes for the Scheme includes the consideration of the following transport factors: • Severance of communities; • Road 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 load.

			would be a major adverse impact on the road.	In practical terms, this meant that the Applicant avoided selecting construction routes which had all, or, some of the following characteristics: • Extensive limited forward visibility; • Accident Hotspots; • Schools; • Village/Residential Centres; • Extensive lengths of single lane carriageway; • The requirement for extensive highway mitigation and engineering works; • The requirement for extensive vegetation removal; and • Narrow or weak bridge structures. The HGV flows past Hullavington are forecast as 56 HGVs on the route to Lime Down D (west) and is an estimate of the deliveries on a peak day, so does not represent a daily average; Trip generation of 56 HGVs 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 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] and outside of peak hours.
SLD-185	Transport and Access	Impact on Villages	5.8.1.2. Acton Turville [44/§§8.5-8.8]: The B4039 through Acton Turville falls within the CNL. Properly considered it should be considered high sensitivity as a consequence of its impacts on tranquillity. The revised	A technical response note to Appendix D will be submitted at Deadline 3 that covers this point further.

			assessment of HGV trip generation indicates a substantial magnitude of impact. As a consequence, there would be a major adverse impact on the B4039.	
SLD-186	Transport and Access	Impact on Villages	5.8.1.3. Burton [45/§§8.9-8.12]: The B4039 separates the majority of the village from the farm shop and the residential development on the northern side of the road. It has a high sensitivity with regard to sensitivity within the CNL. The revised assessment of HGV trip generation indicates a substantial magnitude of impact. As a consequence, there would be a major/moderate adverse impact in relation to severance and a major/adverse impact in relation to tranquillity on the B4039.	A technical response note to Appendix D will be submitted at Deadline 3 that covers this point further.
SLD-187	Transport and Access	Impact on Villages	5.8.1.4. Grittleton [46-47/§§8.13-8.17]: The Applicant identifies Grittleton as having high sensitivity due to its conservation area. As explained above, the route through Grittleton is likely to receive far more than average given the number of access points provided to a compound. The Report predicts a magnitude of impact of medium and the	A technical response note to Appendix D will be submitted at Deadline 3 that covers this point further.

			significant of the impact major/moderate adverse. As a consequence, it is likely that there would be a significant adverse effect on the highly sensitive village of Grittleton.	
SLD-188	Transport and Access	Impact on Cotswolds National Landscape - Policy	CNL Policy 5.9.1. Policy CE5 (Tranquillity) of the Cotswolds National Landscape Management Plan 2025- 2030 states: “CE5.1. Proposals that have the potential to impact on the tranquillity of the Cotswolds National Landscape (CNL) should be delivered in a way that is compatible with and seek to further the conservation and enhancement of this tranquillity, by seeking to avoid and where avoiding is not possible, minimise noise and other aural and visual disturbance. CE5.2. Measures should be taken to remove and where removal is not possible, minimise existing sources of noise and other aural and visual disturbance in order to enhance the tranquillity of the CNL. CE5.3. Proposals that have the potential to impact on the tranquillity of the CNL should have	Only two possible alternative routes exist to these sites that avoid the CNL and they are via Farleaze and via Norton, they are both unsuitable as they include single track narrow roads for long sections with limited visibility and were therefore ruled out. This is detailed in the Construction Routes in the Cotswold National Landscape Technical Note [REP1-131] at Deadline 1. A Technical Note on Tranquillity [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

			regard to – and be compatible with – the CNL Board's Tranquillity Position Statement"	of the Environmental Statement (ES) for the Scheme.
SLD-189	Transport and Access	Impact on Cotswolds National Landscape - Policy	5.9.2. The Cotswolds Conservation Board (CCB) Position Statement on Tranquillity identifies the threshold, above which increases in traffic have the potential to lead to significant environmental effects (CCB Position Statement on Tranquillity, p.13): "The Board recommends that where a development is likely to increase traffic flows – or increase the number of heavy goods vehicles – by 10% or more, this should be considered significant."	Only two possible alternative routes exist to these sites that avoid the CNL and they are via Farleaze and via Norton, they are both unsuitable as they include single track narrow roads for long sections with limited visibility and were therefore ruled out. This is detailed in the Construction Routes in the Cotswold National Landscape Technical Note [REP1-131] at Deadline 1. A Technical Note on Tranquillity [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 Environmental Statement (ES) for the Scheme.
SLD-190	Transport and Access	Impact on Cotswolds National Landscape - Policy	5.9.3. The Tranquillity Position Statement goes on to identify vehicles as directly related to tranquillity in its Over-Arching Recommendations: “All relevant stakeholders should ensure that activities and proposals that affect or have the potential to impact on - the tranquillity of the Cotswolds AONB (p.2): [...] • give great weight to conserving and enhancing the tranquillity of the AONB; • assess potential impacts on tranquillity, particularly with regards to noise, vehicle movements, landscape [...]	Only two possible alternative routes exist to these sites that avoid the CNL and they are via Farleaze and via Norton, they are both unsuitable as they include single track narrow roads for long sections with limited visibility and were therefore ruled out. This is detailed in the Construction Routes in the Cotswold National Landscape Technical Note [REP1-131] at Deadline 1. A Technical Note on Tranquillity [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.

SLD-191	Transport and Access	Likely Impacts on CNL	5.9.4. There is a strong case for categorising the CNL as having high sensitivity to changes in traffic flows in relation to tranquillity and that increases in traffic flows above 10% have the potential to lead to unacceptable harm [49-50/§§10.5-10.8]. The Applicant's own calculations demonstrate cumulative impacts far in excess of the 10% threshold identified by the CCB and ISEP. The revised estimate of trip generation described above identifies an increase of 243% [50/§10.8-10.9].	As set out in Section 6.6 of the ES Chapter 6: Environmental Impact Assessment Methodology [APP-058], route selection evolved in accordance with the mitigation hierarchy. The mitigation hierarchy is a sequential approach that firstly seeks to avoid or prevent an adverse effect at source and if the effect is unavoidable, the provision of mitigation measures to reduce the significance of the effect, and lastly if the effect cannot be avoided or reduced, the implementation of measures to offset the effect. Avoidance in the context of the location and routing of construction routes for the Scheme include: • the avoidance of sensitive receptors and locations; and, • alternative construction routes outside of the Cotswold National Landscape. The development of construction routes for the Scheme includes the consideration of the following

				transport factors taken from Paragraph 1.31 of Institute of Environmental Management and Assessment (IEMA) (now called the Institute for Sustainability and Environmental Professionals (ISEP)) transport and access guidelines. The factors include: • Severance of communities; • Road 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 load. In practical terms, this meant that the Applicant avoided selecting construction routes which had all, or, some of the following characteristics: • Extensive limited forward visibility; • Accident Hotspots; • Schools; • Village/Residential Centres;

				• Extensive lengths of single lane carriageway; • The requirement for extensive highway mitigation and engineering works; • The requirement for extensive vegetation removal; and • Narrow or weak bridge structures. Only two possible alternative routes exist to these sites that avoid the CNL and they are via Farleaze and via Norton, they are both unsuitable as they include single track narrow roads for long sections with limited visibility and were therefore ruled out. This is detailed in the Construction Routes in the Cotswold National Landscape Technical Note [REP1-131] at Deadline 1. In regard to the CNL, we assigned the CNL receptor as medium sensitivity when it is related to the highway environment. Wiltshire County Council agreed to this assignation shown in its Relevant Representation RR-4934.

				The agreement of the proposed construction routes with Wiltshire Council is confirmed in Appendix A of their Relevant Representation submitted to the Planning Inspectorate in January 2026 [RR-4934] at paragraph 16: They state “Plate 4-3 shows the various construction routes considered for access to Lime Down Sites A-C. It is agreed that the route to / from the M4 via the A46, B4040, B4039 and Fosse Way is the best of the alternatives considered.” A Technical Note on Tranquillity [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 Environmental Statement (ES) for the Scheme.

SLD-192	Transport and Access	Likely Impacts on CNL	5.9.5. Both the Transport Chapter and the Landscape and Visual Chapter of the ES fail to assess the impacts of construction traffic on tranquillity within the CNL [51/§10.14]. The applicant has submitted a Tranquillity Technical Note (March 2026) (PDA-010). This reiterates the information concerning the applicant's assessment of transport environmental impacts within the CNL and provides no additional information relating to the impact of construction traffic on tranquillity.	Roads within the CNL are considered to be of a medium sensitivity in accordance with ISEP Para 1.31. Wiltshire County Council agreed to this assignment shown in its Relevant Representation RR-4934. The agreement of the proposed construction routes with Wiltshire Council is confirmed in Appendix A of their Relevant Representation submitted to the Planning Inspectorate in January 2026 [RR-4934] at paragraph 16: They state "Plate 4-3 shows the various construction routes considered for access to Lime Down Sites A-C. It is agreed that the route to / from the M4 via the A46, B4040, B4039 and Fosse Way is the best of the alternatives considered." A Technical Note on Tranquillity [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.
SLD-193	Transport and Access	Likely Impacts on CNL	5.9.6. The report concludes that the Applicant has failed to assess the adverse impacts of construction traffic on the CNL and, given the high magnitude of the increases in HGV flows and the area's high sensitivity, there is no doubt that construction traffic will have a major adverse impact on the CNL in relation to tranquillity.	The impact on the CNL is summarised in the Tranquillity Technical Note [Ref EXAM/9.2] Table 4-1 submitted at Deadline A and in ES Volume 1, Chapter 13: Transport and Access [REP1-019] A Technical Note on Tranquillity [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 Environmental Statement (ES) for the Scheme.
SLD-194	Transport and Access	Conclusion	5.10.1. Overall, SLD submits that there is strong evidence to suggest that the proposed development would have an unacceptable impact on highway safety – both through the impact	ES Volume 1, Chapter 13: Transport and Access [REP1-019] conclude that the effects on the construction route links within the CNL are negligible to minor and the transport impacts of the scheme

			on vulnerable highway users and inadequate safety arrangements at site access junctions.	will be temporary and managed by mitigation measures set out in the Outline CTMP [REP1-112] . These mitigation measures include restrictions on delivery times 09:30 and 16:30 and a booking system to limit the potential for construction vehicles meeting on minor roads and road conditions survey before and after construction to repair any damage caused by construction vehicles.
SLD-195	Transport and Access	Conclusion	5.10.2. It is also evident that the Applicant's assessments of transport impact do not assess a reasonable worst case and fail to assess the effects of construction traffic on the tranquillity of the National Landscape and the high magnitude of impact in this area. In transport environmental terms, construction traffic is also likely to have significant adverse impacts on the settlements including Hullavington, Acton Turville, Burton and Grittleton. A summary of the transport environmental effects is provided at [54/§12.1] Table 6.	The applicant's assessment includes worst case assumptions such as; • a 50% uplift on construction trip numbers; • assuming a peak day occurs everyday of the two year construction period; • assumes all sites are constructed concurrently, when in reality the construction programme will look more like that submitted in the ES Volume 1, Chapter 13: Transport and Access [REP1-019] where some sites start or finish at different times in the phase;

				• assumes all cable access junctions will be in operation concurrently when it is likely that over the whole route only four will be operational at any one time; • assumes all cable access junctions will be in operation for the full duration of the 2-year construction period when actually they are likely to be in operation for 90 days over the two-year construction period. • assumes a peak worker trip occurs every day of the construction period and all sites are built out concurrently for the two-year construction period; • assumes that all access track will be constructed with aggregate even though some will be grass tracks between panels for example. • Assumed standard containers for the solar modules instead of high cube containers which carry more modules; • Includes an allowance for HGV's taking spoil of site,

				even though it is planned that spoil will stay on site; Once the Final CTMP is produced the final construction numbers will be known. At this point a check will be done to see if any of these numbers exceed the AADT's included on the links in the ES assessment. If it is exceeded then and a further ES assessment will be required.
SLD-196	Other Environmental Matters – Glint and Glare	Introduction	6.1.1. An important feature of this Scheme is the proposed use of large 4.5m tracking panels. Such panels are a particular concern for the local community for many reasons, including the adverse landscape and visual effects, but also the risk of glint and glare causing harm to the safety of local roads, and local amenity. This is an important issue given the size and extent of the panels, and SLD has significant concerns about the yellow glare that this Scheme will produce.	Glint and glare from tracking panels has been assessed within ES Volume 3, Appendix 20-4: Solar Photovoltaic Glint and Glare Assessment [APP-261] and no significant impacts have been identified. Intensity of reflections and 'yellow' glare is typically only a consideration for aviation receptors and there are more relevant metrics for the assessment of dwellings and roads, including duration of glare and field of view respectively.
SLD-197	Other Environmental Matters – Glint and Glare	Introduction	6.1.2. On behalf of SLD, a glint and glare report has been produced by Straten Consulting Services Ltd (Appendix G). Where references are made to pages or	Noted.

			paragraphs, they are to that report unless otherwise stated. It should be noted that the impacts of glint and glare in particular contexts (e.g. in LVIA or traffic assessment) is dealt with in the requisite section.	
SLD-198	Other Environmental Matters – Glint and Glare	Policy	6.2.1. Save for a brief section on glare in the context of pilots and air traffic control (para 5.5.55), NPS EN-1 does not have a particular topic area on glint and glare effects. The matter is instead the focus of detailed policy in NPS EN-1 specifically in the context of solar generation.	Noted. The Applicant assumes that the second mention of EN-1 should state EN-3.
SLD-199	Other Environmental Matters – Glint and Glare	Policy	6.2.2. Glint and glare is identified as one of the “two main impact issues that determine distances to sensitive receptors” in EN-3 (para 2.10.27). While the policy recognises that solar panels are specifically designed to absorb, not reflect light, glint and glare is still possible as a result of the sun’s rays hitting panels at certain angles (para 2.10.102). Applicants are required to map receptors and identify the potential for such effects (para 2.10.104). In doing so, applicant should assess the	Noted. The Applicant has complied with this policy in the preparation of ES Volume 3, Appendix 20-4: Solar Photovoltaic Glint and Glare Assessment [APP-261] . The Glint and Glare assessment has assessed road, dwelling, railway, and aviation receptors, as well as sensitive viewpoints. The assessment provides an assessment of these receptors and the potential impact towards them.

			geometric possibility of glint and glare affecting nearby receptors, and provide an assessment of potential impact and impairment based on angle and duration of incidence and the intensity of reflection (para 2.10.104).	
SLD-200	Other Environmental Matters – Glint and Glare	Policy	6.2.3. Importantly, NPS EN-3 notes that glint and glare will depend on specific project design, and that “This may need to account for ‘tracking’ panels if they are proposed as these can cause differential diurnal and/or seasonal impacts” (para 2.10.105).	Noted. Both fixed south facing and single axis tracking panel configurations have been modelled and assessed separately within the ES Volume 3, Appendix 20-4: Solar Photovoltaic Glint and Glare Assessment [APP-261] .
SLD-201	Other Environmental Matters – Glint and Glare	Policy	6.2.4. Various mitigations are detailed at para 2.10-134-2.10.136 including anti-glare/anti-reflective coatings and controlling angles of maximum reflection, use of screening, and control of alignments.	Noted.
SLD-202	Other Environmental Matters – Glint and Glare	Policy	6.2.5. As to impacts, the SoS is directed to “assess the potential impact of glint and glare on nearby homes, motorists, public rights of way, and aviation infrastructure (including aircraft departure and arrival flight paths) (para 2.10.158). It is then explained that it is unlikely that the SoS “is unlikely to	Noted.

			give any more than limited weight to claims of aviation interference because of glint and glare" (para 2.10.159).	
SLD-203	Other Environmental Matters – Glint and Glare	Assessment tools and parameters	6.3.1. The report begins by setting out the various technical assessment tools and parameters at [4/1.2]. It also sets out the definition of "Green" glare with a "low potential for temporary after-image. Glare exists within the receptor's field of view but is assessed by the Sandia model as unlikely to produce a lasting visual effect"; and, "Yellow" glare with a "potential for temporary after-image. This is the more significant intensity classification, indicating that the reflected irradiance is sufficient to produce a temporary visual impairment lasting beyond the period of direct exposure" [4/1.3].	The Applicant agrees with these definitions from the Sandia method.
SLD-204	Other Environmental Matters – Glint and Glare	PV array configuration and scale	6.4.1. The report notes that the size of the Scheme means that it is inappropriate to assess glare impacts from individual array zones. Rather, each aviation, road and rail receptor is exposed to glare from multiple arrays simultaneously or sequentially	The Applicant agrees that potential reflections from different panel areas can vary, and therefore, when predicting the impact on a given receptor, it is important to capture effects from all areas, which is part of the methodology employed by Pager Power on this assessment.

			each day [5/2.2(a)]. Then report also notes that (for array D1-2 for example) a panel array of 145 hectares subtends a far wider arc of azimuth and elevation from a given receptor than a small installation. This means that the window of time during which the sun's angle can produce specular reflection into the receptor's field of view is "considerably extended". Ultimately, academic evidence supports the principle that cumulative photovoltaic glare is a function of panel area, ground reflective power geometry and receptor sensitivity [6/2.2(b)].	The software utilised for aviation receptor intensity calculations cannot combine different panel areas which are not adjacent to each other due to the methodology used for intensity calculations. However, the geometric modelling has considered results from all of the arrays together when considering field of view and glare duration and for aviation receptors the effect of multiple reflecting areas has been considered qualitatively.
SLD-205	Other Environmental Matters – Glint and Glare	ForgeSolar results	6.5.1. The report identifies an aggregate yellow glare from the scheme of 395,315 minutes (equivalent to 6,589 hours) across all arrays and receptors, which is highly significant [6/3.1]. This is not a seasonal anomaly, with Arrays C, D1-2 and D3 exhibiting persistent glare for the entire year. This is a structural characteristic of the development geometry relative to local receptor positions. This is a permanent operative burden [7/3.2].	The Applicant considers that aggregate yellow glare is not a relevant metric for assessing glint and glare impacts. Under Pager Power's methodology, intensity of glare is only a consideration for aviation receptors, and there are better metrics which should be used to assess other receptor types. Aggregate glare times are largely a result of the number of receptors (this does not consider any overlap in glare times, so two neighbouring

				receptors would have approximately twice the aggregate glare time compared to a single receptor in the same location). In addition, the Forge Solar model used to generate these figures does not consider any existing or proposed screening, including terrain and vegetation and thus will greatly overstate the durations when glare could be experienced in practice.
SLD-206	Other Environmental Matters – Glint and Glare	Aviation receptor results	6.6.1. The report agrees with the review of Bowldown Farm Airfield, Charlton Park Airfield, and Langley House Airfield. However, the report suggests scrutiny should be applied to the question of whether the currently unused airfield at Hullavington should be assessed given the length of life of the Scheme. While Langley House identified no glare, Bowldown Farm Airfield received 12,704 minutes of green glare and Charlton Park Airfield 13,340 minutes [7/4.2-4.4]. While yellow glare was expected (as is consistent with tracking panels), the green glare figures were considered a material cumulative effect [9/4.5].	Hullavington Airfield has been closed since 2016, with no indications that there are plans for the airfield to reopen. Glint and glare towards this airfield has been modelled for information only and if the airfield were to reopen in the future they could use this information to design safe operations. Under the Sandia method and former FAA guidance, there is no duration of green glare which is considered unacceptable from an aviation safety perspective, and the Applicant therefore does not consider this to be a material cumulative effect.

SLD-207	Other Environmental Matters – Glint and Glare	Road and rail receptors	6.7.1. Turning to road and rail receptors, two primary road routes were reviewed by the Applicant along with the A429. The Report identifies that, for road 1 and 2, there is respectively 47,246 and 47,498 minutes of yellow glare. The former is the equivalent of 787 hours in the year. These figures indicate sustained intense photovoltaic reflection episodes towards road users throughout the operational life of the scheme [10/5.1].	Intensity of glare towards road receptors is not a relevant consideration under Pager Power's Glint and Glare Guidance (Fourth Edition). Instead, reference is made to a driver's primary field-of-view to determine whether a driver is likely to be looking in the direction of solar reflections. By the time panels are installed on site, it is judged that no solar reflections will be visible from inside a driver's primary field-of-view and therefore no significant impact is predicted.
SLD-208	Other Environmental Matters – Glint and Glare	Road and rail receptors	6.7.2. As to rail receptors, two rail receptors experience yellow glare at 26,868 minutes (rail 2) and 11,834 minutes (rail 3) respectively. The former is the equivalent of 448 hours a year. Again, these figures represent persistent, operationally significant photovoltaic glare in the field of view of train drivers (a safety-critical receptor category) [11/5.2].	As with road receptors, the assessment metric for impacts upon railway operations is whether solar reflections are possible within the train driver's primary field-of-view. No significant effects are predicted in line with this methodology.
SLD-209	Other Environmental Matters – Glint and Glare	Comparative review with Pager Power Report	6.8.1. The report notes that the Applicant's report does not produce the ForgeSolar outputs. This should be done as it allows for consideration of the underlying evidence, and also will provide	The Applicant has used two different models for this assessment, and has provided relevant examples of both in Annex H of ES Volume 3, Appendix 20-4: Solar Photovoltaic Glint and Glare Assessment [APP-261] . For

			quantification of duration, monthly distribution or annual cumulative minutes of predicted glare. Such an omission currently is fundamental as it means that there is no way to understand how significance conclusions have been reached. Given Straten CSL's conclusions, this is even more pressing [11/6.2].	receptors where intensity is not a key consideration (i.e. all other than aviation) only Pager Power's internal model has been utilised. The Applicant will provide the modelling output data for Stop Lime Down to consider at Deadline 3.
SLD-210	Other Environmental Matters – Glint and Glare	Comparative review with Pager Power Report	6.8.2. It is also noted that Pager Power has not modelled local roads where "traffic densities are likely to be relatively low". This is not accepted as an approach, and appears inconsistent with Pager Powers own concerns that "reflections experienced towards a road network whereby the resultant impacts of solar reflections can be much more serious to safety" [11/6.2].	Local roads are considered to be less susceptible to glint and glare impacts because of lower traffic densities reducing the potential for glint and glare to lead to road traffic collisions. Glint and glare within a driver's primary field-of-view can lead to momentary distraction which is unlikely to be significant alone but in combination with other distractions or high-stress scenarios can be one factor in increased risk. This is far more likely and significant on a busy road network than on local roads.
SLD-211	Other Environmental Matters – Glint and Glare	Comparative review with Pager Power Report	6.8.3. The report notes that Pager Power apply a proprietary framework for assessing significance. However, a key deficiency with this is no qualitative thresholds are applied to define boundaries. There is only the	Quantitative thresholds are utilised for all receptor types, with the metrics varying according to the receptor. The metrics and their thresholds are outlined below: • Dwellings – duration of effects ○ 3 months per year

			exercise of judgment without proper engagement or clarity on the underlying evidence base. As already identified above, this has led (for example) to the discounting of local roads notwithstanding density of traffic is not the key consideration. The key consideration is intensity of glare. This is an inappropriate approach to balancing probability against severity. As a result of this approach, the Applicant's figures cannot be understood or independently verified [12/6.3].	○ 60 minutes on any given day. • Road – field of view ○ Primary field-of-view is 50° either side of the direction of travel • Railway – field of view ○ Primary field-of-view is 30° either side of the direction of travel • Aviation – intensity ○ 'Yellow' or 'Green' glare, in accordance with the Sandia methodology (which sets out quantitative thresholds depending on retinal irradiance and subtended source angle)
SLD-212	Other Environmental Matters – Glint and Glare	Comparative review with Pager Power Report	6.8.4. A specific concern is identified in respect of Badminton Airfield. It is noted that there is no quantification of glare provided, a rationale based on "low sun angle" is insufficiently explained, there is an absence again of comparison graphs or impact scales, and the operational context of Badminton is misunderstood. Indeed, Pager Power appear to consider the	The Applicant has not used the absence of an ATC tower to inform the traffic volumes at the airfield and this is not a factor in Pager Power's methodology. The airfield is unlicensed and operates with general aviation (GA) traffic and therefore the receptors used are the 1-mile splayed approach with visual circuits which

			airfield operating without air traffic control as a basis for concluding that traffic volumes are low. Whether or not that is the case, absence of ATC means that risks are higher as pilots must rely on visual observation; yellow glare risk at such airfields is more, not less, operationally significant [13/6.4].	was developed by Pager Power in consultation with GA airfields. Low sun angle is a significant factor as if a pilot would have to look towards the sun in order to see a reflection, the reflection is clearly less significant than direct sunlight in its potential for pilot distraction. It also means that pilots are more likely to expect bright light and be equipped with sunglasses or other equipment which reduces risk of pilot distraction or temporary after-image.
SLD-213	Other Environmental Matters – Glint and Glare	Recommendations	6.9.1. The Report makes a number of recommendations to carry forward in the Examination. The Report recommends the disclosure of the Pager Power ForgeSolar outputs, the provision of qualitative impact thresholds for the significance matrix, independent review of the assessments for Badminton Airfield and Bowdown Airfield, a requirement in the Applicant to address cumulative impacts of the Scheme's 563 hectare panel footprint rather than treating array zones discretely, and to consider whether the Rail 2 and Rail 3	The Applicant has provided details of the qualitative thresholds in a response above and they are present in Annex D of the ES Volume 3, Appendix 20-4: Solar Photovoltaic Glint and Glare Assessment [APP-261]. Solar panel areas have not been considered in isolation other than where required for intensity calculations which cannot be summed across multiple areas. The Applicant considers that the ES Volume 3, Appendix 20-4: Glint and Glare Assessment [APP-261] has adequately assessed all receptors in line with a methodology which is

			effects have been sufficiently assessed in the context of train driver safety [15/7.2].	robust and has been accepted for many other DCO applications.
SLD-214	Other Environmental Matters – Glint and Glare	Conclusion	6.10.1. Glint and glare is an important issue in this Examination due to the large panel sizes used (4.5 meters). SLD consider there are serious amenity and (more importantly) safety concerns arising out of its review of the glint and glare issue, posing a serious risk to roads and also harm to amenity. That risk on the road is not limited to cars, and would extend to cyclists and horse riders. It is key that data addressing the glint and glare effects be provided so that there can be a proper assessment of environmental effects (and query whether what has been provided is sufficient for the EIA Regulations). The Applicant clearly has taken an approach which understates the effects of glint and glare and there must be a full analysis of the underlying data. In the absence of this, the glare identified is a serious safety concern.	The Applicant agrees that Glint and Glare is an important issue and has considered it throughout the project design iteration in order to ensure that there are no significant residual effects predicted for glint and glare. Road safety and residential amenity have been considered within the ES Volume 3, Appendix 20-4: Solar Photovoltaic Glint and Glare Assessment [APP-261] and sufficient information has been provided as part of the environmental statement.
SLD-215	Noise and Vibration	Introduction	7.1.1. The Scheme is proposed in an area notable for its tranquillity.	While the Applicant appreciates the tranquillity of the area, the operational

			Not only is this a special purpose of the Cotswolds National Landscape, but by its own assessment the Applicant has applied a noise floor to background levels for the entire site as it considered them very low. The tranquillity and quietness of this area is especially valued by locals and visitors alike, and provides the setting for various recreational uses (including walking and horse-riding) and for heritage assets. The Scheme will represent a remarkable intrusion into that tranquillity, bringing an incongruous electrical buzz which permeates villages, dwellings and recreation spaces. Even when the Scheme cannot be seen, those locally will be able to hear it. This is even true at night nearby to the BESS (with the Grade 1 listed Bradfield Manor bearing the auditory brunt of that aspect of the development). The noise profile of the Scheme is entirely inappropriate for this location and will contribute to the wholesale shift from a rural to an industrial landscape.	noise levels from the Scheme, as provided in Table 8 and Table 9 of ES Volume 3, Appendix 14-4 Noise Modelling [REP1-061] and displayed in ES Volume 2, Figure 14-2 Daytime Operational Noise Contours [APP-160] and Figure 14-3 Night-time Operational Noise Contours [APP-161], are considered congruous with the existing background sound level. The Scheme will be audible at certain times and in certain places but absolute levels in permanent noise sensitive locations are expected to be low. The Outline OEMP [REP1-098] commits to noise levels from the Scheme at residential dwellings being the same as or below those modelled in the ES. The preparation, approval and implementation of the detailed OEMP, substantially in accordance with the outline plan, are secured through Requirement 14 of Schedule 2 of the Draft Development Consent Order [REP1-007], ensuring operational noise is appropriately controlled throughout the lifetime of the Scheme.

SLD-216	Noise and Vibration	Introduction	7.1.2. Ian MacArthur of Clarke Saunders Associates Ltd has been instructed by SLD to provide specialist expert advice in respect of the Scheme in the fields of acoustics, noise, and vibration control. His report (Appendix H) presents the findings of his assessment of the likely significant effects on noise and vibration as a result of the Scheme. References to the "Report" should be interpreted as the report of Ian MacArthur, unless the reference is otherwise specified.	The Applicant notes this comment and has reviewed said report.
SLD-217	Noise and Vibration	Policy	7.2.1. NPS EN-1 recognises the well-known fact that excess noise "can have wide-ranging impacts on the quality of human life and health such as annoyance, sleep disturbance, cardiovascular disease and mental ill-health". It also recognises the impact on "enjoyment of areas of value such as quiet places and areas with high landscape policy" (para 5.12.1).	The Applicant notes this comment. An overview of how the application complies with national policy, including NPS EN-1, is provided in Table 1 of ES Volume 3, Appendix 14-1 Noise and Vibration Legislation Policy and Guidance [APP-234] .
SLD-218	Noise and Vibration	Policy	7.2.2. The policy directs that an applicant must conduct a noise assessment and, among other things, identify noise-sensitive receptors (para 5.12.6). Applicants	The Applicant notes this comment. An overview of how the application complies with national policy, including NPS EN-1, is provided in Table 1 of ES Volume 3, Appendix

			are required to submit a “detailed impact assessment and mitigation plan” (para 5.12.12). Likewise, the SoS is directed to consider what mitigation measures are required for noise in the operational and construction phases, and may impose mitigation measures (para 5.12.13). The development consent order may itself include specific measurable requirements or mitigation measures for noise to ensure they do not exceed specific limits (para 5.12.18).	14-1 Noise and Vibration Legislation Policy and Guidance [APP-234] . Although this appendix does not reference paragraph 5.12.18 explicitly, the Applicant notes the accurate description of its content in the response.
SLD-219	Noise and Vibration	Policy	7.2.3. One important mitigation measure is layout, by which distance from source and sensitive receptors and using natural and purpose-built barriers can reduce effects (para 5.12.14).	The Applicant notes this comment and highlights the commitment in the Outline OEMP [REP1-098] to site BESS and sub-stations a minimum of 450m and 400m respectively from noise sensitive receptors.
SLD-220	Noise and Vibration	Policy	7.2.4. The key test and policy is derived from the Noise Policy Statement for England. This is explained in the NPS at para 5.12.17 which describes that development consent not be granted unless the SoS is satisfied that the proposal “will meet the following aims, through the effective management and control of noise”. These are (a) “avoid	The Applicant notes this comment. An overview of how the application complies with these aims, is provided in Table 1 of ES Volume 3, Appendix 14-1 Noise and Vibration Legislation Policy and Guidance [APP-234] .

			significant adverse impacts on health and quality of life from noise", typically characterised as a requirement to avoid noise which surpasses SOAEL (the significant observable adverse effect level); (b) "mitigate and minimise other adverse impacts on health and quality of life from noise", typically characterised as a requirement to mitigate noise which is at or surpasses the LOAEL (the lowest observable adverse effect level); and, (c) "where possible, contribute to improvements to health and quality of life through the effective management and control of noise".	
SLD-221	Noise and Vibration	Policy	7.2.5. The policy on PRowS is set out under landscape above. However, it is relevant to look back to the requirement in para 2.10.42 of NPS EN-3 which directs that applicants "are encouraged to design the layout... of the site to ensure continued recreational use of public rights of way where possible... in particular during the operation of the site".	The Applicant notes and accepts this comment, albeit that the relevant paragraph is 2.10.34 in the current version of NPS EN-3.
SLD-222	Noise and Vibration	Construction effects	7.3.1. The report begins by noting that in the construction period there will be effects both above	Avoidance of the drilling itself is not secured, as it is necessary, however Table 8 of the Outline CEMP [REP1-

			Lowest Observable Adverse Effect Level ("LOAEL") and above Significant Observable Adverse Effect Level ("SOAEL"). This includes night-time horizontal directional drilling which has the potential to produce significant effects on a number of sensitive receptors. While transient, there are no requirements of avoidance and mitigation in the Outline CEMP, and avoidance of such drilling is not secured [3/§3.2].	096] does commit to temporary acoustics hoarding if drilling is required at night such that significant adverse noise effects are avoided.
SLD-223	Noise and Vibration	Assessment methodology – policy and basis	7.4.1. Beginning from the requirements of para 5.12.17 and the Noise Policy Statement for England, the report identifies that the Applicant's approach is inconsistent with the policy framework. It is clear that the Applicant only seeks compliance with SOAEL, rather than avoiding significant effect and minimising LOAEL effects. This is a key defect in how the Applicant has approached the noise effects of the Scheme [5/§4.6].	The Applicant's approach is not inconsistent with the policy framework. It seeks to meet all three aims of the NPSE within the context of sustainable development. If compliance with SOAEL were the only goal, then there would not be a suite of mitigation measures committed to in Table 8 of the Outline CEMP [REP1-096] despite no SOAEL exceedances (night-time HDD excepted) and there would not be 17 receptors during the day and 29 at night below the LOAEL for operational noise (Table 14-23 of ES Volume 1, Chapter 14 Noise and Vibration [REP1-021]).

				A key tenet of national policy, overlooked in the SLD response, is the requirement for mitigation to be within the context of Government policy on sustainable development. The NPSE states that “There is a need to integrate consideration of the economic and social benefit of the activity or policy under examination with proper consideration of the adverse environmental effects...”. With respect to Lime Down Solar Park, not only is there a clear economic and social benefit as summarised in the Statement of Need (Rev 2) [REP1-085], but there is also a commitment to low levels of noise in Table 8 of the Outline OEMP [REP1-098] which, with reference to Section 14.9 of ES Volume 1 Chapter 14 Noise and Vibration [REP1- 021], would likely require a not inconsiderable amount of mitigation. It is the Applicant's position that further mitigation would not be within the context of Government policy on sustainable development, as it would put undue financial and engineering constraints on the Scheme for the sake of diminishing returns in

				providing marginal reductions to already low levels of operational noise.
SLD-224	Noise and Vibration	Quantification and description of background noise	7.5.1. The Applicant's approach to background noise is flawed in a number of key respects. To analyse this two monitoring locations are presented in the report (LT8 and LT12), albeit the inconsistencies identified apply across the entire scheme [7/§5.3].	With the exception of the exclusion of some data due to adverse weather conditions, which does not have a material impact on the assessment, the Applicant stands by its approach to background noise as robust and appropriate.
SLD-225	Noise and Vibration	Quantification and description of background noise	7.5.2. Reviewing the background noise measurements at LT8, the Applicant picked a daytime LA90 figure of 36dBLA90 and a night time figure of 29dBLA90 to represent the 'typical' background. That is the case notwithstanding that, in the daytime, the background noise level is below that figure more than 50% of the time, and can fall up to 11dB below. While it may not always be appropriate to apply a precautionary approach and take the lowest figure, the approach of the Applicant is not robust. Rather, a figure in the lower range should be adopted to properly reflect the background, and the report suggests a figure in the range 23-	The selection of the typical value is not always based solely on the modal; it involves the acoustic consultant's judgment, as stated in BS4142:2014, "<i>the objective is not simply to ascertain a lowest measured background sound level, but rather to quantify what is typical during particular time periods</i>" and "<i>A representative level should account for the range of background sound levels and should not automatically be assumed to be either the minimum or modal value.</i>" Within the reported representative background sound levels, the value is often the modal value as shown in the histograms in ES Volume 3, Appendix 14-3 Baseline Noise

			25 dBLA90 at night and 30dBLA90 in the daytime [8/§5.9]. This is consistent with the applicable British Standard and guidance and the proper approach to assessing uncertain figures [9/§5.11]. It is hard to understand how the Applicant's figure represents what is 'typical'; rather, its approach disregards the majority of data.	Survey [APP-236]. The reported values are sometimes higher or lower than the modal, and these have been determined based on professional judgement, and the spread of values within the histograms. All presented values are deemed representative of the measured LA90 levels for the specified measurement periods and are established in accordance with the guidance provided in BS4142:2014. In terms of the typical LA90 for LT8, it is not clear how the 'Report' has determined 30 dB to be appropriate based on Plate 37 in ES Volume 3, Appendix 14-3 Baseline Noise Survey [APP-236].
SLD-226	Noise and Vibration	Quantification and description of background noise	7.5.3. The Applicant has accepted that data included in the range for LT8 from 28 October 2023 was affected by significant rainfall and considers it should be excluded ([PDA-009] SLD-099). However, it then suggests that it makes no difference to the figures picked. The report disagrees; given the figure is already above the mean, median and mode, that the some of the higher data for background	The LT8 data has been re-evaluated, removing the data from 18:00 on 28th October 2023 to 00:30 on 29th October 2023 due to rain. The modal LA90 remains at 36 dB during the daytime, which can be considered typical. However, the 50th percentile LA90 is determined to be 34 dB during the daytime, which could also be considered typical. However, even if 34 dB was used in the operational noise assessment, all effects at the

			noise should also be excluded indicates that the proper background noise figure should be further lowered. It is noted that the Applicant does not explain its professional judgment in coming to this conclusion [9/§5.15-5.16]. Rather, the exclusion of that date further justifies the report's conclusions [9/§5.17].	relevant receptors, R20 to R25 would remain between LOAEL and SOAEL.
SLD-227	Noise and Vibration	Quantification and description of background noise	7.5.4. Reviewing the position for LT12, this is the monitoring location applicable to Bradfield Manor (at R10). As both a dwelling and a Grade I heritage asset, Bradfield Manor is particularly sensitive [9/§5.18]. Aside from concerns about the monitoring location being close to a road (and picking up vehicular traffic noise) [10/§5.20-5.21], it is apparent the figures for this location were affected by high winds. The British Standard emphasises that precautions should be taken in respect of such interference, and it is apparent that on days without wind the background noise was lower [11/§5.24-5.26].	As stated above for 7.5.2, the presented values are deemed representative of the measured LA90 levels for the specified measurement periods and are established in accordance with the guidance provided in BS4142:2014. Based on the information from local weather stations, with the weather data removed at times of wind speeds above 5 m/s, on the 13h October 2023, the typical LA90 for daytime and night-time does not change from previously stated. The weather at all other times during the survey was suitable.
SLD-228	Noise and Vibration	Quantification and description	7.5.5. It is apparent that the typical levels at this location fluctuate	The typical daytime LA90 at LT12 of 34 dB is the modal value, 54% of the

		of background noise	around 30dBLA90 in the daytime and 20dBLA90 at night [11/5.26]. However, the Applicant has instead adopted a 34dBLA90 figure for daytime and 30dBLA90 for nighttime. Again, this has the effect of excluding the bottom 50% of measurements in setting a 'typical' background noise [11/5.28]. This does not represent a typical day at Bradfield Manor with relatively low winds and no precipitation [11/5.29]. Currently, Bradfield Manor experiences very low background noise levels at day and night, characterised by an absence of industrial noise sources [12/5.30]. This analysis shows a persistent approach by the Applicant of setting inappropriately high background noise levels.	cumulative percentage of the LA90 data. Therefore, in accordance with BS4142 can be considered typical. The Report states that noise climate at Bradfield Manor is characterised by an absence of industrial noise. However, it is noted that the Manor is adjacent to the Flying Monk Café and Taproom, and approximately 100 m from a train line, and therefore there is an element of industrial and transportation within the existing sound environment.
SLD-229	Noise and Vibration	Public Rights of Way	7.6.1. As flagged above, the majority of monitoring locations were close to roads. For those which were not (e.g. LT3), there were low average LAeq levels ranging 35-45dBLAq,T during the daytime. This is indicative of ambient levels away from the	The Applicant notes and accepts this observation. Monitoring locations were largely designed to be reflective of residential receptors which are also typically close to local roads, and monitors could only be sited where land access permissions had been granted.

			transport network, which would be the majority of PRowS [12/5.31].	
SLD-230	Noise and Vibration	Public Rights of Way	7.6.2. The Applicant did not assess noise impacts on the PRow network on the basis of the transience of the usage. It was thought there would be no significant adverse effects on PRow users [12/5.32]. However, this disregards the national policy supporting the avoidance and mitigation of effects on PRowS (some of which is set out above) [12/5.33]. The Applicant appears to have confirmed a maximum of 52dBLAeq on PRowS. However, by reference to the ambient levels on such routes, and the natural sounds found on them, the development noise sources would be significantly above and incongruous with the current background noise. It would significantly reduce tranquillity and the enjoyment of the value of the area [12/5.36]. The report disagrees with the Applicant's reliance on a figure for moderate annoyance of 55dBLAeq, 16hr for "moderate annoyance" using 1999 WHO guidelines, and prefers the same guidelines "Outdoors in	As pointed out above, policy encourages that developments allow continued recreational use of PRow during operation. Even if accepting that moderate annoyance could occur above 50 dB LAeq this would only be the case for a very short period as users passed close to the conversion units. It is evident from the figure provided in the SLD technical appendix that for the majority of the PRowS levels would be below this threshold. It is the Applicant's position that this is not enough justification for classifying the noise effects on PRow as significant. A brief transient period of levels being no louder than regular conversation does not constitute a significant impact on health and quality of life, nor does it render the PRow unusable for recreational purposes. Similar reasoning and conclusions have been accepted in consented DCO applications for solar farms in quiet rural areas, such as Tillbridge Solar [S.I. 2026/487]. (https://nsip-documents.planninginspectorate.gov.

			parkland and conservation areas" which provides that "existing quiet outdoor areas should be preserved and the ratio of intruding noise to natural background should be kept low [12/5.37]. Ultimately, noise levels over 50dB LAeq would fall into the "moderate annoyance" category for WHO guidance; it is significantly above ambient [12/5.38]	uk/published-documents/EN010142-001560-Correction%20Order.pdf
SLD-231	Noise and Vibration	Public Rights of Way	7.6.3. The Report reviews the PRow map against the daytime operational noise contours and identifies in excess of 10 PRows likely to experience plant noise levels over 50dB LAeq [13/5.40]. It is also noted that a number of these routes are routes which would be used to access the Cotswolds National Landscape [13/5.41] (See also the interactive map at Appendix Z if the reader wishes to overlay PRow maps with the noise contours).	While the Applicant notes, and agrees with this comment, as stated above such levels would only be exceeded for a short stretch of these PRow. Even then they would not exceed 50 dB LAeq, which is below noise levels associated with regular conversation, by a large amount.
SLD-232	Noise and Vibration	Public Rights of Way	7.6.4. Put shortly, it is wrong to say that the noise produced by the Scheme would be "akin" to the existing conditions. It fails to recognise the existing tranquillity of the area [14/5.44].	While the Applicant accepts that the character of the noise from the Scheme is not akin to the existing environment, predicted levels have been corrected to account for the acoustic features of solar

				infrastructure. Even then, noise from the Scheme across the majority of the site is below existing ambient levels, which, with reference to ES Volume 3, Appendix 14-3 Baseline Noise Survey [APP-236] , tend to vary between 40 and 60 dB L _{Aeq} during the daytime. Therefore, in terms of ambient levels in the area, the statement that solar farm infrastructure noise levels are akin to existing ambient levels is fully justified.
SLD-233	Noise and Vibration	Operational noise impact	7.7.1 A key feature of the Applicant's approach is departing from the core British Standard to apply a background level floor of 30dBA90 [15/6.8]. This effectively decouples the measurement of background noise from the assessment where locations have a background level below this figure [15/6.9]. It is not accepted that the guidance accepts an approach which wholesale replaces background measurements with fixed absolute thresholds [15/6.10]. The effect of doing this is to artificially raise the baseline and therefore raise the LOAEL and SOAEL level (which is set against the baseline) [15/6.14].	The Applicant maintains that this is a perfectly reasonable interpretation of guidance in Section 11 of BS 4142 given it states that " <i>Where background sound levels and rating levels are low, absolute levels might be as, or more, relevant than the margin by which the rating level exceeds the background.</i> " For Lime Down Solar Park, this approach has been agreed with Wiltshire Council, as clarified in Table 14-2 of ES Volume 1, Chapter 14 Noise and Vibration [REP1-021] , and it also aligns with the approach accepted in other consented DCO solar farms.

				Furthermore, the setting of operational LOAEL and SOAEL for Lime Down Solar Park is actually more stringent than many consented schemes in similarly quiet areas, such as Tillbridge Solar [S.I. 2026/487] (which defined SOAEL as 10 dB above background down to a minimum rating level of 45 dB during the day and 40 dB at night) and Cottam [S.I. 2024/0000] (https://nsip-documents.planninginspectorate.gov.uk/published-documents/EN010133-002115-Cottam%20Solar%20Project%20-%20Correction%20Order.pdf) (which did not consider significant effects to be triggered if suitable internal levels, as defined in BS8223, were likely to be met, regardless of background).
SLD-234	Noise and Vibration	Operational noise impact	7.7.2. In essence, this means the Applicant treats 35dBLAr,T as inherently acceptable in design [15/6.15]; that is the case notwithstanding this on some occasions being a 15dB exceedance of the true background levels (an exceedance the British Standard would identify as significant). For locations where background in reality falls to 20dBLAr,T, the 35dBLAr,T is	The Applicant's position is that a rating level of 35 dB does not constitute a significant adverse effect on health a quality of life. Such a level, which includes a rating penalty relating to its character, is that of a whisper or quiet refrigerator and well below levels identified by the WHO as leading to adverse health effects.

			essentially the SOAEL level and (but for this approach by the Applicant) would be significant in EIA terms in itself [15/6.14]. This is a misinterpretation of the British Standard, which encourages considering both absolute and relative levels, rather than substituting one for the other [15/6.16].	It does not make sense to define a SOAEL that could be artificially low and have to make the case that an exceedance of this value is not significant. By setting a minimum level BS4142 is being correctly interpreted in line with national policy rather than the other way round.
SLD-235	Noise and Vibration	Operational noise impact	7.7.3. The effect of this approach to background is, in essence, pre-determining the outcome rather than applying an objective analysis. It is an improper "one size fits all" approach to backgrounds below 30dBLA90 [16/6.21]. This is particularly problematic in a location where there is such tranquillity [16/6.23].	With reference to Table 8 and Table 9 of ES Volume 3, Appendix 14-4 Noise Modelling [REP1-061] , this minimum background level is not relied upon during the daytime and is only used for some of the receptors at night. Using this level at night is fully justified in that it would result in internal levels below the threshold for suitable sleeping conditions, as defined in BS8223, even with windows open.
SLD-236	Noise and Vibration	Operational noise impact	7.7.4. To test the above, one can return to considering Bradfield Manor. Applying the Applicant's approach, the daytime and nighttime noise level is 35dBLAr,T. Considered against the Applicant's fixed background of 30dBLA90, this noise level is at SOAEL (which is set at +5dB above background).	ES Volume 3, Appendix 14-4 Noise Modelling [REP1-061] has been updated at Deadline 1 to correct for some errors in transferring the derived baseline sound levels to the modelling results table. This shows that the levels at Bradfield Manor are actually only 1 dB above the derived baseline, rather than at SOAEL. This

			However, if a more representative nighttime figure were used, such as 20dBLA90, the exceedance is 15dB and would be a major significant adverse effect in EIA terms. The noise from the BESS will be clearly distinguishable and perceptible as a continuous industrial sound (a hum) [17/6.28-6.29]. It would even be the dominant audible noise indoors at Bradfield Manor [17/6.31].	correction notwithstanding, suggesting that a significant adverse effect would occur at 25 dB L_{Ar,Tr} is contrary to all available evidence on sleep disturbance. It is below the recommended threshold for internal levels before encountering the façade of the building, which is likely to provide at least a further 10 dB reduction.
SLD-237	Noise and Vibration	Operational noise impact	7.7.5. For Bradfield Manor the Applicant has undertaken in the Outline OEMP to maintain Bradfield Manor a decimal point below the SOAEL. However, in policy terms, targeting just below the SOAEL is not an acceptable approach and fails to even try to mitigate effects above LOAEL [17/6.33].	As stated above, following corrections to ES Volume 3, Appendix 14-4 Noise Modelling [REP1-061], levels at Bradfield Manor are actually over 4 dB below the SOAEL. It is the Applicant's position that committing to low daytime levels, and night-time levels that are comfortably below those suitable for a good night's sleep, both of which are likely to require significant amounts of mitigation in the central BESS area, as listed in Section 14.9 of ES Volume 1, Chapter 14 Noise and Vibration [REP1-021], is entirely in keeping with policy requirements to mitigate effects above LOAEL within the context of Government policy on sustainable development.

SLD-238	Noise and Vibration	Noise character and uncertainty	7.8.1. It is correct that, as part of its assessment, the Applicant has made an adjustment (in the form of an acoustic feature penalty) pursuant to the British Standard to reflect the incongruous nature of the industrial sound (which makes it easier to identify) [18/6.36-6.37]. However, this does not attempt to justify or address the wholesale change of the soundscape from quiet rural to continuous industrial noise far in excess of background [18/6.38]. There also risk being methodological flaws and uncertainty in the approach to assessing the noise output of units, and mitigation measures [18/6.40].	The Applicant does not accept that the Scheme constitutes a wholesale change in soundscape with continuous industrial noise far in excess of background levels. It is acknowledged that noise from the Scheme will at times be audible in such a rural location but the assessment shows that this noise would be of a low level, below many of the existing sound sources picked up in the measured ambient levels. The Applicant also accepts that there is uncertainty is the noise output of plant, not least because the final detailed design specification has yet to be determined. This is one of the reasons that the Outline OEMP [REP1-098] commits to levels at residential properties rather than to the sound power level of plant items.
SLD-239	Noise and Vibration	Noise mitigation and control	7.9.1. There are no practicable options for mitigation of external noise levels to residential dwellings [19/6.42]. For residents, internal mitigation can be achieved through keeping windows closed and finding other methods of ventilation [19/6.43].	The Applicant notes and agrees with this comment. Operational mitigation, as detailed in Section 14.9 of ES Volume 1, Chapter 14 Noise and Vibration [REP1-021], focuses on noise reduction at source which is the most effective mitigation for this type of Scheme.

SLD-240	Noise and Vibration	Noise mitigation and control	7.9.2. The resulting levels in the Outline OEMP aim to avoid significant effects. However, this does not justify change of the soundscape for the entire life of the Scheme (as it will be clearly audible) [19/6.44]. Other details about mitigation in the plans is limited; only 7 of 166 conversion units are allocated silencers, and there is not a proper attempt to mitigate noise effects at or above LOAEL [19/6.45].	The Applicant is of the position that the levels committed to in the Outline OEMP [REP1-098] mean that the Scheme will only be audible some of the time and then at a low level, and that such a commitment is not incongruous with policy on sustainable development. As stated above, effects above LOAEL have been mitigated across the Scheme, albeit not at every location. The significant investment it would take to apply silencers to the remaining 159 conversion units is not considered proportionate or in line with sustainable development given the low levels already committed to in the Outline OEMP [REP1-098] .
SLD-241	Noise and Vibration	Noise mitigation and control	7.9.3. Some of the noise effects may well be mitigatable by the Scheme, but this is not provided for and it is not clear what trade-offs have been made [19/6.51]. Ultimately, there is a risk that building the Scheme without properly addressing this issue will result in a scheme with no practicable mitigation options; retrospective noise control is always less efficient and sustainable [20/6.53].	While the Applicant accepts that there is limited commentary around the mitigation trade-offs for levels above LOAEL, the levels committed to in the Outline OEMP [REP1-098] are not considered an issue that needs further addressing. Retrospective noise control should not be necessary but is allowed for should the routine monitoring committed to in Table 8 of the Outline

				OEMP [REP1-098] indicate material increases in operational noise.
SLD-242	Noise and Vibration	Conclusion	7.10.1. The Applicant's noise assessment is based on a methodology that understates and fails to clearly define the likely significant effects arising from the development. As a result, it does not provide a robust or reliable basis for the assessment of the potential adverse noise impacts.	The Applicant considers that the noise assessment is suitably robust and has provide evidence for why this is the case. A stated above the noise assessment adopts an industry standard approach that has been accepted by both the Local Authority and in numerous consented solar projects and adopts criteria that are more stringent than many previous applications.
SLD-243	Noise and Vibration	Conclusion	7.10.2. In the context of the tranquillity of the area, even moderate levels of continuous industrial noise would be clearly perceptible at and within nearby residential receptors and would result in a material and permanent change to the existing acoustic environment and rural character. The adoption of fixed raised background noise levels in the assessment prioritises development feasibility and flexibility over preserving quiet rural amenity. In a quiet rural countryside environment, this effectively permits noticeable intrusion where residents and	While it acknowledged that the Scheme will at certain times in certain places be audible, and therefore may be perceived as a disruption to tranquillity, as stated above, the Applicant is of the position that resulting noise levels are not harmful to health and by and large no louder than existing sound sources in the area, as evidenced by the ambient time history data in ES Volume 3, Appendix 14-3 Baseline Noise Survey [APP-236] .

			visitors value natural quiet as an environmental amenity.	
SLD-244	Noise and Vibration	Conclusion	7.10.3. The Applicant's commitments to limit noise emissions to the levels predicted within the assessment are insufficient to provide adequate protection. They rely on constraining impacts to levels marginally below an adopted threshold of significant impact, rather than securing avoidance and meaningful minimisation of identified adverse effects, contrary to the principles of the NPSE, NPS-EN-1 and NPPF.	As stated above, noise levels have been reduced to a minimum within the context of Government policy on sustainable development which is precisely in line with the principles of the NPSE, NPS EN-1 and NPPF.
SLD-245	Noise and Vibration	Conclusion	7.10.4. Further scheme mitigation is likely to be available and practicable to reduce some of the operational noise emissions from the development. A commitment to lower noise emissions and targets, taking proper account of the very quiet rural nature of the area, and potential adverse effects on residences and higher sensitivity receptors, would be required to deliver the stated goal of minimising adverse noise impacts.	Further scheme mitigation in the central BESS area, for example having 100% of BESS containers rather than 75% with silencer units, is of minimal benefit in terms of noise reduction and therefore not within the context of Government policy on sustainable development. Similarly, as stated above, silencers on all of the conversion units are not considered necessary, proportionate or sustainable given the amount of plant and low noise levels committed to in the Outline OEMP [REP1-098] .

SLD-246	Hydrology, Flood Risk and Drainage	Introduction	8.1.1. Flood is a serious issue in the area around the Scheme and is a matter of great importance to local people. In summary, SLD's position in respect of flooding is as follows: • The methodology of the Applicant's Flood Risk Assessment is seriously flawed and underestimates the current flood risk; • The FRA fails to properly assess the increase to flood risk arising from the project; • In respect of site selection, the scheme fails the Sequential Test and the Exception Test – the project will not be safe for its lifetime and will increase flood risk elsewhere; and • In respect of site design, the Applicant has failed to design the Scheme to avoid land with an increased flood risk.	The Applicant acknowledges that flood risk is an important matter for local communities. The Applicant does not agree that the submitted assessment is flawed, that the Scheme fails the Sequential or Exception Test, or that the Scheme would increase flood risk elsewhere. Flood risk from all relevant sources has been assessed in ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [REP1-017] and ES Volume 3, Appendices 11-1 to 11-9: Flood Risk Assessment and Drainage Strategy [REP1-037 to REP1-054]. The majority of the Scheme is located in Flood Zone 1. Where limited interaction with Flood Zones 2 and 3 occurs, primarily at Lime Down D and Lime Down E2, this has been assessed using proportionate methods, including site-specific hydraulic modelling where justified. The BESS and substations are located in Flood Zone 1 where practicable. Solar PV panels within limited floodplain areas are flood-compatible infrastructure, and runoff from impermeable infrastructure will be attenuated and controlled.

SLD-247	Hydrology, Flood Risk and Drainage	Introduction	8.1.2. Professor Richard Skeffington has prepared four papers on behalf of SLD in respect of flood risk: • Critique of the Applicant's Flood Risk Assessment for the Lime Down Solar Park ("F1") • Runoff from Solar Panels at Lime Down ("F2") • Observations of flood extent above Corston ("F3") • Flood Risk at Lime Down due to Reduced Evaporation ("F4")	The Applicant has reviewed the four papers prepared by Professor Skeffington. The Applicant does not agree that those papers identify a material deficiency in the submitted assessment or require a change to the conclusions of ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [REP1-017], the ES Volume 3, Appendices 11-1 to 11-9: Flood Risk Assessment and Drainage Strategy [REP1-037 to REP1-054], or Annex C: Sequential and Exception Test of the Planning Statement [REP1-087]. The specific matters raised are addressed in the responses below.
SLD-248	Hydrology, Flood Risk and Drainage	Policy	8.2.1. NPS EN-1 sets out the Government's policy in respect of flood risk and the delivery of nationally significant energy infrastructure. The major statement of flooding policy is Section 5.8, which provides (emphasis added): 8.2.1.1. "The aims of planning policy on development and flood risk are to ensure that flood risk from all sources of flooding is taken into account at all stages in the planning process to avoid	The Applicant notes the cited policy wording. Flood risk from all sources has been considered in the planning and design of the Scheme, as set out in ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [REP1-017], the ES Volume 3, Appendices 11-1 to 11-9: Flood Risk Assessment and Drainage Strategy [REP1-037 to REP1-054], and Annex C: Sequential and Exception Test of the Planning Statement [REP1-087]. The majority of the Scheme is

			inappropriate development in areas at risk of flooding, and to steer new development to areas with the lowest risk of flooding.” (§5.8.6)	located in Flood Zone 1, with the most vulnerable infrastructure located in Flood Zone 1 where practicable.
SLD-249	Hydrology, Flood Risk and Drainage	Policy	8.2.1.2. “Where new energy infrastructure is, exceptionally, necessary in flood risk areas (for example where there are no reasonably available sites in areas at lower risk), policy aims to make it safe for its lifetime without increasing flood risk elsewhere and, where possible, by reducing flood risk overall. It should also be designed and constructed to remain operational in times of flood.” (§5.8.7)	The Applicant notes the cited policy wording. The Scheme has been designed to remain safe for its lifetime without increasing flood risk elsewhere. The BESS and substations are located in Flood Zone 1 where practicable. Limited areas of solar PV panels interact with Flood Zones 2 and 3, primarily at Lime Down D and Lime Down E2. Solar PV is flood-compatible infrastructure, and the relevant site-specific FRAs confirm that flood risk can be managed safely through the proposed design and embedded mitigation.
SLD-250	Hydrology, Flood Risk and Drainage	Policy	8.2.1.3. “If, following application of the Sequential Test, it is not possible, (taking into account wider sustainable development objectives), for the project to be located in areas of lower flood risk the Exception Test can be applied as defined in https://www.gov.uk/guidance/flood-risk-and-coastal-	The Applicant notes the cited policy wording. The application of the Sequential Test and Exception Test is addressed in Annex C: Sequential and Exception Test of the Planning Statement [REP1-087] , supported by ES Volume 3, Appendices 11-1 to 11-9: Flood Risk Assessment and Drainage Strategy [REP1-037 to REP1-054] , The Applicant maintains

			change#table2. The test provides a method of allowing necessary development to go ahead in situations where suitable sites at lower risk of flooding are not available." (§5.8.8)	that the relevant policy tests have been met.
SLD-251	Hydrology, Flood Risk and Drainage	Policy	8.2.1.4. "The Exception Test is only appropriate for use where the Sequential Test alone cannot deliver an acceptable site. It would only be appropriate to move onto the Exception Test when the Sequential Test has identified reasonably available, lower risk sites appropriate for the proposed development where, accounting for wider sustainable development objectives, application of relevant policies would provide a clear reason for refusing development in any alternative locations identified. Examples could include alternative site(s) that are subject to national designations such as landscape, heritage and nature conservation designations, for example Areas of Outstanding Natural Beauty (AONBs), SSSIs and World Heritage Sites (WHS) which would not usually be considered appropriate." (§5.8.9)	The Applicant notes the cited policy wording. The consideration of flood risk through site selection and site design is set out in Annex C: Sequential and Exception Test of the Planning Statement [REP1-087] . Flood risk was considered alongside wider sustainability, environmental, technical and deliverability considerations. The Applicant does not agree that the identification of lower flood risk land in isolation means that the Scheme fails the Sequential Test.

SLD-252	Hydrology, Flood Risk and Drainage	Policy	8.2.1.5. “Both elements of the Exception Test will have to be satisfied for development to be consented. To pass the Exception Test it should be demonstrated that: - the project would provide wider sustainability benefits to the community that outweigh flood risk; and - the project will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible will reduce flood risk overall.” (§5.8.11)	Annex C Sequential and Exception Test of the Planning Statement [REP1-087] sets out how the sequential and exception tests have been applied by the Applicant in the assessment of alternative sites for the Scheme and in its design of the Solar PV Sites. Section 5 of Annex C Sequential and Exception Test of the Planning Statement [REP1-087] sets out how the Scheme provides wider sustainability benefits to the community that outweigh flood risk; and how the project will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible will reduce flood risk overall. The Applicant has therefore demonstrated how the elements of the Exception Test have been met in line with relevant policy. The Applicant also notes that the technical flood risk position is addressed in the ES Volume 3, Appendices 11-1 to 11-9: Flood Risk Assessment and Drainage Strategy [REP1-037 to REP1-054]. Those documents demonstrate that the Scheme has been designed to remain safe for its lifetime,

				accounting for climate change, and would not materially increase flood risk elsewhere. Runoff from impermeable infrastructure will be attenuated and controlled, and the limited floodplain interaction with solar PV panels has been assessed on the basis that the panels are flood-compatible and raised above existing ground.
SLD-253	Hydrology, Flood Risk and Drainage	Policy	8.2.1.6. "Development should be designed to ensure there is no increase in flood risk elsewhere, accounting for the predicted impacts of climate change throughout the lifetime of the development. There should be no net loss of floodplain storage and any deflection or constriction of flood flow routes should be safely managed within the site. Mitigation measures should make as much use as possible of natural flood management techniques." (§5.8.12)	The Scheme has been designed to avoid increasing flood risk elsewhere, accounting for climate change. The relevant site-specific FRAs assess floodplain interaction and confirm that there would be no material loss of floodplain storage or obstruction to flood flows. Solar PV panel legs, frames and fencing would not materially affect floodplain conveyance. Natural flood management is not relied upon as flood mitigation for the Scheme, although the Scheme includes landscape, ecological and soil management measures which support wider green infrastructure objectives.
SLD-254	Hydrology, Flood Risk and Drainage	Flood Risk Assessment	8.3.1. Chapter 11 of the Applicant's ES [APP/063] addresses hydrology, flood risk	The Applicant agrees that hydrology, flood risk and drainage are assessed in ES Volume 1, Chapter 11:

			and drainage, and is supported by a general flood risk assessment and drainage strategy at Appendix 11-1 [APP-210], and site specific FRAs.	Hydrology, Flood Risk and Drainage [REP1-017] , supported by ES Volume 3, Appendix 11-1: Flood Risk Assessment and Drainage Strategy – Lime Down Covering Report [REP1-037] and the site-specific FRAs at ES Volume 3, Appendices 11-2 to 11-9: Flood Risk Assessment and Drainage Strategy [REP1-039 to REP1-054] ,
SLD-255	Hydrology, Flood Risk and Drainage	Flood Risk Assessment	8.3.2. The FRAs all downplay the flood sensitivity of the area despite historical records of fluvial flooding. The EA's fluvial flooding maps show that fluvial flooding is a risk in parts of all the sites, and the modelling, such as it is, shows the risks are considerable.	The Applicant does not agree that the FRAs downplay flood sensitivity. Existing flood risk has been assessed using Environment Agency flood mapping, Product Data, historical flood records, LiDAR, topography, ordinary watercourse information, Main River flood data and site-specific modelling where justified. The assessments recognise that parts of Lime Down D and Lime Down E2 interact with Flood Zones 2 and 3. That is why site-specific assessment has been undertaken for Gauze Brook and Gabriel's Well. The presence of existing flood risk does not mean the Scheme would increase flood risk elsewhere.
SLD-256	Hydrology, Flood Risk and Drainage	Flood Risk Assessment	8.3.3. Each FRA concludes that the unmitigated flood risk is "negligible to low" in the studied	The Applicant disagrees that the fluvial assessment methodology is flawed. Established areas of fluvial

			area. However, as F1 observes, the Applicant's fluvial modelling is flawed [F1/§§25-29, 51]. There are further flaws in the methodological approach to the FRAs. There is no assessment of the dynamic effects of flooding, contrary to NPS EN-1 paragraph 5.8.15. Where the Applicant has performed more detailed modelling of flooding, the Applicant has failed to show how the model was used or how it was parameterised. Additionally, analysis of the photographic effects of Storm Bert in the area upstream of Corston show a flooding extent greater than that calculated by the model or shown on EA mapping [F1/§32; F3].	flood risk are identified through the Environment Agency Flood Map for Planning and Product Data, which already incorporate catchment hydrology at the strategic scale. The Manning's/open-channel calculations were not undertaken to replace the Environment Agency's catchment hydrology or to predict downstream hydrographs. They were used as proportionate local checks for minor ordinary watercourses and land drainage features where detailed hydraulic modelling was not justified. Where floodplain interaction is material, further modelling has been undertaken, including at Gauze Brook and Gabriel's Well. Appendix F3 provides qualitative photographic evidence of flooding within the known Gauze Brook floodplain during Storm Bert. That is consistent with the Applicant's assessment. The photographs do not provide surveyed levels, measured depths, velocity data or hazard ratings. The water is turbid, the ground surface cannot be seen, and the views are oblique. They do not demonstrate that the modelled flood depths are materially understated.

SLD-257	Hydrology, Flood Risk and Drainage	Flood Risk Assessment	8.3.4. The FRA also fails to take into account the sensitivity of the catchment to rainfall [F1/§§3, 49-50].	The Applicant does not agree that catchment sensitivity to rainfall has been ignored. The assessment considers flood risk from fluvial, surface water, groundwater, sewer, reservoir and drainage sources, including climate change. The FRA also recognises the role of soil condition and construction compaction as a relevant runoff risk pathway. That risk is controlled through the Outline CEMP [REP1-096] , Outline Soil Resources Management Plan [APP-280] and related construction management measures. The purpose of the FRA is to assess whether the Scheme would increase flood risk, not to resolve existing catchment flooding. ES Volume 3, Appendices 11-1 to 11-9: Flood Risk Assessment and Drainage Strategy [REP1-037 to REP1-054] , demonstrates that the Scheme would remain safe for its lifetime and would not materially increase flood risk elsewhere.
SLD-258	Hydrology, Flood Risk and Drainage	Flood Risk Assessment	8.3.5. Additionally, that flawed modelling does not appear to be effectively deployed in the Applicant's assessment. The Applicant's identification of a "low" risk of fluvial flooding appears to	The Applicant disagrees with this characterisation. The "low" flood risk conclusions are not derived solely from the probability of the events considered. They reflect the source-pathway-receptor assessment, the

			be on the basis that the Applicant has modelled a 0.1% AEP event which is, by definition, low probability (although the consequences severe) [F1/§30]. There is no explanation of how a rating of “low” is sensible derived. The Applicant ought to have modelled the normal design flood, a 1% AEP flooding event, which would have more accurately considered the reasonable worst-case scenario of the scheme. Equally, the Applicant’s assessment of the consequences of a flood appears to be based largely on the likely impact to their own assets on site, without considering the likely downstream effects on nearby receptors.	nature and vulnerability of the proposed infrastructure, the location of the most vulnerable infrastructure in Flood Zone 1, predicted flood depths, flood compatibility of solar PV panels, and the absence of a material mechanism for increasing flood risk elsewhere. The Manning’s/open-channel calculations have been mischaracterised. They are local level and conveyance checks for minor watercourses, not predictions of downstream flood hydrographs at Corston, Malmesbury or other settlements. The areas at established fluvial flood risk are already identified through Environment Agency mapping and Product Data. Where a material interaction with mapped floodplain exists, site-specific modelling has been undertaken or refined.
SLD-259	Hydrology, Flood Risk and Drainage	Solar Panel Runoff	8.3.6. Section 11.8 of Chapter 3 [APP/063] identifies the potential flood risk impacts of the scheme which were scoped into the Applicant’s assessment. For the construction/decommissioning phase the primary risks arose from mud and debris blockages, a temporary increase in impermeable area for flooding, and	The Applicant notes the matters scoped into the assessment. These risks are assessed in ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [REP1-017] and the ES Volume 3, Appendices 11-1 to 11-9: Flood Risk Assessment and Drainage Strategy [REP1-037 to REP1-054], Construction and decommissioning risks, including

			the compaction of soils. For the operation and maintenance phase, the risks were associated with the permanent increase in impermeable area, increase in discharge to local watercourses, and blockage of drainage networks.	mud, debris, temporary drainage disruption and soil compaction, are controlled through the Outline CEMP [REP1-096] , the Soil Resources Management Plan and the Outline Decommissioning Strategy [REP1-100] . Operational runoff from impermeable infrastructure is controlled through the drainage strategy.
SLD-260	Hydrology, Flood Risk and Drainage	Solar Panel Runoff	8.3.7. The Applicant relies almost entirely on the embedded risks of mitigation to remove flooding risk and the Applicant is over-optimistic in the likely effects of the proposed mitigation.	The Applicant does not agree that the assessment relies on over-optimistic mitigation. The mitigation relied upon is secured through the DCO Requirements and outline management plans, including the Outline CEMP [REP1-096] , Outline OEMP [REP1-098] , Outline Decommissioning Strategy [REP1-100] and Outline Soil Resources Management Plan [APP-280] . These controls include soil protection, management of compaction, retention of permeable ground, watercourse buffers, maintenance of overland flow routes and attenuation of runoff from impermeable infrastructure.

SLD-261	Hydrology, Flood Risk and Drainage	Solar Panel Runoff	8.3.8. Professor Skeffington's second paper ("F2"), address the increased risk of flooding at the site as a consequence of solar panel runoff. The ES acknowledges the risk that panels "concentrate rainfall under the leeward edge of the panels themselves" [APP/063, 43] but there is no adequate assessment of this risk. The Applicant asserts that maintaining grass beneath panels is sufficient mitigation.	The Applicant does not agree that there has been no adequate assessment of panel runoff. Solar PV panels are elevated above ground and do not create a continuous impermeable surface. Rainfall continues to fall to the ground beneath and between panel rows. The Applicant recognises that there may be localised concentration of runoff at panel edges, but that is a soil and vegetation management issue, not a basis for treating the panelled areas as impermeable hardstanding. The relevant risks are controlled through vegetation establishment, soil management, construction controls and operational land management secured through the Outline CEMP [REP1-096] , Outline Soil Resources Management Plan [APP-280] and Outline OEMP [REP1-098] .
SLD-262	Hydrology, Flood Risk and Drainage	Solar Panel Runoff	8.3.9. In support of that statement, the Applicant relies on an outdated 2013 model by Cook and McCuen, which conducted an early review of the hydrological effects of solar models through a computer model, which was not validated by field measurements from real solar farms. As F2 demonstrates, recent	The Applicant does not rely solely on Cook and McCuen. The assessment is based on the nature of the Scheme, the elevated form of solar PV panels, the retention of permeable ground, the proposed soil and vegetation management measures, and the drainage strategy for impermeable infrastructure. The

			research, using observed data and improved models demonstrates that ground-mounted panels can lead to greater runoff volumes, higher flood peaks, and local soil erosion (as discussed in Appendix K1).	studies referred to by SLD do not demonstrate that the Lime Down Scheme would materially increase catchment runoff or downstream flood risk. They also do not justify treating the panelled areas as impermeable. The realistic hydrological risk is localised soil compaction and erosion risk, which is controlled through the Outline CEMP [APP-277] , Outline OEMP [APP-278] and the Outline Soil Resources Management Plan [APP-280] .
SLD-263	Hydrology, Flood Risk and Drainage	Solar Panel Runoff	8.3.10. In the case of this Scheme, the impact of solar panel run off is likely to be even greater. The larger panel size would mean that the rainfall concentration factor is greater than for conventional panels, making it even less likely that vegetated soils have adequate infiltration capacity to absorb the water. This would increase both peak discharge and the risk of soil erosion. Moreover, the height from which the rainfall runs off the panels, typically 30-40 cm, would be much greater for the tracking panels especially as they are intended to be kept horizontally 2.5 m above the ground surface outside generating hours. The	ES Volume 1, Chapter 17: Soils and Agriculture [REP1-025] addresses the risk of soil erosion from panel run-off in paragraphs 17.10.17 to 17.10.19, noting that inherent site as well as soil conditions will reduce the risk of such erosion. From a hydrology perspective, the Applicant does not agree that tracker panel height or panel size demonstrates a material increase in flood risk. The panels do not connect rainfall to a formal drainage network and do not create continuous impermeable cover. Rainfall will continue to drain to vegetated ground beneath and between panel rows.

			kinetic energy of a water stream falling from 2.5 m is more than six times the same stream falling from 40 cm. This energy would be manifested as increased runoff and soil erosion.	Localised erosion risk at panel edges is managed through soil protection, vegetation establishment and operational land management measures secured through the Outline CEMP [REP1-096] , Outline OEMP [REP1-098] and Outline Soil Resources Management Plan [APP-280] .
SLD-264	Hydrology, Flood Risk and Drainage	Solar Panel Runoff	8.3.11. The Applicant's proposed mitigation is overly optimistic. The only mitigation proposed for panel runoff is to maintain a vegetation cover under the panels. However, the high density of the panels proposed on the proposal to keep them level all the time and thus shading the ground, will make maintaining a vegetation cover difficult, as Appendix K1, the Soil Report, discusses.	ES Volume 1, Chapter 17: Soils and Agriculture [REP1-025] addresses the risk of soil erosion from panel runoff in paragraphs 17.10.17 to 17.10.19, noting that inherent site as well as soil conditions will reduce the risk of such erosion. The Applicant does not agree that mitigation is limited to maintaining grass beneath the panels. The Scheme includes a wider package of hydrology and soil management controls, including soil handling measures, wet weather working controls, vehicle routing, remedial decompaction where required, maintenance of vegetated cover, watercourse buffers and controlled drainage for impermeable infrastructure. These measures are secured through the Outline CEMP

				[REP1-096], Outline OEMP [REP1-098], Outline Decommissioning Strategy [AREP1-100] and Outline Soil Resources Management Plan [APP-280].
SLD-265	Hydrology, Flood Risk and Drainage	Solar Panel Runoff	8.3.12. Likewise, the Soil Report and (Appendix K1) and the Soil Site Report (Appendix K2) note the sensitivity of the soil within the Order Limits to compaction. Compacted soils will exacerbate the ability of the soils to effectively drain or absorb solar panel runoff.	The soil and agricultural land surveys undertaken by the Applicant identified that the soil resource is primarily of high sensitivity, as assessed in ES Volume 1, Chapter 17: Soils and Agriculture [REP1-025]. The Outline Soil Resources Management Plan [APP-280] sets out monitoring requirements, which include monitoring the soils for signs of compaction during construction, and notes that any compaction identified must be remediated prior to panels being fixed, while the ground remains accessible. The Applicant agrees that soil compaction is a relevant risk pathway. That is why it is identified and controlled in the application documents. It does not follow that the Scheme would create an unacceptable flood risk. Construction compaction risk is managed through secured controls on soil handling, plant routing, wet weather working,

				inspection and remediation. The panelled areas remain permeable, and runoff from impermeable infrastructure is attenuated and controlled through the ES Volume 3, Appendices 11-1 to 11-9: Flood Risk Assessment and Drainage Strategy [REP1-037 to REP1-054].
SLD-266	Hydrology, Flood Risk and Drainage	Increased Water Availability due to Reduced Evaporation	8.3.13. Professor Skeffington's fourth paper ("F4") addresses the likely observes that solar panels drives evaporation of water form land surfaces. As a consequence, there is an increase in soil moisture in soil sites, which results in the effective production of water and increases flood risk in wet areas. Professor Skeffington's conservative calculations suggest that an addition 233,000 cubic metres of additional water could be generated as a consequence of evaporation restriction at the Solar PV Sites [F4, 1/§2]. This additional water will ultimately leave the solar farm, either in surface runoff or groundwater or both. It will therefore increase the amount of water offsite.	The Applicant does not agree that Appendix F4 demonstrates a material increase in flood risk. The reduced evaporation argument is an annual water balance hypothesis. It does not demonstrate a material increase in storm runoff, peak discharge, flood depth or flood hazard. Flood risk during storm events is driven by rainfall intensity, antecedent conditions, infiltration capacity, drainage pathways and catchment response over short timescales. The panelled areas remain permeable and are not positively drained to watercourses. Runoff from impermeable infrastructure is attenuated and controlled through the ES Volume 3, Appendices 11-1 to 11-9: Flood Risk Assessment and Drainage Strategy [REP1-037 to REP1-054].

SLD-267	Hydrology, Flood Risk and Drainage	Increased Water Availability due to Reduced Evaporation	8.3.14. The Applicant has failed to properly consider this increased flood risk, contrary to NPS EN-1, or any measures to effectively mitigate it. Covering a relatively high proportion of the area of small headwater catchments in a high flood risk district with outsize solar panels is unwise. Connectedly, the Applicant has failed to demonstrate that this will not cause an unacceptable flood risk both on and off site.	The Applicant does not agree that reduced evaporation gives rise to an unassessed unacceptable flood risk. Appendix F4 does not demonstrate a mechanism by which the Scheme would materially increase peak flood flows or downstream flood risk. The cited annual volume does not equate to an increase in storm runoff or flood hazard. The submitted assessment considers the relevant flood risk mechanisms for the Scheme, including fluvial flooding, surface water flooding, groundwater flooding, drainage disruption, soil compaction, runoff from impermeable infrastructure and climate change.
SLD-268	Hydrology, Flood Risk and Drainage	Sequential and Exception Test: Site Selection	Site Selection 8.4.1. The Applicant's site selection report identifies twelve sites as prospective solar farms for a grid connection at Melksham. Maps of these in relation to flood risk are shown in Appendix A of Annex C in the Planning Statement. Most sites, including Lime Down, have an amber risk for both fluvial and surface water flooding. Site 12, however, has a green risk for fluvial flooding. IGP	The Applicant does not agree that the Scheme fails the second part of the Exception Test. ES Volume 3, Appendices 11-1 to 11-9: Flood Risk Assessment and Drainage Strategy [REP1-037 to REP1-054] , demonstrates that the Scheme would remain safe for its lifetime, accounting for climate change, and would not materially increase flood risk elsewhere. Solar PV panels within limited floodplain areas are flood-compatible infrastructure, while the BESS and substations are located in Flood Zone 1 where

			relies on the Exception Test to justify the site selected. As set out above, SLD considers that the Scheme does not meet the second criterion of the Exception Test, because the Applicant has not demonstrated the Scheme would be safe for its duration and there will be an increased flood risk arising from the Scheme [F1/§§19-21].	practicable. Runoff from impermeable infrastructure will be attenuated and controlled. Annex C Sequential and Exception Test of the Planning Statement [REP1-087] sets out how the sequential and exception tests have been applied by the Applicant in the assessment of alternative sites for the Scheme and in its design of the Solar PV Sites. The Applicant maintains that, in terms of flood risk, the Scheme would be safe for its lifetime and there would not be an increased flood risk arising from the Scheme. This conclusion is demonstrated in ES Volume 3, Appendices 11-1 to 11-9: Flood Risk Assessments and Drainage Strategies [REP1-037 to REP1-054] which include specific flood risk assessments for each of the Solar PV Sites and the Cable Route Corridor and set out mitigation measures which are required to ensure that the Scheme remains safe for its lifetime, avoid increasing flood risk elsewhere, and may reduce flood risk overall.

				Paragraphs 5.3.2 to 5.3.5 of Annex C Sequential and Exception Test of the Planning Statement [REP1-087] summarises the embedded mitigation measures incorporated into the Scheme to ensure the Scheme remains safe for its lifetime.
SLD-269	Hydrology, Flood Risk and Drainage	Sequential and Exception Test: Site Selection	Site Design 8.4.2. The Applicant is required to apply a sequential approach at site level to the layout and design of the scheme to minimise flood risk. However, there are substantial areas of solar panels for Flood Zone 3, near the Gauze Brook upstream of Corston for Lime Down D [F1/§17]. Even where panels are raised higher above ground, such mitigation of the risk to panels may be insufficient. Photographic evidence of the area demonstrates that panels may be partially submerged if a weather event like Stom Bert were to happen again [F3].	The Applicant does not agree that there are substantial areas of solar panels in Flood Zone 3. The interaction with Flood Zones 2 and 3 is limited and is primarily associated with Gauze Brook at Lime Down D and Gabriel's Well at Lime Down E2. Appendix F3 does not demonstrate that panels would be partially submerged. The photographs show turbid floodwater within the known Gauze Brook floodplain, but do not provide surveyed flood levels, measured depths, velocity data or hazard ratings. The photographed extents broadly corroborate the presence of the existing Gauze Brook floodplain, which has already been identified and assessed in ES Volume 3, Appendices 11-6: Flood Risk Assessment and Drainage Strategy – Lime Down D / BESS [REP1-047].

				Annex C Sequential and Exception Test of the Planning Statement [REP1-087] explains how a sequential approach has been applied to site design, by directing the most vulnerable aspects of the Scheme to areas of lowest flood risk. The design also incorporates opportunities to reduce flood risk from the Solar PV Sites through the use of sustainable drainage strategies. Paragraph 4.1.2 of Annex C Sequential and Exception Test of the Planning Statement [REP1-087] describes the design features that have been incorporated in the design of the Scheme, and to minimise flood risk. For example, the areas of the Solar PV Sites within Flood Zones 2 and 3 have been used for the proposed location of solar PV panels and for biodiversity and enhancement areas, being elements of the Scheme that are less vulnerable to flooding. In addition, the most vulnerable elements of infrastructure, being the BESS and substations, will be sited in areas of Flood Zone 1, at lower risk of flooding.

SLD-270	Hydrology, Flood Risk and Drainage	Conclusion	8.5.1. The FRA fails to address many of the minimum requirements for a FRA under NPS EN-1. The FRA systematically underestimates flood sensitivity in the area, the risk to receptors, and flood risk. The Applicant's own modelling shows that an extreme rainfall event would be devastating locally and downstream due to fluvial flooding, whereas the assessment ignores the modelling and concludes that the risk of fluvial flooding is "low".	The Applicant disagrees. ES Volume 3, Appendices 11-1 to 11-9: Flood Risk Assessment and Drainage Strategy [REP1-037 to REP1-054] , addresses the requirements of NPS EN-1 and considers flood risk from all relevant sources. The Applicant's modelling and local calculations have been mischaracterised. The Manning's/open-channel calculations are proportionate local checks for minor watercourses and drainage features, not predicted downstream flood hydrographs. They do not show that an extreme rainfall event would be "devastating" as a consequence of the Scheme. Where material floodplain interaction occurs, site-specific modelling has been undertaken or refined. ES Volume 3, Appendices 11-1 to 11-9: Flood Risk Assessment and Drainage Strategy [REP1-037 to REP1-054] , demonstrates that flood risk is acceptable and that the Scheme would not materially increase flood risk elsewhere.
SLD-271	Hydrology, Flood Risk and Drainage	Conclusion	8.5.2. The assessment and proposed management of flood for the Scheme is poor, and reflects a site selection process which failed properly to have regard to Flood	The Applicant disagrees. Flood risk has been considered through site selection, site design, and the site-specific FRAs. The majority of the Scheme is in Flood Zone 1, and the

			Zone 2 and Flood Zone 3 and the knock-on effects. The ExA can have no confidence that this Scheme would not increase the risk of flood in an area already blighted by flood events.	most vulnerable infrastructure has been located in Flood Zone 1 where practicable. Limited interaction with Flood Zones 2 and 3 has been assessed, including at Lime Down D and Lime Down E2. Existing flooding in the wider catchment is acknowledged, but the Scheme is not required to resolve existing catchment flooding. The submitted ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [REP1-017] and ES Volume 3, Appendices 11-1 to 11-9: Flood Risk Assessment and Drainage Strategy [REP1-037 to REP1-054] , provide a robust basis for concluding that the Scheme would not materially increase flood risk on or off site.
SLD-272	Soils and Agriculture	Introduction	9.1.1. SLD submits that there are good reasons for protecting the Solar PV Sites and Cable Route Corridor from development where the loss of valuable productive farmland has not been shown to be necessary. There has been insufficient justification for siting the Solar PV Sites and Cable Route Corridor on agricultural land, much of which is best and most versatile agricultural land	An appraisal of alternative sites is presented 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 assessment considered alternative sites within a 20 km radius of the existing National Grid Melksham Substation and concludes that there are no more suitable locations within the defined search

			("BMVAL"). Likewise, the likelihood of long-term permanent soil damage is high and the Applicant has not proposed sufficient mitigation to remove these harms or consider the adverse effect low.	area than the proposed Site. The Site Selection Assessment explains how brownfield land, industrial land, previously developed land and lower grade agricultural land were considered in accordance with policy. As stated in ES Volume 3, Appendix 17-1: Agricultural Land Classification and Soil Resource Survey Report [REP1-063] approximately two-thirds of the land within the Solar PV Sites is in Subgrade 3b and Grade 4, which is not considered to be among the Best and Most Versatile agricultural land. There is no land of Grade 1 present within the Solar PV Sites or in the Cable Route Corridor. Land of Grade 2 quality is present in the east of the Solar PV Sites and amounts to approximately 4% of the Solar PV Sites area, and land of Subgrade 3a accounts for approximately 29%. An outline of proposed mitigation is presented in the Outline Soil Resources Management Plan [APP-280] and includes determination of appropriate soil handling windows based on soil conditions, as well as other measures

				to minimise the risks of compaction and damage to the soils.
SLD-273	Soils and Agriculture	Introduction	9.1.2. This chapter is accompanied by two appendices: • Appendix K1 Soils and Agricultural Impact Report (produced by Sam Franklin of Landscape) • Appendix K2 Soil Site Report (produced by Cranfield University)	The Applicant has reviewed Appendix K1 and K2 in response to the Written Representations on Soils and Agriculture and responds to detailed points made below.
SLD-274	Soils and Agriculture	Policy	9.2.1. Chapter 5 of NPS EN-1 addresses land use objections to renewable energy infrastructure. The most important policies for the purpose of this paper are: 9.2.1.1. “Applicants should seek to minimise impacts on the best and most versatile agricultural land (defined as land in grades 1, 2 and 3a of the Agricultural Land Classification) and preferably use land in areas of poorer quality (grades 3b, 4 and 5) (Paragraph 5.11.12).	As stated in ES Volume 3, Appendix 17-1: Agricultural Land Classification and Soil Resource Survey Report [REP1-063] approximately two-thirds of the land within the Solar PV Sites is in Subgrade 3b and Grade 4, which is not considered to be among the Best and Most Versatile agricultural land. There is no land of Grade 1 present within the Solar PV Sites or in the Cable Route Corridor. Land of Grade 2 quality is present in the east of the Solar PV Sites and amounts to approximately 4% of the Solar PV Sites area, and land of Subgrade 3a accounts for approximately 29%.

SLD-275	Soils and Agriculture	Policy	9.2.1.2. Applicants should also identify any effects and seek to minimise impacts on soil health and protect and improve soil quality taking into account any mitigation measures proposed. (Paragraph 5.11.13)	ES Volume 1, Chapter 17: Soils and Agriculture [REP1-025] identifies the likely significant effects of the Scheme on agricultural land and soils. The likely effects include anticipated beneficial outcomes for the in-situ soil resource. The Applicant has developed the Outline Soil Resources Management Plan [APP-280] for the purpose of minimising adverse effects on soils during each phase of the Scheme.
SLD-276	Soils and Agriculture	Policy	9.2.1.3. The Secretary of State should ensure that applicants do not site their scheme on the best and most versatile agricultural land without justification. Where schemes are to be sited on best and most versatile agricultural land the Secretary of State should take into account the economic and other 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 a higher quality. (Paragraph 5.11.34)	As stated in ES Volume 3, Appendix 17-1: Agricultural Land Classification and Soil Resource Survey Report [REP1-063] approximately two-thirds of the land within the Solar PV Sites is in Subgrade 3b and Grade 4, which is not considered to be among the Best and Most Versatile agricultural land.
SLD-277	Soils and Agriculture	Policy	9.2.2. Chapter 2 of NPS EN-3 addresses solar photovoltaic generation specifically. The most relevant paragraphs are as follows:	The consideration of alternatives, including the availability and suitability of land of lower agricultural quality, is set out in ES Volume 1,

			9.2.2.1. “While land type should not be a predominating factor in determining the suitability of the site location applicants should, where possible, utilise suitable previously developed land, brownfield land, contaminated land and industrial land. Where the proposed use of any agricultural land has been shown to be necessary, poorer quality land should be preferred to higher quality land avoiding the use of “Best and Most Versatile” agricultural land where possible. ‘Best and Most Versatile agricultural land is defined as land in grades 1, 2 and 3a of the Agricultural Land Classification” (Paragraph 2.10.29)	Chapter 4: Alternatives and Design Evolution [APP-056] and ES Volume 3, Appendix 4-1: Site Selection Assessment Report [APP 185]. This assessment explains how alternative sites, including areas of brownfield land and lower grade agricultural land, were considered in accordance with planning policy.
SLD-278	Soils and Agriculture	Policy	9.2.2.2. “Whilst the development of ground mounted solar arrays is not prohibited on Best and Most Versatile agricultural land, or sites designated for their natural beauty, or recognised for ecological or archaeological importance, the impacts of such are expected to be considered and are discussed under paragraphs 2.10.73 – 92	ES Volume 1, Chapter 17: Soils and Agriculture [REP1-025] identifies the likely significant effects of the Scheme on agricultural land and soils. The likely effects include anticipated beneficial outcomes for the in-situ soil resource.

			and 2.10.107 – 2.10.126” (Paragraph 2.10.30)	
SLD-279	Soils and Agriculture	Policy	9.2.2.3. “It is recognised that at this scale, it is likely that applicants’ developments will use some agricultural land. Applicants should explain their choice of site, noting the preference for development to be on suitable brownfield, industrial and low and medium grade agricultural land.” (Paragraph 2.10.31)	The consideration of alternatives, including the availability and suitability of land of lower agricultural quality, 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 assessment explains how alternative sites, including areas of brownfield land and lower grade agricultural land, were considered in accordance with planning policy.
SLD-280	Soils and Agriculture	Policy	9.2.2.4. “Where sited on agricultural land, consideration may be given as to whether the proposal allows for continued agricultural use and/or can be co-located with other functions (for example, onshore wind generation, storage, hydrogen electrolyzers) to maximise the efficiency of land use.” (Paragraph 2.10.32)	ES Volume 1, Chapter 3: The Scheme [APP-055] notes that there are no known landowner restrictive covenants or other reasons that would prevent the land in the solar PV Sites being grazed by livestock. While grazing has not been relied upon as mitigation in any part of the assessment, continued agricultural use of the land through grazing is a future management option.
SLD-281	Soils and Agriculture	Policy	9.2.2.5. “The Agricultural Land Classification (ALC) is the only approved system for grading agricultural quality in England and	The agricultural land quality and soil resources baseline was established through surveys undertaken in accordance with the established ALC

			Wales and, if necessary, field surveys should be used to establish the ALC grades in accordance with the current, or any successor to it, grading criteria and identify the soil types to inform soil management at the construction, operation, and decommissioning phases in line with the Defra Construction Code.” (Paragraph 2.10.33).	guidelines. The full methodology, schedule of findings and reasoning for all classifications are set out in ES Volume 3, Appendix 17-1: Agricultural Land Classification and Soil Resources Survey Report [REP1-063] . The survey methodology was agreed in consultation with Natural England.
SLD-282	Soils and Agriculture	Food Security and Loss of Productive Agricultural Land	9.3.1. The United Kingdom Food Security Report 2024 observes that Russia's invasion of Ukraine in 2022, alongside increased conflict in the Middle East, has disrupted international energy and grain supply. The latter has, in particular, disrupted the system by altering supply routes and the navigational safety of the Red Sea. Likewise, extreme weather conditions in the UK and across the globe, as a consequence of climate change, have caused food chain disruptions which even more localised impacts [Appendix K1, 4/§3.3]. Since that report was written, the insecurity of the global food network has become even more pronounced.	The Applicant notes this comment.

SLD-283	Soils and Agriculture	Food Security and Loss of Productive Agricultural Land	9.3.2. It is now more important than ever to for productive agricultural farmland to be protected from development and long-term decline. Far from taking farmland out of production for at least 60 years, efforts should be made to increase food production on agricultural land. Nonetheless, SLD acknowledge that, under NPS EN-1 and NPS EN-3, development on BMVAL is not prohibited. However, the Applicant is required to demonstrate that proposed development is not sited on agricultural land without justification, having regard to the availability of other poorer quality land. Appendix K1 concludes that the Applicant has not done so [Appendix K1, 15/§6.1].	The consideration of alternatives, including the availability and suitability of land of lower agricultural quality, 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 assessment explains how alternative sites, including areas of brownfield land and lower grade agricultural land, were considered in accordance with planning policy.
SLD-284	Soils and Agriculture	Food Security and Loss of Productive Agricultural Land	9.3.3. The Applicant's Agricultural Land Classification Mapping [APP-172], indicates that there is Grade 3a BMVAL across the Solar PV Sites. The Soil Site Report prepared by Cranfield University notes that much of the land is appropriate for dairying, cereals, and stock rearing [Appendix K2, Soil Thematic Map 11, 24-25]: Additionally, an extensive portion	The Applicant considers the findings of the ALC survey, as reported in ES Volume 3, Appendix 17-1: Agricultural Land Classification and Soil Resources Survey Report [REP1-063] and shown in ES Volume 2, Figure 17-2: Agricultural Land Classification Mapping [APP-172] , and the conclusions drawn in

			of the land comprising the Cable Route Corridor has a high probability of being BMVAL [Appendix K1, 6/§4.2]. Much of the land in the CRC has not been surveyed by the Applicant.	the desk-based Soil Site Report, to be in agreement. Areas of the Cable Route Corridor that had no landowner permission to access were not surveyed.
SLD-285	Soils and Agriculture	Livestock Grazing on Solar PV Sites	9.4.1. The Applicant's ES suggest at Chapter 17 that during the anticipated lifespan of the Scheme of 60 years, some agricultural use may resume within the Solar PV Sites if the area beneath the panels is grazed by livestock [APP-069].	ES Volume 1, Chapter 3: The Scheme [APP-055] confirms that there are no known landowner restrictive covenants or other reasons that would prevent the land in the Solar PV Sites being grazed by livestock. While grazing has not been relied upon as mitigation in any part of the assessment, continued agricultural use of the land through grazing is a future management option.
SLD-286	Soils and Agriculture	Livestock Grazing on Solar PV Sites	9.4.2. Mr. Franklin's report considers that such grazing practices are unlikely to be tenable for most farmers, and those managing the Solar PV Panels [Appendix K1, 7-8/§§4.7-4.13]. Grazing around panels is unlikely to be cost-effective for any grazier and there is always a risk that animals may damage the panels. Land in use for solar panels is ineligible for most normal	On commencement of construction, the primary land use would cease to be agricultural. There is no continued financial output assumed with regard to agricultural production, although the applicable landowners would be receiving ground rent from the Applicant so the land would continue to provide some income to the farm holding.

			agricultural subsidies which likewise makes farming less financially attractive going forward.	
SLD-287	Soils and Agriculture	Livestock Grazing on Solar PV Sites	9.4.3. Equally, Mr. Franklin notes that grass does not grow well under the panels themselves, as there are often areas which are either dry or barren, which will only host weed species due to heavy shading and patchy wetness [Appendix K1, 8/§4.13].	The effect of shading on beneath-panel grassland establishment is taken into consideration in the Outline LEMP [APP-283] , in paragraphs 1.3.86 to 1.3.101.
SLD-288	Soils and Agriculture	Damage to Soils during Construction and Operation	9.5.1. Soil is recognised to be a finite resource that fulfils many important functions and services for society [Appendix K1, 9/§5.1]. The soils located locally are mainly clay and heavy clay loam soils over clay at depth [Appendix K2, Soil Thematic Map 1n]. As the Applicant acknowledges, most of the topsoil and subsoils throughout the Order Limits are a resource of high sensitivity [APP-243/§17.10.4]. The Soil Site Report demonstrates that many of these soils are very susceptible to compaction [Appendix K2, 34-35].	The Applicant notes this comment.
SLD-289	Soils and Agriculture	Damage to Soils during Construction and Operation	9.5.2. The use of heavy machinery can initiate the production of large clods and compaction in topsoils. This can have many negative	The land will be under grassland for the duration of the operational phase of the Scheme, and therefore the production of clods and compaction

			effects on the quality of the sole for future arable production – including: poor germination and seedling emergence, impeded drainage, waterlogging, and anaerobic conditions all leading to increased susceptibility of the crop and root to diseases and pests and soil erosion [Appendix K2, 35]. The Soil Site Report further indicates that, in many areas, there is little potential for soil structures to recover from damage experienced after compaction [Appendix K2, 38-39] and that mechanical rectification will be difficult in many places.	of arable topsoils due to cultivation by heavy machinery will not be applicable.
SLD-290	Soils and Agriculture	Damage to Soils during Construction and Operation	9.5.3. SLD considers that the Applicant has not properly assessed the likely long-term impacts on the soils after construction and decommissioning. The Applicant erroneously suggests that taking the land out of production may improve the status of the land. In reality, in locations where soil compaction is a risk, construction of the Solar PV Sites and Cable Route Corridor is likely to cause permanent damage which cannot be remedied and is likely to	The extreme and un-remediable soil damage displayed in Appendix K1 has clearly occurred through substantial contravention, or total absence, of a SRMP. Adhering to the best practice measures set out in the Outline Soil Resources Management Plan [APP-280] , and later the detailed SRMP, will ensure that such damage does not occur as a result of the Scheme. The detailed SRMP will propose soil investigations to be undertaken at decommissioning, to include investigatory boreholes and pits, to

			affect the quality of the land in the future [Appendix K1, 9/§5.5].	establish the baseline conditions at decommissioning, and to identify any necessary remedial works.
SLD-291	Soils and Agriculture	Damage to Soils during Construction and Operation	9.5.4. To this extent, the Applicant has also been overly optimistic in the effectiveness of its proposed mitigation measures, and the measures imposed are unlikely to remove all of the likely significant effects. The ES identifies that the number of field capacity day is larger than average for lowland England, meaning that there are long periods in the year when construction and trafficking on the land should be avoided [APP-243/§1.2.20]. It is not realistic for such a construction project to only work outside of the 150 FCD period [Appendix K1/§5.9]. Additionally, poor construction practices cannot be easily controlled by condition on such a large-scale operation [Appendix K1, 13/§5.18].	The number of Field Capacity Days is a broad climatic parameter. Section 1.8 of the Outline Soil Resources Management Plan [APP-280] sets out likely appropriate handling windows based on climate and soil clay content, as derived from published guidance, but goes on to give prescriptions for determining appropriate soil conditions for handling as part of a continuous monitoring programme throughout construction. Should the DCO be granted, adherence to the detailed SRMP will be a condition. Requirement 17 of Schedule 2 of the Draft DCO [REP1-007] states that "The soil resources management plan must be implemented as approved."
SLD-292	Soils and Agriculture Hydrology, Flood Risk and Drainage	Flooding	9.6.1. Connected to the risk of compaction, is the increased flood risk where water is unable to penetrate the topsoil. The Applicant's ES has failed to consider the impact of inserting	Solar Energy UK's Factsheet on Solar Farms and Agricultural Land (2024) notes that "While solar farms do cover large areas, the actual area of soil that is disturbed is very small, typically less than 2% of the total site

			piles into the ground and trenching works on drainage, and the likely reduction in agricultural soil quality. The Outline Soil Management Plan does not properly deal with these drainage issues [Appendix K1, 11/§5.11].	area.” Most of the land and soil in the Solar PV Areas will remain in-situ throughout the construction period, maintaining the current soil drainage status. Trenching works will be subject to the best practice principles set out in the Outline Soil Resources Management Plan [APP-280], which notes that reinstatement of soils in the trenches should occur as soon as practicable following cable installation, such that the soil handling conditions are likely to be the same at excavation and reinstatement, i.e. in an appropriately dry and friable state, minimising risk of damage and subsequent potential adverse effects on soil drainage. From a hydrology perspective, the Applicant does not agree that piling and trenching would result in an unassessed or unacceptable flood risk effect. Piling is localised and does not create a material catchment-scale change to drainage pathways or runoff generation. Trenching works are temporary and will be reinstated following installation.

				The principal drainage risk associated with construction is soil compaction and temporary disturbance to local drainage pathways. This has been assessed in ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [REP1-017] and is controlled through the Outline CEMP [REP1-096], the Outline Soil Resources Management Plan [APP-280] and the Outline Decommissioning Strategy [APP-279]. These documents secure soil handling controls, wet weather working controls, routing of plant, protection of retained drainage features, and remediation of any compaction or drainage disruption where identified. Where existing land drainage is encountered or affected during construction, it would be reinstated or otherwise managed so that drainage function is maintained. The Scheme would not materially alter the existing catchment drainage regime or increase flood risk as a result of piling or trenching works.

SLD-293	Soils and Agriculture	Conclusion	9.7.1. The Applicant has failed to provide a clear justification for the development of Lime Down Solar Park within the Order Limits. Much of the land is BMVAL, yet the Applicant has failed to demonstrate why this land is necessary for the scheme where poorer quality land is available elsewhere. Compounding this, the risk of long-term permanent soil damage is significant, and the mitigation proposed is wholly inadequate to address it.	The consideration of alternatives, including the availability and suitability of land of lower agricultural quality, 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 assessment explains how alternative sites, including areas of brownfield land and lower grade agricultural land, were considered in accordance with planning policy.
SLD-294	Ecology and Biodiversity	Introduction	10.1.1. This section addresses the ecology and biodiversity impacts of the proposed Lime Down Solar Park. A report has been prepared by Nicholas Valori of Betts Ecology on behalf of Stop Lime Down, to comment upon the biodiversity and ecology findings presented within the Applicant's ES (Appendix E). The concerns set out below relate to the adequacy of the ecological baseline surveys, the Applicant's approach to mitigation, and the likely impacts of the development during both construction and operation across the Solar PV	The Applicant has reviewed Appendix E in response to the Written Representations on Ecology and Biodiversity The Applicant makes note of this comment and detailed responses regarding ecological baseline surveys, mitigation measures, and likely impacts of the Scheme are provided in the relevant responses below

			Sites and the Cable Route Corridor.	
SLD-295	Ecology and Biodiversity	Introduction	10.1.2. SLD notes that the Applicant has indicated that Chapter 9 will be updated following the completion of additional site surveys which have been undertaken. SLD awaits receipt of these and will seek to comment at a later date.	The Applicant can confirm that an updated version of ES Volume 1, Chapter 9: Ecology and Biodiversity (Rev 2) [REP1-015] was submitted at Deadline 1
SLD-296	Ecology and Biodiversity	Policy	10.2.1. NPS EN-1 sets out the Government's policy in respect of ecology and biodiversity and the delivery of nationally significant energy infrastructure. Section 5.4 addresses biodiversity and geological conservation.	The Applicant notes this comment.
SLD-297	Ecology and Biodiversity	Policy	10.2.1.1. The applicant should show how the project has taken advantage of opportunities to conserve and enhance biodiversity and geological conservation interests (§5.4.18).	National Planning Policies (NPS) relevant to the Scheme include NPS EN-1, NPS EN-3, and NPS EN-5, and have been considered throughout Scheme design and in the Development Consent Order (DCO) application documents. ES Volume 3, Appendix 5-1: NPS Requirements [APP-186] sets out the relevant NPS requirements and an indication of where information has been provided to address these requirements within the DCO application, including for

				biodiversity and geological conservation.
SLD-298	Ecology and Biodiversity	Policy	10.2.1.2. The design of energy NSIP proposals will need to consider the movement of mobile/migratory species such as birds, fish and marine and terrestrial mammals and their potential to interact with infrastructure. As energy infrastructure could occur anywhere within England and Wales, both inland and onshore and offshore, the potential to affect mobile and migratory species across the UK and more widely across Europe (transboundary effects) requires consideration, depending on the location of development (§5.4.22).	The potential impacts of the Scheme on mobile and migratory species have been assessed in ES Volume 1, Chapter 9: Ecology and Biodiversity (Rev 2) [REP1-015] , with particular consideration for those mobile species associated with designated sites identified during the desk study. As set out within Section 9.5 of ES Chapter 9 [REP1-015] , the Study Area for the assessment of ecology and biodiversity was extended from 10km for international designated sites to up to 30km for sites with migratory birds or bats listed as a qualifying feature, or where hydrological connectivity exists between a site and the Scheme. This is to ensure potential impacts on mobile and migratory species, such as birds, bats, and fish, are fully considered within the assessment.
SLD-299	Ecology and Biodiversity	Policy	10.2.1.3. Applicants should consider any reasonable opportunities to maximise the restoration, creation, and enhancement of wider biodiversity, and the protection and restoration of the ability of habitats to store or	Opportunities for biodiversity enhancements across the Scheme are set out within ES Volume 1, Chapter 9: Ecology and Biodiversity (Rev 2) [REP1-015] . Inclusion of biodiversity enhancements within the Scheme

			sequester carbon as set out under Section 4.6.(§5.4.33)	has been informed by local policy objectives, such as development of green and blue infrastructure; early engagement with relevant consultees, including conservation organisations such as Butterfly Conservation; and results of the desk study. Enhancements have sought to strengthen existing habitat networks and provide benefits to protected and notable species. Proposed habitat creation and enhancement measures are set out within the Biodiversity Net Gain Assessment Report [REP1-089], and enhancements across the Scheme will be delivered in line with the Outline LEMP [APP-283]. These enhancement measures will be secured via Development Consent Order (DCO) Requirements, following production of a detailed LEMP document.
SLD-300	Ecology and Biodiversity	Policy	10.2.2. In respect of mitigation, NPS EN-1 provides: 10.2.2.1. “Applicants should appropriate avoidance, mitigation, compensation and enhancement measures as an integral part of the	Appropriate avoidance, mitigation, and compensation measures for potential impacts of the Scheme on ecological features are set out within ES Volume 1, Chapter 9: Ecology and Biodiversity (Rev 2) [REP1-015]. The mitigation hierarchy has

			proposed development. In particular, the applicant should demonstrate that: 1.1.1..1. during construction, they will seek to ensure that activities will be confined to the minimum areas required for the works 1.1.1..2. the timing of construction has been planned to avoid or limit disturbance during construction and operation best practice will be followed to ensure that risk of disturbance or damage to species or habitats is minimised, including as a consequence of transport access arrangements 1.1.1..3. habitats will, where practicable, be restored after construction works have finished 1.1.1..4. opportunities will be taken to enhance existing habitats rather than replace them, and where practicable, create new habitats of value within the site landscaping proposals. Where habitat creation is required as mitigation, compensation, or enhancement, the location and quality will be of key importance. In this regard habitat creation should be focused on areas where the	been considered throughout Scheme design. Specific measures to be implemented during construction, including working areas and sensitive timing of construction works, and measures to minimise construction-phase impacts to protected / notable species, are provided within the Outline EPMS (Rev 2) [REP1-106]. A detailed EPMS will be produced prior to commencement of construction, and the avoidance, mitigation and compensation measures within which will be secured via DCO Requirements. Biodiversity enhancement measures are also set out within ES Chapter 9 [REP1-015] and have been strategically designed to maximise potential ecological benefits. Proposed habitat creation and enhancement, including the re-instatement of habitats following construction, are described in the Biodiversity Net Gain Assessment Report (Rev 2) [REP1-089]. Measures for the delivery of habitat proposals are set out within the

			most ecological and ecosystems benefits can be realised. 1.1.1..5. mitigations required as a result of legal protection of habitats or species will be complied with.	Outline LEMP [APP-283] and will be secured via DCO Requirements, following production of a detailed LEMP, substantially in accordance with the Outline LEMP [APP-283].
SLD-301	Ecology and Biodiversity	Policy	10.2.3. In respect of Secretary of State decision-making, NPS EN-1 provides: 10.2.3.1. As a general principle, and subject to the specific policies below, development should, in line with the mitigation hierarchy, aim to avoid significant harm to biodiversity and geological conservation interests, including through consideration of reasonable alternatives (as set out in Section 4.3 above). Where significant harm cannot be avoided, impacts should be mitigated and as a last resort, appropriate compensation measures should be sought (paragraph 5.4.42)	The Applicant notes this comment. Application of the mitigation hierarchy is described in Paragraphs 9.6.27 to 9.6.34, and is evidenced throughout, ES Volume 1, Chapter 9: Ecology and Biodiversity (Rev 2) [REP1-015].
SLD-302	Ecology and Biodiversity	Assessment of Ecological Baseline - Lack of species-specific surveys	Lack of species-specific surveys for the Solar PV Sites 10.3.1. The Applicant has not provided follow-up, species-	The Applicant maintains that a sufficiently robust assessment of potential impacts of the Scheme on protected / notable species has been undertaken, and is presented within

		for the Solar PV Sites	specific surveys for brown hare, hazel dormouse, reptiles, harvest mouse, hedgehog, polecat or macro-invertebrates, particularly aquatic invertebrates such as white-clawed crayfish. When this omission was queried by the Secretary of State, the Applicant's position was that an adequate assessment could be undertaken on the basis of the habitats affected, rather than target species or population/ community surveys [APP-181].	ES Volume 1, Chapter 9: Ecology and Biodiversity (Rev 2) [REP1-015]. This assessment is based on extensive baseline surveys at the Solar PV Sites, the scope of which has been agreed with relevant stakeholders, including Natural England and the Environment Agency. Habitats present within the Solar PV Sites have been assessed for their potential to support protected / notable species, including brown hare, hazel dormouse, reptiles, harvest mouse, hedgehog, polecat, and macro-invertebrates such as white-clawed crayfish. Where habitat suitability assessments identified potential for protected / notable species, their presence has been assumed, in line with the precautionary principle. On this basis, it was determined that species-specific surveys were not necessary, as a reasonable worst-case scenario has been applied. An assessment of potential impacts of the Scheme for each of the aforementioned species has been presented within ES Chapter 9 [REP1-015].

				Furthermore, this approach to impact assessment where species-specific surveys have not been undertaken is consistent with other similar consented solar NSIP schemes including West Burton Solar Project [EN010132] and Cottam Solar Project [EN010133].
SLD-303	Ecology and Biodiversity	Assessment of Ecological Baseline - Lack of species-specific surveys for the Solar PV Sites	10.3.2. However, it is not clear that the Applicant's approach complies with the core Mitigation Hierarchy (Avoid, Mitigate, Restore, Compensate) principles that underpin UK Ecological Best Practice. It significantly generalises the avoidance phase for a site of this scale to its broad habitat categories, prioritising instead subsequent Mitigation and Restoration. While proceeding under the assumption of presence of a protected species implies putting in place the highest mitigation measures possible for the identified species (i.e. higher than would be usually carried out following a standard species survey), in practice it is often not feasible to effectively detect, and thus avoid and mitigate ecological impacts without a suitably informed and detailed baseline on which to	Application of the mitigation hierarchy is described in Paragraphs 9.6.27 to 9.6.34, and is evidenced throughout, ES Volume 1, Chapter 9: Ecology and Biodiversity (Rev 2) [REP1-015]. Avoidance of key habitats, including designated sites and priority habitats, as well as those habitats identified as having potential to support protected / notable species, has been a key consideration throughout Scheme design. Avoidance measures have included removal of certain fields from the Order Limits and incorporation of protective buffers within Scheme design from an early stage, as set out in Paragraph 9.10.74 of ES Chapter 9 [REP1-015]. Further avoidance measures, referred to as 'embedded mitigation' within ES Chapter 9 [REP1-0.15], are also proposed to avoid potential impacts

			make appropriate decisions, monitor and resolve negative impacts in the long term [Appendix E/§§19-20].	on important ecological features, including those species whose presence has been assumed within the Order Limits. Embedded mitigation includes the standard good practice working methods set out within the Outline EPMS (Rev 2) [REP1-106]. Where the assessment identifies the potential for significant residual adverse effects following the application of avoidance measures, additional mitigation is proposed, in line with the mitigation hierarchy. Additional mitigation measures are set out within ES Chapter 9 [REP1-015] and Outline EPMS [REP1-106]. The scope of ecological and species-specific survey within the Solar PV Sites was defined using a proportionate, risk-based approach. Potential impacts within the Solar PV Sites have been assessed on a precautionary reasonable worst-case basis. Where suitable habitat (as identified through baseline habitat surveys), exists for any species assessed within ES Chapter 9 [REP1-0.15] for the purposes of assessment the presence of all such species has been assumed on a precautionary basis.

				The Applicant maintains that this approach means a suitably proportionate approach to managing impacts on ecological features within the Solar PV Sites will be adopted. The baseline information is considered sufficient to support a robust and proportionate assessment of likely significant effects within the Solar PV Sites, and the conclusions of ES Chapter 9 [REP1-0.15] remain appropriate and justified.
SLD-304	Ecology and Biodiversity	Assessment of Ecological Baseline - Lack of species-specific surveys for the Solar PV Sites	10.3.3. Likewise, the effectiveness of mitigation and restoration measures is limited by gaps in knowledge of the current on-site ecosystem's status. As a result, the proposal has a significantly greater potential to cause harm to these protected species, while also lacking the means to effectively monitor and address in the long term any unexpected impacts to these species resulting from the development [Appendix E/§19].	As detailed in the relevant responses above, for those protected / notable species where species-specific surveys have not been undertaken, the approach to establishing baseline conditions is considered sufficiently robust to underpin the impact assessment set out within ES Volume 1, Chapter 9: Ecology and Biodiversity (Rev 2) [REP1-015]. The design of proposed avoidance, mitigation, compensation and enhancement measures set out within ES Chapter 9 [REP1-015] has been informed by detailed desk study information, local policy, habitat suitability assessment surveys,

				consultation with relevant stakeholders, and professional judgement informed by industry best practice guidance, and have been designed considering a reasonable worst-case scenario. The Applicant maintains that a robust and proportionate assessment of likely significant effects is presented in ES Chapter 9 [REP1-015], and does not agree that a significantly greater risk of potential harm to species whose presence has been assumed results from this approach. An outline strategy for long-term ecological monitoring is set out within Section 1.4 the Outline LEMP [APP-283]. Detailed prescriptions for ecological monitoring will be provided in a detailed LEMP document and secured via DCO Requirements. Ecological monitoring will ensure the proposed habitat creation and enhancement measures, providing mitigation and enhancement for protected / notable species, establish and are maintained as desired and remedial actions identified, where necessary.

				For those protected / notable species where species-specific baseline surveys have not been undertaken, the efficacy of proposed mitigation and enhancement measures will be determined via the monitoring of habitat creation and enhancement measures, as set out within the Outline LEMP [APP-283]. Monitoring will ensure continued provision of suitable habitat is maintained throughout the operational phase. The Applicant considers this to be a proportionate and robust approach to monitoring operational phase impacts to protected / notable species whose presence has been assumed within the Order Limits.
SLD-305	Ecology and Biodiversity	Lack of species-specific surveys for the CRC	10.3.4. Save for possibly badgers, no species-specific surveys have been conducted in respect of the Cable Route Corridor. The Applicant's assumptions on species present in the CRC have been based on qualitative assessments of habitats undertaken to inform the Applicant's BNG, surveys carried out within the Solar Panel Fields, and desk-based assessments. Generally, the Applicant has given the explanation that, because of	The Applicant notes the comments regarding the scope of ecological survey within the Cable Route Corridor (CRC). Habitat surveys have been undertaken across the entirety of the CRC, including at approximately 17ha of additional areas, the surveys for which were completed following submission of the DCO application. The results of these surveys were provided at Deadline 1, and baseline habitat data has informed the assessment presented in ES Volume 1, Chapter

			the “temporary and limited nature of impacts associated with cable route construction, with all habitat expected to be reinstated following a relatively short construction period... surveys for the CRC were not considered proportionate considering the potential impacts.” As a consequence, the Applicant concludes that such species-specific surveys are not necessary or proportionate.	9: Ecology and Biodiversity (Rev 2) [REP1-015]. The scope of ecological and species-specific survey within the CRC was defined using a proportionate, risk-based approach. Survey scope and effort across the Order Limits were targeted to areas and features where there was a reasonable likelihood of significant effects, rather than applied uniformly across the Order Limits irrespective of risk. The assessment has had regard to the short-term, temporary and construction-phase nature of works within the CRC, the absence of permanent operational effects, and a robust appraisal of habitat suitability for species based on baseline habitat data collected through surveys. Based on this, a reduced survey effort within the CRC has been undertaken compared to the Solar PV Sites. This is consistent with the approach to cable route baseline surveys adopted for other similar consented solar NSIP schemes which feature significant cable routes, including West Burton Solar Project [EN010132], Cottam Solar Project [EN010133], Byers Gill

				Solar [EN010139] and Botley West Solar Farm [EN010147].
SLD-306	Ecology and Biodiversity	Lack of species-specific surveys for the CRC	10.3.5. As for the Solar PV Sites, the Applicant's approach fails to properly give effect to the mitigation hierarchy within the CRC. In the absence of species-specific information, it is unclear how the Applicant will be able to effectively plan the cable route to avoid avoidable impacts to species (as they are required to do). It is not possible to make adequately informed secure decisions on the actual routing of the Cable Corridor, both from the Applicant's and the planners' perspectives, with the current lack of analysis of actual species data for these sections [Appendix E/ §§22-28].	Potential impacts within the Cable Route Corridor (CRC), including temporary habitat loss, disturbance and fragmentation, have been assessed on a precautionary reasonable worst-case basis. Where suitable habitat (as identified through baseline habitat surveys), exists for any species assessed within ES Volume 1, Chapter 9: Ecology and Biodiversity (Rev 2) [REP1-015] for the purposes of assessment the presence of all such species has been assumed on a precautionary basis. As set out in ES Volume 1, Chapter 3: The Scheme [APP-055] the CRC Order Limit has a width of 50 m along the majority of its length, increasing up to 665 m in a number of locations to provide sufficient space for use of trenchless construction techniques and temporary construction compounds or to provide a wider area to allow space to avoid features. The width of the CRC allows for flexibility in its final alignment as the Scheme

				design develops. In practice, the construction working width for installation of the cables will typically be a width of 25 m within the CRC, narrowing at hedgerows. Embedded mitigation and further controls secured through the Outline EPMS (Rev 2) [REP1-106], including pre-construction surveys and inspections, micro-siting of cabling works, appointment of an Ecological Clerk of Works and species-specific protection measures, where appropriate, provide a recognised mechanism for managing residual risk. Furthermore, reinstatement of any disturbed habitats will take place as a priority following construction within the CRC. The Applicant maintains that this approach means a suitably proportionate approach to managing impacts on ecological features within the CRC will be adopted, and allows for appropriate flexibility to determine final cable route alignment taking into consideration the presence of ecological features. The baseline information is considered sufficient to support a robust and proportionate assessment of likely significant effects within the CRC, and the

				conclusions of ES Chapter 9 [REP1-015] remain appropriate and justified.
SLD-307	Ecology and Biodiversity	Construction and Decommissioning Impacts	Road Widening and Boundary Features 10.4.1. Appendix E considers that the full extent of harm to the hedgerow network has been overlooked by the Applicant. While the Applicant acknowledges inevitable adverse hedgerow impacts when access is required into fields and with the creation of the new access points during construction, the Applicant has overlooked likely ecological impacts during road widening. Having regard to SLD's Transport Report [Appendix D], extensive road widening is likely for many roads across the Solar PV Site.	The Applicant notes this comment. The Applicant refers to detailed responses to comments provided by Stop Lime Down on transport and access matters which refute that extensive road widening is likely for many roads across the Solar PV Sites. As such, it is the Applicant's view that the assessment of impacts on hedgerows present within ES Volume 1, Chapter 9: Ecology and Biodiversity (Rev 2) [REP1-015] can be relied upon.
SLD-308	Ecology and Biodiversity	Construction and Decommissioning Impacts	Cable-laying in the CRC 10.4.2. As cable-laying will be carried out through open trenches rather than through underground coring or similar, more indirect but expensive approaches, cable-laying will result in at least temporary loss of habitat and features directly above its	The Applicant notes this comment. Whilst it is acknowledged that the majority of cable installation works will likely employ open-cut trenching techniques, as a point of clarity, and as described in ES Volume 3, Appendix 3-2: Cable Route Construction Method Statement [APP-183], there are a number of locations where cable installation

			trench lines. Extensive trenches such as these are also among the works most likely to conflict with wildlife features such as badger setts, mammal and bird nests, food resources, dormouse hedgerow corridors, etc. within the local landscape, due to the required overall length of the cable corridor.	works will employ trenchless technologies in 'Avoidance Areas'. The locations of the Avoidance Areas are shown in ES Volume 2, Figure 3-2-1 to 3-2-10: Key Construction Phase Features [APP-082] .
SLD-309	Ecology and Biodiversity	Construction and Decommissioning Impacts	10.4.3. While the 50m corridor width affords some leeway to avoid particularly high-value features at the design stage, and measures are scheduled to be included to avoid damages within sensitive areas such as designated sites, even in a best case scenario of like-for-like restoration, this phase of the works will unavoidably result in significant short-term habitat losses. Even when "temporary", large-scale trenching such as that proposed carries an inherently high risk of adversely affecting protected and vulnerable fauna, irreplaceable habitats and features above and below ground, which have been overlooked due to the great length and area of the work area.	The Applicant acknowledges the potential for adverse impacts on ecological features as a result of cable trenching works, including from the temporary loss of many sections of hedgerow within the Cable Route Corridor. This is transparently presented within ES Volume 1, Chapter 9: Ecology and Biodiversity (Rev 2) [REP1-015] . The assessment identifies embedded and additional mitigation measures and concludes that, with these measures in place, no significant adverse effects are anticipated on ecological features as a result of cable installation works with the exception of hedgerows. Residual significant adverse effects on this feature are anticipated at a local-level of geographical importance only. Embedded and additional mitigation measures secured through the

				Outline EPMS (Rev 2) [REP1-106] , include pre-construction surveys and inspections, micro-siting of cabling works, appointment of an Ecological Clerk of Works and species-specific protection measures, where appropriate. Furthermore, reinstatement of any temporarily removed habitats will take place as a priority following construction within the Cable Route Corridor.
SLD-310	Ecology and Biodiversity	Construction and Decommissioning Impacts	10.4.4. SLD seeks clarity from the Applicant as to what methods would be used to determine at the final design and construction stages, whether a particular pathway is preferable over another, particularly in regard to identifying ecologically sensitive habitats and features which may not be currently listed as specifically designated sites or within Public Records.	The Applicant notes this comment. All areas of the Cable Route Corridor have been subject to comprehensive baseline habitat surveys which has enabled identification of sensitive habitats and helped to inform Scheme design. For example, the locations of 'Avoidance Areas' as described in ES Volume 3, Appendix 3-2: Cable Route Construction Method Statement [APP-183] , have been identified through an iterative EIA process including taking into account baseline habitat survey findings. For example, Avoidance Areas have been embedded into the scheme where the Cable Route Corridor crosses certain habitats likely to be of elevated value for biodiversity including woodland habitats, as well as watercourses

				likely to support migratory fish species (as described in Paragraph 9.10.317 of ES Volume 1, Chapter 9: Ecology and Biodiversity (Rev 2) [REP1-015]. This is in accordance with the mitigation hierarchy. More generally, the overall approach to identifying and mitigating impacts at the detailed design and construction phase will be to avoid impacts in the first instance, for instance through micro siting cable trenches to avoid sensitive features such as badger setts, trees with bat roosting potential, or features used by riparian mammals, as described in Paragraphs, 9.10.161, 9.10.175, and 9.12.24 respectively within ES Chapter 9 [REP1-015]. Where impacts cannot be avoided, appropriate measures would be adopted to mitigate impacts as far as possible or, where appropriate, conduct works under relevant mitigation licences. Embedded and additional mitigation measures secured through the Outline EPMS (Rev 2) [REP1-106] include pre-construction surveys and inspections, micro-siting of cabling works, appointment of an Ecological

				Clerk of Works and species-specific protection measures, where appropriate.
SLD-311	Ecology and Biodiversity	Construction and Decommissioning Impacts	Likely Construction Effects on Species 10.4.5. The ES identifies potential adverse construction impacts to species arising from [APP/061, §9.8.3]: - Habitat loss, for example the loss of hedgerows where existing field access points cannot be used or need to be widened, or clearance to facilitate permanent hardstanding; - Killing and injury, arising out of habitat clearance and the actions of vehicles and plant during construction; - Fragmentation of habitats as a consequence of habitat loss and habitat change, reducing the function of the habitats and impeding the ability of species to disperse and maintain a viable population; - Disturbance to species, including through movement and vibration during construction operations and increased footfall;	The Applicant notes this comment. Potential impacts of the Scheme on ecology and biodiversity as a result of construction phase impacts are assessed in ES Volume 1, Chapter 9: Ecology and Biodiversity (Rev 2) [REP1-015], which considers baseline conditions and evaluates likely effects during construction, operation and decommissioning. The assessment identifies embedded and additional mitigation measures and concludes that, with these measures in place, no significant adverse effects are anticipated on ecological features with the exception of hedgerows and ground-nesting birds of open habitats. Residual significant adverse effects on hedgerows and skylark are anticipated at a local-level of geographical importance only, and at a site level for other ground-nesting bird species.

			Pollution and habitat degradation through the release of chemical, sediment or dust pollution, interfering with the normal function of habitats and directly harming species.	
SLD-312	Ecology and Biodiversity	Construction and Decommissioning Impacts	10.4.6. The stated mitigation for all the species mentioned in the Applicant's reports is to focus on pre-clearance searches carried out by an ecologist shortly prior to works. Where any animals are discovered, works within the section are to halt until these have been successfully translocated. Pre-clearance searches alone are not an effective means of detecting and mitigating potential adverse impacts on all fauna.	The Applicant highlights that embedded and additional mitigation measures for all ecological features (including species) are presented in Sections 9.9 and 9.12 of ES Volume 1, Chapter 9: Ecology and Biodiversity (Rev 2) [REP1-015]. This includes the iterative design of the Scheme to retain key wildlife habitats, implementation of protective buffer zones from key habitats and features, pollution prevention measures, micro-siting of cabling works, sensitive timing and methodologies of certain works, attendance of an Ecological Clerk of Works, reinstatement of habitat following temporary removal, and provision of extensive new habitats. Such embedded and additional mitigation measures are secured through the Outline EPMS (Rev 2) [REP1-106], Outline CEMP (Rev 2) [REP1-096] and Outline LEMP [APP-283]. Whilst pre-construction surveys and inspections form part of

				the package of mitigation measures, these are far from the focus of mitigation.
SLD-313	Ecology and Biodiversity	Construction and Decommissioning Impacts	10.4.7. Additionally, relocation of species is often a highly complex operation without certainty of outcome, particularly when operating without prior data on the site and species concerned. Receptor site identification and suitability, as well as the study of the individual species and populations concerned, are paramount.	The Applicant notes this comment. Capture and translocation of wildlife to suitable nearby and retained habitat is prescribed for some species within the Outline EPMS (Rev 2) [REP1-106] to reduce impacts during construction, where habitat loss is unavoidable. However, in all cases this would occur where discrete sections of habitat are to be impacted, such as relatively small sections of hedgerow or watercourse to be temporarily or permanently removed for access. Any such translocation would be undertaken by a suitably qualified and experienced Ecological Clerk of Works (EcoCoW). Any translocation of individual animals would be to nearby retained habitat as identified by the EcoCoW and would likely involve small numbers of any animals in any one location. It is therefore the Applicant's view that can be demonstrated that any such requirement will be undertaken appropriately and in accordance with best practice.

SLD-314	Ecology and Biodiversity	Construction and Decommissioning Impacts	Residual Effects Table 9-12 10.4.8. Within ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061], the Applicant provides a summary of the significant residual effects which they identify as arising out of the Scheme. The Applicant concludes that the majority of significant adverse effects identified in section 9.10 can be reduced to neutral non-significant effects. There are just two likely significant adverse effects reported for the whole scheme and they are confined to the construction and decommissioning phase, as specified in the Applicant's Table 9-12 [APP/061/170]: Impact – Temporary loss of hedgerows within the Cable Route Corridor Proposed mitigation/enhancement measures and residual effects after mitigation – Proposed creation and enhancement of considerable extent of	The Applicant notes this comment.

			hedgerows. Adverse – significant at the local level in the short term. Neutral – not significant in the medium to long term.	
SLD-315	Ecology and Biodiversity	Construction and Decommissioning Impacts	Impact – Displacement of ground-nesting birds, for example skylark, from Solar PV Sites Proposed mitigation/enhancement measures and residual effects after mitigation – Provision of compensatory nesting habitat, including permanent grassland and set aside; enhancement of foraging opportunities; and targeted management under the Outline LEMP. Adverse – significant at local level for skylark. Adverse – significant at site level for yellow wagtail, corn bunting, grey partridge and quail.	The Applicant notes this comment.
SLD-316	Ecology and Biodiversity	Construction and Decommissioning Impacts	10.4.9. Appendix E challenges these conclusions. Mr. Valori considers the likely impact of the loss of hedgerow to be at least medium term, being 3-5 years for standard hedgerow and	The assessment methodology, including for the characterisation of impacts, is set out within ES Volume 2, Chapter 9: Ecology and Biodiversity (Rev 2) [REP1-015] . Definitions of short, medium and

			proportionally much longer for a hedge with trees or one which has ancient attributes – the latter of which are effectively irreplaceable. Additionally, the scale of losses would be closer to at least district level impact, as opposed to local.	long-term impacts are provided in Paragraph 9.6.24 within ES Chapter 9 [REP1-015] and are taken from CIEEM Guidelines for Ecological Evaluation and Impact Assessment, as referenced within the Chapter. Short-term impacts are generally taken to be those limited to no longer than 5 years, which corroborates the assessment of hedgerow impact duration provided in Stop Lime Down's comment. It is recognised that the impact of removing mature trees within hedgerows is likely to exceed this timeframe. Micro-siting of hedgerow removal works within the parameters of Schedule 12 of the Draft DCO (Rev 2) [REP1-007] and the Hedgerow Removal Plan presented within the Outline EPMS (Rev 2) [REP1-106] will seek to avoid impacts to mature trees as far as is reasonably practicable, as set out within ES Chapter 9 [REP1-015]. However, connectivity of hedgerows can be expected to be restored following re-planting of hedgerow gaps within the Cable Route Corridor (CRC) within 5 years. Extensive

				hedgerow creation and enhancement within the Solar PV Sites is also proposed and can be anticipated to establish over the defined short-term timescale, providing additional mitigation for the anticipated hedgerow losses. The conclusion that likely significant residual adverse effects on hedgerows are anticipated in the short-term only set out within ES Chapter 9 [REP1-015], is therefore considered appropriate and sufficiently robust. Irreplaceable habitats, as defined in The Biodiversity Gain Requirements (Irreplaceable Habitat) Regulations 2024, have been identified within the Biodiversity Net Gain (BNG) Assessment Report (Rev 2) [REP1-089] and Statutory Biodiversity Metric (Rev 2) [REP1-093]. All identified irreplaceable habitats within the Order Limits, comprising veteran trees, are retained within the proposals. Hedgerow habitats are evaluated as being of district level ecological importance within ES Chapter 9 [REP1-015], with a total of approximately 144km of hedgerows

				and lines of trees present within the Order Limits. Given that anticipated hedgerow losses based on a reasonable worst-case scenario comprise only a relatively small percentage of the total extent of hedgerow habitat present (approximately 1.77km in total) due to Scheme design and embedded mitigation measures, the impacts on hedgerows are considered to constitute an effect at a local scale of geographic importance.
SLD-317	Ecology and Biodiversity	Construction and Decommissioning Impacts	10.4.10. While Mr. Valori's report supports the enhancement of retained fields to allow for a greater number of skylark, he notes that these retained fields remain a limited fraction of the total area which will be deployed.	The Applicant welcomes Stop Lime Down's support of proposed habitat enhancement measures for skylark in retained fields. It is recognised within the impact assessment presented within ES Volume 1, Chapter 9: Ecology and Biodiversity (Rev 2) [REP1-015] that the proposed measures are not anticipated to compensate in full for loss of existing skylark habitat within the Order Limits. This is reflected in the anticipated significant residual adverse effects on the species at a local level as a result of Construction and Decommissioning phase impacts.
SLD-318	Ecology and Biodiversity	Construction and	10.4.11. It is further noted that the Applicant's table does not	Construction phase impacts have been assessed within ES Volume 1,

		Decommissioning Impacts	include any assessment of the residual adverse effects during the construction and decommissioning phases for any other species. That assertion is surprising because, even with effective mitigation, it is very unlikely that all species harms will be avoided.	Chapter 9: Ecology and Biodiversity (Rev 2) [REP1-015] on a precautionary worst-case basis, and residual effects determined considering proposed embedded and additional mitigation measures. The assessment presented within ES Chapter 9 [REP1-015] concludes that no significant residual adverse effects on protected / notable species as a result of the Scheme are anticipated during Construction, with the exception of ground-nesting birds of open habitat. Tables 9-12 and 9-13 presented within ES Chapter 9 (Rev 2) [REP1-015] only summarise where significant residual effects remain for any ecological features only once embedded and additional mitigation have been taken into account. These tables do not summarise any potential adverse effects which are non-significant. The preparation, approval and implementation of a detailed Ecological Protection and Mitigation Strategy, substantially in accordance with the Outline EPMS [REP1-106], is secured through Requirement 8 in Schedule 2 of the Draft DCO (Rev 2)

				[REP1-007] , ensuring that proposed Construction phase measures to avoid residual significant adverse effects to protected / notable species are implemented.
SLD-319	Ecology and Biodiversity	Construction and Decommissioning Impacts	10.4.12. Further clarification is also sought from the Applicant as to the likely significant ecological effects following the construction phase, as distinct from the decommissioning phase.	Table 9-12 within ES Volume 1, Chapter 9: Ecology and Biodiversity (Rev 2) [REP1-015] provides a summary of likely significant residual effects anticipated during Construction and Decommissioning, as determined by the impact assessment presented within the Chapter. As set out within Paragraph 9.9.25 of ES Chapter 9 [REP1-015] , the likely significant residual effects anticipated during Decommissioning are considered likely to be similar to those identified during Construction, and have been summarised as such in Table 9-12.
SLD-320	Ecology and Biodiversity	Operation and Maintenance Impacts	10.5.1. Appendix E considers that during the operation and maintenance phase there will be likely adverse effects on the local population of species such as hares, which generally inhabit open swathes of grassland. Likewise, the fences installed for the scheme are likely to cause commute route disruption and	The Applicant disagrees that likely adverse effects on brown hare can be anticipated during Operation and Maintenance. As set out within Paragraph 9.10.226 of ES Volume 1, Chapter 9: Ecology and Biodiversity (Rev 2) [REP1-015] , monitoring of active solar arrays published by Solar Energy UK indicates that brown hare can be

			exclusion of fauna from the Solar PV Fields.	found in relatively high numbers within panelled areas, and that establishment of permanent grassland habitat provides suitable grazing and foraging habitat for the species. As such, the increased shelter, extent and quality of foraging habitat across the Solar PV Sites and reduction in disturbance from regular ploughing and other agricultural activities, are considered likely to result in significant beneficial residual effects on brown hare at site level, as set out within ES Chapter 9 [REP1-015]. With regards to the impacts of fencing installation on fauna at the Solar PV Sites during Operation and Maintenance, potential effects of boundary treatments and fencing on ecology and wildlife movement are assessed in ES Chapter 9 [REP1-015], which considers impacts on habitats and species during construction, operation and decommissioning and identifies measures to avoid or mitigate barriers to wildlife movement. The assessment concludes that no significant adverse effects on ecology

				and biodiversity are anticipated as a result of boundary treatments and fencing. The Scheme design incorporates fencing around the Solar PV Arrays that is permeable to wildlife, with the exception of deer. This means animals (excluding deer only) will be able to freely access habitats within the Solar PV Sites without the need for wildlife gates. In addition, wide buffers are retained around the peripheries of the Solar PV Sites to allow wildlife, including deer, to move between favoured habitats. These measures are described in ES Chapter 9 [REP1-015] and detailed in the Outline EPMS (Rev 2) [REP1-106]. Fencing will be subject to regular inspection and maintenance to ensure continued permeability to wildlife and effective functioning over the lifetime of the Scheme. Measures for ongoing ecological management and maintenance are set out in the Outline LEMP [APP-283]. The preparation, approval and implementation of the detailed EPMS and LEMP, substantially in

				accordance with the Outline EPMS [REP1-106] and Outline LEMP [APP-283] , are secured through Requirements 8 and 7 respectively in Schedule 2 of the Draft DCO (Rev 2) [REP1-007] , ensuring that fencing design and maintenance measures are delivered and maintained throughout the lifetime of the Scheme.
SLD-321	Ecology and Biodiversity	Conclusion	10.6.1. The ecological evidence submitted by the Applicant falls materially short of what is required to support a safe planning decision. Species-specific surveys have not been carried out for a significant number of protected and notable species across both the Solar PV Sites and the Cable Route Corridor, and the Applicant's reliance on habitat-based assessments and reactive pre-clearance searches does not comply with the mitigation hierarchy that underpins the NPS. The likely impacts of road widening, open-trench cable-laying across 22km of the landscape, and the long-term effects of fencing and panel installation on open-habitat species have not been adequately assessed. The	The Applicant respectfully disagrees with the concluding comment and considers the assessment on ecology and biodiversity present in ES Volume 1, Chapter 9: Ecology and Biodiversity (Rev 2) [REP1-015] to be robust. The Applicant considers likely effects of all important ecological features resulting from potential sources of impact have been fully considered and assessed. The scope of ecological and species-specific survey across the Order Limits has been completed using a proportionate, risk-based approach. These have been targeted to areas and features where there was a reasonable likelihood of significant effects, rather than applied uniformly

			application should not be approved in its current form, not least as in its current form it does not properly comply with the mitigation hierarchy.	across the Order Limits irrespective of risk or potential impacts. The Applicant considers the Scheme to firmly comply with the mitigation hierarchy. Avoidance of key habitats, including designated sites and priority habitats, as well as those habitats identified as having potential to support protected / notable species, has been a key consideration throughout Scheme design. Avoidance measures have included removal of certain fields from the Order Limits, identification of Avoidance Areas where trenchless technologies will be used to install cables, and incorporation of protective buffers at key habitats and features within the Scheme design from an early stage. Where the assessment has identified the potential for significant adverse effects which remain following the application of avoidance measures, additional mitigation is proposed, in line with the mitigation hierarchy.
SLD-322	Socio-Economics,	Introduction	11.1.1. Chapter 16 of the Applicant's ES presents findings of an assessment of the likely	The Applicant notes this comment.

	Tourism and Recreation		significant effects on socio-economics and tourism as a result of Lime Down Solar Park [APP-068]. The chapter identifies and proposes measures to address the potential impacts and likely significant effects on socio-economics and tourism during the construction, operation and maintenance and decommissioning phases of the Scheme.	
SLD-323	Socio-Economics, Tourism and Recreation	Introduction	11.1.2. SLD considers that the Scheme, by virtue of its scale and wide-ranging impacts, is likely to have significant adverse effects on the local population and economy, based on the evidence which has already appeared in the Examination	The Applicant notes this comment and refers to Table 2-1 in the Applicant responses to Local Impact Report (Rev 1) [EN010168/EXAM/9.21] submitted at Deadline 2 where effects to the local population and economy are discussed. 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 Schedule 2 to the Draft DCO [REP1-007].
SLD-324	Socio-Economics, Tourism and Recreation	Policy	11.2.1. The relevant NPS requirements specifically relevant to socio-economics and tourism are detailed in Appendix 16-1 of the Applicant's ES [APP-240].	The Applicant notes this comment.
SLD-325	Socio-Economics, Tourism and Recreation	Policy	11.2.2. Paragraph 4.1.5 of EN-1 provides that in decision making, the Secretary of State should take into account the potential benefits and potential adverse impacts of development proposals including their	The Applicant notes this comment.

			"contribution to meeting the need for energy infrastructure, job creation, reduction of geographical disparities, environmental enhancements, and any long-term or wider benefits". Paragraph 4.1.6 goes on to state that the Secretary of State should take into account "environmental, social and economic benefits and adverse impacts, at national, regional and local levels".	
SLD-326	Socio-Economics, Tourism and Recreation	Policy	11.2.3. Paragraph 5.13.2 of EN-1 outlines: "Where the project is likely to have socio-economic impacts at local or regional levels, the applicant should undertake and include in their application an assessment of these impacts as part of the ES."	The Applicant notes this comment and refers to ES Volume 1, Chapter 16 Socioeconomics, Tourism and Recreation [APP-068] where socio-economic impacts at a local or regional level have been assessed in full. 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 Applicants assessment and compliance with paragraph 5.13 of EN-1 is signposted in ES Volume 3, Appendix 5-1 National Policy Statement Requirements [APP-186]. The Applicant has sought to

				comply with local planning policy in respect of economy wherever practicable.
SLD-327	Socio-Economics, Tourism and Recreation	Likely Impacts to the Scheme	11.3.1.1. Ashton Hawker: Mr. Hawker is a local resident with a long-established farm business in Hullavington. At the OFH, Mr. Hawker explained that his business purchases locally owned grain from a farm which has agreed for its land to be used in the Scheme. As a consequence, it will be difficult for Mr. Hawker to acquire sufficient grain for his livestock, which will impact his ability fulfil supply contracts for beef. This could have corresponding impacts on his business and redundancies are probable.	The Applicant notes this comment and refers to Table 2.1 (pages 2-7) in the Written Summary of the Oral submissions at the Open Floor Hearing 1 and the Applicants Responses [REP1A-013] where the Applicant has responded in writing. With regards to the comments relating to loss of agricultural revenue (and thus resultant impacts on employment) as a result of temporary works to construct the Cable Route Corridor, these can be compensated either through voluntary agreement with the Applicant, or through the application of compulsory acquisition powers. The anticipated effects to the farming business affected by cable routing works are likely to be temporary and restricted to the width required for cable construction works. The Outline CEMP [REP1-096], secured by Requirement 13 in Schedule 2 to the Draft DCO [REP1-007] furthermore commits to the reinstatement of land affected by cabling works as soon as practicable

				to allow for agricultural work on the land to recommence as soon as construction of that section of cable route is complete.
SLD-328	Socio-Economics, Tourism and Recreation	Likely Impacts to the Scheme	11.3.1.2. January Farrington: Mrs. Farrington operates a thoroughbred stud farm adjacent to Area D, alongside the Gauzebrook. West Park Stud Farm will be significantly impacted by the Scheme, with likely views of industrial infrastructure and moving tracker panels. The farm was purchased for its peaceful environment, open landscape and safe access, all of which are essential for broodmares and young stock. The introduction of permanent noise, movement, visual disturbance, dust, access disruption and flood risk will have adverse impacts on the young stock which Ms. Farrington rears at West Park Stud Farm. Insurance for staff and high-value bloodstock will become untenable and Ms. Farrington considers it likely that her clients will choose to not keep their valuable breeding stock in an industrialised environment.	The Applicant notes this comment and refers to Table 2.6 (pages 30-34) in the Written Summary of the Oral submissions at the Open Floor Hearing 1 and the Applicants Responses [REP1A-013] where the Applicant has responded in writing. The Applicant acknowledges the importance of tranquillity on West Park Farm, however, given the buffer between the Schemes' Order Limits, the Gauze Brook and the facility beyond, no significant effects to West Park Farm are anticipated at any phase of the Scheme. No significant residual effects to the operation, business or recreational use to the facility have been identified. Construction noise effects would be controlled through the implementation of the Outline CEMP [REP1-096], secured through Requirement 13 of Schedule 2 to the Draft DCO [REP1-007]. In particular, Sections 2.5 and 3.9 of the Outline CEMP [REP1-096] set out a range of embedded

				mitigation measures, including adherence to best practicable means in accordance with BS 5228, restrictions on core construction working hours, management of out-of-hours working through Section 61 agreements where required, use of temporary acoustic fencing around HDD compounds where necessary, and implementation of additional site-specific mitigation measures where activities have the potential to affect nearby noise-sensitive receptors.
SLD-329	Socio-Economics, Tourism and Recreation	Likely Impacts to the Scheme	11.3.1.3. Freddie Spickernell: Mr. Spickernell runs the Vine Tree, a historic pub which is popular with the local community as well as visitors who come to walk, enjoy lunch, and sit in the garden to experience the countryside. The Vine Tree will be surrounded on all sides by panels from the Scheme, and every access route to the pub will be lined with industrial-scale solar panels, which will actively deter these visitors. If the pub is forced to close, many young people will lose a valuable source of first-time employment.	The Applicant notes this comment and refers to Table 2.21 (pages 119-122) in the Written Summary of the Oral submissions at the Open Floor Hearing 1 and the Applicants Responses [REP1A-013] where the Applicant has responded in full in writing.

SLD-330	Socio-Economics, Tourism and Recreation	Likely Impacts to the Scheme	11.3.1.4. Alex Frost: Mr. Frost operates a stud business which employs 5 people directly and contributes hundreds of thousands of pounds each year to the local economy in veterinary bills, feed, staff wages and other contribution. Mr. Frost emphasises that independent veterinary and scientific evidence shows that industrial scale solar developments can cause serious welfare risks to horses, especially pregnant mares and foals. The Scheme will inevitable lead to the closure of stud farms, an unnecessary loss of rural employment and reduced inward investment.	The Applicant notes this comment and refers to Table 2.33 (pages 177-187) in the Written Summary of the Oral submissions at the Open Floor Hearing 1 and the Applicants Responses [REP1A-013] where the Applicant has responded in full in writing. While the concerns raised are acknowledged, the Applicant maintains that the Scheme does not pose a threat to local rural businesses or the local equestrian economy. The equestrian facilities at Ladyswood Farm & Stud have been assessed as a specific receptor in ES Volume 3 Appendix 16-2 Tourism and Recreation Receptor Tables [APP-241]. During construction, a medium-term temporary moderate-minor (non-significant) adverse effect has been identified and mitigation measures proposed as set out above.
SLD-331	Socio-Economics, Tourism and Recreation	Likely Impacts to the Scheme	11.3.1.5. Isabel Ross: Ms. Ross manages a fourth-generation farm which breeds rare sheep. Her property is in the path of the Cable Route Corridor and Ms. Ross	The Applicant notes this comment and refers to Table 2.45 (pages 275-282) in the Written Summary of the Oral submissions at the Open Floor Hearing 1 and the Applicants

			predicts that, as a consequence of the construction, she will have to cut her flock by up to 80% as a consequence of the loss of grassland. This will lead to a loss of farm income of, at a minimum, £20,000 per year.	Responses [REP1A-013] where the Applicant has responded in full in writing. The Applicant acknowledges that the grazing pastures south of Park Farm are directly affected by the routing of the Cable Route Corridor and there will be substantial, albeit temporary disruption to grazing on this land. Under the provisions of the Land Compensation Act 1961, the Land Compensation Act 1973 and the Compulsory Purchase Act 1965, reasonable losses incurred by the landowner or occupier as a result of the Applicant's works, are recoverable following claims to the Applicant supported by evidence.
SLD-332	Socio-Economics, Tourism and Recreation	Likely Impacts to the Scheme	11.3.2. SLD further notes that the Local Impact Report from Wiltshire Council is yet to be published, and SLD reserves its right to comment on the report when it comes forward. Nonetheless, SLD draws attention to the observations which have already been made by Wiltshire Council to date in respect of the likely socioeconomic and tourism	The Applicant notes this comment and refers to the Applicants Response to Wiltshire Council Local Impact Report [EN010168/EXAM/9.21] submitted at Deadline 2. The Applicant identifies that the reported impacts in this section by Wiltshire Council refer to the

			impacts of the Scheme, which include a loss of £1.76 million per year of tourism spending during the construction phase, reducing to £395,000 per year once construction is completed [RR-4934, §18.1]. Having regard to the representations made by local residents at the OFH, as well as the necessarily diffuse impacts which will be experienced as a consequence of this scheme, SLD considers these estimates are likely to be a significant underestimation.	Applicant's PEIR, and not the assessment as submitted for the DCO Application. The Applicant refers to their response to comment WC-306 in the Applicant's Response to Relevant Representation (Part 1) [PDA-009] . The construction phase impacts are set out in ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068] .
SLD-333	Socio-Economics, Tourism and Recreation	Likely Impacts to the Scheme	11.3.3. Wiltshire Council further observes that "whilst this development will help with the economic viability of a number of farm businesses, a significant number of other businesses will be impacted negatively and overall business activity in the area will fall" [RR-4934, §18.12].	The Application refers to their response to comment WC-308 (page 321) in Applicant's Response to Relevant Representation (Part 1) [PDA-009] . 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 SSCEP [REP1-108], with the intention of this having a legacy impact throughout the operational lifetime of the Scheme. This is secured by Requirement 18 in Schedule 2 to the Draft DCO [REP1-007].
SLD-334	Socio-Economics, Tourism and Recreation	Conclusion	11.4.1. SLD submits that the Scheme will give rise to significant and wide-ranging adverse socioeconomic and tourism impacts on the local area. The evidence of local residents and businesses, as presented in representations and at the Open Floor Hearing, demonstrates the breadth and severity of those impacts: from the loss of agricultural livelihoods to the undermining of the area's tourism offer. Wiltshire Council's estimates point to a loss of £1.76 million per	The Applicant refers to its responses to the above comments. The Applicant acknowledges that adverse effects on tourism and recreation are identified in ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068], including residual significant adverse effects on individual PRoWs and long-distance recreational routes. However, the Applicant does not consider that the Scheme would result in a significant adverse effect on tourism or recreation overall within the Study Area at any stage of the Scheme's

			year in tourism spending during construction alone, and SLD considers even those figures are likely to underestimate the true scale of the harm. SLD therefore submits that the Applicant has failed to adequately assess the socioeconomic and tourism impacts of the Scheme, and that those impacts weigh against the grant of consent.	lifecycle. The Applicant considers that all impacts have been appropriately mitigated and secured through the Outline SSCEP [REP1-108], with the intention of this having a legacy impact throughout the operational lifetime of the Scheme. This is secured by Requirement 18 in Schedule 2 to the Draft DCO [REP1-007].
SLD-335	Human Health	Introduction	12.1.1. Health is a cross-cutting issue for the Examination of the Lime Down Solar Park. SLD submits that the Scheme gives rise to significant and foreseeable health impacts, both through its effects on the everyday lives of local residents and through the risks posed by the proposed Battery Energy Storage System (BESS).	Impacts of the Scheme on mental health and wellbeing are assessed in ES Volume 1, Chapter 18: Human Health [APP-070]. This chapter provides a comprehensive assessment of the Scheme's potential effects on human health, including mental health and wellbeing, through consideration of a broad range of health determinants. These include access to open space and recreation, transport and connectivity, community identity and cohesion, employment and income, noise and vibration, air quality, and access to health and social care services. The assessment applies a health "lens" to the findings of relevant technical chapters and concludes that, with the embedded mitigation and additional measures outlined in the relevant management

				plans [APP-277 to APP-287 updated by REP1-096 to REP1-112] and secured by their respective requirements in Schedule 2 to the Draft DCO [REP1-007], the Scheme would not give rise to significant adverse effects on population health, including mental health and wellbeing. Mitigation measures include (but are not limited to) ensuring PRowS remain open as much as is practicable, HGV movements are set to defined routes and within set hours, community liaison and engagement is maintained, and construction impacts on noise and air quality are regulated. Potential effects of toxic gases arising from a BESS fire are assessed in ES Volume 1, Chapter 15: Air Quality [REP1-023] and in ES Volume 1, Chapter 20: Other Environmental Matters [APP 072], Section 20.7: Major Accidents and Disasters. An assessment of how these fumes could affect sensitive receptors within a 1 km radius of the BESS Area, including residential properties and ecological receptors, is provided in ES Volume 1, Chapter 15: Air Quality [REP1-023]. This

				assessment concludes that no significant off-site impacts are predicted should a fire event occur. The Applicant also refers to the Applicant's Detailed Response to Stop Lime Down Deadline 1 Submission on BESS Fire Emissions (Rev 1) [EN010168/EXAM/9.25], submitted at Deadline 2. Risks associated with BESS are considered in ES Volume 1, Chapter 18: Human Health [APP-070], including potential impacts associated with changes in local air quality associated with potential fires and impacts to water quality associated with firewater run off. Measures to control BESS fire emissions are outlined in the Outline Battery Safety Management Plan (BSMP) [REP1-110] and secured through Requirement 6 (Battery safety management) in Schedule 2 of the Draft DCO [REP1-007]. No significant effects have been identified.
SLD-336	Human Health	Introduction	12.1.2. The following papers/reports are relevant to	The Applicant notes this comment. Please refer to Applicant's Detailed Response to Stop Lime Down

			SLD's position in respect of the issue of health: - Human health impacts of Lime Down Solar Park, by Dr. Claire Osmond (Appendix I1) - Air Pollution Modelling from a Bess Fire at Lime Down by Professor Richard Skeffington and Professor Peter Dobson (Appendix I2)	Deadline 1 Submission on BESS Fire Emissions (Rev 1) [EN010168/EXAM/9.25], submitted at Deadline 2.
SLD-337	Human Health	Policy	12.2.1. NPS EN-1 recognises that energy infrastructure has the potential to impact on the health and well-being if the population. Direct impacts on health include increased traffic, air or water pollution, dust, and noise. It recognises that it may also have indirect health impacts, for example, if the infrastructure affects access to key public services, transport, or the use of open space for recreation and physical activity (NPS EN-1, para 4.4.3). As a consequence, applicants are required to assess the effects of each element of a project and identify any potential adverse health impacts and any	The Applicant notes this comment and refers Section 18.6 of the ES Volume 1, Chapter 18: Human Health [APP-070]. The assessment of health cross refers to the technical assessments undertaken for the other technical disciplines in the ES, highlighting any conclusions reached which are relevant to human health. A health 'lens' has been applied to these conclusions to determine the extent to which these conclusions have any effect (or not) upon the health of the local population or specific population groups therein. A clear pathway between the anticipated impact and the resultant health effects has been determined to understand the significance of any

			measures to avoid, reduce, or compensate these impacts.	effects to human health, including for direct and less obvious indirect effects, this is outlined within Table 18-8. The assessment has included health detriments such as air quality, water quality or availability, land quality and noise and vibration. The assessment has also been informed by available topic-specific literature, and where appropriate, engagement with health and wellbeing stakeholders and statutory bodies, as aligned with NPS EN-1. The assessment in ES Volume 1, Chapter 18: Human Health [APP-070] applies a health-based review of relevant technical chapters to identify potential pathways by which the Scheme could affect physical health. It concludes that, with the embedded mitigation and additional measures outlined in the relevant management plans [APP-277 to APP-287] updated by REP1-096 to REP1-112 and secured by their respective requirements in Schedule 2 to the Draft DCO [REP1-007], the Scheme would not give rise to significant adverse effects on population physical health at any phase of the Scheme.

				Furthermore, compliance with national policy, including NPS EN-1 are set out in Annex A to the Planning Statement [REP1-087] .
SLD-338	Human Health	Policy	12.2.2. Paragraph 4.4.8 of EN-1 notes that where an area is not subject to separate regulation (as is the case for example, air pollution), the Secretary of State “may want to take account of health concerns when setting requirements relating to a range of impacts, such as noise.”	The Applicant acknowledges paragraph 4.4.8 of National Policy Statement EN-1 within Volume 3, Appendix 18-2. To ensure that the relationships between different aspects of the Scheme are identified, Sections 18.7, 18.9 and 18.10 of ES Volume 1, Chapter 18: Human Health [APP-070] refer to other chapters within the ES which pertain to effects on human health. A series of embedded and additional mitigation measures have been identified and are outlined within Volume 1, Chapter 18: Human Health with measures proposed to be secured through requirements in the Draft DCO [REP1-007].
SLD-339	Human Health	Policy	12.2.3. The most recent version of the NPPF (amended 2024 and February 2025)	The Applicant acknowledges paragraph 104 of the National Planning Policy Framework within ES

			promotes the preservation of healthy and safe communities. While the NPPF does not contain specific policies for NSIPs, its policies are relevant and may be given weight in decision-making. Chapter 8 observes that “access to a network of high quality open spaces and opportunities for sport and physical activity is important for the health and well-being of communities, and can deliver wider benefits for nature and support efforts to address climate change” (para103). It further emphasizes the importance of proactively seeking to “protect and enhance public rights of way and access, including taking opportunities to provide better facilities for users” (para 104).	Volume 3, Appendix 18-2: Human Health Legislation, Policy and Guidance [APP-245]. A detailed assessment of the likely significance of effects from the Scheme on the use and desirability of individual PROW and recreational access to the countryside is included in ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068] and ES Volume 3, Appendix 16-2: Tourism and Recreation Receptor Tables [APP-241]. This assessment considers the impact on individual recreational routes, including their practical use, enjoyment and desirability. The Applicant confirms that the majority of significant adverse effects can be mitigated. However, some significant adverse effects to users of PROW and unsurfaced roads in Lime Down E during construction cannot be mitigated further. No significant residual effects are anticipated during the operational phase of the Scheme. The assessment in ES Volume 1, Chapter 18: Human Health [APP-

				070] also considers the physical and mental health impacts of changes to recreation and countryside access under the assessment topic 'open space, leisure and play', and concludes that no significant adverse effects are anticipated at any phase of the Scheme. The Applicant confirms that existing PROW are to be protected as far as practicable within the Scheme design, with management measures set out in the Outline PROWPPMP [REP1-104], confirmed as embedded mitigation in Section 16.9 of ES Chapter 16. 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. New permissive access routes have been incorporated into the Scheme design, shown 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]. These are identified as additional mitigation and enhancement measures in Section 16.11 of ES Chapter 16. The Outline PROWPPMP [REP1-104] is secured through Requirement 16 of Schedule 2 of the Draft DCO [REP1-007]. Where the Scheme is anticipated to benefit local people more specifically, this is done through providing onsite permissive paths to increase access to the countryside, providing improved landscape planting through reinforcing existing hedgerows and planting of new trees, providing biodiversity net gains through habitat improvements. This is secured through the Outline LEMP [APP-283] and Outline PROWPPMP [REP1-104] through Requirements 7 and 16 of Schedule 2 to the Draft DCO [REP1-007]. The preparation, approval and implementation of the detailed CEMP and CTMP, substantially in accordance with the outline plans, are secured 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. The approach to recreation and access has been discussed with Wiltshire Council's Public Health team and is under discussion with Wiltshire Council's Countryside Access Team and is set out in the relevant Statement of Common Ground. Furthermore, compliance with national policy, including the NPPF are set out in Annex A to the Planning Statement [REP1-087].
SLD-340	Human Health	Human Health Impacts	12.3.1. Health is a cross-cutting issue for the Examination and SLD will highlight how many of the Scheme's impacts directly intersect with it. The way individuals enjoy the landscape, take recreation, socialise, and maintain a healthy life is inseparable from the area in which they live. The loss of visual amenity, alongside non-visual effects such as noise and vibration, will undermine the mental health and wellbeing of local residents. In	Please refer to the response above in regard to the 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 the assessment in ES Volume 1, Chapter 18: Human Health [APP-070] also considers the physical and mental health impacts of changes to

			addition, any reduction in access to green spaces or diminished use of recreational routes, whether as a consequence of construction or their settings having been adversely affected, will limit opportunities for physical exercise and everyday engagement with nature. These are essential to sustaining good health.	recreation and countryside access under the assessment topic 'open space, leisure and play'.
SLD-341	Human Health	Mental Health and Greenspace Loss	12.3.2. The following health impacts of Lime Down Solar Park are discussed in the paper of Dr. Claire Osmond: 12.3.2.1. Mental Health and Greenspace Loss: There is a body of mental health research which has found that greenspace is associated with population-level reductions in anxiety, depression, mood disorders, and mental illness. Greenspace can help alleviate poor mental health by offering avenues for mindfulness and stress reduction [3/§12]. Here, hundreds of hectares of greenspace would be lost as a consequence of the scheme. Equally, the Scheme is likely to have greater landscape impacts	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. Please refer to the response above in regard to the 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 the assessment in ES Volume 1, Chapter 18: Human Health [APP-070] also considers the physical and

			due to the use of 4.5m tracer panels (see the Landscape and Visual Impact Report of Carly Tinkler). As a consequence, the scheme is likely to have an adverse effect on the mental health of the public [5/§14].	mental health impacts of changes to recreation and countryside access under the assessment topic 'open space, leisure and play'. The Applicant has reviewed the points relating to Landscape and Visual in section 3 and Appendix B within the Applicant's Response to Stop Lime Down Written Representation Appendix B Landscape and Visual Report [EN010168/EXAM/9.27] submitted at Deadline 2.
SLD-342	Human Health	Health Impacts of Loss of Recreational Amenity	12.3.2.2. Health Impacts of Loss of Recreational Amenity: The LVIA Report (Appendix B, as summarised above) impacts on the highest sensitivity amenity receptors would experience significant adverse effects for all phases of the Scheme (§9.2) Reduced access to green spaces, diminished enjoyment of local routes, and the industrialisation of a previously tranquil environment all have well-established impacts on mental health and wellbeing. Any degradation of PROW or the wider landscape setting will directly	ES Volume 1, Chapter 8: Landscape and Visual Impact Assessment [APP-060] has been undertaken with consideration of the appropriate and relevant guidance and robustly assesses both the landscape and visual effects of the Scheme independently to ensure both the impacts and effects on the fabric and character of the landscape are taken into account as well as views and visibility. The LVIA fully and transparently acknowledges adverse effects to both Landscape Character and Visual Amenity as a

			affect people's capacity to maintain healthy routines which involve exercising in the setting of the Scheme.	consequence of the Scheme whilst also identifying embedded mitigation measures. The Applicant recognises that there will be adverse effects on landscape character and visual amenity during the construction period which will result in temporary disturbance and perceptible change to local landscape character. Please refer to Table 5-1 in the Applicant Response to Local Impact Report (Rev 1) [EN010168/EXAM/9.21], submitted at Deadline 2. An assessment of the likely effects of the Scheme on the local economy and employment is provided in ES Volume 1, Chapter 16: Socio-economics, Tourism and Recreation [APP-068]. This chapter considers potential impacts on key sectors likely to be impacted by the Scheme: construction and engineering sectors, agricultural activity, tourism-related businesses, and wider local economic conditions during construction, operation and decommissioning.

				The Applicant has sought to assess all known public rights of way and long distance recreational or promoted routes affected by the Scheme in 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 assessment finds no significant residual effects to individual PROW or the PROW network overall. However, residual significant effects are anticipated to some long-distance recreation routes during all phases of the Scheme due to their regional or national importance. The assessment in ES Volume 1, Chapter 18: Human Health [APP-070] also considers the physical and mental health impacts of changes to recreation and countryside access under the assessment topic 'open space, leisure and play', and concludes that no significant adverse

				effects are anticipated at any phase of the Scheme. 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. New permissive access routes have been incorporated into the Scheme design, shown 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]. These are identified as additional mitigation and enhancement measures in Section 16.11 of ES Chapter 16. The Outline PRowPPMP [REP1-104] is secured through Requirement 16 of Schedule 2 of the Draft (DCO [REP1-007]). The preparation, approval and implementation of the detailed CEMP and CTMP, substantially in accordance with the

				outline plans, are secured 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.
SLD-343	Human Health	Community Isolation	12.3.2.3. Community Isolation: The scale of the development risks physically and socially fragmenting local villages, making routes between communities less pleasant and usable. This could increase loneliness and isolation, particularly for those who depend on these routes for social contact.	Impacts on community cohesion have been considered as part of the assessment of “community identity, culture, influence and resilience” in ES Volume 1, Chapter 18: Human Health [APP-070] . The Applicant has considered how changes to perceptions of rurality, community sense of place, pride, engagement and difference in consideration of importance of different aspects of the Scheme (for example opposing views on harms versus benefits) may lead to a degree of impact to communities. The assessment has considered that this is likely to be up to a minor adverse effect on local communities and thus on residents’ mental health and wellbeing. This is not considered a significant effect.

				The Applicant confirms that opportunities to enhance accessibility within the PRoW network have been considered throughout the operational lifetime of the Scheme. This includes the provision of permissive pedestrian paths, as well as permissive routes for pedestrians, cyclists, and equestrians, with the aim of improving connectivity and access between local villages.
SLD-344	Human Health	Health Impacts of Noise	12.3.2.4. Health Impacts of Noise: There is a growing body of research which links environmental noise exposure to increases in blood pressure and cardiovascular ailments. A study published in 2022 showed significant pooled associations between high noise annoyance and general mental health problems, as well as diagnoses of depression and anxiety disorder, and general mental health [7-8/§21-25]. The Acoustics Report (Appendix H), observes that significant changes in noise level and character are anticipated by the Scheme, and it follows that there may be corresponding health effects.	An assessment of the effects of the Scheme on noise and vibration is provided in ES Volume 1, Chapter 14: Noise and Vibration [REP1-021], with supporting technical information supplied in ES Volume 3, Appendix 14-4: Noise Modelling [REP1-061]. The assessment considers potential noise and vibration impacts during construction, operation and decommissioning. The Applicant notes that the approach to noise and vibration has been discussed and agreed with Wiltshire Council, as described in Section 14.2 of ES Chapter 14 [REP1-021]. The Applicant disputes the assertion that there would be significant

				changes in noise level, given that levels at residences would be around the existing background sound level, and would like to make clear that the noise levels committed to in the Outline OEMP [REP1-098] are well below levels described by WHO as giving rise to adverse health effects. Mitigation measures associated with construction activity are presented in Section 14.9 of ES Chapter 14 [REP1-021] and are committed to through the Outline CEMP [REP1-096]. The Outline OEMP [REP1-098] commits to noise levels from the Scheme at residential dwellings being the same as or below those modelled in the ES. This provides assurance that significant effects from operational noise will be avoided, while allowing flexibility in how this is achieved. These measures are secured through Requirements 13 and 14 in Schedule 2 of the Draft DCO [REP1-007]. With these measures in place, the assessment concludes that no significant effects from construction or operational noise or vibration are expected.

				The assessment of impacts to human health from noise and vibration in ES Volume 1, Chapter 18: Human Health [REP1-021] has relied upon the technical assessment in ES Chapter 14 [REP1-021] . As such, the assessment has found no significant adverse effects to health and mental wellbeing as a result of noise and vibration from any phase of the Scheme.
SLD-345	Air Quality Other Environmental Matters	BESS	12.4.1. BESS thermal runaway events, or “fires”, can release a wide range of toxic gases. The Lime Down ES includes a model assessment of the likely concentrations and effects of a BESS fire at Hullavington in the Lime Down Scheme. The topic is covered in Chapter 15 of the ES [APP-067]: methodology in §15.6.30 et seq. and results in §15.10.36 et seq. Appendix 15-2 [APP-239] covers the methods and results of modelling in more detail, Figure 15-5 maps the modelling area [APP-166], and there is an outline Battery Safety Management Plan [APP-286]. The assessment concludes that concentrations of all the gases modelled are	Please refer to Applicant's Detailed Response to Stop Lime Down Deadline 1 Submission on BESS Fire Emissions (Rev 1) [EN010168/EXAM/9.25] , submitted at Deadline 2.

			insignificant and not harmful to health at the closest receptors.	
SLD-346	Air Quality Other Environmental Matters	Principal Issues	12.4.3. In summary, the principal issues identified with the Applicant's assessment are identified as follows: 12.4.3.1. It is assumed that only one model container will catch fire, and there will be no spread to other containers. This ignores experience from other BESS fires, and a reasonable worst-case assumption requires that the fire will spread to all 270 battery containers.	Please refer to Applicant's Detailed Response to Stop Lime Down Deadline 1 Submission on BESS Fire Emissions (Rev 1) [EN010168/EXAM/9.25] submitted at Deadline 2.
SLD-347	Air Quality Other Environmental Matters	Principal Issues	12.4.3.2. The assessment is artificially restricted to a spread distance of 1 km, whereas a pollutant plume from a BESS fire is likely to spread much further, as shown for instance by the fire in a similar-sized BESS in California in 2025.	Please refer to Applicant's Detailed Response to Stop Lime Down Deadline 1 Submission on BESS Fire Emissions (Rev 1) [EN010168/EXAM/9.25] , submitted at Deadline 2.
SLD-348	Air Quality Other Environmental Matters	Principal Issues	12.4.3.3. A more realistic assessment based on a 5 km spread would put many more receptors at risk, including nine villages, three primary schools and the M4.	Please refer to Applicant's Detailed Response to Stop Lime Down Deadline 1 Submission on BESS Fire Emissions (Rev 1) [EN010168/EXAM/9.25] , submitted at Deadline 2.

SLD-349	Air Quality Major Accidents and Disasters	Principal Issues	12.4.3.4. Workplace exposure standards are wrongly used to assess the effects of particulate exposure, whereas there are ambient standards which could be used.	Please refer to Applicant's Detailed Response to Stop Lime Down Deadline 1 Submission on BESS Fire Emissions (Rev 1) [EN010168/EXAM/9.25] , submitted at Deadline 2.
SLD-350	Air Quality Major Accidents and Disasters	Principal Issues	12.4.3.5. Pollutant concentrations were not assessed at the closest receptors, which include the main line railway to South Wales.	Please refer to Applicant's Detailed Response to Stop Lime Down Deadline 1 Submission on BESS Fire Emissions (Rev 1) [EN010168/EXAM/9.25] , submitted at Deadline 2.
SLD-351	Air Quality Major Accidents and Disasters	Principal Issues	12.4.3.6. Particle concentrations were assessed using a diesel fire as a model, whereas there are data available to allow assessment using lithium-ion battery fires. This has led to an underestimation of particle concentrations by a factor of 2.5 to 4.6.	Please refer to Applicant's Detailed Response to Stop Lime Down Deadline 1 Submission on BESS Fire Emissions (Rev 1) [EN010168/EXAM/9.25] , submitted at Deadline 2.
SLD-352	Air Quality Major Accidents and Disasters	Principal Issues	12.4.3.7. Not every potentially serious pollutant has been assessed, including very fine particles and heavy vapours.	Please refer to Applicant's Detailed Response to Stop Lime Down Deadline 1 Submission on BESS Fire Emissions (Rev 1) [EN010168/EXAM/9.25] , submitted at Deadline 2.

SLD-353	Air Quality Major Accidents and Disasters	Principal Issues	12.4.4. Appendix I2 therefore demonstrates that the Applicant's modelling is not reliable as it does not present a reasonable worst-case assessment of the likely significant environmental effects of this aspect of the proposed development at Lime Down.	Please refer to Applicant's Detailed Response to Stop Lime Down Deadline 1 Submission on BESS Fire Emissions (Rev 1) [EN010168/EXAM/9.25] , submitted at Deadline 2.
SLD-354	Air Quality Major Accidents and Disasters	Conclusion	12.5.1. For the reasons set out above, SLD submits that the Scheme gives rise to serious and inadequately assessed health impacts. The loss of greenspace, recreational amenity, and community connectivity, combined with noise impacts, will have a material effect on the mental health and wellbeing of local residents in an area where anxiety levels are already above the national average. In addition, the Applicant's modelling of the risks posed by a BESS fire is seriously flawed and cannot be relied upon. A realistic worst-case assessment would place nine villages, three primary schools, and approximately 10,000 people within range of toxic emissions. SLD therefore submits that the health impacts of the Scheme have not been properly evaluated, and	The Applicant has undertaken a robust and comprehensive assessment of potential health effects within ES Volume 1, Chapter 18: Human Health [APP-070]. The chapter presents a detailed assessment of the Scheme's potential effects on human health and wellbeing, including mental health, through consideration of a wide range of relevant health determinants. These include, but are not limited to, access to open space and recreation, transport and connectivity, noise and vibration, and air quality. A range of mitigation measures has been incorporated to minimise potential effects. These include maintaining PRow access wherever reasonably practicable, restricting HGV movements to defined routes

			that the Examining Authority should require the Applicant to address these deficiencies before any decision is made.	and specified hours, maintaining ongoing community liaison and engagement, and implementing controls to manage construction-related noise and air quality impacts. The Applicant also confirms that existing PRoW have been protected as far as practicable through the Scheme design, with management measures detailed within the Outline PROWPPMP [REP1-104] . Please also refer to Applicant's Detailed Response to Stop Lime Down Deadline 1 Submission on BESS Fire Emissions (Rev 1) [EN010168/EXAM/9.25] , submitted at Deadline 2 for detailed responses in relation to air quality impacts.
SLD-355	Climate Change and Energy Need	Introduction	13.1.1. A key justification for the Scheme is its contribution to decarbonisation of the Grid. While it is accepted that the Scheme is renewable generation attracting the relevant policy weight, the Applicant also ascribes distinct weight to that decarbonisation in the planning balance. For that reason, it is pertinent to address the decarbonisation that the Scheme provides for, and to note	The embodied carbon and associated emissions from the cables and BESS are assessed within ES Volume 1, Chapter 7: Climate Change [APP-059] . A separate technical note on response to the break even or 'pay back' year is being prepared and will be submitted at Deadline 3. To summarise, the applicant does not accept that the break even or payback year assessment is a useful metric for considering the significance

			the effect of the specific design of this Scheme (given its very lengthy 400kV cable and 1000MWh BESS). This is a Scheme which, either, only breaks even against the Grid long after the net zero date in 2050, or does not do so at all.	of the scheme in offsetting carbon emissions. The Applicant is bringing forward a Scheme which will, if consented, deliver a significant beneficial quantity of low carbon, home-grown, affordable electricity over its operational period. The flexibilities sought for the Scheme's design will ensure that the benefits arising from the development of the Scheme can be as significant, and useful, as possible. The Scheme will provide power to the grid to support its decarbonisation and also to grow supplies of low-carbon energy such that they may be used to reduce carbon emissions from other (non-traditional) sectors, including but not limited to road transport, home heating, and industrial and commercial processes. As the Clean Power 2030 Action Plan explains (p39), "Electrification and other needs for clean power as part of net zero are likely to result in at least a doubling of electricity consumption compared to today ...

				This will require strong growth in power generation from a diverse range of clean sources on a sustained basis through the 2030s and 2040s"
SLD-356	Climate Change and Energy Need	Introduction	13.1.2. The University of Derby have been commissioned by SLD to prepare a report on the generation and greenhouse gas emissions ("GHG") emissions of the Scheme. The report is authored by Chris Sansom, Heather Almond, and Zaharaddeen Hussaini and is listed at Appendix J1. There is also a paper produced by Professor Skeffington related to rainfall and climate change adaptation. That is listed at Appendix J2. Save where is identified, references in this section to a page or paragraph number is to the University of Derby report.	The Applicant notes this comment and is planning to respond to Appendix J2 in a separate Technical Note submitted at Deadline 3.
SLD-357	Climate Change and Energy Need	Policy	13.2.1. GHG emissions are addressed in section 5.3 of NPS EN-1. It notes the benefits of decarbonisation (paras 5.3.1 and 5.3.3), and explains that an applicant is expected to conduct a whole life cycle GHG assessment (para 5.3.4). The policy explains	A GHG assessment has been completed as part of ES Volume 1, Chapter 7: Climate Change [APP-059] considering embodied carbon, construction phase, operational phase and decommissioning emissions.

			that the assessment should be used to drive down GHG emissions at every stage to ensure that they are minimised as far as possible (para 5.3.5).	
SLD-358	Climate Change and Energy Need	Policy	13.2.2. For SoS decision-making, the SoS must be satisfied that GHG emissions have been assessed as far as possible (para 5.3.8), and that all reasonable steps have been taken to reduce GHG emissions (para 5.3.9).	The GHG assessment completed as part of ES Volume 1, Chapter 7: Climate Change [APP-059] sets out that which has been considered as part of the scheme. Wherever possible, conservative assessments have been made to account for emissions (e.g. shipping of all materials from China). This has been undertaken for the purpose of providing a conservative assessment. In reality, efforts will be made to source equipment locally and put in place other measures to reduce potential GHG emissions.
SLD-359	Climate Change and Energy Need	Policy	13.2.3. Of emissions themselves, the SoS is directed to give weight to project that embed nature-based or technological processes to mitigate or offset GHGs. However, the SoS must accept that there are likely to be some residual emissions from construction and decommissioning (para 5.3.10).	This aligns with the findings within ES Volume 1, Chapter 7: Climate Change [APP-059] .

SLD-360	Climate Change and Energy Need	Policy	13.2.4. Para 5.3.11 addresses energy schemes which emit GHGs. For such schemes, emissions are not a reason to prohibit consenting, and such emissions are managed in an economy-wide manner (para 5.3.12). As a result, the SoS does not need to assess individual applications against operational carbon emissions and their contribution to carbon budgets, net zero and international climate commitments (para 5.3.12).	This should be considered within the context of the ISEP guidance on assessing significance of Greenhouse Gas Emissions, which does give a methodology for considering the impact of a scheme in the context of carbon budgets and other wider effects of Greenhouse Gases.
SLD-361	Climate Change and Energy Need	Policy	13.2.5. As to climate change adaptation and resilience, this is addressed in section 4.10 of NPS EN-1. New energy infrastructure must be "sufficiently resilient" (para 4.10.1). The policy notes the "likelihood of increased flooding... and intense rainfall events" in the future (para 4.10.2). Adaption is required as a result. It goes on to explain that "New energy infrastructure will typically need to remain operational over many decades, in the face of climate change". Thus direct and indirect effects must be considered (para 4.10.8). As a result,	The Applicant has assessed flood risk and climate change resilience in ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [REP1-017] and the ES Volume 3, Appendices 11-1 to 11-9: Flood Risk Assessment and Drainage Strategy [REP1-037 to REP1-054] ., The assessment applies relevant climate change allowances to fluvial and surface water flood risk and confirms that flood-sensitive infrastructure has been sequentially located outside the 1% AEP plus climate change flood extent where practicable. The BESS and substations are located in Flood Zone 1, and surface water drainage for

			applicants should assess impacts on and from their project across a range of climate scenarios (para 4.10.10) and demonstrate a high level of climate resilience (para 4.10.11). Safety critical elements should be assessed on a credible maximum scenario (para 4.10.12). The SoS must be satisfied that applicants have “taken into account the potential impacts of climate change” (para 4.10.13).	impermeable infrastructure has been designed to attenuate and control runoff with climate change allowance applied. The Scheme has therefore taken account of the potential impacts of climate change and has been designed to remain safe for its lifetime without increasing flood risk elsewhere.
SLD-362	Climate Change and Energy Need	Lifecycle Greenhouse Gasses	13.3.1. The report considers the lifetime effects of the Scheme, considering two key scenarios measured against the estimated grid baseline emissions figure for 2029. It should be noted that, for this part of the assessment, the grid emissions intensity for 2029 is applied for the entire remainder of the life of the Scheme (so it is assumed there is no change). The first is a levelized approach which averages the carbon intensity of the Scheme across its life, whereas the event-based approach identifies the cumulative GHGs avoided on a year by year basis [8/3.3].	This approach has been taken so as not to double count the effect of the scheme as the scheme coming online would directly affect the total grid emissions by generating more energy. Therefore, it is considered appropriate to use the operational baseline year as a point of comparison. See also the Applicant's response to SLD-342 which describes the benefits associated with using low-carbon electricity to displace carbon emissions from other sectors including heat, transport among others.

SLD-363	Climate Change and Energy Need	Lifecycle Greenhouse Gasses	13.3.2. The outcome of this analysis, using the Applicant's figures, is that the point at which the "avoided" emissions arising from the Scheme surpass the lifetime emissions of the scheme itself on a levelized approach is 2075 (for fixed panels) or 2078 (for tracker panels). That is in the region of 45+ years into the life of the Scheme [9/3.4.4].	There are several limitations with using this approach as put forward by Stop Lime Down. 1) The GHG assessment considers global emissions (e.g. shipping from China, embodied carbon from products sourced outside of the UK) and compares this to a UK only emissions value which does not consider the embodied carbon from developing energy infrastructure. The high level approach used in ES Volume 1, Chapter 7: Climate Change [APP-059] is illustrative that even with this point of comparison, there remains a net negative change in emissions. 2) The assessment considers that future operational emissions associated with replacement products will be the same as those in the baseline operational year. E.g. replacement panels will have the same embodied carbon emissions in 40 years as they do in the assessment year of 2025. In reality, as global

				efforts move towards Net Zero from all sources, this is a highly conservative approach and in reality emissions in future are likely to be far lower. This approach has been taken so as to be conservative and in the absence of forecast emissions reductions approaches. 3) The point of comparison against a forecast UK grid average was chosen so as to compare against a realistic but low grid average for emissions. Previous assessments have compared against other energy generating methods such as CCGT. Should the scheme be compared against CCGT and the same methodology applied, the 'pay back' would occur within 2 years'. Should the scheme be compared against existing UK grid average emissions, (i.e. not forecast) the scheme would 'pay back' emissions within 4 years.

SLD-364	Climate Change and Energy Need	Lifecycle Greenhouse Gasses	13.3.3. Similarly, using the Applicant's figures, the point at which the "avoided" emissions arising from the Scheme surpass the lifetime emissions of the Scheme itself on an event based approach is 2062 (for fixed panels) and 2070 (for tracker panels). That is in the region of 33+ years into the life of the Scheme [12/3.5.4].	The Applicant has responded to this comment under Reference ID SLD-355.
SLD-365	Climate Change and Energy Need	Whole-life carbon assessment	13.4.1. The report also provides a review of the quantification of GHGs by the Applicant. It notes that the Applicant has underestimated emissions in relation to cable materials, concrete and civil works, construction plant fuel, SF6 initial fill, and non-transformer substation scope [13/4.3.1].	The Applicant notes this comment and is planning to respond in a separate Technical Note submitted at Deadline 3.
SLD-366	Climate Change and Energy Need	Whole-life carbon assessment	13.4.2. By far the most significant change is the embedded carbon in the construction phase (but also generally) related to cables (most notably the 400kV cable). While the Applicant assessed 876 tCO ₂ e, the report identifies 20,762 tCO ₂ e as a result of the cable. Around 60% of this is devoted to the 400kV cable itself, which has a	The Applicant notes this comment and is planning to respond in a separate Technical Note submitted at Deadline 3.

			carbon intensity per kilometre of 587 tCO ₂ e [14/4.3.2]. Taken with the additional required concrete and construction plant fuel, the revised figures (using the Reports "base" rather than "high" case) is 263,565 tCO ₂ e compared to the Applicant's 237,149 tCO ₂ e (an increase of around 10%) [14/Table 7].	
SLD-367	Climate Change and Energy Need	Whole-life carbon assessment	13.4.3. As to the operational phase, the increase is relatively small (on the reviewed base case representing an increase of 6,755 tCO ₂ e) [16, Table 8].	The Applicant notes this comment and is planning to respond in a separate Technical Note submitted at Deadline 3.
SLD-368	Climate Change and Energy Need	Grid intensity	13.5.1. As a final step, the Report considers counterfactuals where the Grid GHG intensity is not set at the figure for 2029 for the life of the Scheme. The Report explains that a constant grid factor avoids the circularity problem that can arise when a single project is tested against a future grid pathway, however it has the problem of possibly overstating long-term avoided emissions if presented as a 60 year forecast (as here). Thus, a time-varying grid average has benefits as a stress test [17/5.2].	The Applicant has responded to this comment under Reference ID SLD-355. The complication with Stop Lime Down's reasoning is that the scheme itself will contribute to the wider reduction in emissions from the UK grid. See also the Applicant's response to SLD-342 which describes the benefits associated with using low-carbon electricity to displace carbon emissions from other sectors including heat, transport among others.

SLD-369	Climate Change and Energy Need	Grid intensity	13.5.2. The difference can be described in this way – (1) a constant grid intensity test answers the question: how long would the Scheme take to offset its whole life carbon if each exported kWh displaced a fixed grid intensity? Whereas (2) a time-varying test answers the different question: is the Scheme's whole life carbon intensity clearly ahead of the official decarbonisation grid pathway over the 60-year life? [17.5.3].	The Applicant has responded to this under Reference ID SLD-355.
SLD-370	Climate Change and Energy Need	Grid intensity	13.5.3. For the former test the 2029 figure of 49 gCO ₂ e/kWh and the 2030 figure of 45 gCO ₂ e/kWh is used, for the latter the recognised Department for Energy Security and Net Zero figures for intensity over time is used [17/5.4]. The result is as follows:	The Applicant has responded to this under Reference ID SLD-355.
SLD-371	Climate Change and Energy Need	Grid intensity	13.5.4. As is apparent from the above, depending on the scenario chosen (and applying the levelized approach), it is either late in the lifecycle of the Scheme, or never, that the Scheme ultimately meets carbon payback.	The Applicant has responded to this under Reference ID SLD-355.

SLD-372	Climate Change and Energy Need	Rainfall amounts used in the climate change review	13.6.1. In respect of the Applicant's climate change risk review, Prof Skeffington's paper identifies that an inappropriate location for the measurement of precipitation is used (Yeovilton, 68km from Lime Down) [1/1]. Such an approach risks underestimation, as that paper identifies a gridded average for the Scheme which is around 14% higher than the figure used [2/6]. Alternatively, data assessed at the Royal Agricultural College at Cirencester would have been more proximate (23km) and have had much closer location characteristics [2/7]. As a result the risk review likely underestimates risk and should be reassessed to meet the requirements of policy [3/10].	It is accepted that Cirencester's rainfall data is closer. However, it does not have other useful historical data including temperature maximum and minimums for which Yeovilton is closest on the Met Office website.
SLD-373	Climate Change and Energy Need	Conclusion	13.7.1. It is clear from the University of Derby's report that the carbon payback for the Scheme is late in its lifetime (if at all). While that does not detract from the in-principle policy weight for renewable energy generation (set out in NPS EN-1), insofar as the Applicant makes a separate argument about the contribution of the Scheme to GHG reduction, it is	The Applicant has responded to this under Reference ID SLD-355.

			pertinent to have in mind. It is also important to recognise the embedded and operational GHGs in the proposal. It is apparent from the report that much of the GHGs of the Scheme come from its BESS, and that the Applicant has underestimated the relevant figures.	
SLD-374	Cumulative and In-Combination Effects	Introduction	14.1.1. When considering a Scheme of this scale, it is important having identified a large number of adverse environmental effects to take a step back and consider how they interact. This is because anyone experiencing this Scheme, if consented and built, and be they residents or visitors, would not experience the above environmental and other effects in isolation. Rather, they would be experienced in combination, establishing an overall impression of how the Scheme has changed this part of the Cotswolds. They would also be experienced cumulatively not only intra-Scheme (because of the disaggregated approach spreading development over five principal sites and a cable route), but also inter-scheme with other local development including	The Applicant reaffirms that the point is agreed and that full and extensive engagement, consideration, assessment and reporting of intra- and inter-project cumulative effects has been undertaken. The intra project effects assessment has been undertaken whereby all overlapping effects across all technical disciplines are considered to determine where effects in one discipline (such as glint and glare) together with effects from another discipline (such as noise) could combine to generate a significant effect. The In Combination Effects Matrix presented in ES Volume 3, Appendix 21-1 Long List of In Combination Effects and Cumulative Developments [APP-264] sets out all receptors and technical disciplines considered. The

			other solar farms. For many who travel this area in their daily lives and jobs, it will also be experienced sequentially.	assessment is then reported in Table 21-6 and Table 21-7 of ES Volume 1, Chapter 21: In Combination and Cumulative Effects [APP-073] . With implementation of the secured management and mitigation measures, effect interactions do not increase the significance of effects identified in the Environmental Statement.
SLD-375	Cumulative and In-Combination Effects	Introduction	14.1.2. On its face, the Scheme appears not as one large single generating station, but as five approximately NSIP-scale schemes connected across the landscape and accompanied by the 400kV cable. By dividing up the Scheme, there is far more perimeter that individuals can come into contact with than an equivalent 500MW scheme built in one large block. For example, a person in Norton leaving by any of the principal routes out of that village would always come into contact with the Scheme and would experience a surrounding effect. A resident at the Grain Barn on Pig Lane would see their home	The Applicant agrees that there are wide ranging effects during the construction, operational and decommissioning stages. Affected receptors and how they will be impacted is set out across the ES together with the measures taken to minimise effects including avoidance, mitigation and a suite of control measures.

			surrounded to the North, East, South and West by solar panels. These are not changes confined to specific views or specific circumstances; they are wholesale changes for many sensitive locations and receptors.	
SLD-376	Cumulative and In-Combination Effects	Introduction	14.1.3. It is a feature of the Applicant's approach to cumulative and in-combination effects that it underplays the interrelationship between such effect and how they function to almost stack. The Planning Inspectorate's Guidance "NSIPs: Advice on Cumulative Effects Assessment" recognises that "separate consideration may be needed for the accumulation or inter-relationship of these effects on an individual set of receptors". SLD agrees that this accumulation on receptors is key; it is that accumulation which gives rise to the concern of industrialisation. And it is that accumulation which will be experienced by residents and visitors.	The Applicant reaffirms that it agrees that consideration is needed for the accumulation or inter-relationship of the effects on an individual set of receptors. This consideration and associated assessment and reporting of effects is set out within the within each of the technical assessments with a summary of each of these assessments provided within ES Volume 1, Chapter 21: In Combination and Cumulative Effects [APP-073] . With implementation of the secured management and mitigation measures, effect interactions do not increase the significance of effects identified in the Environmental Statement.
SLD-377	Cumulative and In-Combination Effects	Policy	14.2.1. NPS EN-1 is clear that assessment must include "direct effects and any indirect,	The Applicant agrees with this statement. The approach to assessment and reporting of effects

			secondary, cumulative, transboundary, short, medium and long-term, permanent and temporary, positive and negative effects at all stages of the project" (para 4.3.3). It goes on that the SoS "should consider how the accumulation of, and interrelationship between, effects might affect the environment, economy or community as a whole, even though they may be acceptable when considered on an individual basis with mitigations in place" (para 4.3.19).	including interaction and accumulation is set out within ES Volume 1, Chapter 6: EIA Assessment Methodology [APP-058] .
SLD-378	Cumulative and In-Combination Effects	Policy	14.2.2. A number of the policies recognise how specific types of asset may be particularly susceptible to a change in overall character due to cumulative and in-combination effects on the "wider historic landscape" (para 5.9.9) or cumulative effects on understanding the effects on the landscape character as a whole (paras 5.10.16-5.10.17). While assessment of landscape and visual effects of such schemes is likely to be the same as other infrastructure, NPS EN-3 recognises that solar farms are "likely to be in low lying areas of	The Applicant agrees with this statement. In the case of landscape and visual, the judgement on landscape sensitivity is based on consideration of both the landscape receptor's value and its susceptibility to change arising from the Scheme. How landscape value and susceptibility is assessed is contained within Section 1.6 of ES Volume 3, Appendix 8-1: LVIA Methodology [REP1A-006] .

			good exposure and as such may have a wider zone of visual influence than other types of onshore energy infrastructure" (para 2.10.94). Such cumulative landscape effects are particularly identified in EN-3 para 2.10.157.	
SLD-379	Cumulative and In-Combination Effects	Policy	14.2.3. The requirement to assess cumulative effects reflects the requirement to identify and assess any such likely effects in the EIA Regulations (regs.1 and 3, and Schedule 4 para 5).	The Applicant agrees with this statement. Section 1.8 of ES Volume 1, Chapter 1: Introduction [APP-053] sets out the requirements of Part 1 of Schedule 4 of the EIA Regulations and where in the ES the response to those requirements is contained.
SLD-380	Cumulative and In-Combination Effects	Scene setting	14.3.1. The Cotswolds are of national significance and one of England's premier destinations for tourists and holiday makers. It is a national asset which should be preserved, with a characteristic landscape beauty (recognised by SLD's landscape expert to include but also extend beyond the Cotswolds National Landscape itself into its setting).	The LVIA recognises the statutory importance of the Cotswold National Landscape (CNL) and its juxtaposition with the Scheme. A standalone Assessment on the CNL and its Special Qualities has been undertaken in Appendix 8-6 [APP-197] . This Appendix includes assessment of the impacts of the proposal upon landscape character and visual amenity, drawing on the findings of the LVIA and also assesses the effects of the proposals on the special qualities of the Cotswolds National

				Landscape. This Appendix also considers the enhancement measures incorporated into the scheme, to further the purposes of the Cotswolds National Landscape.
SLD-381	Cumulative and In-Combination Effects	Scene setting	14.3.1. The Cotswolds are of national significance and one of England's premier destinations for tourists and holiday makers. It is a national asset which should be preserved, with a characteristic landscape beauty (recognised by SLD's landscape expert to include but also extend beyond the Cotswolds National Landscape itself into its setting).	The Applicant notes this comment.
SLD-382	Cumulative and In-Combination Effects	Scene setting	14.3.2. The area chosen for the Scheme is characterised by big skies and gently rolling landscapes of sweeping views, low hedges and sparse woodland. The human footprint is equally delicate, defined as honey-hewed limestone villages, dry stone walls and a notable absence of industrial estates and high-voltage infrastructure. Tall structures are limited to traditional church steeples, water towers and farm barns, preserving a skyline free from industrial intrusion. This	The Applicant notes this comment.

			results in a rare sense of tranquillity further enhanced by the lack of aircraft noise, light pollution and sparse number of high-voltage overhead cables. This makes the location a premier destination for walkers, cyclists and holiday makers who frequent its extensive network of footpaths and bridleways.	
SLD-383	Cumulative and In-Combination Effects	Scene setting	14.3.3. On the other hand, the area lacks the infrastructure it would need to accommodate any major developments. The waterways are prone to rapid flooding, impacting travel and local properties. The narrow and meandering rural road network is ill-equipped for traffic to pass safely and verges deeply rutted. Negotiating these routes is often precarious, with footpaths and cycleways non-existent.	The Applicant acknowledges that parts of the local catchment experience existing flooding during heavy rainfall. That baseline condition has been considered in ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [REP-017] and ES Volume 3, Appendices 11-1 to 11-9: Flood Risk Assessment and Drainage Strategy [REP1-037 to REP1-054]. The relevant test is whether the Scheme would materially increase flood risk, rather than whether existing catchment flooding occurs. The Scheme would not materially alter catchment hydrology, would retain permeable ground across the Solar PV Sites, and would attenuate and control runoff from impermeable

				infrastructure. Construction risks, including temporary drainage disruption, sediment mobilisation and soil compaction, are controlled through the Outline CEMP [REP1-096] and the Outline Soil Resources Management Plan [APP-280]. The Applicant therefore does not agree that existing local flooding provides a basis for concluding that the Scheme would give rise to an unacceptable cumulative flood risk effect.
SLD-384	Cumulative and In-Combination Effects	Scene setting	14.3.4. The remarkable effect of the Scheme is reflected in the responses that have already been received at OFH1 but also in the approximately 5,000 relevant representations. From an SLD analysis of those representations (and accepting that categorisation of complaints can be difficult), the following concerns and issues were the most frequently mentioned: • Impact on landscape and proximity to National Landscape – 2,775. • Food security and loss of farmland – 2,389.	The Applicant notes this comment.

			• Impact on ecology and biodiversity – 2,266. • Increased traffic, road congestion and road safety – 2,216. • Size and scale of the proposal – 1,244. • Alternative sites, locations and technologies – 1,196. • Noise and loss of tranquillity – 1,098. • Industrialisation – 1,091. • Tourism, hospitality and retail employment – 1,014. • Flood risk – 1,011.	
SLD-385	Cumulative and In-Combination Effects	Scene setting	14.3.5. The wide range of issues is reflective of the fact that residents and visitors will experience effects in many varying ways. The use of words such as “industrialisation” is also indicative of a theme of many of the effects combining together; for example, the BESS does not industrialise simply because of its visual impact. It is also its incongruous and (relatively) loud electrical noise, the uncharacteristic nature of the installation compared to the rest of the landscape setting, the health	ES Volume 1, Chapter 8: Landscape and Visual Impact Assessment [APP-060] has been undertaken with consideration of the appropriate and relevant guidance and robustly assesses both the landscape and visual effects of the Scheme independently to ensure both the impacts and effects on the fabric and character of the landscape are taken into account as well as views and visibility. The LVIA fully and transparently acknowledges adverse effects to both Landscape Character and Visual Amenity as a

			and safety concerns of locals, and the mitigations surrounding the installation which themselves have adverse effects, the damage to the setting of Grade 1 heritage assets, and impacts on the routes going to and from that location all contribute to this effect. Industrialisation is not indicative of one effect but the in-combination results of many effects.	consequence of the Scheme whilst also identifying embedded mitigation measures. In terms of noise, the BESS is 35 dB L _{Aeq} at the closest receptor, which, while potentially audible at certain times, is at a level of existing sound sources and closer to a whisper or quiet hum than something which is overly intrusive.
SLD-386	Cumulative and In-Combination Effects	Appendices to this Written Representation	14.4.1. In the reports which are appendixes to this Written Representation, SLD's experts have given their views on the in-combination and cumulative effects of the Scheme. Without attempting to traverse all of them, and as an example addressing traffic in detail, the following are particularly pertinent.	The Applicant notes this comment.
SLD-387	Landscape and Visual	Appendices to this Written Representation	14.4.2. Appendix B (landscape and visual effects) in section 12 concludes that the effects would be "greater and higher" than the LVIA predicts ([Appendix B/108/12.2]). Much of this stems from disagreement more broadly by that Report with the LVIA. An important aspect of that is the focus on intervisibility	The Applicant has reviewed the points relating to Landscape and Visual in section 3 and Appendix B within the Applicant's Response to Stop Lime Down Written Representation Appendix B Landscape and Visual Report [EN010168/EXAM/9.27] submitted at Deadline 2

			and the failure to consider other relevant effects (noise, disruption, pollution, experiential etc) [Appendix B/108/12.7]. It also fails to consider properly sequential views which are experienced by people travelling the area (including when you arrive in the area at your residence) [Appendix B/108/12.8-12.9]. The Report notes how this is “amplified by the Scheme Design Parameters providing for the general use of tracker solar panels up to 4.5m above ground level” [Appendix B/109/12.15]. It is important to recognise, as GLVIA3 does, that non-significant effects can become significant when combined and experienced as a whole. The report concludes that both intra-project and inter-project effects would be significant [Appendix B/109/ 12.17].	
SLD-388	Construction and Decommissioning	Appendices to this Written Representation	14.4.3. A particularly important effect is the cumulative transport effects, as identified by SLD's transport expert and recorded here. In respect of intra-scheme effects, the Applicant fails to assess the in-combination effects of construction on the solar	The majority (two thirds) of the cable route construction vehicles will use routes other than the PV solar Route. A technical response note to Appendix D will be submitted at Deadline 3 that covers this point further.

			array areas and construction of the cable route. It is apparent from Table 13-9 of [APP-233] that such works would be undertaken at the same time. While the Applicant argues that "The majority of routes for the construction of the Cable Route Corridor use different parts of the highway network for the construction route for the Solar PV Sites" ([PDA-009], p.925) this does not reflect the reality.	
SLD-389	Construction and Decommissioning	Appendices to this Written Representation	14.4.4. Figure 13-2 of [APP-147] shows the section of the cable route corridor accessed via Junction 18 of the M4 and through the Cotswolds National Landscape occupying areas between Lime Down A, B, C and D, both north and south of the railway line, extending south past Grittleton and across the M4 and further south to a point north of Yatton Keynell. The section of the cable route corridor that shares a construction route with Areas A, B and C of the solar arrays therefore has a length of around 8km. This is more than a third of the total cable route. The applicant's statement that different parts of the highway network are used is therefore incorrect and	The majority (two thirds) of the cable route construction vehicles will use routes other than the PV solar Route. A technical response note to Appendix D will be submitted at Deadline 3 that covers this point further.

			does not reflect the evidence in the ES.	
SLD-390	Transport and Access	Appendices to this Written Representation	14.4.5. The Applicant has not identified where the solar array and cable route impacts will combine and has therefore failed to undertake a robust assessment of transport environmental impact. Given that the cable route corridor is predicted to generate around 10,000 HGV deliveries (around 77% of the predicted solar array construction trip generation) and there is clear evidence that the same, sensitive, sections of the highway network are relied upon for construction access, this omission is significant.	A technical response note to Appendix D will be submitted at Deadline 3 that covers this point further.
SLD-391	Transport and Access	Appendices to this Written Representation	14.4.6. Information set out in SLD's Transport Written Representation (Appendix D) shows that the effect of assessing the cumulative impact of solar array and cable route construction, on the basis of the Applicant's own estimate of trip generation, is to increase the daily number of HGV movements through the CNL from 50 to 66, an increase of 32% in magnitude of impact. This increases the significance of the	A technical response note to Appendix D will be submitted at Deadline 3 that covers this point further.

			Scheme's adverse transport environmental impacts on the highly sensitive CNL.	
SLD-392	Transport and Access	Appendices to this Written Representation	14.4.7. Of committed developments, the Applicant has not taken into account any committed developments in deriving background traffic flows on the local highway network. Traffic survey flows have been factored to a 2028 baseline using TEMPro growth factors for Wiltshire. There are several large development sites that are likely to affect traffic flows in the area during the construction period (2028-2030).	ES Volume 1, Chapter 13: Transport and Access [REP1-057] conclude that the effects on the construction route links within the CNL are negligible to minor and the transport impacts of the scheme will be temporary and managed by mitigation measures set out in the Outline CTMP [REP1-112] . These mitigation measures include restrictions on delivery times 09:30 and 16:30 and a booking system to limit the potential for construction vehicles meeting on minor roads and road conditions survey before and after construction to repair any damage caused by construction vehicles.
SLD-393	Transport and Access	Appendices to this Written Representation	14.4.8. Proposed development north-east of Junction 17 on the M4: Planning application PL/2025/02425 is for approximately 50,000sqm of flexible B2/B8 use with the amount of B2 capped at 33% on land immediately to the north-east of Junction 17 of the M4. Both	A technical response note to Appendix D will be submitted at Deadline 3 that covers this point further.

			construction traffic and operational traffic will use Junction 17 and the section of the A429 immediately to the north of this junction. The planning application is yet to be determined but the latest decision date is identified on the Wiltshire Planning portal as 15 May 2026. It is therefore possible that the application will be determined in the near future. The size of the development and the potential level of trip generation associated with it during both construction and operational phases suggests that it should have been considered as a potential cumulative scheme.	
SLD-394	Description and DCO Process	Appendices to this Written Representation	14.4.9. Dyson Employment at Hullavington Airfield: Planning application 18/08271/OUT that is approved (although it appears that the permission expired in 2022) is for 44,150 sqm GIA of research and development and ancillary development at Hullavington Airfield. Although the planning permission has expired, National Highways required that the transport work supporting the development north-east of Junction 17 take account of the Dyson development. It therefore appears	The Applicant is in contact with and has a Statement of Common Ground with National Highways (Rev 1) [EN010168/EXAM/8.8], submitted at Deadline 2. This identifies any outstanding concerns NH has with the proposals and sets out matter of agreement.

			likely that National Highways would require the Applicant to adopt a similar approach.	
SLD-395	Transport and Access	Appendices to this Written Representation	14.4.10. Proposed Works at Junction 17 of the M4: A scheme is proposed to upgrade Junction 17 of the M4 (see https://www.wiltshire.gov.uk/article/6356/Junction-17-M4). A contractor has been appointed and it is possible that work could commence in 2027. The scheme involves the complete signalisation of the junction, widening of approach arms and widening of the bridges over the M4 from two to three lanes. This is likely to involve the replacement of the bridge decks. The works are likely to lead to disruption for a period of time that could affect Scheme construction traffic by introducing delays. The works themselves will generate construction traffic that will add to Scheme construction traffic if the schemes are progressed simultaneously. If the schemes are not simultaneous, they would lead to successive impacts affecting the local area.	As Lime Down proposes the use of M4 Junction 17 as the access route to Lime Down D and these works could result in closure of the junction then the route will be unavailable until it opens again so there will be no cumulative impact. Construction could take 1 year to complete. The Applicant is in contact with and has a Statement of Common Ground with National Highways (Rev 1) [EN010168/EXAM/8.8] submitted at Deadline 2. This identifies any outstanding concerns NH has with the proposals and sets out matter of agreement. A technical response note to Appendix D will be submitted at Deadline 3 that covers this point further.

SLD-396	Transport and Access	Appendices to this Written Representation	14.4.11. Transport cumulative effects overall have not properly been assessed both within the Scheme itself but also with other local planning applications and proposed works.	Cumulative schemes identified in ES Volume 1, Chapter 21: Cumulative and In-Combination Effects have been reviewed. Those schemes which have the potential to result in cumulative effects on Transport and Access within the Study Area are set out in Table 13-44. of ES Volume 1, Chapter 13: Transport and Access [REP1-019]. The remaining schemes are not considered to have cumulative effects on Transport and Access within the Study Area. The number of traffic flows on the links associated with the construction phase of the Scheme are low, and it is therefore unlikely that the cumulative effects will greatly affect the severity of effects from the Scheme. This is particularly the case given that the impacts of the construction phase are temporary in nature and that measures set out in the Outline CTMP [REP1-112] will ensure that construction traffic avoids the AM and PM highway peaks. The TEMPro growth factor applied to establish the future baseline year also allows for increased future flows and,

				therefore, inherently takes into account those from permitted and allocated developments.
SLD-397	Hydrology, Flood Risk and Drainage	Appendices to this Written Representation	14.4.12. As to Appendix F (flooding), it seems clear that solar panel installations make the ground wetter, the possibility of cumulative effects should be considered. On the same site, effects may accumulate over time if the additional wetness raises the groundwater level sufficiently for it not to return to baseline during the Summer and thus starts the following hydrological year at a higher level. Flood risk may then increase over several years from its initial value. Another somewhat longer-term possibility is that the nature of the wetted soil changes so that it becomes less permeable or retains water for longer. Both these will increase flood risk. Whether these effects actually occur will depend on site conditions.	The Applicant does not agree that Appendix F demonstrates that the Scheme would make the ground wetter in a way that would materially increase flood risk over time. The reduced evaporation argument is a theoretical annual water balance hypothesis. It does not demonstrate a material increase in storm runoff, peak discharge, groundwater level, flood depth or flood hazard. The panelled areas would remain permeable and would not be positively drained to watercourses. The key soil-related flood risk pathway is construction-phase compaction, which is already identified and controlled through ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [REP1-017], the Outline CEMP [REP1-096], the Outline Soil Resources Management Plan [APP-280] and the Outline OEMP [REP1-098]. No change to ES Volume 3, Appendices 11-1 to 11-9: Flood Risk Assessment and Drainage Strategy

				[REP1-037 to REP1-054] conclusions is required.
SLD-398	Hydrology, Flood Risk and Drainage	Appendices to this Written Representation	14.4.13. Inter-site cumulative effects will occur when several solar sites drain into the same river system. Each site will increase the volume of water in the shared drainage. Flood risk assessments need to consider the additional volume from a proposed new site constitutes an unacceptable flood risk. Unlike the on-site effects, the increase in volume does not depend on site conditions but will occur in almost every case, the only exceptions being where discharge is exclusively to groundwater.	The Applicant does not agree that each solar site would increase the volume of water in the shared drainage system in the manner asserted. This assumes that solar PV panels create a direct additional runoff volume to watercourses, which is not the case. Solar PV panels are elevated above ground, the panelled areas remain permeable, and rainfall continues to drain to vegetated ground beneath and between panel rows. Runoff from impermeable infrastructure is attenuated and controlled through the ES Volume 3, Appendices 11-1 to 11-9: Flood Risk Assessment and Drainage Strategy [REP1-037 to REP1-054] . Cumulative flood risk has been considered proportionately within ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [REP1-017] . Other developments would be subject to their own flood risk and drainage controls through the planning process. The Scheme would not materially increase runoff rates or flood risk within the Bristol Avon catchment.

SLD-399	Other Environmental Matters	Appendices to this Written Representation	14.4.14. Appendix G (glint and glare) notes that the significant size of the Scheme is a particular reason to require cumulative assessment of glint and glare effects. It is not appropriate, as Pager Power has done, to assess the Scheme's 563 hectare panel footprint on a per-array basis. This fails properly to consider the sequential and surrounding effects of the Scheme [15/7.2].	The Applicant has not considered the arrays individually and all impacts in ES Volume 3, Appendix 20-4: Solar Photovoltaic Glint and Glare Assessment [APP-261] account for potential impacts from all panel areas. The only instance where modelling has not considered all panel areas together is for aviation intensity calculations, as non-adjacent areas cannot be modelled cumulatively as a limitation of the Sandia method for glare intensity.
SLD-400	Human Health	Appendices to this Written Representation	14.4.15. Appendix H (health) already sets out the cross-cutting issues of health. The loss of green space and enjoyable outdoor experiences, along with noise and other factors, come together both at home and out in the countryside as a negative effect on residents and visitors alike.	Impacts of the Scheme on mental health and wellbeing are assessed in ES Volume 1, Chapter 18: Human Health [APP-070] . This chapter provides a comprehensive assessment of the Scheme's potential effects on human health, including mental health and wellbeing, through consideration of a broad range of health determinants. These include access to open space and recreation, transport and connectivity, community identity and cohesion, employment and income, noise and vibration, air quality, and access to health and social care services. The assessment applies a

				health “lens” to the findings of relevant technical chapters and concludes that, with the embedded mitigation and additional measures outlined in the relevant management plans [APP-277 to APP-287 updated by REP1-096 to REP1-112] and secured by their respective requirements in Schedule 2 to the Draft DCO [REP1-007], the Scheme would not give rise to significant adverse effects on population health, including mental health and wellbeing. Mitigation measures include (but are not limited to) ensuring PRowS remain open as much as is practicable, inbound workers are accommodated in the most suitable locations for housing and health service access, community liaison and engagement is maintained, and construction impacts on waterways, soils, noise and air quality are regulated. Impacts on community cohesion have been considered as part of the

				assessment of “community identity, culture, influence and resilience” in ES Volume 1, Chapter 18: Human Health [APP-070] . The Applicant has considered how changes to perceptions of rurality, community sense of place, pride, engagement and difference in consideration of importance of different aspects of the Scheme (for example opposing views on harms versus benefits) may lead to a degree of impact to communities. The assessment has considered that this is likely to be up to a minor adverse effect on local communities and thus on residents’ mental health and wellbeing. This is not considered a significant effect.
SLD-401	Cumulative and In-Combination Effects	Appendices to this Written Representation	14.4.16. Part of the reason for such wide-ranging in-combination effects is the propensity for the Scheme to have in-combination intra-Scheme effects. Because it is broken up into five sites, each close to or capable of being NSIPs in their own right, the 10km x 5km general area occupied by the scheme has a sense of being multiply developed for solar. The sense of not being able to get	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

			away from the Scheme is particularly apparent in such circumstances. The Scheme is a collection of relatively isolated islands of panels north of Norton taken with a 12km elongated snake of parcels near Sherston and finishing at Seagry Wood. SLD is in no doubt that a version of the Scheme which did not spread the development in this way would impact many of the most valuable aspects of this area far less than the proposal does.	and rail infrastructure and the changing topography. The discrete areas of land in the Scheme are placed so far apart that the Scheme would not be perceived in its entirety and the solar panels are distributed 'in and amongst' the landscape features to assimilate them into the landscape. The strong framework of existing vegetation means that this would 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.
SLD-402	Description and DCO Process	The Applicant's Assessment	14.5.1. The Applicant's assessment of effects is at [APP-073]. It is notable because every receptor identified at every stage of the lifecycle of the Scheme is identified as "effect interaction is not expected to increase the	The Applicant respectfully disagrees with the comment that effects are underestimated. Effects identified across each of the discipline assessments are determined based on realistic worst case assumptions in accordance with the methodologies

			significance of effects” and that no additional mitigation is required. In the first place, SLD consider that is not credible on its face given the nature of the Scheme and some of the locations particularly impacted (e.g. Grain Store Barn, see below). Second, it is apparent that much of these conclusions arise from the underestimation of effects by the Applicant at other stages.	set out within the ‘Assessment Methodology’ sub-section of each of the ES Chapters [APP-059 to APP-071 updated by REP1-015 to REP1-027] .
SLD-403	Landscape and Visual	The Applicant's Assessment	14.5.2. As a side note, column “Description of Potential Effects” in [APP-073] from p.50 is not understood as for various receptors it refers to “Lordswood Farm” where (among other things) RI061 onwards are in Norton.	The Applicant notes this comment.
SLD-404	Landscape and Visual	Worked examples	14.6.1. It is useful to take three worked example, just to demonstrate the cumulation of effects. However, SLD consider this is an issue that impacts very many locations and receptors. 14.6.2. The first is Grain Store Barn, identified as not the subject of effect interaction expected to increase the significance of effects (RG020 in [APP-079]). In the construction and	The Applicant notes this comment and agrees with the summarised noise and LVIA impact.

			decommissioning stage, it is identified to have landscape and visual effects at Major/Moderate adverse in construction, Moderate/Minor adverse in decommissioning, and noise and vibration between LOAEL and SOAEL. In the operational stage it is identified to have landscape and visual effects at Major/Moderate adverse at Year 1, Moderate/Minor adverse at Year 15, noise and vibration effects between LOAEL and SOAEL, and glint and glare effects at low.	
SLD-405	Landscape and Visual	Worked examples	14.6.3. Even on the Applicant's own case and assessments, there will be experiential disruption from not only visibility (which at times is significant in EIA terms) but also the noise of the Scheme, and glint and glare, emphasising the industrialised nature of this residential location. Coming and going from Grain Store Barn requires the passing of much more of the Scheme, emphasising the sense of being surrounded. Footpaths beginning close by to the Barn similarly take a person through the PV sites. The sense	Effect interactions are identified at Grain Store Barn. It is agreed that there will be Landscape and Visual and Noise effect interactions during the construction and operational phase. Mitigation in the form of control of noise, offsets and screening is secured within the DCO via the Outline CEMP [REP1-096], the Outline Landscape and Ecological Mitigation Plan [REP1-029 to REP1-032] and the Outline LEMP [APP-283]. The detailed LEMP will be prepared in accordance with the principles of

			will be one of a complete change in character of the location from rural and agrarian to industrialised and energy generating. A proper exercise of judgment would recognise this effect and address whether mitigation is possible. This also is before the significant effects that SLD identifies are applied (and also the call in Appendix B to the Written Representation that an RVAA should properly be undertaken at the Barn [102/10.4.27]).	the Outline LEMP [APP-283] and will be submitted to and approved by the relevant planning authority or authorities. This will include measures to ensure the landscape mitigation and enhancements are established and maintained into and throughout the operational phase. With the implementation of the secured mitigation, significant cumulative effects are not identified at Grain Store Barn.
SLD-406	Noise and Vibration	Worked examples	14.6.4. The second is Bradfield Manor, identified as not the subject of effect interaction expected to increase the significance of effects (RI068 in [APP-079]). The Applicant's assessment reports no relevant effects in the construction and decommissioning phase. In the operational phase landscape and visual effects at Moderate adverse are identified at Year 1, Moderate/Minor "neutral" effects at Year 15, and noise and vibration between LOAEL and SOAEL.	The Applicant accepts that the operational noise level would be between LOAEL and SOAEL.
SLD-407	Noise and Vibration	Worked examples	14.6.5. SLD consider this again fails to identify appropriate	The Applicant has provided detailed responses to SLD Appendix H above,

			effect interactions. Even with the Applicant securing an (insufficient) approach to noise at this location, the Scheme will be just be a decimal point below a SOAEL effect (and this is before addressing the issues of background noise identified in Appendix H). This Grade 1 listed heritage asset, no longer surrounded by the agricultural holdings from which part of its significance is derived, would be in an incongruous landscape which SLD considers (Appendix C) causes significant Major/Moderate adverse harm to this asset. There is the inappropriate routing of HGVs and increase in traffic of 240% on Bradfield Cottages ([Appendix D, 10/2.37, 28/5.2]. In addition, Bradfield Manor is associated with a number of prominent PRowS running to both Norton but also Bradfield Woods. The significant impact on these again gives the sense of being surrounded on the typical walks which would be experienced from this site. The effect is typical the sense of the industrialisation of a the setting of a dwelling and	suffice to say that following a correction to ES Volume 3, Appendix 14-4 Noise Modelling [REP1-061] at Deadline 1, levels at Bradfield Manor are over 4 dB below the SOAEL and not of a level for which there is evidence of adverse health effects.

			heritage asset of the utmost importance.	
SLD-408	Socio-Economics, Tourism and Recreation	Worked examples	14.6.6. The third is WT/HULL/1, which is again identified as not the subject of effect interaction expected to increase the significance of effects (TP121 in [APP-079]. In the construction and decommissioning phase it is identified as having landscape and visual effects of Major/Moderate adverse during construction and Moderate adverse in decommissioning, with Minor adverse transport effects. No operational effects are identified in [APP-079], although the Landscape and Visual chapter of the ES [APP-060] identifies Major/Moderate adverse at Year 1 and Year 15. It is noted that some mitigation measures are included in the Outline ProW and Permissive Path Management Plan [APP-282].	PRoW which cross the Order Limits will generally remain open during the construction phase of the Scheme. There may be some slight perceptible delay to NMU movement if a construction vehicle is crossing a PRoW within the Order Limits. An Outline PRoWPPMP [REP1-104] forms an embedded mitigation and will provide measures to ensure the effects of the construction phase on PRoW users is minimised.
SLD-409	Socio-Economics, Tourism and Recreation	Worked examples	14.6.7. This once again falls short. It is surprising that the change in the setting from the range of factors effecting this PRoW has not been taken into account. Not only are there	With reference to ES Volume 2, Figure 14-2 Daytime Operational Noise Contours [APP-160] and Figure 2-4 PRoW and Highways [APP-080] , noise levels on PRoW around the Scheme would typically

			significant adverse visual effects for the life of the Scheme, but this manifests in the form of a route (identified in the LEMP [APP-084]) with unshielded views to the west including towards the BESS and 400kV substation, and noise (assessed from the contours) as likely to be approaching the 52dB which the Applicant has identified as the likely maximum for PRowS. It is hard to envisage how this combination of effects will not dissuade a person from using this PRow in circumstances where each individual effect may not result in this. These are effects which will be felt on many of the PRowS around the Scheme.	vary between 20 and 52 dB which is congruent with their continued recreational use.
SLD-410	Cumulative and In-Combination Effects	Worked examples	14.6.8. These worked examples are far from the only examples which could be set out. It is important to recognise though that, ultimately, the assessment of cumulative and in-combination effects is an exercise of judgment (see paras 21.4.2 [APP-079]). While the Applicant relies on its “professional judgment”, given the evidence of SLD’s experts, considering these locations on site visits, and applying even just	The Applicant agrees that the definition and level of effect is a critical element of the process. The methodology for determining receptor sensitivity is set out in Table 6-2 of ES Volume 1, Chapter 6 EIA Methodology [APP-058] ; the methodology for determining magnitude is set out in Table 6-3. Each ES technical chapter then provides the criteria for that discipline, including sources and justifications, for quantifying the different categories

			common sense, the remarkable effect of industrialising these locations is obvious.	of effect. This is based upon quantitative and accepted criteria (for example, noise assessment guidelines), together with the use of value judgment to establish to what extent an effect is environmentally significant.
SLD-411	Cumulative and In-Combination Effects	Conclusion	14.7.1. The cumulative and in-combination effects of the Scheme, when properly considered, accurately reflect why so many residents and visitors consider that the Scheme will industrialise the setting. Each environmental effect adds to that sense, building up the idea that this is no longer a rural and tranquil location but rather one devoted to generation. It is that combination of effects that SLD is particularly concerned about, and SLD consider it an error to dismiss such effects which are already well envisaged and (on a proper review of the evidence) well made out.	The Applicant agrees that combination effects cannot be dismissed. The Applicant has responded to comments relating to cumulative effects in detail in on page 806-807 and page 870-871 of the Applicant's Response to Relevant Representations [PDA-009] , where it is explained that full and extensive engagement, consideration, assessment and reporting of intra- and inter-project cumulative effects has been undertaken with the conclusions set out within ES Volume 1, Chapter 21 Cumulative and In-Combination Effects [APP-073] .
SLD-412	Description and DCO Process	Introduction	15.1.1. SLD has instructed Marrons to produce a planning statement in respect of the Scheme. Marrons have reviewed the evidence that SLD has produced, and taken that into	The Applicant notes that Marrons has been instructed and has considered the contents of the Planning Report in providing responses to the issues raised, noting that it in part summaries the technical appendices

			account in coming to conclusions on whether the Scheme should be granted development consent. That paper sets out the detail of Marrons consideration of that evidence, and its contents are not repeated here. Below, the conclusions reached by Marrons are set out in summary. The Marrons paper is at Appendix A.	provided by other consultants working on behalf of Stop Lime Down.
SLD-413	Climate Change and Energy Need	Summary of conclusions	15.2.1. The conclusions reached by Marrons are threefold. First, they conclude that the Applicant has failed properly to engage with the mitigation hierarchy such that the CNP Infrastructure presumption does not apply at all (NPS EN-1 para 4.2.14) [61/§6.4]. On the flat balance that applies as a result, they consider that development consent should be withheld.	As set out in paragraph 5.2.8 of the Planning Statement [REP1-087] , low carbon infrastructure such as solar has been identified as being of critical national priority (CNP). This means that if residual impacts remain after application of the mitigation hierarchy, the urgent need for solar and other forms of CNP infrastructure is likely to outweigh those residual impacts of development in all but the most exceptional circumstances (NPS EN-1 paragraph 4.1.7). Section 9.5 of the Planning Statement [REP1-087] sets out how the CNP presumption applies to the Scheme given it is demonstrated that the Applicant has met the requirements of relevant National Policy Statements, the mitigation hierarchy has been applied and other

				legal and regulatory tests have been met. The Applicant maintains that the mitigation hierarchy has been correctly applied. The mitigation hierarchy is a sequential approach that firstly seeks to avoid or prevent an adverse effect at source and if the effect is unavoidable the provision of mitigation measures to reduce the significance of the effect, and lastly if the effect cannot be avoided or reduced, the implementation of measures to offset the effect. In terms of site selection, the process sets out in ES Volume 3, Appendix 4-1 Site Selection Assessment Report [APP-185] reflects how the mitigation hierarchy has been applied. In order to avoid or prevent an adverse effect, all constraints were removed from the area of search, in order to ascertain if an unconstrained site could be identified; this is Step 1 of the process. Following site selection, embedded mitigation measures in the form of buffers between receptors and solar infrastructure were identified from an

				early stage in order to reduce and minimise impacts. Table 4-1 of ES Volume 1, Chapter 4: Alternatives and Design Evolution [APP-056] sets out the buffers that were applied, such as 15m from all hedgerows and woodland and 30m from major watercourses. Furthermore, in terms of the application of the mitigation hierarchy in the environmental assessments undertaken, ES Volume 1, Chapter 6: EIA Methodology [APP-058] explains that where significant effects have been identified, the Applicant has sought to avoid, reduce and mitigate those effects through embedded mitigation and where necessary, additional mitigation. Such mitigation measures are addressed in the various Outline Management Plans which are secured via Requirements in Schedule 2 of the Draft DCO [REP1-007]. However, residual significant adverse effects which cannot be avoided, reduced, or mitigated, remain as outlined in ES Volume 1, Chapter 22: Summary of Residual Effects [APP-074].

				Paragraph 4.2.15 of NPS EN-1 provides that “<i>Where residual non-HRA or non-MCZ impacts remain after the mitigation hierarchy has been applied, these residual impacts are unlikely to outweigh the urgent need for this type of infrastructure. Therefore, in all but the most exceptional circumstances, it is unlikely that consent will be refused on the basis of these residual impacts</i>”. Given the exceptions to this (impacts that present an unacceptable risk to, or unacceptable interference with, human health and public safety, defence, irreplaceable habitats or unacceptable risk to the achievement of net zero – see row below) do not apply to the Scheme, the CNP presumption, in relation to application of the mitigation hierarchy applies to the Scheme.
SLD-414	Human Health	Summary of conclusions	15.2.2. Second, Marrons considered the position if the CNP Infrastructure presumption does apply. In those circumstances they identify that two of the factors that they have weighed substantially against the Scheme fall within an exception at para 4.2.15 of NPS EN-1: public safety and human health. As a result of the	NPS EN-1 sets out that applicants for CNP infrastructure must continue to show how their application meets the requirements in the NPSs, apply the mitigation hierarchy, as well as demonstrate how any other legal and regulatory requirements are met. If the Secretary of State is satisfied that the requirements have been met, the CNP presumptions apply. These are:

			conclusions reached particularly in respect of traffic and transport, but also glint and glare, Marrons consider that exception applies. As a result, they consider again that development consent should be withheld [70/§6.30].	• That residual impacts are unlikely to outweigh the urgent need for this type of infrastructure. Therefore, in all but the most exceptional circumstances, it is unlikely that consent will be refused on the basis of any residual impacts. (paragraph 4.2.15 of NPS EN-1). • The Secretary of State will take as the starting point for decision making that CNP infrastructure is to be treated as if it has met any tests which are set out within the NPSs, or any other planning policy, which requires a clear outweighing of harm, exceptionality or very special circumstances. A non-exhaustive, list of tests is stated which includes development in nationally designated landscapes. (paragraph 4.2.16 of NPS EN-1). At Section 9.5 of the Planning Statement [REP1-087] the Applicant demonstrates how the Scheme has met the requirements of the energy NPSs, how the mitigation hierarchy has been applied and how other legal

				and regulatory requirements have been met. Therefore, given this, the CNP presumption applies and the Secretary of State should take as a starting point for decision making that the urgent need for the Scheme outweighs any residual impacts, and that any tests have been met. The exceptions to the presumption are set out in paragraph 4.2.15 of EN-1 which states <i>"Where residual non-HRA or non-MCZ impacts remain after the mitigation hierarchy has been applied, these residual impacts are unlikely to outweigh the urgent need for this type of infrastructure. Therefore, in all but the most exceptional circumstances, it is unlikely that consent will be refused on the basis of these residual impacts. The exception to this presumption of consent are residual impacts onshore and offshore which present an unacceptable risk to, or unacceptable interference with, human health and public safety, defence, irreplaceable habitats or unacceptable risk to the achievement of net zero. Further, the same exception applies to this presumption for residual impacts which present an</i>

			<i>unacceptable risk to, or unacceptable interference offshore to navigation, or onshore to flood and coastal erosion risk."</i> Taking each of these in turn: Regarding Human Health, ES Volume 1 Chapter 18: Human Health [APP-070] concludes that there are no residual significant effects from the Scheme on human health anticipated at any stage of the Scheme following the implementation of embedded and additional mitigation. Furthermore, in their relevant representation [RR-4798], the UK Health Security Agency acknowledge that the ES has not identified any issues which could significantly affect public health and also state that following their review of the submitted documentation they are satisfied that the proposed development would not result in any significant adverse impact on public health. Glint and glare impacts upon road safety have been considered and no significant impacts are predicted. It is not considered that there is any risk

				to human health and public safety as a result of glint and glare. Regarding Public Safety, Section 7 of ES Volume 1, Chapter 20 Major Accidents and Disasters [APP-072] concludes that all major accident and disaster risk events associated with the Scheme can be appropriately mitigated through design, measures and the application of management plans submitted as part of the DCO Application. With the implementation of this mitigation, the likelihood of an accident is negligible, and the very nature of a disaster means it is not likely. The assessment included consideration of a fire at the BESS site. Safety measures related to the BESS are set out in the Outline BSMP [REP1-110] which is secured under Requirement 6 of the draft DCO [REP1-007]. Regarding Traffic and Transport, 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,

			operation and decommissioning phases of the Scheme. The Scheme is not likely to result in any significant residual Transport and Access effects during the construction, operation and decommissioning phases. An Outline CTMP [REP1-112] and Outline PRowPPMP [REP1-104] have been prepared to manage construction vehicle movement during the construction phase and operation and maintenance phase. The applicant does not agree with the SLD conclusions on highway safety, trip generation and worse case assessment, banksmen or mitigation measures in the Outline CEMP [REP1-096]. A technical note that responds to the points raised in SLD Appendix D further will be submitted at Deadline 3. Regarding the points raised on defence, in its Deadline 1 submission [REP1-153], Ministry of Defence (MOD) confirm that there are no Wide Area Multilateration (WAM) safeguarding concerns, there are no height safeguarding concerns and

				there are no bird strike safeguarding concerns, and therefore the MOD do not object to the Scheme. This position is also reflected in the signed and finalised Statement of Common Ground with the Defence Infrastructure Organisation [EN010168/EXAM/8.15] that is submitted at Deadline 2. Regarding the points raised on irreplaceable habitats, NPS EN-1 defines irreplaceable habitats as those that would be technically very difficult (or take a very significant time) to restore, recreate or replace once destroyed, such as ancient woodland and ancient and veteran trees. As confirmed in ES Volume 1, Chapter 10 Arboriculture [APP-062], neutral and non-significant impacts are anticipated for all veteran trees and ancient woodland (although note there is no ancient woodland within the Order Limits), however, minor and non-significant impacts to a small number of trees on the outer northern edge of W0005 - North Bincombe Wood are anticipated from

				the installation of an access track near the woodland. Regarding the risk to the achievement of net zero, the Scheme contributes to the achievement of net zero targets and therefore does not present a risk to the target itself. Overall, as demonstrated, the Scheme does not present an unacceptable risk to, or unacceptable interference with, human health and public safety, defence, irreplaceable habitats or unacceptable risk to the achievement of net zero, therefore, the presumption that it is unlikely that consent will be refused on the basis of any residual impacts still applies.
SLD-415	Description and DCO Process	Summary of conclusions	15.2.3. Third, Marrons consider the position if the CNP Infrastructure presumption does apply, but also that an exception to that presumption does not apply. In considering this scenario, they note that there is a high bar to pass for the planning balance to indicate against the grant of development consent [69/§6.29]. However, considering their views as to the weighting of the relevant	The Applicant notes the comments made by Marrons on the planning balance, which are considered in detail in the row below. The Applicant's consideration of the planning balance is set out in Section 9.4 of the Planning Statement [REP1-087] which considers the positive, neutral and negative impacts of the Scheme. The Applicant's consideration of the planning balance

			planning considerations, Marrons concluded that this case was an exceptional one [70/6.31]. As a result, Marrons conclude that the SoS should refuse development consent [70/§6.32].	is also based on an appraisal of the Scheme against relevant planning policy, therefore this section should be read in conjunction with Section 8 of the Planning Statement [REP1-087]. The comments made by Stop Lime Down on the double counting of benefits are noted (in relation to the need for renewable energy infrastructure and GHG emissions savings). The Applicant considers that paragraph 3.2.1 of NPS EN-1 which states <i>"The government's objectives for the energy system are to ensure our supply of energy always remains secure, reliable, affordable, and consistent with net zero emissions in 2050 for a wide range of future scenarios, including through delivery of our carbon budgets and Nationally Determined Contributions"</i> is addressing two objectives for the energy system, i.e., to ensure that supply of energy always remains secure, reliable, affordable, and is consistent with net zero emissions in 2050 for a wide range of future scenarios. These separate but linked elements are considered in the Planning Statement [REP1-087] at

				paragraphs 9.4.5 and 9.4.6, where the link between the two is acknowledged/ A weighting is accordingly provided for each in order to aid the Secretary of State in its decision making. It is considered that benefits have not been double counted. Notwithstanding, the need for renewable energy infrastructure and GHG emissions savings are both benefits of the Scheme, either individually or combined, and both should be taken into account in the overall planning balance in decision making. It will be for the Secretary of State to determine how to attribute the weighting, and whether or not to deal with need and GHG emissions within the overall weighting given to the principle of development.
SLD-416	Description and DCO Process	Planning Balance	15.3.1. Below the planning balance table is extracted from the Marrons report and provided: <i>Table 4: Planning Balance</i>	The Applicant has considered Stop Lime Down's view of the planning balance and would make the following comments: 1. It is noted that there is agreement that the need for renewable

			Identified Impact: Need for renewable energy infrastructure and contribution to electricity generation and security of supply Weight by Applicant: Substantial positive weight Weight by Interested Party: Substantial positive weight Identified Impact: GHG emissions savings Weight by Applicant: Substantial positive weight Weight by Interested Party: Neutral weight as benefits through GHG emissions savings are already implied by the need for renewable energy infrastructure. Identified Impact: Ecology and Habitats Weight by Applicant: Moderate positive weight Weight by Interested Party: Moderate negative weight due to failure of the Applicant to demonstrate the proposed development would not result in significant adverse effects on habitats and species. Identified Impact: Biodiversity net gain Weight by Applicant: Moderate positive weight Weight	energy infrastructure, and the contribution the Scheme would make to electricity generation, and security of supply should be afforded substantial positive weight in the planning balance. 2. The Applicant disagrees that GHG emissions saving should be afforded neutral weight in the planning balance for the reasons stated in the row above. 3. The Applicant disagrees that ecology and habitats should be afforded moderate negative weight given the overall beneficial effects on biological conservation which should be afforded moderate positive weight. 4. The Applicant disagrees that biodiversity net gain (BNG) should be afforded limited positive weight given 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 34.75% for area habitat units, 12.31% for hedgerow units and

			by Interested Party: Limited positive weight. Identified Impact: Connectivity improvements and enhancements – permissive paths Weight by Applicant: Substantial positive weight Weight by Interested Party: Moderate positive weight. The benefit being delivered through the provision of new permissive paths is diminished by the environment within which they will be located. Identified Impact: Employment Generation Weight by Applicant: Limited positive weight Weight by Interested Party: Limited positive weight. Identified Impact: Economic Benefits Weight by Applicant: Limited positive weight Weight by Interested Party: Limited negative weight. Identified Impact: Landscape and visual effects Weight by Applicant: Landscape effects – moderate negative weight. Visual effects –	20.08% for watercourse units. As such, it is considered that a moderate positive weighting is appropriate. 5. The Applicant disagrees that the provision of permissive paths should only be afforded moderate positive weight. Given the creation of 12.8 km of new permissive paths, which will be open up to 365 days per calendar year throughout the proposed 60-year operational lifetime of the Scheme, substantial positive weight should be afforded. 6. It is noted that the Applicant and Stop Lime Down agree that the weighting for employment generation is limited positive weight. 7. The Applicant disagrees that economic benefits should be afforded limited negative weight. As a result of the generation of over £161 million GVA (chained to 2023 value) over the Scheme's lifetime within 20 km of the Scheme alone (with further benefits nationally), it is considered that the GVA generated by the Scheme should

		moderate negative weight. Landscape and visual impacts are afforded moderate negative weight. Weight by Interested Party: Landscape effects – substantial negative weight. Visual effects – substantial negative weight. Landscape and visual impacts should be afforded substantial negative weight for the reasons set out in Ms Tinkler's report. Identified Impact: Agricultural Land Weight by Applicant: Moderate negative weight Weight by Interested Party: Moderate negative weight. Identified Impact: Tourism and Recreation Weight by Applicant: Limited negative weight Weight by Interested Party: Great negative weight based on a combination of impacts on the local area including impacts on tranquillity, the local highway network, and the landscape setting. Identified Impact: PRow Weight by Applicant: Moderate negative weight in the planning balance	be afforded limited positive weight in the planning balance. 8. The Applicant considers that overall landscape and visual impacts should be avoided moderate negative weight in the planning balance given the assessment concludes both beneficial and adverse landscape effects and disagrees that landscape and visual effects should be afforded substantial negative weight. 9. It is noted that the Applicant and Stop Lime Down agree that for agricultural land the weighting is moderate negative weight. 10. The Applicant disagrees that tourism and recreation should be afforded great negative weight, given adverse effects have been minimised, leaving only temporary moderate adverse residual effects. As such, it is considered that a limited negative weighting is appropriate. 11. The Applicant maintains that the moderate negative weight afforded PRow should not be double counted given this is taken into account in the weightings for

		when considered in isolation. However, on the basis that the visual and socio-economic effects on PRow have already been considered in the wider weightings above for visual effects and effects on tourism and recreation, this weighting should not be double counted. Weight by Interested Party: Limited negative weight. We agree with the Applicant's position that harms to PRow are, in part, assessed through other topics. However, there remains a residual effect not fully considered elsewhere that the PRow will attract less users, a negative weighting should therefore be applied. Identified Impact: Air Quality Weight by Applicant: Neutral weight Weight by Interested Party: Moderate negative weight arising from potential air quality effects from risk of BESS fire, which has not adequately been assessed or mitigated. Identified Impact: Woodland Weight by Applicant: Neutral	visual effects and effects on tourism and recreation. 12. The Applicant disagrees that air quality should be afforded moderate negative weight given there are no significant adverse effects on air quality anticipated, the Scheme will not lead to a deterioration in air quality and therefore is considered to comply with national and local planning policy. It is therefore considered that a neutral weighting is appropriate. 13. It is noted that the Applicant and Stop Lime Down agree that for arboriculture the weighting is neutral. 14. The Applicant disagrees that flood risk and drainage should be afforded significant negative weight given the Scheme complies with the relevant policies in relation to flood risk and drainage. It is therefore considered that a neutral weighting is appropriate. 15. The Applicant disagrees that the historic environment should be afforded substantial negative weight given the Scheme

			weight Weight by Interested Party: Neutral weight. Identified Impact: Flood Risk and Drainage Weight by Applicant: Neutral weight Weight by Interested Party: Significant negative weight. In line with the conclusions of Professor Skeffington, the Applicant's work has not demonstrated how impacts from flooding will be avoided or addressed. There are risks identified which are not mitigated. Identified Impact: Historic Environment Weight by Applicant: Neutral weight Weight by Interested Party: Substantial negative weight due to multiple significant adverse effects on heritage assets, including on Grade I Listed Bradfield Manor and Fosse Way. Identified Impact: Soils Weight by Applicant: Neutral weight Weight by Interested Party: Moderate negative weight.	complies with the relevant policies in relation to the historic environment and no residual significant effects are anticipated. It is therefore considered that a neutral weighting is appropriate. 16. The Applicant disagrees that soils should be afforded moderate negative weight given the Scheme complies with the relevant policies in relation to soils. A neutral weighting is appropriate as whilst temporary moderate significant adverse effects on soil resources are anticipated during the construction of the Scheme, this is balanced by the temporary moderate significant beneficial effect which results from taking land out of intensive arable production for 60 years. 17. The Applicant disagrees that noise and vibration should be afforded significant negative weight given the Scheme demonstrates compliance with NPS EN-1, the National Planning Policy Framework and local policy in relation to noise. It is therefore considered that a neutral weighting is appropriate.

		Identified Impact: Noise and Vibration Weight by Applicant: Neutral weight Weight by Interested Party: Significant negative weight due to the loss of very quiet background noise levels that are characteristic of the area and the Applicant not seeking to mitigate to below LOAEL. Identified Impact: Traffic and Transport Weight by Applicant: Neutral weight Weight by Interested Party: Substantial negative weight. Identified Impact: Resource and Waste Management Weight by Applicant: Neutral weight Weight by Interested Party: Neutral weight. Identified Impact: Water Quality and Resources Weight by Applicant: Neutral weight Weight by Interested Party: Neutral weight. Identified Impact: Ground Conditions Weight by Applicant: Neutral weight Weight by Interested Party: Neutral weight.	18. The Applicant disagrees that traffic and transport should be afforded substantial negative weight given the Scheme demonstrates compliance with the relevant NPSs, the NPPF and local policy. It is therefore considered that a neutral weighting is appropriate. 19. It is noted that the Applicant and Stop Lime Down agree that for waste management the weighting is neutral. 20. It is noted that the Applicant and Stop Lime Down agree that for water quality and resources the weighting is neutral. 21. It is noted that the Applicant and Stop Lime Down agree that for ground conditions the weighting is neutral. 22. The Applicant disagrees that glint and glare should be afforded moderate negative weight given there are anticipated to be no glint and glare impacts to any civil, military aviation and defence interests and no envisaged increase in risk of bird strike. It is therefore considered that a neutral weighting is appropriate.

			Identified Impact: Glint and Glare Weight by Applicant: Neutral weight Weight by Interested Party: Substantial negative weight due to impact of glare on sensitive receptors including potential persistent safety-related hazards. Identified Impact: Civil Aviation and Defence Interests Weight by Applicant: Neutral weight Weight by Interested Party: Neutral weight. Identified Impact: Battery Safety Weight by Applicant: Neutral weight Weight by Interested Party: See Air Quality. Identified Impact: Human Health Weight by Applicant: Neutral weight Weight by Interested Party: Moderate negative weight.	23. It is noted that the Applicant and Stop Lime Down agree that for civil aviation and defence interests the weighting is neutral. 24. See point (12) above. 25. The Applicant disagrees that human health should be afforded moderate negative weight given there are no residual significant effects from the Scheme on human health anticipated at any stage of the Scheme following the implementation of embedded and additional mitigation and therefore the Scheme demonstrates compliance with the relevant NPSs, the NPPF and local policy. It is therefore considered that a neutral weighting is appropriate.
SLD-417	Description and DCO Process	Introduction	16.1.1. With the assistance of its legal advisors, below SLD provide a table setting out comments on the current draft DCO [APP-016]. These are provided without prejudice to SLD's objection to the Scheme. Where appropriate, commentary is also provided on the current	The Applicant notes this comment and sets out its responses to each specific comment on the draft DCO [REP1-007] below.

			Explanatory Memorandum [APP-017]. Following on from the table below are submissions on discrete points arising out of the draft DCO (and the hearings held in April 2026).	
SLD-418	Description and DCO Process	Table of Comments	Article/Req: Article 2(1) Text (where appropriate): “applicable period” Article/Req: Article 2(1) Text: “applicable period” Article/Req: Article 2(1) Text: “commence” Article/Req: Article 2(1) Text: “date of final commissioning” Comment: SLD note that, at ISH1, the Applicant indicated that it would bring further wording relevant to the interaction of commencement, the date of final commissioning, and the date of decommissioning. This was, in particular, related to commissioning of some parts of the Scheme before others. SLD understands that this will include provisions securing a phasing plan. Noting the concerns on the effect of the lifetime of the development	The Applicant has provided the updates to the draft DCO [REP1-007] referred to at Deadline 1, which should be read together with the Schedule of Changes [REP1-132] and updated Explanatory Memorandum [REP1-009].

			raised at ISH1, SLD will comment on this new wording when it becomes available. (Note this is also relevant to various Requirements in Schedule 2)	
SLD-419	Description and DCO Process	Table of Comments	Article/Req: Article 2(1) Text: "date of decommissioning" Comment: SLD note that, at ISH1, the Applicant indicated that it would bring further wording relevant to the approach to decommissioning in parts. Noting the concerns on the effect of the lifetime of the development raised at ISH1, and the comments in the next section below this table, SLD will comment on this new wording when it becomes available. (Note this is also relevant to various Requirements in Schedule 2)	The Applicant has provided the updates to the draft DCO [REP1-007] referred to at Deadline 1, which should be read together with the Schedule of Changes [REP1-132] and updated Explanatory Memorandum [REP1-009].
SLD-420	Description and DCO Process	Table of Comments	Article/Req: Article 2(1) Text: "permitted preliminary works"	As set out in the Explanatory Memorandum [REP1-009] at paragraph 4.2.2, permitted

			Comment: SLD have concerns about the scope of permitted preliminary works and whether any aspect of them can give rise to environmental effects (noting the intention at p.19 of the Explanatory Memorandum not to have such effects). Among other things, SLD have concerns that “preparation” in (c), “remedial works” in (d), and “site clearance” in (h) have scope to have such environmental effects. Additionally, SLD note that (e) permits the “laying of apparatus”. The word “apparatus” is also defined in Article 2(1), and SLD notes that it includes “electricity cables”. SLD consider that it must be made clear that “electricity cables” does not include those cables identified in Works No.1-10.	preliminary works are works that are not expected to give rise to environmental effects that require mitigation. The cables captured by the relevant works numbers under Schedule 1 are captured by the definition of “authorised development”, and so would be constrained by the various requirements in Schedule 2 that prevent the authorised development from “commencing” until matters such as the detailed LEMP (Requirement 7), the CEMP (Requirement 13), and the CTMP (Requirement 15) have been approved by the relevant planning authority. As such, the Scheme needs to “commence” in order for those works to be undertaken and could not be undertaken as permitted preliminary works.
SLD-421	Description and DCO Process	Table of Comments	Article/Req: Article 6(3) Text: “any development or in the exercise of any functions” Comment:	The Applicant does not consider this necessary as the extent of hedgerows authorised to be removed are already constrained by Article 40(4), Requirement 8 and Schedule 12. This drafting is consistent with a

			It is unclear whether the wording provides for the removal of hedgerows outside of that provided for by Article 40(4). As such, it is suggested "Article 40(4) of the" is added after "authorised by" in the provision.	range of made solar DCOs, including Cottam Solar Project Order 2024, West Burton Solar Project Order 2025, and most recently, The Springwell Solar Farm Order 2026.
SLD-422	Description and DCO Process	Table of Comments	Article/Req: Article 7 Comment: SLD notes para 4.2.21 and 4.2.22 of the Explanatory Memorandum and notes (1) that this article is typically included in all solar DCOs; and, (2) that the provision is essentially included as a "model provision" which strikes a balance. SLD would welcome examination of whether the removal of the requisite protections does strike the right balance, albeit noting the typical position. It is noted that, while not just s.79(1)(g) is engaged in the Statutory Nuisance Statement [APP-271], it is only that subsection which is identified for exclusion here.	Article 7 of the Draft DCO is an unchanged model provision that is standard across made solar DCOs including Cottam Solar Project Order 2024, West Burton Solar Project Order 2025, and most recently, The Springwell Solar Farm Order 2026. It is also typical across non-solar DCOs. As requested, the Applicant will include further explanation for Article 7 in the Explanatory Memorandum at a future deadline.

			In the first instance, a more detailed explanation of this provision in the Explanatory Memorandum may assist in examination of this issue.	
SLD-423	Description and DCO Process	Table of Comments	Article/Req: Article 17 Comment: This article provides a regime for discharge of water. On that basis SLD consider it would be appropriate for ss.106 and 118 of the Water Industry Act 1991 to be disapplied. Particularly in respect of the former, that right would appear to cut across the regime in Article 17. It is noted that disapplying s.106 should not disapply the reference to s.106 in Article 17(2) of the draft DCO.	The Applicant notes that Article 17 is based on a model provision and is standard drafting in all DCOs. The Applicant does not consider it necessary or appropriate for sections 106 and 118 of the Water Industry Act 1991 to be disapplied by the draft DCO [REP1-007]. Article 17 provides the right for the Applicant to discharge water into watercourses, public sewers or drains, with the consent of the person to whom that watercourse, sewer or drain belongs. It applies only to clean water, and therefore cannot be used to permit any foul discharge into a public sewer. Section 118 of the Water Industry Act 1991, which requires consent for the discharge of trade effluent into public sewers, remains applicable (albeit it should be noted that there is no intention to make any connection with a foul sewer in relation to the Scheme). In relation to section 106 of the Water

				Industry Act 1991, this provides a general right to communicate with public sewers. A sewerage undertaker can only refuse such a connection, under section 106(4), where the connection a) does not satisfy the standards reasonably required by the sewerage undertaker; or b) the making of the connection would be prejudicial to the undertaker's sewerage system. Article 17(2) provides that any dispute about the right to connect into a public sewer or drain is to be determined as though it were a dispute under section 106 of the Water Industry Act 1991. In respect of public sewers and drains, article 17 therefore mirrors the existing legislative position under the Water Industry Act 1991. Where Article 17 is broader in effect is that it additionally provides the Applicant with the power to discharge clean water into watercourses with the owner's consent. It is not considered necessary to disapply section 106 of the Water Industry Act 1991, and the Applicant

				does not agree that the provisions of section 106 'cut across' the regime in Article 17. Rather, the reference to section 106 as the mechanism for determining any dispute for a connection made under Article 17 ensures that the same considerations that would apply to an application made under section 106, also apply to the application made under Article 17. In this way, section 106 underpins the operation of Article 17 in relation to public sewers, and for these reasons should not be disapplied.
SLD-424	Description and DCO Process	Table of Comments	Article/Req: Article 44 Text: "différence" Comment: SLD consider that the use of the word "difference" may be vague and cause confusion about its relationship with Article 47 and Schedule 16 (as, for example, disagreement with Wiltshire Council about discharge of Requirements might be understood to be a "difference"). SLD consider that, for the avoidance of doubt, a wording should be included to	The Applicant does not consider that any further clarification is required because Article 44 already provides "<i>unless otherwise expressly provided for</i>". On that basis, the appeal mechanism in Schedule 16 (4) applies to any decision made by Wiltshire Council regarding the discharge of Requirements that it does not agree with.

			indicate that Article 44 is displaced by the specific regime in Schedule 16.	
SLD-425	Description and DCO Process	Table of Comments	Article/Req: Article 47(4) Text: "six weeks" Comment: SLD notes that the period of time applicable to the deeming provision in this Article is different to Schedule 16. SLD do not understand the basis for that difference and consider it should be the same unless a good reason is provided. SLD comment on Schedule 16 below.	The purpose of the deeming provisions under Article 47(4) and Schedule 16 are to ensure that timely decision making occurs that does not unduly delay the implementation of the Scheme. The Applicant considers that the 6 week period in Article 47 is a sufficient time period to provide consent. However, in response to specific concerns raised by Wiltshire Council, Schedule 16, paragraph 2(2) of the Draft DCO [REP1-007] was amended at Deadline 1 to provide a period of 10 weeks.
SLD-426	Description and DCO Process	Table of Comments	Article/Req: S2, Req 4(3) Text: "first anniversary" Comment: SLD suggest that this should be changed to "sixth anniversary". This is because a number of mitigation measures are either secured with a management timetable running for the first five years of the Scheme, or continuously for the life of the	The Applicant does not consider this necessary on the basis that the Outline OEMP [REP1-098] and Outline Decommissioning Strategy already [REP1-100] require a Community Liaison Manager to be re-established during operational replacement activities and decommissioning. This ensures the Community Liaison Group is in place for the first part of the operational phase and also across periods where more substantive works are taking place.

			Scheme (so, including Year 6 onwards). See, for example, the Outline Landscape Ecological Management Plan – Annex A [APP-283]. SLD consider liaison is still important when (for example) mitigation measures are still becoming established. SLD accept that the need for liaison may reduce over the operational life of the Scheme. It considers the sixth anniversary strikes the right balance given the reasoning above.	As set out in paragraph 1.4.1 of the Outline LEMP [APP-283], monitoring of mitigation planting will be set out within the detailed Landscape and Ecological Management Plan, with regular monitoring to occur over the first 5 years of operation. As Wiltshire Council will be the monitoring body for the Outline LEMP [APP-283] and other management plans, it would be open to the local community to raise any concerns regarding mitigation planting directly with Wiltshire Council over that period.
SLD-427	Description and DCO Process	Table of Comments	Article/Req: S2, Req 4 Comment: For the same reason as applies at the construction phase of the Scheme, SLD consider that a community liaison group should also be secured for the decommissioning phase of the Scheme.	Section 2.10 of the Outline Decommissioning Strategy [REP1-100] already requires a Community Liaison Manager to be appointed during the decommissioning phase.
SLD-428	Description and DCO Process	Table of Comments	Article/Req: S2, Req 5(1) Text: "No part of Works Nos. 1, 2 or 3" Comment:	Requirement 5 only relates to Works Nos. 1, 2 and 3 because other Works Nos. either relate to subsoil activities that are not required to be subject to

			SLD notes that this provision does not include Works Nos. 4-10 (save for Works No.5 which is the subject of a narrower provision in req 5(4)). SLD consider that all Works should be included in this provision to ensure that there is oversight of detailed design of all aspects of the Scheme. This includes Works No. 5, which should not be the subject of a more limited provision in Req 5(3). By comparison to this provision, the comparable provision in the three most recently consented solar DCOs is: • Springwell Solar Farm DCO: secures all works in the equivalent requirement except temporary construction and decommissioning compounds, and facilitatory highways works. • Fenwick Solar Farm DCO: secures all works in the equivalent requirement.	the same types of detailed design controls or are controlled by other Requirements. For example, fencing works are controlled by Requirement 10 of the Draft DCO [REP1-007]. Inclusion of additional Works Nos. within Requirement 5 is unnecessary and would be duplicating a process separately controlled by other Requirements of the Draft DCO [REP1-007].

			Helios Renewable Energy Project DCO: secures all works in the equivalent requirement.	
SLD-429	Description and DCO Process	Table of Comments	Article/Req: S2 Req 5(1) Text: "(a) the layout; [etc]" Comment: SLD also note that the details to be required are more limited than the list provided in recent DCOs, and invites the contents of this list to be examined and added to. For example, referring to the Springwell Solar Farm DCO, the following items were included in addition to those already in the draft DCO in this case: - Refuse and other storage units, signs and lighting; - Drainage, water, power and communications cables and pipelines; - Programme for landscaping works; - Security measures; and,	For the reasons set out above, it is not considered that the list of matters captured by Requirement 5 needs to be changed because such matters are already appropriately controlled by other Requirements within the draft DCO [REP1-007]. The matters proposed are already captured by the following Requirements: - Requirement 11 – Surface and foul water drainage - Requirement 13 - The Outline CEMP [REP1-096]. - Requirement 14 - The Outline OEMP [REP1-098]. - Requirement 7 - The Outline LEMP [APP-283]. - Requirement 19 - The Outline Site Waste Management Plan [REP1-102].

			Any mitigation measure necessary to address noise impacts. Fencing is not included from the Springwell list as it is secured by S2 Req 10. It is noted that a number of these considerations already appear within the Design Principles and Parameters [APP-269]. See, for example, the parameters secured for CCTV in Works Nos. 6 and 7.	
SLD-430	Description and DCO Process	Table of Comments	Article/Req: S14 Art 8(2) Comment: SLD consider that any materials filed and served in the arbitration should be open and accessible to the public, unless ordered otherwise by the arbitrator, in line with the provision for public hearings in Art 8(1). While there is variance in the granted DCOs, this was the approach adopted in the Springwell Solar Farm DCO and the Helios Renewable Energy	Depending on the nature of the dispute it may not be appropriate for the document to be disclosed where it contains commercially sensitive information or information that otherwise imports an obligation of confidence. For example, matters relating to the location of badger setts are strictly confidential. On that basis, the Applicant considers it appropriate that there is a presumption of confidentiality, with information able to be disclosed by agreement between the parties.

			Project DCO and SLD considers the same wording should be used here.	
SLD-431	Description and DCO Process	Table of Comments	Article/Req: S16 Comment: SLD note that the procedure for discharge is ultimately a matter for Wiltshire Council. However, among other things, it is noted that Article 2 provides 8 weeks to determine all discharge applications, and Article 3 provides only 10 working days for the Council to make requests for further information, and 5 days to commence consultations. Given the consequences of failing to comply are considerable (see e.g. Arts 2(4) and 3(4)), SLD consider that Wiltshire Council must be satisfied that the timelines provided in this Schedule are achievable (including in the case of a large number of discharge applications being made at once). SLD notes that, while Appendix 1 to PINS Advice Note 15: drafting	In response to concerns raised by Wiltshire Council, the Applicant has already updated Schedule 16 of the Draft DCO [REP1-007] at Deadline 1 to provide a 10 week time period for the discharge of Requirements. Paragraph 5.16.1 of the Explanatory Memorandum [REP1-009] explains that Appendix 1 of Advice Note 15: drafting Development Consent Orders from the Planning Inspectorate provides that this decision period from the discharging authority is 42 days. The 8 weeks provided (or indeed now the extended 10 week period now provided as updated at Deadline 1) is a more generous period. Depending on the extent or complexity of detail required, Schedule 16 allows a longer period by agreement between the parties. That is what Advice Note 15 is referring to when it says “to agree a proportionate timescale for discharge depending on the extent or complexity of detail reserved for subsequent approval”.

			Development Consent Orders does use 42 days in the exemplar text, para 19.2 of the note explains "Applicants should engage with the discharging authorities... for example to agree a proportionate timescale for discharge depending on the extent or complexity of detail reserved for subsequent approval". Thus, the matter is open to negotiation between the parties. It is noted that the Explanatory Memorandum at para 5.16.1 appears to assume that the period provided for in Article 2(2) is six weeks rather than 8 weeks.	
SLD-432	Description and DCO Process	Table of Comments	Article/Req: S16 Comment: SLD note there is a cross-referencing error in this Article, which appears to have arisen from the time to determine being listed at (2) rather than (1).	The Applicant agrees this is a cross-referencing error and will correct this in the next version of the draft DCO to be submitted into Examination.

SLD-433	Description and DCO Process	Comments	Article/Req: S16 Art 2 16.2.1. It is noted that, as local planning authority and primary authority which will discharge requirements, it is likely that Wiltshire Council will come forwards with further requirements for the DCO. SLD will consider these additional requirements as part of reviewing the published LIR, and is also open to discussions with all parties about additional requirements.	The Applicant notes this comment.
SLD-434	Description and DCO Process	Comments	16.2.2. It is also noted that it is the DCO which secures the Design Principles and Parameters [APP-269]. SLD note that changes to those parameters could make a difference in avoiding or mitigating effects identified throughout this Written Representation. That might include securing smaller solar panels to attempt to mitigate effects (especially given the submission, at ISH1, that fixed 3.5m panels are more generative). SLD will consider the response to Written Representations provided by the Applicant and approach this issue accordingly.	As set out in Design Principles and Parameters [REP1A-008] , the Scheme has been designed, and the Environmental Impact Assessment has been undertaken taking account of design principles and parameters. The Environmental Impact Assessment undertaken has adopted the 'Rochdale Envelope' approach in accordance with the Planning Inspectorate's Advice Note Nine: Rochdale Envelope which provides guidance on the degree of flexibility that may be considered appropriate. The approach recognises that the worst-case parameter for one technical assessment may differ from

				another, ensuring that worst case overall impacts are predicted. Furthermore as stated in paragraph 1.2.4 of the Design Principles and Parameters [REP1A-008], It is necessary that there will be some flexibility built into the design of the Scheme in order that the detailed design of the Scheme can be informed by technical considerations, post-consent work, and take advantage of innovation in technology. This is of particular importance in order to maintain flexibility due to the rapid pace of change in solar PV and battery storage technology, whilst maintaining a robust and comprehensive assessment of potential effects. In terms of the point raised about solar panels, flexibility for either tracker or fixed panels has been built into the Scheme. In terms of layout, the tracking solar PV modules would be aligned in north-south rows, and the fixed solar panels would be aligned in east-west rows. Each panel type is considered below. Tracker PV Modules

				Tracker panels are mounted on horizontal axes which run north-south. In the morning the panels face east and they track the sun as it moves across the sky through the course of the day. The maximum height of the highest part of the tracking solar PV modules at its greatest inclination would be 4.5m Above Ground Level (AGL). The maximum height of the highest part of the solar PV modules when horizontal will be 2.5m AGL. Full details are as set out within Table 2-1 Work No.1 Design Parameters and Commitments of the Design Principles and Parameters Document [REP1A-008]. The tracking solar PV modules rotate to follow the course of the sun throughout the day, with 'full tilt' (4.5m) occurring at the beginning and at the end of the daylight hours (sun rise and sun set) of each day. Throughout the day, the panels would slowly rotate around the central axis of the module to track the course of the sun and when horizontal sit at 2.5m AGL.

				Tracker PV modules sit horizontal overnight, and area also programmed to position themselves to optimum orientation for protection in storm or high wind events (still within the 4.5m parameters). Fixed PV Modules Fixed PV Modules are installed in a fixed position, facing broadly south, and are tilted, depending on location and local land topology, to optimise the incident irradiation throughout the day and the year. The maximum height of the highest part of the fixed solar PV modules will be 3.5m. Foundations are most likely to be galvanised steel poles driven into the ground. These will either be piles rammed into a predrilled hole, or a pillar attaching to a steel ground screw. Full details are as set out within Table 2-1 Work No.1 Design Parameters and Commitments of the Design Principles and Parameters Document [REP1A-008]. Effects associated with Tracker or Fixed PV Modules

				ES Volume 1, Chapter 8: Landscape and Visual Impact Assessment [APP-060] has been undertaken on a Rochdale Envelope Worse Case basis, with a panel height of 4.5m AGL (the uppermost reach of the Tracker PV Modules) used to undertake an assessment of potential effects. As identified above, it is only at sunrise and sunset that the Tracker PV Modules would reach 4.5m AGL, spending the rest of the daylight hours at a height ranging between 2.5m and 4.5m AGL. Key to this range is that there will be a period of the day when the panels are either at, or close to the horizontal plane and closer to 2.5m AGL, and therefore below the height (3.5m AGL) of the Fixed PV Modules. Seasonality is a key factor when considering the position of the Tracker PV Modules. The earlier sunrise occurs and the later that of the sunset, (ie in Summer months) then the earlier in the day that the panels would rotate to a position lower than the Fixed PV Modules and

				the longer panels would spend horizontal (in summer months the sun is higher in the sky). The converse is recognised for winter months, but the Tracker PV Modules would still track the full course of the sun spending periods of the day either at, or close to the horizontal plane. The height AGL with Fixed PV Modules is constant (3.5m), with no daily variation or seasonality and therefore associated effects are consistent (all be it with the seasonal changes of the host landscape). The Applicant considers that despite the Fixed PV Modules being 'shorter' than the Tracker PV Modules, at 3.5m AGL the difference between the upper extents of the Fixed PV Modules and the Tracker PV Modules (1m) is not so substantive as to overcome the variation provided by the Tracker PV Modules across the course of the day (especially when the sun is at its highest in the sky and the panels are either horizontal or close to it at 2.5m), compared to the constant nature of the Fixed PV Modules. As such, the adverse

				effects associated with the Fixed PV Modules are considered directly comparable to that of the taller Tracker PV Modules, despite the Tracker PV Modules being taller at the beginning and at the end of the daylight hours. Therefore, for the reasons set out above, it is not considered that from an LVIA perspective one system or the other is likely to result in a greater or lesser level of effect.
SLD-435	Description and DCO Process	Further Submissions Related to the Draft DCO	16.3.1. There are a number of further issues which SLD consider need to be addressed related to the draft DCO and the Explanatory Memorandum. These concerns relate the operation of the statutory machinery provided for in the draft DCO.	The Applicant notes this comment and has responded to specific comments where made.
SLD-436	Description and DCO Process	Further Submissions Related to the Draft DCO	16.3.2. Decommissioning of parts of the Scheme: SLD understands from discussions at ISH1 that the Applicant will come forward at Deadline 1 with an amended wording to the draft DCO addressing the situation where parts of the Scheme require to be decommissioned earlier than other parts of the Scheme. As has already been noted above, this	The Applicant confirms that the amended wording has been added in Schedule 2, Requirement 20 of the Draft DCO [REP1-007] submitted at Deadline 1.

			raises questions related to properly securing the maximum life of the Scheme. However, it also raises questions related to the likely effects of the Scheme (and, in particular, the security that, if consented, the Scheme in its full form will come forwards for its lifetime).	
SLD-437	Description and DCO Process	Further Submissions Related to the Draft DCO	16.3.3. SLD understands from ISH1 and the submissions made by the Applicant that, currently, the way in which the need to decommission part of the Scheme early could come about is as a result of it not being able to secure land rights from owners of Lime Down Sites A-E for the full lifetime of the Scheme. SLD understands from the Applicant's submissions at ISH1 that it cannot confirm that it has land rights to cover the full construction, operational, and decommissioning lifetime of the Scheme. Further, as rights of compulsory acquisition under the draft DCO are time limited, it will not have the ability to acquire further land rights if agreements to extend leases (etc) with landowners are unsuccessful.	It is correct that the exercise of the compulsory acquisition powers in the draft DCO [REP1-007] is time limited. The terms of the Option Agreements are confidential and the Applicant cannot provide details without the landowner's consent. However, as an example, the Applicant has the landowner's consent to confirm that the Option Agreement dated 21 February 2023 in respect of Site E is for a maximum term of 40 years and therefore any extension to 60 years would be by agreement.

SLD-438	Description and DCO Process	Further Submissions Related to the Draft DCO	16.3.4. SLD notes that it has not seen the wording of the provisions proposed to achieve this partial decommissioning. As such, it will reserve its full position to comment on that wording and address its effects. However, for the moment, SLD makes the following preliminary points.	The Applicant notes this comment.
SLD-439	Description and DCO Process	Further Submissions Related to the Draft DCO	16.3.5. Partial decommissioning of the Scheme in advance of the expiry of its 60-year operational period raises the issue that the ExA cannot be satisfied that the benefits of the Scheme are secured. That was a point identified by the ExA at ISH1 and is a consequence of the Applicant being unable to confirm that it can or will have the requisite land rights. Were part of the Scheme to be decommissioned before the 60 years has passed, the amount of energy generation achieved would be less than is currently estimated in the Applicant's Environmental Statement.	The Applicant has provided calculations for GHG emissions for the Scheme based on a 40 year duration in page 56 its Written Summary of the Applicant's Oral Submissions and Responses at Issue Specific Hearing 1 and Responses to Action Points [REP1A-012]. In a 40-year scenario, the total GHG emissions are predicted to be lower as it is assumed that full replacement of the panels would not take place during the operational phase (total emissions estimated to be 736,869 tCO₂e instead of 933,140 tCO₂e). However, there would also be less renewable energy generated during the operational life of the Scheme and this would reduce the net saving over the Scheme's lifetime from

				253,839 tCO ₂ e to 14,256 tCO ₂ e using the methodology set out in ES Volume 1, Chapter 7: Climate Change [APP-059] .
SLD-440	Description and DCO Process	Further Submissions Related to the Draft DCO	16.3.6. While this in itself is an important point, SLD consider there is an even more critical issue. As is apparent from (e.g.) the Works Plans [APP-007], various of the Works are not evenly distributed across the Scheme. For example, a significant portion of Works No.9 (securing habitat management areas) is included in Lime Down C. Were it the case that, as a result of difficulties with land agreements, Lime Down C required to be decommissioned after 30 years, those Works No.9 areas would be no longer secured. As a result, the environmental mitigations and enhancements therein secured would no longer be part of the Scheme and would be lost. That is critical, as it would mean the environmental effects of the Scheme would change, and it is likely that mitigation measures risk being lost which would make effects of the Scheme all materially worse in some way.	The Applicant is legally obliged to comply with the measures set out in the management plans secured by the Requirements in the draft DCO [REP1-007]. In the event that the part of the Scheme to be decommissioned contained mitigation measures relating to other parts of the Scheme, the Applicant would be required to either: (1) secure the necessary rights to retain the required mitigation; (2) apply to change the mitigation to another form or location of mitigation measure that appropriately addresses the relevant effect; or (3) decommission the other parts of the Scheme.

SLD-441	Description and DCO Process	Further Submissions Related to the Draft DCO	16.3.7. Both of the events identified in the last two paragraphs go to the heart of the consenting process in the EIA Regulations. Pursuant to those regulations, the obligation on the Applicant in its Environmental Statement (and the SoS when determining whether to grant development consent) is to identify and weigh the likely significant effects of the Scheme. Given the Rochdale envelope approach, those effects are measured on a reasonable worst-case basis.	The Applicant notes this comment.
SLD-442	Description and DCO Process	Further Submissions Related to the Draft DCO	16.3.8. In circumstances where the DCO has the power to decommission parts of the Scheme, and the Applicant cannot demonstrate that all of the Scheme is secured for its lifetime, the question of what are the likely significant effects of the scheme changes from simply the 60-year operational case to any case where decommissioning is required due to a land agreement failing (or, indeed, any other reason for decommissioning part but not all of the Scheme arising).	The draft DCO [REP1-007] imposes a maximum operational period of 60 years. There is no requirement in the draft DCO for the Scheme to remain operational for 60 years. The Applicant considers that assessing a 60-year period represents the reasonable worst case from an EIA perspective.

SLD-443	Description and DCO Process	Further Submissions Related to the Draft DCO	16.3.9. For those reasons set out in summary, SLD consider that it is important that the ExA are furnished with the information which allows it to conclude what is a reasonable worst-case assessment of the lifetime of the Scheme. From that, it may then be possible to progress some form of assessment of the likely effects of that version of the Scheme (albeit it is noted that this information is not currently in the Environmental Statement). Without taking these steps, SLD consider there is a probability that the Environmental Statement will not identify the likely significant effects of the Scheme (and, as a result, the SoS not weigh them in the balance as part of the decision-making process.	The Applicant disagrees with this comment as the Environmental Statement concludes the likely effects of the Scheme from a worst-case scenario.
SLD-444	Description and DCO Process	Further Submissions Related to the Draft DCO	16.3.10. At the ISH it was suggested that SLD was suggesting that the Applicant breach non-disclosure agreements with the relevant landowners. That was not the suggestion. Rather, SLD was recognising three things: (1) it is for the Applicant to set out the likely significant effects of the Scheme in its Environmental Statement; (2) the ExA must be	As noted in the Written Summary of the Applicant's Oral Submissions and Responses at Issue Specific Hearing 1 and Responses to Action Points [REP1A-012] , the Applicant is subject to contractual confidentiality obligations which prevent disclosure of the terms of relevant commercial agreements without consent from the other party. This is distinct from relying on "commercial sensitivity" as

			satisfied by the Applicant that there is a proper basis to conclude the effects in the Environmental Statement are the likely significant effects of the scheme; and, (3) the Applicant is a party to the agreements with landowners and the party whose advisors joined in drafting those agreements. As a result, it is for the Applicant to positively demonstrate to the ExA the length of the land agreements. If the Applicant is bound by non-disclosure agreements, it has freely entered them, and it is for the Applicant to secure a release so that it can provide the requisite evidence to the ExA. If such release is not forthcoming, it remains the role of the Applicant to satisfy the ExA as to the reasonable worst case for the lifetime of the Scheme, and the significant effects as a result. In short, this is an absence of information, and the ExA (and SoS) need some security that they can lawfully conclude that the significant adverse effects of the Scheme have properly been described.	such, and that providing further details would require the consent of the landowner. Ms Brodrick acknowledged the point made that the Applicant relies on a 60-year operational period to demonstrate Scheme benefits, but noted that any reduction in the operational life of the Scheme would correspondingly reduce the benefits relied upon.

			16.3.11. SLD will comment on this issue further once the proposed wording relating to decommissioning has become available.	
SLD-445	Description and DCO Process	Relationship between Works No.1 and Works No.2	16.3.12. Relationship between Works No.1 and Works No.2: SLD understand from discussions with the Applicant that, as a result of grid connection reforms with the National Energy System Operator ("NESO"), that the Applicant is currently the recipient of an offer of a Gate 2, Phase 1 connection for the Works No.11 part of the Scheme (i.e. the ground mounted solar photovoltaic generating station) and a Gate 1 connection for Works No.2 (the BESS). That is in line with current NESO practice of only offering Gate 2 connections to BESS that (essentially) are well advanced through the design and planning process. Further details of the Connection Reforms process at NESO is available on the NESO website. <i>While framed by reference to Works No.1 and Works No.2, SLD is aware that the offer of a</i>	The Applicant has an accepted connection offer to the National Electricity Transmission System (NETS) at National Grid's existing Melksham 400kV substation. The agreement is for 500MW (AC) of export and 250MW (AC) of import. 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 non-firm connection date).

			<i>connection is not determined by reference to the draft DCO (and thus other works would come forwards as part of construction and connection). Defining this issue by reference to Works No.1 and Works No.2 is merely used as a useful shorthand.</i>	
SLD-446	Description and DCO Process	Relationship between Works No.1 and Works No.2	16.3.13. As a result, on the offers currently made to the Applicant, if accepted it will have the right to connect to the National Electricity Transmission System (i.e. the Grid) on or prior to 2030 in respect of Works No.1, but after 2035 (and with no set date) for Works No.2. The Applicant has indicated to SLD that it intends to make representations to NESO (if the Scheme is consented) so as to invite it to bring forward the date for the Works No.2 connection (as it is appropriate that a different approach is taken to co-located BESS). While this is noted, SLD is not aware of any evidence that this is the step that NESO currently plans to take.	NESO's Connections Reform activities, the initial results of which were published in December 2025, assigned a priority to schemes according to their readiness, and strategic alignment with government's current Clean Power capacity ranges. The Applicant has been informed that: The solar component of the Scheme will receive an Agreement to Vary to its existing connection agreement to move it to a Gate 2 Phase 1 connection offer. The confirmed connection date for such offers is expected to be in 2030 or earlier and will be confirmed by NESO between mid-May and mid-September 2026 (NESO-led confirmation

				timelines which may be subject to change). The BESS component of the Scheme will receive an Agreement to Vary to its existing connection agreement to move it to a Gate 1 connection offer. The indicative connection date for such offers has not yet been confirmed but is expected to be confirmed no earlier than April 2027 by NESO, but after Gate 2 offers have been sent out (NESO-led confirmation timelines which may be subject to change). Upon receiving consent for the Scheme (if granted) the Applicant would re-submit the BESS component of the Scheme to a future re-prioritisation round to seek a Gate 2 connection offer (firm connection date). Any firm connection date for the BESS if awarded, would be subject to NESO's re-prioritisation against the capacity ranges applicable at the time of the re-prioritisation round. A connection date before 2035 is therefore not

				prohibited, as the SLD WR suggests is the case. It is not the Government's intention that project approvals should be limited by the Clean Power 2030 capacity ranges or NESO's prioritisation (NPS EN-1(2025), Para 3.2.6). Indeed, the Government's Clean Power 2030 Action Plan states, at p55, that Government is <i>"expecting an increase in planning applications with the Clean Power 2030 target"</i>. Further, the Government confirmed in its 2025 consultation response to Planning for New Energy Infrastructure that: <i>"Clean Power 2030 is a milestone that reflects the scale of ambition required to meet our Net Zero 2050 target; it is not a fixed ceiling on technology deployment or project approvals."</i> Therefore, the need established by NPS EN-1 for low carbon and flexible schemes continues to apply to schemes or component of schemes

				which currently hold Gate 1 connection agreements.
SLD-447	Description and DCO Process	Relationship between Works No.1 and Works No.2	16.3.14. SLD understands that this issue was intended to be addressed at ISH1 but time ran short. SLD makes the following two points in outline. When further information becomes available from the Applicant, it will provide additional submissions on the position.	The Applicant notes this comment.
SLD-448	Description and DCO Process	Relationship between Works No.1 and Works No.2	16.3.15. First, NPS EN-1. Para 4.11.12 explains that the "Secretary of State should be satisfied that appropriate network connection arrangements are/will be in place for a given project". It goes on to consider single or multi-link projects.	The Applicant agrees that is what paragraph 4.11.12 of NPS EN-1 says.
SLD-449	Description and DCO Process	Relationship between Works No.1 and Works No.2	16.3.16. On the current evidence there are doubts as to compliance with this provision. What the Applicant says is a key part of the Scheme (the BESS) is likely to come forwards at a time years more distant than the generating aspects of the Scheme. Indeed, while there is the query of commencement of only parts of the Scheme (identified above), at a	Both components of the Scheme (solar and BESS) have connection agreements with NESO, but the firm or indicative connection dates have not yet been confirmed for either element of the Scheme. Upon receiving consent for the Scheme (if granted) the Applicant would re-submit the BESS component of the Scheme to a future re-prioritisation round to seek a Gate

			general level it is likely to be longer than 5 years from consent (which is used as a comparator because that is the stated life of the DCO itself without commencement). Given there is positive evidence of a Gate 1 offer, and NESO has not provided any guidance to indicate the connection may become available sooner, it does not appear that the Applicant can satisfy the Secretary of State to the appropriate level.	2 connection offer (firm connection date). The Government has made it very clear in its currently designated Overarching National Policy Statement EN-1 (2025) that (Para 3.2.6) "It is not the government's intention in presenting any of the figures or targets in this NPS to propose limits on any new infrastructure that can be consented in accordance with the energy NPSs." Further, in its response to the consultation regarding the new (Jan 2026) NPSs, Government confirmed that "Clean Power 2030 is a milestone that reflects the scale of ambition required to meet our Net Zero 2050 target; it is not a fixed ceiling on technology deployment or project approvals".
SLD-450	Description and DCO Process	Relationship between Works No.1 and Works No.2	16.3.17. Second, it is noted (e.g. at para 3.1.6-3.1.9 of the Explanatory Memorandum to the draft DCO [APP-017]) that Works No.2 are considered to comprise associated development. Those paragraphs refer to the relevant April 2013 guidance of the Department for Communities and	The Applicant notes this comment.

			Local Government: "Guidance on associated development applications for major infrastructure projects" and (among other things) assert that Works No.2-10 are "all required to support the construction, maintenance and operation of the generating station, or to mitigate its impacts".	
SLD-451	Description and DCO Process	Relationship between Works No.1 and Works No.2	16.3.18. Para 5(i) of the Guidance identifies the following core principle (amongst four listed): that associated development requires "a direct relationship between associated development and principal development. Associated development should therefore either support the construction or operation of the principal development, or help address its impacts".	The Applicant notes this comment.
SLD-452	Description and DCO Process	Relationship between Works No.1 and Works No.2	16.3.19. Given, currently, there appears to be a disconnect between the connection date for Works No.1 versus Works No.2 (in the order of years), it would suggest a similar disconnect between the principal PV generation aspect of the Scheme and the BESS. That, it would appear, calls into question the	The Applicant does not agree with this position. It is well established that BESS is " <i>associated development</i> " for Solar NSIPs and the reasoning for the inclusion of BESS is set out at section 6.10 of the Statement of Need [REP1-085] . The Applicant is awaiting further details on the specific connection date for both the solar and BESS from NESO.

			“direct relationship” between principal development and associated development. Rather, it suggests the BESS is independent development located in the same place. Were that the case, it would appear the appropriate consenting regime would be a separate Town and Country Planning Act 1990 location nearby to the Scheme.	
SLD-453	Description and DCO Process	Relationship between Works No.1 and Works No.2	16.3.20. This concern regards associated development is, however, speculative. It may be (for example) that the Applicant accepts it would not come forward with the Scheme at all until a coordinated connection date is achieved.	The Applicant is required to implement the Scheme within a restricted time period. Under Requirement 2(1) of the draft DCO [REP1-007], the authorised development must not be commenced after the expiration of the applicable period. The “applicable period” means the period of five years beginning on the day on which this Order comes into force, subject to the extension mechanisms available.
SLD-454	Description and DCO Process	Relationship between Works No.1 and Works No.2	16.3.21. SLD will comment on this issue further once the relevant information becomes available.	The Applicant notes this comment.
SLD-455	Consultation and Engagement	Conclusion	SLD welcomes the opportunity to provide this Written Representation to the ExA. It considers that its	The Applicant notes this comment.

			evidence base is strong, and that a wide range of significant adverse effects have been identified as a result of the Scheme. For all of the reasons set out above, and in the Appendices attached to this Written Representation, the ExA are asked to recommend to the Secretary of State that development consent be withheld, and the Secretary of State asked to withhold that consent.	
SLD-456	Landscape and Visual	Annex A	Annex A This note provides assistance to using the interactive map produced by James Verschoyle on behalf of SLD and provided as Appendix Z to this Written Representation. Using a layered PDF map is like having a stack of clear tracing papers that you can peel away to see exactly what you need. The following instructions here are to control what you see on the map using Adobe Acrobat. Similar steps can be taken in all typical PDF viewers. 1. Open the PDF	The Applicant notes this comment.

			To do so, download the document and then open through your desktop PDF viewer such as Adobe. Viewing it through your browser can cause difficulties. 2. Open the layers panel Look at the vertical tab on the far right side of your screen. Click the layers icon (which appears like two stacked diamonds). This will slide open a panel listing the layers of information. 3. Turn information on and off Next to each layer name, you will see a box. The layers which are already applied will have an eye icon in them. To show a layer click the empty box. To hide a layer click the eye icon in the box. 4. Tips for best results - Always keep the two "Base-OS Map" layers on so that you can see the underlying map. - If visibility is difficult select "Optional – Background Tint". This will apply a white tint in the layers	

			which helps with visibility (by partially obscuring the OS map behind). • The layers stack is long, so use the scroll wheel on your mouse to navigate. • The layer groups are as follows: - o Base – the base mapping. Typically should be left on at all times. - o Optional – useful information which is not specifically tied to an Examination document (primarily taken from the Defra Magic Map). - o APPXXX – layer provides specific information from an Examination document. • Print what you see: when you print a PDF, Acrobat will only print the current layers you see. If you wish to save a view, you can print (or print to PDF to have an electronic copy). • Save your view: if you find a specific combination of layers you like, you can save the map PDF and it will usually remember them the next time you open it.	

			SLD will provide further updated maps as appropriate to best assist the Examination and the understanding of the evidence base.	

4 The Applicant's responses to other statutory consultees, undertakers and notable parties

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
Mills & Reeve LLP on Behalf of National Gas REP1-165				
NGT-001	Description and DCO Process	Introduction	This written representation is submitted on behalf of National Gas Transmission plc (" NGT") in response to the application by Lime Down Solar Park Limited (" Promoter ") for the Lime Down Solar Project Development Consent Order (" Order") for the construction of the Lime Down Solar Project (which will comprise of a new solar and energy storage project, with associated infrastructure (defined in the draft Order as the " Authorised Development ")).	The Applicant notes this comment.
NGT-002	Description and DCO Process	NGT Infrastructure	NGT infrastructure 2.1 As set out in NGT's relevant representation dated 8 January 2026 [RR-3423], NGT has a	The Draft DCO [REP1-007] currently contains draft Protective Provisions for the protection of NGT at Part 4 of Schedule 15 (Protective Provisions) to the Order. The Applicant and NGT

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			number of assets that form an essential part of the gas transmission network in England, Wales and Scotland either within, or in close proximity to, the Order limits. These include Feeder Main 14 (Wormington to Pucklechurch) (a high-pressure gas transmission asset) ("NGT Assets")(which is shown on the plans at Appendix 1 ("NGT Assets Plans")), together with associated apparatus, including Cathodic Protection Groundbeds/Transformer Rectifier(s). 2.2 Any interference with, damage to, or restriction of access to the NGT Assets would present an unacceptable risk to public safety and network integrity. Therefore, in respect of the NGT Assets (and any other NGT infrastructure located within the Order limits or in close proximity to the Authorised Development), NGT will require	are currently negotiating the form of bespoke Protective Provisions to be contained within the Draft DCO [REP1-007]. These provisions ensure that NGT's approval is required for any works that may affect the NGT's apparatus or property. As a result, there will be no serious detriment to NGT's undertaking.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			protective provisions to be put in place to ensure that: all NGT interests and rights, including rights of access to the NGT Assets and any other NGT apparatus, are unaffected by powers of compulsory acquisition, temporary possession, and the grant and/or extinguishment of rights as set out in the Order; and appropriate protection for the NGT Assets and any other retained apparatus is maintained during construction and throughout operation of the Authorised Development in accordance with the protective provisions, and the relevant safety standards as set out below. 2.3 Discussions regarding site-specific interactions and impacts are ongoing between NGT and the Promoter, and NGT reserves the right to raise further issues as these discussions progress.	

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
NGT-003	Description and DCO Process	NGT Regulatory Framework	3 NGT Regulatory Framework 3.1 Relevant guidance in respect of standards and protocols for working in the vicinity of high pressure gas pipelines applies in the form of National Gas Transmission Guidance for Safe Working in the vicinity of High Pressure Pipelines T/SP/SSW/22 which is aimed at parties carrying out work in the vicinity of high pressure gas pipelines and associated installations and is provided to ensure that those planning and undertaking work take appropriate measures to prevent damage. 3.2 The requirements in T/SP/SSW/22 are in accordance with IGEM (Institution of Gas Engineers and Managers) technical standard IGEM/SR/18 Edition 3 – Safe Working Practices to Ensure the Integrity of Gas Pipelines and Associated Installations and HSE's guidance	Please see the response to NGT-002.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			document HS(G) 47 Avoiding Danger from Underground Services. 3.3 NGT requires specific protective provisions to be put in place to provide for an appropriate level of control and protection for all retained assets (including the NGT Assets) and assurance that industry standards and guidance will be complied with in connection with any works to, and in the vicinity of, the same.	
NGT-004	Description and DCO Process	Property Rights	4 Property issues 4.1 Maintaining necessary and appropriate property rights in relation to NGT Assets and associated apparatus and protecting these from compulsory acquisition and/or interference, overriding or extinguishment in the Order is a fundamental safety concern for NGT.	The Draft DCO [REP1-007] currently contains draft Protective Provisions for the protection of NGT at Part 4 of Schedule 15 (Protective Provisions) to the Order. These provisions ensure that NGT's approval is required for any works that may affect the NGT's apparatus or property. As a result, there will be no serious detriment to NGT's undertaking. Specifically, Paragraph 39 of the Protective Provisions provides that

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			4.2 Insufficient property rights would have the following safety implications for the NGT Assets and associated apparatus: inability for qualified personnel to gain access to NGT Assets and associated apparatus for the purpose of its inspection, maintenance and repair; risk of strike to buried NGT Assets and associated apparatus if development occurs within the NGT easement zone which seeks to protect such buried assets; and risk of inappropriate development within the vicinity of NGT Assets and associated apparatus, thereby increasing the risk of unacceptable electrical interference to transmission pipelines (which may be continuous and cumulative, requiring compliance with applicable standards, protective controls, and monitoring which must be in place for the full operational life of the development to ensure ongoing pipeline integrity	the Applicant cannot acquire, interfere with or extinguish any rights belonging to NGT without NGT's agreement and therefore the issues identified by NGT will not arise.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			and statutory compliance), the risk of damage to the asset and to the integrity of the gas transmission network. 4.3 Due to the interaction between the NGT Assets and the Authorised Development (shown on the NGT Assets Plans) there is a significant risk of increased electrical interference to transmission pipelines, traffic loading and pipeline vibrations during construction of the Authorised Development. These significant risks have the potential to result in safety limits being breached. NGT requires specific electrical impact assessments to fully evaluate the risks posed by the Authorised Development. Given the potential significant safety implications of electrical interference, securing sufficient property rights is essential to ensuring the safety and integrity of	

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			the gas transmission network.	
NGT-005	Description and DCO Process	Protective Provisions	5 Protective provisions 5.1 NGT seeks to protect its statutory undertaking, and insists that in respect of connections and work in close proximity to its apparatus (including but not limited to the NGT Assets) as part of the Authorised Development the following procedures are complied with by the Promoter: NGT controls the plans, methodology and specification for works within 15 metres of any apparatus (or any works which may in any way adversely affect any such apparatus); and works in the vicinity of NGT's apparatus, are not authorised or commenced unless protective provisions are in place preventing compulsory acquisition of NGT's land or rights or the overriding or extinguishment of, or other interference with, the same. Any	Please see the response to NGT-002. The Applicant considers that the Protective Provisions included in Part 4 of Schedule 15 to the Draft DCO [REP1-007] already include sufficient protections to deal with the points raised by NGT.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			acquisition of rights must be subject to NGT's existing interests and rights and not contradict with or cut across such rights, including pipeline easements restricting development. 5.2 In particular, NGT has concerns arising from the nature of the Authorised Development as solar photovoltaic installations can cause significant risk to NGT Assets and associated apparatus and appropriate steps must be taken to ensure that these are mitigated. The identified risks arising from the Authorised Development include electrical interference, construction loading, vibration and access constraints, all of which are inherent risks in a development of the scale and nature of the Authorised Development. 5.3 In light of the above, NGT requires its standard form of	

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			protective provisions ("NGT Protective Provisions") (which have been commercially assessed and deemed necessary for the adequate protection of NGT's Assets and associated apparatus) to be included on the face of the Order to ensure that the NGT Assets and associated apparatus and interests are adequately protected, and to ensure compliance with relevant safety standards. We include a copy of the NGT Protective Provisions at Appendix 2.	
NGT-006	Description and DCO Process	Protective Provisions	Consistency 5.4 Notwithstanding the merits of the NGT Protective Provisions, it is important when operating a large network that the legal framework within which operatives must work is largely the same. It is impossible to operate a large network with the efficiency that bill-payers are entitled to expect if operatives are required to check the exact terms of any relationship with third	The Draft DCO [REP1-007] currently contains draft Protective Provisions for the protection of NGT at Part 4 of Schedule 15 (Protective Provisions) to the Order. The Applicant and NGT are currently negotiating the form of bespoke Protective Provisions to be contained within the Draft DCO [REP1-007]. The Applicant considers that the amendments that it has requested to

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			parties each time they carry out an activity. Therefore, an efficient operator should seek to keep the terms of such relationships the same. It is for this reason that NGT seeks to achieve (1) consistency of terms; and (2) consistency of process through the NGT Protective Provisions. 5.5 NGT also seeks to keep the protective provisions for all Development Consent Orders broadly the same as the provisions which govern the legal relationship between NGT and landowners, and developers generally.	NGT's standard protective provisions are reasonable and consistent with provisions that have been agreed with other statutory undertakers including the owners of high-pressure gas pipelines. For example, it is standard practice for insurance for large scale energy and infrastructure projects to be taken out by the contractor.
NGT-007	Description and DCO Process	Protective Provisions	6 Status of negotiations 6.1 NGT's solicitors have been engaging with the Promoter's solicitors and provided them with a copy of the NGT Protective Provisions on 14 March 2025. Discussions between the parties remain ongoing. However, the Promoter has intimated that the	Please see the response to NGT-006. The Applicant notes this comment and welcomes ongoing engagement with NGT in respect of the form of bespoke Protective Provisions to be contained within the Draft DCO [REP1-007].

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			form of protective provisions to be included in the next iteration of the draft Order will be in a form which deviates from the NGT Protective Provisions in a number of material ways, thereby rendering the proposed protective provisions deficient from NGT's perspective. Additionally, the Promoter has proposed a number of drafting amendments which are unnecessary in NGT's view, and would conflict with NGT's need to retain consistency across the protective provisions that it agrees with promoters of infrastructure projects. 6.2 Until satisfactory agreement has been reached with the Promoter, NGT must continue to object to the application for the Order and reserves its right to make further submissions to the Examination at a later date, including appearance at and participation in Compulsory Acquisition and/or Issue Specific	

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			Hearings to address the required format of the protective provisions and any necessary amendment to the Order. NGT also reserves the right to provide further written information in support of any detailed issues remaining in dispute between the parties at that stage.	
NGT-008	Description and DCO Process	Appendices	Mills & Reeve LLP on behalf of National Gas Transmission PLC included a copy of the NGT Assets Plan at Appendix 1.	The Applicant notes the Asset Plan in Appendix 1.
NGT-009	Description and DCO Process	Appendices	Mills & Reeve LLP on behalf of National Gas Transmission PLC included a copy of the NGT Protective Provisions at Appendix 2.	The Applicant notes the copy of the Protective Provisions in Appendix 2.
Greenergy Renewables UK Limited REP1A-021				
GRUL-001	Consultation and Engagement	Engagement	Greenergy is disappointed to note that there has been no contact from the Applicant since its Procedural Deadline A submission dated 9 March [PDA-011]. Greenergy acknowledges the	The Applicant continues to engage with Greenergy and has categorised them as a statutory/notable organisation for the purposes of Examination following clarification of their interests in plots 15-014 and 15-

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			significant number of representations on the scheme but reiterates its request for urgent engagement from the Applicant. Grenergy maintains its objection to the compulsory acquisition of any land in which it has an interest.	02. The Applicant will update the Book of Reference [REP1-011] at Deadline 3 to include these interests. Furthermore, following a productive meeting between the Applicant and Grenergy representatives on 14 May 2026, it has been agreed that the parties will enter into a Cooperation Agreement to provide Grenergy with assurance in relation to future installation requirements where they would interact with the Schemes assets, in the event that the Scheme is granted development consent.
Rosalind Savage MP REP1-238				
RS-001	Description and DCO Process	Introduction	1. Introduction I support the transition to renewable energy. My record - as an environmental campaigner, ocean rower, UN Climate Hero, and trained presenter for the Climate Reality Project - speaks for itself. I am not opposed to solar energy. I am opposed to this scheme, at this scale, in this	The Applicant notes this comment and has responded in detail to the matters raised under References RS-002 to RS-034 in this document.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			location, for reasons I set out in my Relevant Representation and which I develop further below. 2. The applicant's response to my Relevant Representation (Table 4-6, EN010168-000906) engages with the points I raised but does not resolve the concerns that matter most to my constituents and to me. This Written Representation identifies where I consider those responses to be inadequate, and provides additional evidence and context where appropriate.	
RS-002	Site Selection and Alternatives	Scale	The proposed development would span 748 hectares across the communities of Malmesbury, Sherston, Alderton, Foxley, Grittleton, Hullavington, Rodbourne and Norton. The scale is unprecedented for a scheme of this dispersed, fragmented character. The communities	The methodology for site selection is explained 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]. A number of potential development areas within a 20 km radius of the point of connection were

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			affected are not opposed to renewable energy - but they are entitled to expect that the balance between national energy need and local impact has been weighed honestly, with full scrutiny of the site selection process and the competence and accountability of the developer.	considered for the Scheme against a range of planning, environmental and operational factors. This resulted in the proposed location for the Scheme being chosen with the report concluding that there are no more suitable and available locations within the search area than the proposed location for the Scheme. The Statement of Need [REP1-085] explains why solar development is required at this scale to meet the Government's targets as set out in the Clean Power 2030 Action Plan. It is the Government's policy to support the development of large-scale schemes in order to meet the urgent need for unprecedented levels of clean electricity. Relevant planning policy (specifically NPS EN-1 paragraph 3.3.12) recognises that meeting the country's energy needs requires the use of large-scale, centralised electricity generating facilities via a high-voltage transmission system, which enables the pooling of both generation and

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				demand, which in turn offers a number of economic and other benefits, such as more efficient bulk transfer of power and enabling surplus generation capacity in one area to be used to cover shortfalls elsewhere. NPS EN-3 paragraph 2.10.31 recognises that at this scale, solar development is likely to use some agricultural land. Please refer to reference ID CB-01 in the Applicant's Response to Relevant Representations Part 2 [REP1-117] which acknowledges that adverse effects of the Scheme are more likely to be felt locally than the wider-scale benefits of the Scheme, however, there are a wide range of benefits associated with the Scheme which have been developed within the context of the local area and will provide direct benefits to the local people.
RS-003	Description and DCO Process	The Applicant	3. The Developer: Ownership, Track Record, and Accountability	Further to the response provided in RS-005 in 9.1 Applicant's Response to Relevant Representations (Part

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			My Relevant Representation raised serious concerns about the ownership of Island Green Power by Macquarie Asset Management, and the implications of that ownership for public trust and long-term stewardship (RS-005). The applicant's response acknowledges my concerns and points to Macquarie's claimed UK investment record. That response does not adequately address the issue. The question is not whether Macquarie has invested in UK infrastructure in aggregate - it is whether its record of stewardship of specific assets demonstrates the kind of accountability that a 40-year energy infrastructure project in a rural community demands. 4. Macquarie's ownership of Thames Water is directly relevant to this examination - not as political point-scoring but as material evidence of how the same	1) [PDA-009] the Applicant wishes to clarify that Macquarie's involvement in Thames Water has been repeatedly mischaracterised. Macquarie-managed funds were part owners of Thames Water for 11 years between 2006 and 2017. In that time, the company invested £11 billion and Thames Water's assets almost doubled, from £6.5 billion to £12.9 billion. There were significant improvements in water quality (ranked amongst the sector's best), water leakage was cut by around 22%, the second-best improvement in the sector over this time, and pollution incidents were down by 75% between 2008 and 2012. This investment programme was delivered while achieving the third lowest customer bills for water and wastewater in England and Wales at the time of Macquarie's full exit, while from 2009 to 2012, the debt to assets ratio reduced by about 6%.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			investment group manages critical infrastructure in my constituency. My constituents have experienced the consequences of that management first-hand: sewage discharging into the River Avon, a closed 'No Swimming' sign at Daniel's Well in Malmesbury, and documented failures to invest in adequate infrastructure while paying substantial returns to investors. Thames Water's current financial position - placed into special administration - is the direct result of decisions made under Macquarie's ownership.	Furthermore, the context here is very different. The development of a privately owned new solar farm is a very different situation from an investment in a former publicly owned service company with existing operational assets that was privatised. In the case of the Scheme, Macquarie has provided the up-front equity capital to develop the Scheme and, as such, carries significant up-front development risk. Until the Development Consent Order is secured, the Scheme would not generate any income at all, with no guarantee of return unless the Scheme progresses successfully through development, planning, construction and operation. This creates a strong long-term commercial incentive for Macquarie to see the Scheme through to completion. Finally, the Applicant, and any future

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				operator of the Scheme, is bound by the legally enforceable requirements of the Development Consent Order (DCO) as set out in the draft DCO [REP1-007]. These legally binding requirements are attached to the Scheme and pass directly to any new operator throughout the lifetime of operation and decommissioning. Under the Planning Act 2008, failing to comply with a DCO Requirement is a criminal offence. This provides the legal mechanism for the enforcement of responsibility directly on the project operator, irrespective of its corporate structure. The Applicant maintains that comments made in relation to Thames Water hold no relevance to the Scheme, due to the mischaracterisation of Macquarie's involvement, the legally binding responsibilities and regulations under which a DCO for the Scheme would be strictly governed, and the fundamental difference between a

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				new energy generating asset and a long-standing utility provider.
RS-004	Description and DCO Process	The Applicant	The applicant's Funding Statement [APP-019] addresses corporate structure but does not engage with the substantive question of whether this ownership model creates the right long-term incentives for responsible stewardship of a nationally significant energy asset. A Development Consent Order creates legally binding requirements - but enforcement depends on the operator remaining solvent, present, and accountable. These are not hypothetical concerns.	While the corporate structure is mentioned in the Funding Statement [APP-019] , the Applicant wishes to clarify that accountability is secured through the Development Consent Order (DCO) itself. Once granted, the DCO becomes a statutory instrument, and its legally binding Requirements are attached to the Scheme as set out in the Draft DCO [REP1-007] , passing all secured responsibilities directly to any future operator. Therefore, responsible stewardship is legally and financially secured throughout the lifetime of the Scheme through the legally binding mechanisms of the DCO.
RS-005	Landscape and Visual	LVIA	3. Landscape and Visual Impact The applicant's response to RS-001 and RS-004 sets out the standard methodology of the Landscape and Visual Impact Assessment (LVIA) and identifies mitigation measures including	The Applicant is confident that the conclusions presented in ES Volume 1, Chapter 8: Landscape and Visual Impact Assessment (LVIA) [APP-060] are robust and adequately reflect the reality of the effects of the Scheme on the surrounding

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			landscaping, hedgerow retention, and buffer zones. I do not dispute that an assessment has been carried out. I dispute whether the conclusions of that assessment adequately reflect the reality of what this scheme would mean for the landscape.	landscape. For example, the LVIA 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. The LVIA also recognises that there will be Beneficial 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 Enhancements of ES Volume 1, Chapter 8: Landscape and Visual Impact Assessment [APP-060] and shown below: • Green Corridor & Woodland Planting 11.45 ha

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				- Enhanced Riparian Native Planting 7.78 ha - Hedgerow Reinforcement & Reinforced - Roadside Vegetation 54.92 km - Proposed Hedgerows 16.23 km - Proposed Ponds and Wader Scrapes 14 - Groundcover 702.8 ha. Mitigation and enhancement measures are detailed in the Outline LEMP [APP-283] and the Outline EPMS [REP1-106], which set out habitat creation, species protection measures, buffer zones and long-term ecological management.
RS-006	Landscape and Visual	LVIA	The LVIA acknowledges that 10 receptors would experience Significant Long-Term Visual Effects. These are not abstracted planning figures - they are real people living in a landscape they have chosen and which underpins their quality of life and the character of their communities.	ES Volume 1, Chapter 8: Landscape and Visual Impact Assessment [APP-060] recognises in Table 8-19 Significant Visual Effects: Private Receptors that there are short term Adverse effects on nine residential Receptors during construction and Year 1 of operation. By Year 15, the effects of the

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			The applicant notes that mitigation planting would be inappropriate in some locations, and the significant effects at those locations are accepted as unavoidable. This acknowledgement, buried in the technical documents, deserves greater weight in the overall assessment.	mitigation will reduce the adverse effects of the Scheme to non-significant levels. All residential properties can be effectively mitigated. The LVIA recognises that there are some footpaths where there will be long-term Significant adverse effects. These are set out in Table 8-30 Significant Long Term Visual Effects of the LVIA in ES Volume 1, Chapter 8 [APP-060]. All these receptors are PRow with the majority being footpaths which diagonally cross fields where solar infrastructure is proposed and where mitigation such as hedgerow screening would be inappropriate to the legacy landscape.
RS-007	Landscape and Visual	LVIA	More broadly, the LVIA methodology cannot fully capture the cumulative character of this scheme. Individual field-by-field assessments may each show 'moderate' or 'reducing' effects, but the scheme's dispersed layout -	ES Volume 1, Chapter 8: Landscape and Visual Impact Assessment [APP-060] assess the effects of the Scheme on the character of the Lime Down Sites A-E

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			stretching across an 18-square-mile envelope - transforms the experience of the landscape in a way that is qualitatively different from a single consolidated site. The communities of Sherston, Grittleton, Hullavington and Norton do not experience this as a list of assessed receptors. They experience it as their home.	individually and as a whole. It does not assess the individual fields. The dispersed nature of the Scheme which comprises a series of independent Sites set across an extensive agricultural landscape, with large areas of land between each of the Sites assists with assimilation of the Scheme into the landscape. Each Site is set apart by their associated features such as robust hedgerows, woodland and tree cover, intervening settlements and the road and rail infrastructure and the changing topography. The discrete areas of land in the Scheme are placed so far apart that the Scheme would not be perceived in its entirety and the solar panels are distributed 'in and amongst' the landscape features to assimilate them into the landscape. The combined or Intra project cumulative effects were assessed in the LVIA and a 9.6 Technical Note on Intra Project Cumulative Visual Effects [REP1-122] was submitted at Deadline 1 to explain the assessment

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				undertaken in the LVIA and to summarise the significant effects. The combined or intra project effects are when more than one Site is visible from any identified Receptor. The Technical Note 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 as 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 a rolling character of the Hullavington Lowlands. As such, the assessment

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				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.
RS-008	Landscape and Visual	LVIA	I note that the applicant removed panels along the edge of the Cotswolds National Landscape and along the Fosse Way following consultation. I welcome that. But the scale of what remains is still unprecedented in this landscape, and the removal of the most visually prominent elements does not address the broader transformation of the rural character of North Wiltshire.	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 LVIA recognises that there are Significant effects to the character of

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				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

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				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 as 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.
RS-009	Soils and Agriculture	Agricultural Land	4. Agricultural Land and Food Security 5. My Relevant Representation raised concerns about the use of best and most versatile (BMV) agricultural land (RS-002, RS-004). The applicant's response states	The Applicant notes this comment and has responded under RS-010 to RS-012.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			that around two-thirds of the site is non-BMV (Subgrade 3b and Grade 4) and that no permanent loss of agricultural land is anticipated. I have three concerns with this response.	
RS-010	Soils and Agriculture	BMV Land	First, the remaining one-third of the site that is BMV land represents a substantial area of high-quality agricultural land in a period of heightened national concern about food security. The National Policy Statement does not preclude BMV use, but it requires applicants to justify it. I do not consider the site selection justification - which concluded that no more suitable site exists within the search area - to have been tested with sufficient rigour.	An appraisal of alternative sites is presented 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 assessment considered alternative sites within a 20 km radius of the existing National Grid Melksham Substation and concludes that there are no more suitable locations within the defined search area than the proposed Site. The Site Selection Assessment explains how brownfield land, industrial land, previously developed land and lower grade agricultural land

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				were considered in accordance with policy.
RS-011	Soils and Agriculture Construction and Decommissioning	Restoration of Agricultural Land	Second, the applicant's claim that no permanent loss is anticipated because land will be returned to agricultural use after decommissioning does not adequately account for the 40-year operational period. Soil structure, biological activity, and the accumulated knowledge of generations of farming families cannot simply be reinstated after four decades. 'Temporary' in planning terms is not temporary in agricultural terms.	Soil structure and biological activity are expected to improve over the operational phase of the Scheme such that the effect is assessed as a significant benefit in ES Volume 1, Chapter 17: Soils and Agriculture [REP1-025]. The Outline LEMP [APP-283] similarly acknowledges that benefits to soil health are anticipated to arise, in addition to benefits to neighbouring agricultural land as a result of reversion of arable use to grassland within the Solar PV Sites. The landowners affected by the siting of the Solar PV Sites have entered into voluntary agreements for the use of the land, and therefore will have made their own judgement, supported by legal and professional advice, about the potential impacts on their holdings.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
RS-012	Soils and Agriculture Site Selection and Alternatives	Site Selection	Third, the government's own UK Solar Roadmap (2025) states that solar development should prioritise lower-quality land. The applicant's site selection report [APP-185] acknowledges that it could not find sufficient brownfield or low-grade agricultural land within the search area. I would ask whether the search area itself was drawn sufficiently widely, or whether constraints on grid connection - rather than land quality and community impact - drove the site selection process.	As set out above, an appraisal of alternative sites is presented 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 assessment considered alternative sites within a 20 km radius of the existing National Grid Melksham Substation and concludes that there are no more suitable locations within the defined search area than the proposed Site. The Site Selection Assessment explains how brownfield land, industrial land, previously developed land and lower grade agricultural land were considered in accordance with policy. The Applicant has considered a wider search area (to 25 km) in the context of seeking to establish whether a suitable site could be identified that was not in close proximity to the Cotswold National Landscape. As set out in the Technical note on Site Selection Assessment

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				[EN010168/EXAM/9.26] submitted at Deadline 2, extending the search area to a 25 km radius has not revealed any new potential development areas suitable for further consideration as alternative sites for the Scheme.
RS-013	Other Environmental Matters - Major Accidents and Disasters	BESS Safety Ground Conditions	5. Battery Energy Storage System Safety My Relevant Representation raised concerns about the BESS, including the proximity to the railway line (RS-007), fire and toxic gas risks (RS-006, RS-008), contamination risks to groundwater and the Thames Valley aquifer (RS-008), and the absence of a statutory regulatory framework (RS-009).	The Applicant has responded to each of the concerns in responses to RS-014 to RS-017.
RS-014	Other Environmental Matters - Major Accidents and Disasters	BESS Safety	I note that the applicant has committed to updating the Outline Battery Safety Management Plan at Deadline 1 to fully incorporate the latest requirements under NFPA 855 (2026). I welcome this,	The Applicant emphasises that this is a wholly incorrect interpretation of the Applicant's response. There is a tracked change version of the Outline Battery Safety Management Plan (BSMP) [REP1-

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			but it means that key safety documentation was not complete at the time of application. The Examining Authority should satisfy itself that the updated documentation addresses the specific concerns raised about this site before reaching any conclusions on this matter.	111] which provides descriptions of changes to documentation. The original Outline BSMP [REP1-110] referenced and included drafted content from NFPA 855 (2026), but publication did not occur until after the original Outline BSMP [APP-286] was submitted in 2025. NFPA 855 (2023) requirements were referenced within the document alongside the proposed changes in the 2026 revision. Section 2.5.3 of the original Outline BSMP [REP1-110] defined the Applicant's usage of guidance from NFPA 855 as follows: <i>"National Fire Protection Agency (NFPA) NFPA 855 (2023): Standard for the Installation of Stationary Energy Storage Systems. The emerging updates to NFPA 855 (due for publication in 2026) have also been considered. Where differences exist between the 2023 and forthcoming 2026 versions, the Scheme has adopted the more</i>

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				<i>stringent or precautionary requirements."</i> The Outline BSMP [REP1-110] was primarily revised to include new BESS area drainage content that has been agreed during ongoing consultations with the Environment Agency. The Applicant took the opportunity to upgrade references and a small amount of content to incorporate NFPA 855 (2026), Revised NFCC guidance (2026), and UL 9540A (6th Edition, 2026). Section 1.1.8 of the Outline BSMP [REP1-110] stipulates: <i>"By way of requirement that is secured in the Draft DCO [EN010168/APP/3.1], prior to the commencement of construction of the BESS; the Applicant will be required to prepare a Battery Safety Management Plan (BSMP) which must be in accordance with this Outline BSMP (OBSMP). As part of the BSMP, the Applicant will take into account the latest good practices for</i>

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				<i>battery system failure prevention and detection, consequence modelling, risk analysis, and emergency response planning, as guidance continues to develop in the UK and around the world."</i>
RS-015	Other Environmental Matters - Major Accidents and Disasters	BESS Safety - Contamination	On the contamination risk to groundwater, the applicant's response acknowledges that the approach to risk assessment is still under discussion with the Environment Agency and that a Statement of Common Ground with the EA will be submitted at a later Deadline. This is a material outstanding matter. The Thames Valley aquifer serves communities across a wide area, and the consequences of contamination from a BESS fire or chemical spill would be severe and long-lasting. I ask the Examining Authority to ensure that this matter is resolved, and the EA's position clearly stated, before the examination concludes.	The Applicant's Outline BSMP [REP1-111] Section 5.5 documents agreed drainage strategy for the BESS area. The Applicant confirms that firefighting water containment for the BESS has been designed on the basis of credible incident scenarios, including the potential for multiple units to be involved, and is not limited to routine or minor events. The approach set out in the Outline BSMP [REP1-110] and the standalone Firewater Containment and Drainage Strategy – Lime Down BESS [REP1-124] is to contain and isolate firefighting water within the BESS Area, rather than allow discharge to the environment. This is achieved through a sealed and isolatable drainage system,

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				capable of retaining firefighting water and rainfall during an incident. More broadly, potential risks to groundwater receptors are considered in ES Volume 1, Chapter 19: Ground Conditions [REP1-027] and in the associated ES Volume 3, Appendices 19-1 to 19-8 [REP1-065 to REP1-080]. Mitigation to ensure protection of groundwater is presented in the Outline CEMP [REP1-096], which also secures additional measures such as Foundation Works Risk Assessments, to ensure that no adverse impacts to potable drinking water resources are realised. Similarly, the Outline CEMP [REP1-096] and the Outline OEMP [REP1-098] secure measures to control possible impacts to surface water receptors, including run-off to reversed springs or other locations where ingress to groundwater could occur From a hydrology perspective, the

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				Applicant does not agree that groundwater contamination from a BESS fire or chemical spill remains an unresolved assessment matter. The submitted assessment identifies the groundwater and surface water pathways and secures mitigation through the relevant DCO Requirements and outline management plans. The key hydrology control is that potentially contaminated firewater, suppression water or incident runoff from the BESS would be isolated and contained within the BESS drainage system. It would then be tested and removed for appropriate disposal where required. It would not be discharged uncontrolled to ground, watercourses or groundwater. This approach is set out in the Outline BSMP [REP1-110] and the standalone Firewater Containment and Drainage Strategies submitted at Deadline 1 at the request of the Environment Agency:

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				• 9.8 Firewater Containment and Drainage Strategy – Lime Down D Battery Energy Storage [REP1-124]; and • 9.9 Firewater Containment and Drainage Strategy - Lime Down Substation [REP1-125]. Chemical spill risks during construction and operation are also controlled through the Outline CEMP [REP1-096] and Outline OEMP [REP1-098], including pollution prevention, incident response, drainage isolation, appropriate storage of materials and protection of water receptors. Engagement with the Environment Agency through the Statement of Common Ground process does not mean that the assessment is absent or incomplete. The submitted documents provide the assessment basis and secured mitigation for protection of the underlying aquifer and associated water receptors.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
RS-016	Other Environmental Matters - Major Accidents and Disasters	BESS Location	On the BESS location near the railway line, the applicant argues that the proximity to existing infrastructure corridors reduces land take and that Network Rail can halt trains in an emergency. I do not find this reassuring. The question is not whether emergency procedures exist, but whether it was appropriate to site a large-scale BESS facility in this location in the first place, given the cumulative risks of fire, toxic gas, and contamination in close proximity to a major transport artery.	The Applicant has responded to this query in the Document 9.19 Written Summary of the Oral Submissions at the Open Floor Hearing 1 and the Applicant's Response [REP1A-013] in response MH-001 (pages 101 to 106). This response explains that National Fire Protection Association (NPFA) Standard 855 (2026) defines a safe BESS exclusion zone as follows: <i>"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."</i> The railway line referred to is located at a substantially greater distance, such that direct thermal effects, blast overpressure or debris impacts capable of affecting rail operations are not anticipated under credible worst-case scenarios.
RS-017	Other Environmental Matters - Major	BESS Location	I note that the UKHSA has confirmed it is satisfied with the	The justification for the choice of site for the BESS is set out in ES Volume

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
	Accidents and Disasters		submitted documentation. That is relevant but not determinative. The UKHSA assesses compliance with existing guidance; it does not assess whether the site selection decision was the right one, or whether the regulatory framework for BESS at this scale is adequate.	1, Chapter 4: Alternatives and Design Evolution [APP-056]. The BESS location at Lime Down D was informed by design development, environmental survey and assessment work and statutory and non-statutory consultation feedback. Design evolution and alternative sites considered are identified and discussed within section 4.7 ES Chapter 4 Alternatives and Design Evolution [APP-056]. Land at Lime Down D provides a location for the BESS that is in close proximity to the solar PV sites and the onsite substation and represents the option with the least overall effects. Regarding fire safety, the Applicant disputes the suggestion that the current regulatory framework is inadequate, quite the contrary to this, the legislative framework requires thorough assessment of BESS safety as set out below. The Applicant has followed National Fire Chiefs Council (NFCC) guidance and commissioned a BESS fire emissions assessment

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				(as detailed in ES Volume 3, Appendix 15-2: BESS Fire Emissions Modelling [APP-239]) to model toxic gas emissions and visibility impacts from a BESS fire on all sensitive receptors within a 1km radius of the BESS area. The fire emissions modelled in the report were based upon recent UK Health Security Agency (UKHSA) requests for DCO BESS projects which explore both immediate air quality impacts together with annual UK air quality requirements. The UKHSA stated in their relevant representation [RR-4798] that <i>"Following our review of the submitted documentation the UKSHA are satisfied that the proposed development should not result in any significant adverse impact on public health"</i>. The spacing distances of the illustrative BESS site design are based upon LSFT where no fire propagation occurred; therefore, this is a credible worst-case scenario. ES Volume 3, Appendix 15-2: BESS

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				Fire Emissions Modelling [APP-239] concludes that there would be no significant air quality effects as a result of a BESS fire incident and visibility issues were not predicted. To validate the final BESS site design, the Applicant has also committed to commissioning an additional Plume Analysis Study at the detailed design stage as stipulated in Section 5.5.9 of the Outline BSMP [REP1-110] and secured through the DCO: <i>"...at the detailed design stage, a BESS system and site-specific Plume Analysis study will be conducted to assess the environmental impact of a site incident to sensitive receptors within a 1 km radius. Toxic gas emissions to sensitive receptors must be below relevant public health exposure limit guidelines when the battery system of a BESS is fully consumed (burnt out), production of Particulate Matter (PM) and a visibility impact assessment on any transport links within a 1 km radius of the</i>

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				<i>BESS area will also be included. The ERP produced at the detailed design stage (template outlined in Section 5.4.4) will incorporate all necessary emergency response procedures and actions based upon thermal runaway test data supplied by the BESS system provider."</i>
RS-018	Human Health Community Benefit	Mental Health and Wellbeing	6. Community Impact and Mental Wellbeing 7. The applicant's response to RS-001 addresses community wellbeing through a reference to ES Volume 1, Chapter 18 (Human Health), and notes that residual effects on health are assessed as not significant. I accept that the assessment was undertaken. I do not accept that it adequately captures what is happening in this community.	The assessment methodologies described within ES Volume 1, Chapter 18: Human Health [APP-070] have been developed in line with the relevant planning policy and industry guidance for assessing potential effects of the Scheme on human health. The Applicant notes that the assessment methodology for health and wellbeing has been agreed with Wiltshire Council's Public Health team and is set out in the relevant Statement of Common Ground submitted at Deadline 2 of Examination [EN010168/EXAM/8.2]. The assessment of human health is undertaken on the understanding that as defined by the Constitution of the

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				World Health Organization (WHO) in 1948, <i>"Health is a state of complete physical, mental and social well-being and not merely the absence of disease or infirmity"</i>. As such, the health and wellbeing of individuals and communities is based on a broad range of determinants of health, which have been modelled by Dahlgren and Whitehead (1991), and Barton and Green (2006) respectively. Full details of the legislation, policy, and guidance of relevance to the assessment of human health is provided in full in ES Volume 3, Appendix 18-2: Human Health Legislation, Policy and Guidance [APP-245]. For the assessment of baseline conditions with respect to human health, data has been gathered from a number of available data sources to provide a holistic understanding of the baseline conditions in the Study Areas. The health effects have been assessed in the context of the baseline position, as well as the

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				nature and context of the effect, taking account of the sensitivity of the identified receptor (i.e. the existing population and identified vulnerable/priority groups). The assessment of health also cross refers to the technical assessments undertaken for the other technical disciplines in the ES, highlighting any conclusions reached which are relevant to human health. A health 'lens' has been applied to these conclusions to determine the extent to which these conclusions have any effect (or not) upon the health of the local population or specific population groups therein. A clear pathway between the anticipated impact and the resultant health effects has been determined to understand the significance of any effects to human health, including for direct and less obvious indirect effects.
RS-019	Human Health	Mental Health	The communities affected have organised, campaigned, and engaged with this process with	The Applicant acknowledges that the application process can be challenging for local communities and

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			extraordinary commitment and at considerable personal cost. The stress imposed by a multi-year planning process for a development of this scale and proximity is real, documented, and disproportionate to what these communities have any obligation to bear. The applicant's commitment to signpost mental health resources is not an adequate response to harm caused by the process itself.	may give rise to frustration, stress, anxiety, and associated impacts on mental wellbeing. The timescales for the pre-application stage are intended to provide sufficient opportunity for consultation, environmental surveys, and the ongoing refinement of the Scheme design. This iterative approach is an important part of the process, ensuring that potential impacts are identified, assessed, and, where possible, appropriately mitigated. The examination timescales are established by the Planning Inspectorate. Through engagement with Wiltshire Council's Public Health Team, the Applicant has committed to signposting locally available mental health and wellbeing resources to members of the public engaging with the Scheme, using information provided by Wiltshire Council's Public Health Team. The Applicant will continue to monitor consultation

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				responses relating to mental health and will provide appropriate signposting to existing local support services where requested. As no member of the Applicant or consultant team is a mental health professional, the Applicant's team is in no position to offer any medical advice to stakeholders, and if requested will signpost to relevant contacts and resources.
RS-020	Human Health Community Benefit Consultation and Engagement	Sentiment	Wiltshire Council unanimously rejected this application. Its Full Council subsequently endorsed that decision. Hundreds of residents have registered as interested parties and submitted representations. Parish councils across the affected area have raised consistent objections. I have met constituents who have been reduced to tears by what this proposal would mean for the landscape they love and the communities they have built.	The Applicant notes this comment. Please refer to the Applicant's response to RS-010 within 9.1 The Applicant's Response to Relevant Representations (Part 1) [PDA-009]. The DCO process anticipates that differing views may be expressed by consultees, including local authorities, councillors and MPs, and such representations will be considered by the Examining Authority alongside all other evidence submitted. The Applicant engaged with Wiltshire

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				Council, a host local planning authority, throughout the pre-application process and will continue to do so during Examination. The Applicant has also engaged with local councillors and Members of Parliament during the pre-application process as part of its wider programme of stakeholder and community engagement. The approach to consultation and engagement, including engagement with elected representatives and Wiltshire Council, is described in the Consultation Report [APP-022] , and its Appendices [APP-023 to APP-051] .
RS-021	Description and DCO Process	Local Democracy	The DCO process does not prevent the Secretary of State from granting consent against the wishes of the local community - but it does require the Examining Authority to weigh those wishes honestly and to be satisfied that the planning balance justifies overriding them. I do not believe the applicant has	In decision making, S104 of the Planning Act 2008 provides that applications for development consent must be decided by the Secretary of State in accordance with any relevant National Policy Statement to the extent that one or more exceptions apply. This includes whether the adverse impacts of the Scheme would outweigh its benefits. The

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			demonstrated that the balance justifies that conclusion.	Applicant's consideration of the planning balance is set out in Section 9.4 of the Planning Statement [REP1-087] where it concludes that having regard to all important and relevant matters, it is concluded that there are no adverse impacts of sufficient weight, either on their own or collectively, that would mean the DCO should not be made. The adverse impacts identified are clearly outweighed by the substantial public benefits that would arise from the provision of low carbon energy to meet the need identified in NPS EN-1.
RS-022	Site Selection and Alternatives	Site Selection	8. Site Selection and Alternatives 9. My Relevant Representation identified that brownfield and greyfield sites could accommodate solar development without the landscape and community impacts of this scheme (RS-018).	The Applicant notes the comment [RS-018] about brownfield and greyfield sites across the country, set out in the Applicant's Response to Relevant Representations (Part 1) [PDA-009]. However, the site selection process was not undertaken on a country wide basis. The first stage of assessment requires the identification

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			The applicant's response [APP-185] concludes that no suitable brownfield sites exist within the search area.	of an area of search which was based on an available point of connection, which in the case of the Scheme was the Melksham Substation. As set out in ES Volume 3, Appendix 4-1: Site Selection Assessment Report [APP-185], an initial search area was identified at a 5 km radius from the POC, however this was later expanded as no suitable and available sites within 5 km were identified. The search area was enlarged incrementally to a 20 km radius which is considered by the Applicant to be a viable cable connection distance for a solar project of this scale. It is within the 20km area of search that brownfield land was considered. As set out in ES Volume 3, Appendix 4-1: Site Selection Assessment Report [APP-185] the Applicant reviewed brownfield land registers for local authorities within the area of search including Wiltshire Council, South Gloucestershire Council, Bath and North East

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				Somerset Council, and Somerset Council. The assessment concluded that there were no sites within the search area of sufficient size to accommodate a large-scale solar development, either individually or cumulatively. The sites assessed were too small to support the proposed Scheme and were largely allocated for housing or mixed-use development, in line with local planning policies, thereby creating a conflict with the intended use for renewable energy infrastructure. Therefore, it was concluded that there was no available or suitable brownfield land for the purposes of the Scheme. In terms of greyfield sites, the Applicant assumes this to be a reference grey belt sites, which are as defined in the NPPF as previously developed land or land that does not strongly contribute to the purposes of the Green Belt. The Applicant's site selection assessment excluded all land within the Bath Green Belt from

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				its area of search. However, it is acknowledged that there are some circumstances where development of renewable infrastructure within the Green Belt would be considered acceptable, subject to a case-by-case review of the land to be used, which may include where land which is considered to be grey belt. The Applicant has therefore further considered land within the Bath Green Belt in the Technical Note on Site Selection Assessment [EN010168/EXAM/9.26] produced for Deadline 2 to determine whether there are any alternative sites for consideration within Green Belt land which would provide an opportunity to site the Scheme further away from the Cotswolds National Landscape. That exercise has not revealed any further alternative sites which are suitable for further consideration as alternatives for the Scheme. The conclusions in ES Volume 3, Appendix 4-1: Site Selection

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				Assessment Report [APP-185] therefore remain unchanged.
RS-023	Site Selection and Alternatives	Grid Connection	I ask the Examining Authority to scrutinise that conclusion carefully. The applicant has confirmed that the search area was determined in part by the available grid connection at Melksham Substation. That is an operational constraint that served the applicant's interests; it is not a constraint that serves the national interest in minimising harm. If the search area had been defined differently - or if grid connection costs had been weighed alongside landscape and community impact as costs rather than constraints - the conclusion might have been different.	The Applicant considers that determining the area of search from the point of connection is reasonable and consistent with the approach taken in the site selection process for other solar NSIP projects, given the limited locations where the required infrastructure exists to allow for large-scale solar and energy storage projects, which are classified as Critical National Priority (CNP) infrastructure, to deliver low-cost, low-carbon energy to the network.
RS-024	Site Selection and Alternatives	Site Selection	This matters because the applicant's own documentation acknowledges that the scheme generates significant adverse effects that cannot be fully mitigated - on visual amenity, on	NPS-EN1 sets out at paragraph 3.1.1 that the government sees a need for significant amounts of new large scale energy infrastructure and at paragraph 3.1.2 recognises that it will not be possible to develop the

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			certain public rights of way, on BMV agricultural land, and on the character of the landscape. In the planning balance, the weight given to those acknowledged harms must be set against a genuine assessment of whether they were avoidable. The applicant has not provided that assessment.	necessary amounts of such infrastructure without some significant residual adverse impacts and that these effects will be minimised through the application of policy set out in NPS EN-1. The Applicant's consideration of the planning balance is set out in Section 9.4 of the Planning Statement [REP1-087] where it concludes that having regard to all important and relevant matters, it is concluded that there are no adverse impacts of sufficient weight, either on their own or collectively, that would mean the DCO should not be made. The adverse impacts identified are clearly outweighed by the substantial public benefits that would arise from the provision of low carbon energy to meet the need identified in NPS EN-1.
RS-025	Transport and Access	Traffic	8. Transport and Access My constituents have raised specific and well-founded concerns about HGV movements on narrow,	The Applicant makes note of this comment. Annex J of ES Volume 3, Appendix 13-1: Transport Assessment

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			single-track rural roads during the construction phase (RS-011). The applicant's response acknowledges these concerns and points to the Outline Construction Traffic Management Plan [APP-287].	[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-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

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				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. 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

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				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;

Reference	Theme	Issue	Comments/Issue Raised	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; 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:

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				• 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

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				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; 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

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				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 HGVs 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

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				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; • Much greater impact on hedgerow, trees and character; and • Low level of existing HGVs on the route to Lime Down D (west) – The average

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				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 the highway and verges during the construction period. The details of these surveys will be confirmed as part of the Final CTMP.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
RS-026	Transport and Access	Traffic	I note that the CTMP provides for HGV deliveries to arrive and depart between 09:30 and 16:30 where possible. The word 'possible' leaves significant discretion. The rural road network in this area is not designed to accommodate significant HGV volumes at any time of day, and the cumulative impact of construction traffic across a multi-year programme will be severe. I ask that the Examining Authority consider whether the CTMP provides sufficient certainty and enforceability, or whether stronger conditions are needed.	The Applicant makes note of this comment. The word 'possible' has been included as there may be extenuating circumstances where an individual, one-off HGV delivery would need to be made outside these hours.
RS-027	Landscape and Visual	Fosse Way	9. Cultural Heritage: The Fosse Way The applicant's response to RS-013 notes that Fields C26, the westernmost part of C25, and the majority of Field C13 have been removed from the Order Limits, and that the Fosse Way will retain its legibility as a roadway within a largely agrarian landscape. I note	The Applicant welcomes the comment that mitigation for impacts to the Fosse Way has been agreed with Historic England.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			that this assessment has been agreed with Historic England.	
RS-028	Landscape and Visual	Fosse Way	I remain concerned that the cumulative effect of solar development in fields abutting the Fosse Way - even with offsets established - will diminish the experience and significance of this exceptional historic asset for walkers, riders, and users of the surrounding landscape. I ask the Examining Authority to satisfy itself that the mitigation measures are sufficient not just to meet the threshold of 'no significant effect' in technical planning terms, but to preserve the Fosse Way as a meaningful and valued part of this landscape.	The Fosse Way passes through the Scheme for approximately 5km from Fosse Lodge to the south to Foxley Road to the north. Apart from a 1.8km stretch of Byway to the north of Lime Down Site B, the Fosse Way is a surfaced local road with no pavements. Six field parcels within the Scheme adjoin the Fosse Way: Field B6 to the north and Fields C22, C23, C11, C12 and C14 to the south are proposed for solar infrastructure. No infrastructure is proposed along the By way section of the Fosse Way. The LVIA in ES Volume 1, Chapter 8: Landscape and Visual Impact Assessment [APP-060] recognises that there are Moderate Adverse effects (Significant) on the Fosse Way (receptor TR145) during construction and Year 1 as set out in ES Volume 3, Appendix 8-3-2-2: Landscape and Visual Assessment Sheets (Significant) [APP-191] . The proposed mitigation measures, as set

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				out in the Outline LEMP [APP-283] , will reduce the effects of the Scheme to Moderate/Minor Adverse by Year 15.
RS-029	Description and DCO Process	Summary	I support renewable energy. I supported the Climate and Nature Bill, which I introduced through the Private Members' Bill ballot. I sit on the Environmental Audit Committee. My entire pre-parliamentary career was dedicated to raising the alarm about the environmental crisis facing our planet. I know, as well as anyone in this examination, that we need to build renewable energy infrastructure at scale and at pace.	The Applicant notes that Rosalind Savage MP supported the Climate and Nature Bill and understands the need to build renewable energy infrastructure at scale and pace.
RS-030	Description and DCO Process	Summary	But the transition to net zero must be built with communities, not imposed on them. It must be sited carefully, with genuine attention to whether the harm caused to landscapes, agricultural land, and rural communities is justified and unavoidable. And it must be delivered by developers who have	The Applicant has sought to consult and engage with the communities in close proximity to the Scheme prior to submission of the DCO application. The Consultation Report and its associated appendices [APP-022 to APP-051] provide a summary of the process undertaken and how the

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			earned - and can be trusted to retain - the confidence of the communities they are asking to host them.	feedback provided was taken into account. In recognition of the Scheme's location, the Applicant has adopted a landscape led design approach, and identified a Design Vision and Design Principles which provided a framework for design evolution of the Scheme. The Design Approach Document [APP-268] provides a summary of how the design of the Scheme has evolved and how the Applicant has sought to deliver a scheme that is sustainable and sensitive to place. The Applicant has also committed to a Community Benefit Fund (CBF) which will be available to fund local projects. It is acknowledged that the CBF does not form part of the DCO application, and this funding is not required to mitigate the impacts of the Scheme, therefore it cannot be taken into account in the decision-making process for determining the DCO application.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
RS-031	Site Selection and Alternatives	Site Selection and Scale	On each of these tests, I do not believe this application passes. The scale is unprecedented and the site selection process has not convincingly demonstrated that the harm is unavoidable.	As to the scale and location of the development, the Statement of Need [REP1-085] explains why solar development is required at this scale to meet the Government's targets as set out in the Clean Power 2030 Action Plan. It is the Government's policy to support the development of large-scale schemes in order to meet the urgent need for unprecedented levels of clean electricity. Relevant planning policy (specifically NPS EN-1 paragraph 3.3.12) recognises that meeting the country's energy needs requires the use of large scale, centralised electricity generating facilities via a high-voltage transmission system, which enables the pooling of both generation and demand, which in turn offers a number of economic and other benefits, such as more efficient bulk transfer of power and enabling surplus generation capacity in one area to be used to cover shortfalls elsewhere.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				Furthermore, paragraphs 3.1.1 and 3.1.2 of NPS EN-1 recognise that whilst there is a need for significant amounts of new large-scale energy infrastructure to meet its energy objectives, it will not be possible to develop the necessary amounts of such infrastructure without some significant residual adverse impacts. However, paragraph 3.1.2 of NPS EN-1 sets out that these effects will be minimised by the application of the policies contained in the relevant NPSs. As set out in the Planning Statement [REP1-087] , the Applicant has applied the relevant policies in the development and assessment of the Scheme.
RS-032	Description and DCO Process	Conclusion	The acknowledged significant effects - on visual amenity, on BMV agricultural land, on public rights of way - are real costs that weigh against consent.	The Applicant acknowledges that there will be some significant effects which cannot be mitigated as a result of the Scheme such as those set out in RS-032. The Applicant has made every effort to minimise these effects where practicable and notes any residual significant effects are matters which will have to be considered in

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				the planning balance when the DCO is determined by the Secretary of State.
RS-033	Description and DCO Process	The Applicant	The developer's ownership history raises legitimate questions about long-term accountability that have not been adequately addressed.	The Applicant clarifies that the ownership history of Island Green Power has remained stable, changing only once in a phased manner during the 13 years since the company was founded. In that time, it has demonstrated a strong track record of developing Nationally Significant Infrastructure Project (NSIP) scale Schemes, notably the consented Cottam Solar Project and West Burton Solar Project, alongside a strong pipeline of further applications coming forward. The Applicant refers to comments in RS-003 & RS-004 of this response.
RS-034	Description and DCO Process	General Matters	And the community's opposition is not the opposition of people who reject renewable energy - it is the opposition of people who deserve to be taken seriously. I strongly urge the Examining Authority to	The Applicant's Statement of Need [REP1-085] provides evidence that an unprecedented capacity of new low-carbon generation schemes is urgently needed for the UK to meet its legally binding climate change targets. The government has

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			recommend that consent be refused.	confirmed that solar energy is at the heart of the Clean Power 2030 Mission [NPS EN-3 (2025) Paras 2.10.1 & 2.10.2]. The Statement of Need [REP1-085] confirms that the need for the Scheme is urgent and that substantial weight should be given to the need for the Scheme [NPS EN-1 (2023) Para 3.2.6-3.2.7]. The Applicant is confident that the proposed management and mitigation measures set out in the Environmental Statement (ES) [APP-052 to APP-265] are comprehensive and robust and that the Scheme aligns with national and local planning policy; this is outlined in the Planning Statement [REP1-087]. Of particular relevance are Annex A: National Policy Statement Accordance Tables and Annex B: Local Policy Accordance Tables, of the Planning Statement which set out an appraisal of the Scheme against national and local planning policies.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
Grittleton Sevington and Leigh Delamere Village Hall and Recreation Ground REP1-163				
GSLD-001	Description and DCO Process		We note the responses made by the Applicant however the Trustees of the Village Hall still feel that, even with the additional mitigation mentioned, the financial viability of the Hall is still threatened and therefore still object to the proposed development.	The Applicant notes this comment and has responded to the comments raised by the Trustees of the Village Hall below. The Applicant is confident that the mitigation measures proposed, and the temporary nature of the proposed impacts, are sufficient to ensure no significant adverse effect to the financial viability of the Village Hall are incurred. The Applicant also seeks to reiterate that should the DCO be consented, the Applicant is committed to setting up a Community Liaison Group prior to construction, to provide an intermediary between interested parties and the onsite contractors to ensure community concerns and any information they need are communicated and responded to. This is secured by through Requirement 4 in Schedule 2 to the Draft Development Consent Order (DCO) [REP1-007].

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
GSLD-002	Socio-Economics, Recreation and Tourism	Income	The income generated by our regular classes is essential for our survival.	The Applicant notes this comment and refers to Table 4.39, reference GS-008, in the Applicant's Response to Relevant Representation (Part 1) [PDA-009] where the Applicant has responded in full in writing.
GSLD-003	Transport and Access	Traffic Hours	The response states "Construction deliveries are restricted to outside of peak hours" however they seem to have ignored our statement that these classes also operate outside peak hours.	The Applicant makes note of this comment. The Outline CTMP [REP1-112] also sets out additional measures to mitigate the impact of construction traffic. 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, who 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. It also includes a community liaison element to keep local communities informed about the construction process and to provide a contact for feedback should any

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				issues arise. This could include active dialogue with the village hall representatives, whilst cable works are undertaken in this area. Compliance with the final CTMP will be monitored by the Developer, Contractor and Wiltshire Council as local highway authority. The preparation, approval and implementation of the final CTMP, substantially in accordance with the Outline CTMP [REP1-112], are secured through Requirement 15 of Schedule 2 of the Draft Development Consent Order (DCO) [REP1-007], ensuring construction traffic impacts are appropriately managed throughout the construction phase of the Scheme.
GSLD-004	Transport and Access	Access Points	On reviewing the documents mentioned within the response, it is reassuring to note that banksmen will be positioned to help traffic into and out of Access Points 101 C 102, serving both the cable corridor plus a construction compound. This will not remove the surrounding impacts of the	The Applicant makes note of this comment. The cable route will be constructed in four separate 5.5km sections. One access will be in operation in each section at any one time as rolling construction. Each access will be operation for approximately 90 days. Any impacts with therefore be temporary as set

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			HGV/LGVs slowing down to a stop or accelerating away. Our Village Hall is only 75 metres from these entrances.	out in ES Volume 1, Chapter 13: Transport and Access [REP1-019]. The number of vehicle trips associated with each cable route corridor access are relatively low (see para 13.10.66 of ES Volume 1 Chapter 13: Transport and Access [REP1-019]) and there are no current HGV restrictions on this section of highway. Construction traffic slowing and accelerating when entering and exiting the site will be managed through traffic management agreed with Wiltshire Council and likely include the Banksman to manage these movements.
GSLD-005	Transport and Access		The response mentions "the construction of the Cable Route Corridor is anticipated to generate a low level of trips and will only be in use for a temporary construction period of approximately 50 days". We do not consider 32 movements of HGV/LGV, 20 of cars/vans plus the compound traffic each day for potentially 90 days to be "low level"	The Applicant makes note of this comment. The cable route will be constructed in four separate 5.5km sections. One access in operation in each section at any one time as rolling construction. Each access will be operation for approximately 90 days. Any impacts with therefore be temporary as set out in ES Volume 1 ,

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			Outline Construction Traffic Management Plan APP/7.22 The quoted 90 days will be longer as there are 2 Access Points, one of which is new and will have to be built, plus there will be the construction/dismantling of the compound. That is a long time for our regular classes to suffer. Our concern is that whilst the Applicant considers the impact temporary, our hirers will find it too long to deal with and leave.	Chapter 13: Transport and Access [REP1-019]. The Outline CTMP [REP1-112] also sets out additional measures to mitigate the impact of construction traffic. As set out in the Outline Construction Traffic Management Plan [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, who 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. It also includes a community liaison element to keep local communities informed about the construction process and to provide a contact for feedback should any issues arise. This could include active dialogue with the village hall representatives, whilst cable works are undertaken in this area.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				Compliance with the final CTMP will be monitored by the Developer, Contractor and Wiltshire Council as local highway authority. The preparation, approval and implementation of the final CTMP, substantially in accordance with the Outline CTMP [REP1-112], 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.
The Courtyard Cafe - Sherston REP1-189				
CCS-001	Transport and Access		We operate a café in Sherston which caters for cyclists. Their safety and access to the area will be greatly impacted by the proposed constructions and HGV traffic.	The potential impact of the Scheme on non-motorised users (NMU) is assessed in ES Volume 1, Chapter 13: Transport and Access [REP1-019] which concludes that there would be no significant impact on NMU as a result of the Scheme. Highway widths of construction routes have been assessed and provide sufficient opportunities and width for HGV traffic to comfortably pass cyclists, equestrians and

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				pedestrians. ES Volume 1, Appendix 13-1: Transport Assessment [REP1-057 and REP1-059] concludes that the level of flow change will not result in a step change in fear and intimidation as defined in the IEMA guidance at Tables 3.1, 3.2 and 3.3. An Outline CTMP [REP1-112] and Outline PRowPPMP [REP1-104] support the DCO Application and include outline measures to ensure impacts to NMU along highways and PRow are minimised as far as practicable.
Cllr Jon Atkey REP1-200				
JA-001	Description and DCO Process	General Matters	This submission is confined to responding to the Applicant's response to my Relevant Representation (RR-0914). I am not raising new objections. My purpose is to explain why, in my view, the Applicant's response does not properly or substantively address the points I originally made.	The Applicant notes this comment.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
JA-002	Description and DCO Process	General Matters	My original representation was concerned with the scale, location and cumulative impact of the proposal on a settled rural landscape and the communities that live there. That remains my position.	The Applicant notes this comment and has responded in detail to the matters raised under JA-005 to JA-0013.
JA-003	Description and DCO Process	General Matters	My RR-0914 was not a series of isolated technical points. It set out a clear planning balance argument – that the proposal represents a very large industrial development imposed on a landscape of villages and hamlets, fields, hedgerows, footpaths and bridleways, with profound consequences for how that place is experienced over decades.	The Applicant notes this comment and has responded in detail to the matters raised under JA-005 to JA-0013. Responses were split into separate rows and addressed separately so the Applicant could ensure each point was considered by the relevant technical discipline and respond to each point in more detail.
JA-004	Description and DCO Process	General Matters	The Applicant's response breaks these concerns down into separate topic areas and addresses them individually, largely through assertions about mitigation. In doing so, it avoids grappling with the combined effect of the proposal on place and community, which was the essence of my representation. In several instances, the response	The Applicant notes this comment and has responded in detail to the matters raised under JA-005 to JA-0013.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			appears carefully framed so as to avoid answering the point actually raised, replacing it with more general reassurance.	
JA-005	Site Selection and Alternatives	Scale	A central issue in my RR-0914 was the mismatch between the scale of the proposed development and the character of the area.	The Applicant notes this comment and has provided a response within the Landscape and Visual response below in JA-006.
JA-006	Landscape and Visual	Visual Impact	This is not a vast, empty or previously industrialised landscape. It is a living landscape of villages and hamlets, fields, hedgerows, footpaths and bridleways, forming the everyday setting for the people who live there. The Applicant's response does not engage with the reality that the proposal would fundamentally transform the character of the area, turning what is currently a patchwork rural landscape into the setting for a large industrial complex for much of a human lifetime. References to planting and long-term management do not answer that point – they simply assume the acceptability of the change. This is not mitigation of	ES Volume 1, Chapter 8 Landscape and Visual Impact Assessment (LVIA) [APP-060] recognises that there will be short term Moderate Adverse (Significant) effects on the character of the Landscape (including within the Lime Down Sites) during construction and Year 1 as a result of the Scheme and the change from agricultural land to a solar infrastructure. This effect reduces as a result of the maturing proposed mitigation by Year 15 to non-Significant levels. These significant short term adverse effects will be a material consideration in the planning balance. The dispersed nature of the Scheme which comprises a series of independent Sites set across an

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			harm, but acceptance of the permanent industrialisation of what is currently a settled rural landscape.	extensive agricultural landscape, with large areas of land between each of the Sites assists with assimilation of the Scheme into the landscape. Each Site is set apart by their associated features such as robust hedgerows, woodland and tree cover, intervening settlements and the road and rail infrastructure and the changing topography. The discrete areas of land in the Scheme are placed so far apart that the Scheme would not be perceived in its entirety, and the solar panels are distributed 'in and amongst' the landscape features to assimilate them into the landscape. 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 combined or intra project effects are when more than one Site is visible from any identified Receptor.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				The Technical Note [REP1-122] 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 “<i>disaggregated / disparate nature of the Lime Down Sites A to E</i>” 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.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
JA-007	Site Selection and Alternatives	Distance from Grid	My original representation raised concerns about the extent and spread of infrastructure required. The Applicant's response confirms that the site's distance from the grid necessitates extensive additional works. This matters because it shows that the scale and reach of the development are being driven by the need to make the project commercially viable, rather than by what the landscape and surrounding communities can reasonably accommodate. The response treats this as a neutral engineering consideration, but its effects are spatial, visual and experiential, and were part of the harm I identified.	The Applicant maintains that spatial and experiential harms have been robustly assessed and not ignored as "<i>neutral</i>" considerations. The Applicant has responded to these points in JA-001 in the Applicants Response to Relevant Representations Part 1 [PDA-009] which sets out how the landscape and receptors have been assessed and the and the mitigation measures proposed. The LVIA specifically evaluates impacts on landscape character and the perception of rurality and directs to the Applicants response to JA-006 above. Furthermore, the Applicant confirms that the Funding Statement [APP-019] submitted with the DCO application demonstrates that the Scheme is financially viable and adequately funded to be delivered in its entirety and approximates the total cost to be £900 million to £950 million. To be clear, this includes all associated infrastructure for a 22 km 400kV single circuit cable

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				route, including technical cable laying methodologies and trenchless solution technologies at various crossing points, have been carefully considered within project financing. These cables will be laid underground, and therefore any visual impact on the landscape would be temporary during construction, and the long-term experience of the landscape on the cable route, unchanged.
JA-008	Climate Change and Energy Need	Carbon Emissions	Although carbon emissions were not a central plank of my original representation, the Applicant has chosen to rely on claimed carbon benefits as a way of justifying or outweighing the harms I described. It is therefore reasonable for me to respond to that reliance. At the Open House Forum, I used the Applicant's own figures and deliberately took a favourable view of them, in order to illustrate the earliest point at which any claimed benefits might begin to offset the initial impacts. Even on that basis, any benefits are	Paragraphs 3.2.6 to 3.2.9 of NPS EN-1 (2023), and replicated at Paragraphs 3.2.8 to 3.2.10 of the currently designated version, explains that it is the Government's policy position that there is an urgent need for new nationally significant low-carbon infrastructure developments such as the Scheme; that substantial weight should be given to the identified need; and that the contributions of any individual projects to satisfying the identified need does not require separate consideration. Further, NPS EN-1 (2023) ascribes a critical national priority to nationally

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			heavily backloaded.	significant infrastructure projects such as the Scheme, and at Paragraph 3.3.63 describes that it is the Government's view that the benefits arising from the Scheme to assist in achieving the UK's energy objectives, together with the national security, economic, commercial, and net zero benefits, will in general outweigh any other residual impacts not capable of being addressed by application of the mitigation hierarchy. It is acknowledged that there will be emissions inevitably arising from the initial construction phase of the scheme and embodied carbon associated with products. However, the wider benefits of providing renewable energy are demonstrated to outweigh these impacts within ES Volume 1, Chapter 7: Climate Change [APP-059]. The future baseline used for assessment within ES Volume 1, Chapter 7: Climate Change [APP-059] was based on the forecast year

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				of development operations beginning and energy generation beginning. The applicant is preparing a separate technical note to respond to the point on carbon pay back which will be submitted at Deadline 3.
JA-009	Climate Change and Energy Need	Carbon Benefit	More importantly, the information provided by the Applicant is not sufficiently robust or complete to support confidence in the outcome being relied upon. Where an Applicant seeks to justify significant and long-lasting harm by reference to carbon benefit, it is reasonable to expect that benefit to be demonstrated with clarity and certainty. In my view, that has not been done.	The Greenhouse Gas assessment included in ES Volume 1, Chapter 7: Climate Change [APP-059] has been completed in line with industry standard best practice guidance and any assumptions or limitations clearly set out.
JA-010	Climate Change and Energy Need	Carbon Benefit	The Applicant has not yet had the opportunity to respond to my oral representation, but nothing in their written response demonstrates that carbon considerations outweigh or neutralise the place-based harms I originally raised.	The Applicant refers to its response to Reference ID JA-008. Further, the findings of the Climate Change assessment show that there will be a beneficial effect with a reduction in emissions compared to the UK grid average emissions factor forecast for the 2029 opening year.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
JA-011	Climate Change and Energy Need	Carbon Benefit	More broadly, where the Applicant seeks to rely on carbon benefit as part of the justification for the scheme, it is reasonable to consider how the proposal uses a finite carbon budget. In the absence of clear and timely net benefit, there is a real question as to whether the level and timing of emissions associated with the scheme represent a justified or proportionate use of that budget.	The ES Volume 1, Chapter 7: Climate Change [APP-059] has been completed in line with the industry standard guidance for completing Climate Change assessments of Greenhouse Gases and assessing significance as prepared by the Institute of Sustainability and Environmental Professionals (ISEP). This document is titled 'Assessing Greenhouse Gas Emissions and Evaluating their Significance'. This guidance recommends using both carbon budgets and a holistic approach of other context to justify the significance of the impact of a scheme which is set out within the ES Volume 1, Chapter 7: Climate Change [APP-059] .
JA-012	Description and DCO Process	Mitigation and Management	Across several topics, the Applicant's response depends on matters being resolved at a later stage, through outline or subsequent detailed plans. This includes landscape mitigation and aspects of long-term management.	The approach taken by the Applicant aligns with all other NSIP projects. The DCO Application has been submitted in outline and is supported by outline management plans, such as the Outline LEMP [APP-283] . This has been based upon the Design Principles and Parameters [REP1-008] which presents secured maximum and,

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				where relevant, minimum worst-case parameters applied to elements of the Scheme where flexibility needs to be retained under the Rochdale Envelope approach. A detailed design and detailed versions of management plans would be prepared post consent. The detailed design would not exceed the secured parameters, and detailed management plans would be in substantial accordance with the outline management plans and approved by Wiltshire Council. This is secured by the requirements set out in Schedule 2 of the draft DCO [REP1-007].
JA-013	Description and DCO Process	Details	My original representation raised concerns about the level of harm and uncertainty associated with the proposal. The Applicant's response relies heavily on matters being addressed at a later stage but does not explain why it is acceptable to proceed on that basis in this case.	The Applicant notes that detailed design information will follow later and the Outline CEMP [REP1-096] , Outline LEMP [APP-283] and the Outline CTMP [REP1-112] have therefore been amended to include appropriately worded mitigation measures that allow flexibility to respond to the final design.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			That concern has not been addressed in substance.	
JA-014	Description and DCO Process	Conclusion	For these reasons, I do not consider that the Applicant's response adequately addresses my Relevant Representation. It does not engage with the planning balance I set out, nor does it convincingly demonstrate that the scale and impacts of the proposal are appropriate for this location. Nothing in the Applicant's response alters the conclusions.	The Applicant notes this comment.
West Park Farm REP1-191				
WPF-001	Socio-Economics, Recreation and Tourism	Stud Farm	West Park Farm in Corston is a thoroughbred stud farm which we operate alongside Dermot's international bloodstock business. This business invests in approximately 50–100 horses per annum, has been active for over 20 years and responsible for Group 1 winners in all major racing countries in both the Northern and Southern hemispheres. West Park Farm is integral to these operations and accommodates a	Equestrian facilities, such as those at West Park Farm have been considered as specific recreational receptors in the assessment in the ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068] . The likely effects on West Park Farm are specifically assessed in ES Volume 3, Appendix 16-2: Tourism and Recreation Receptor Tables [APP-241] which identifies no significant residual effects to the operation of the

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			changing population of high-value horses throughout the year, including pregnant broodmares, foals, yearlings, and racehorses. We also board valuable bloodstock on behalf of overseas clients with horses regularly in transit to destinations such as Hong Kong, Australia, and the United States, as well as to sales across Europe. As an example, just earlier this week Dermot attended the OBS sales in Florida accompanying a client who spent \$3,530,000 on 5 two- year-old thoroughbreds (just one made \$2,300,000). Any of these horses we would expect to board on our farm in the future.	facilities at West Park Farm. The value and international clientele of the business were not made known to the Applicant, nor advertised in a manner that could readily be attributed to this location when the assessment was being undertaken. As such, the assessment has considered this location in the same manner as all other identified equestrian facilities. The Applicant confirms that embedded and additional mitigation measures including offsetting from the Gauze Brook and paddocks at West Park Farm, and traffic control and PRow safety measures, are secured through the Design Principles and Parameters [REP1A-008], Outline CTMP [REP1-112], and Outline PROWPPMP [REP1-104] by Requirements 5, 15, and 16 respectively in Schedule 2 to the Draft DCO [REP1-007] .
WPF-002	Socio-Economics, Recreation and Tourism	Stud Farm	A core part of our business is "pinhooking" foals. These young horses typically remain on the farm for less than a year and are prepared for yearling sales. This involves daily handling, including	The likely effects on West Park Farm are specifically assessed in ES Volume 3, Appendix 16-2: Tourism and Recreation Receptor Tables [APP-241] which identifies no significant residual effects to the

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			walking them in-hand around paddocks, particularly alongside the Gauze brook. Thoroughbreds are highly sensitive animals and are easily spooked, even within a stable environment. The introduction of a large-scale solar development, including construction activity, infrastructure, and associated noise would present a significant and unacceptable risk to the welfare of the horses and the viability of our operations and business.	operation of the facilities at West Park Farm. The Applicant confirms that embedded and additional mitigation measures including offsetting from the Gauze Brook and paddocks at West Park Farm, and measures to control impacts resulting from construction noise or activities, are secured through the Design Principles and Parameters [REP1A-008] and Outline CEMP [REP1-096] by Requirements 5 and 13 respectively in Schedule 2 to the Draft DCO [REP1-007] .
WPF-003	Socio-Economics, Recreation and Tourism	Stud Farm	Since acquiring the farm in 2018, we have made substantial investments in facilities and infrastructure. However, due to the uncertainty surrounding Lime Down and the potential impact, we have had to stop further investment. It would be irresponsible to continue operating or investing under these conditions given the level of risk and potential loss.	The Applicant notes this comment and refers to ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068] , where economic impacts to the local community have been assessed. The Applicant confirms that this assesses impacts to wider economic industries, not to individual businesses, as this would be a disproportionate level of detail due to the scale of the Scheme.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				The Applicant has sought to provide robust and transparent information about the Scheme throughout the pre-application consultation process undertaken, as recorded in the Consultation Report [APP-022] and its supporting appendices [APP-023 to APP-051]. This has included the opportunity for all affected persons to make contact with the Applicant team through free-to-use services. This has been done to ensure residents and business owners have had access to as much material as practicable at each stage of the DCO process, to be able to reduce anxiety or concerns from being unsure of what impacts the Scheme may have to them.
WPF-004	Socio-Economics, Recreation and Tourism Landscape and Visual Description and DCO Process	Stud Farm	In terms of location: - Our barns and stables are positioned in an elevated position overlooking Area D - Our grazing land and paddocks are used for both general management and yearling preparation and run alongside the Gauze brook, sitting	The effects of the Scheme on West Park Farm (Receptor RG029) were fully assessed in the LVIA. Minor adverse effects were recorded at all stages of the Scheme due to the channelled nature of cross valley views over the Gauze Brook and the enclosure provided by trees. The full assessment on West Park Farm is presented in ES

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			directly adjacent to the proposed panel areas. - The proposed substation (previously identified as a second BESS) is elevated and opposite our buildings. We have not been able to find the Environmental Impact assessment for this substation within IGP's DCO application.	Volume 3, Appendix 8-3-2-1 Visual Assessment Sheets (Non-Significant) [APP-190].
WPF-005	Socio-Economics, Recreation and Tourism	Local Economy	We feel our input into the local economy is significant. We employ three full time staff but in addition use many local subcontractors. I noted only last week we had 13 subcontractors on the farm at one point. Our part time/ full time staff totals 11 with many local businesses also benefitting. These include local farriers (£15,000 PA), local vets (£40,000 PA), international transporters (£100,000 PA), domestic and local transporters (£10,000), local feed and locally grown hay & straw (£40,000 at least PA). Our farm accountant is five miles away and all our farm equipment including tractors, trailers and quad bikes are also sourced locally. We have	The likely effects on West Park Farm as an equestrian facility are assessed in ES Volume 3, Appendix 16-2: Tourism and Recreation Receptor Tables [APP-241] which identifies no significant residual effects to the operation of the facilities at West Park Farm. That notwithstanding, the Applicant confirms that this has not assessed the likely economic impact to West Park Farm as an individual business, as this would be a disproportionate level of detail due to the scale of the Scheme. The Applicant is however confident that with the mitigation measures secured by relevant requirements in Schedule 2 to the Draft DCO

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			employed over a dozen school leavers that have had their first job on our farm and the last international client that came to stay ended up investing £5m in the UK racing industry.	[REP1-007], there would not be a significant economic impact to the operation of West Park Farm or to its supply chain. The Applicant understands the importance of local employment, supply chains and skill sharing and uplifting, and so has committed to supporting and improving local skills and employment 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]. The Applicant therefore encourages further engagement with West Park Farm and other equestrian stakeholders when developing the detailed SSCEP following determination of the DCO.
WPF-006	Socio-Economics, Recreation and	Flooding	We have also experienced a noticeable increase in flooding from the Gauze brook over the	Gauze Brook is one of the locations where material fluvial interaction has been specifically considered. The

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
	Tourism Hydrology, Flood Risk and Drainage		past two years, which is a growing concern in itself. The implications on our staff and farm insurance will increase significantly. The first picture is taken from our farm that currently doesn't flood overlooking the proposed site South of us. The second shows our neighbour on the proposed site during Storm Bert in November 2024.	assessment is set out in ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [APP-063] and ES Volume 3, Appendices 11-1 to 11-9: Flood Risk Assessment and Drainage Strategies [REP1-037 to REP1-054], with targeted hydraulic modelling and floodplain assessment undertaken where justified. The reported increase in existing flooding does not demonstrate that the Scheme would increase flood risk. The Scheme does not rely on uncontrolled discharge to Gauze Brook. Formal drainage areas will follow the drainage hierarchy and be controlled within the secured drainage parameters, including attenuation and controlled discharge where required. Panelled land remains permeable and is managed through soil, vegetation and connectivity controls. The submitted assessment concludes that the Scheme would not materially increase off-site flood risk.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
WPF-007	Noise and Vibration	The Applicant	We have already encountered trespassing with a monitoring device chained to our boundary fence in March 2024, prior to any notification of the Lime Down project. We believe this was to monitor sound but no permission was sought, so we requested its immediate removal.	The sound surveys conducted by the Applicant are presented in ES Volume 3, Appendix 14-3: Baseline Noise Survey [APP-236] . Table 1 within this appendix shows that none of these surveys were being conducted in March 2024. Therefore, any sound monitors placed on land in March 2024 do not relate to Lime Down Solar Park.
WPF-008	Socio-Economics, Recreation and Tourism Ecology and Biodiversity	Equestrian Facilities	Lime Down sits across an established, very active equestrian landscape which was reflected by the 400 relevant representations specifically raising equine concerns. But despite the number of stud farms, professional yards and everyday equine use in the area, there is no equine specific assessment, businesses aren't being treated as sensitive receptors and rural riding routes are being dismissed simply because they are considered not heavily used.	Equestrian facilities, including private stables and paddocks, studs, riding schools have been considered as specific recreational receptors in the assessment in the ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068] . The likely effects on these locations are specifically assessed in ES Volume 3, Appendix 16-2: Tourism and Recreation Receptor Tables [APP-241] which identifies no significant residual effects to their operation or recreational use as a result of noise impacts, subject to implementation of embedded and additional mitigation measures with any mitigation requirements (such as noise screening and offsetting away from neighbouring paddocks) secured

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				through the relevant management documents.
WPF-009	Ecology and Biodiversity	Horses	As prey animals with strong flight responses, horses are neurologically adapted to react to unfamiliar noise and movement. For breeding environments, where pregnant mares, foals and valuable bloodstock are present, maintaining low-stress, stable surroundings is particularly important.	The Applicant acknowledges the importance of setting for the operation of the stud farm at West Park Farm. The Scheme design therefore includes for buffered offsets to the Gauze Brook (and by extension the paddocks at West Park Farm) to maintain physical separation from the Scheme and paddock areas. This is set out in the Design Principles and Parameters [REP1A-008] , secured by Requirement 5 of Schedule 2 to the Draft DCO [REP1-007] . Furthermore, the Scheme includes for landscape screening planting which should reduce visual impacts from the Scheme, particularly when viewed from the nearest (lowest) parts of the paddocks. This is secured through the Outline LEMP [APP-283] , secured by Requirement 7 of Schedule 2 to the Draft DCO [REP1-007] With these measures in place, no significant residual effects to the operation, business or recreational

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				use to the facility have been identified during the Scheme's operational phase. Construction noise effects would be controlled through the implementation of the Outline CEMP [REP1-096], secured through Requirement 13 of Schedule 2 to the Draft DCO [REP1-007]. The Applicant considers that the Environmental Statement has fully assessed the impacts of the Scheme on all receptors. The Applicant is committed to ensuring impacts on equestrian facilities such as West Park Farm can be mitigated wherever practicable, and therefore is undertaking, and encourages further, engagement with relevant stakeholders through the DCO process. Following the written representations submitted at Deadline 1 and 1A relating to horses and equine businesses, the Applicant is considering the technical information provided in detail and will provide further commentary at Deadline 3.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
WPF-010	Ecology and Biodiversity	Equine Assessment	From our review, key gaps in IGP's current equine assessment include: No equine-specific assessment methodology	Equestrian facilities, including private stables and paddocks, studs, riding schools have been considered as specific recreational receptors in the assessment in the ES Volume 1, Chapter 16: Socio Economics, Tourism and Recreation [APP-068] . The likely effects on these locations are specifically assessed in ES Volume 3, Appendix 16-2: Tourism and Recreation Receptor Tables [APP-241] which identifies no significant residual effects to their operation or recreational use as a result of noise impacts, subject to implementation of embedded and additional mitigation measures with any mitigation requirements (such as noise screening and offsetting away from neighbouring paddocks) secured through the relevant management documents.
WPF-011	Scheme Description and DCO Process	Equine Assessment	From our review, key gaps in IGP's current equine assessment include: Static solar panel guidance being applied to large-scale tracking panels	The Applicant confirms that in assessing the likely impacts to equestrian facilities as specific recreational receptors in ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068] , the assessment has considered the

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				likely noise and visual impacts of tracker panels due to their greater peak height and movement, and has therefore used these to consider a worst-case for equestrian facilities. The Applicant is however confident that no significant residual effects to West Park Farm are anticipated with the mitigation measures set in place to limit operation impacts, as secured through the Design Principles and Parameters [REP1A-008] and Outline LEMP [APP-283], secured by Requirements 5 and 7 of Schedule 2 to the Draft DCO [REP1-007]. The Applicant acknowledges that guidance from the British Horse Society refers to fixed panel arrays rather than tracker panels. However, with the physical separation and screening proposed, the Applicant understands this will therefore not have a long-term effect on equine responses to the Solar PV Arrays as visual stimuli.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				The Applicant considers that the Environmental Statement has fully assessed the impacts of the Scheme on all receptors. The Applicant is committed to ensuring impacts on equestrian facilities such as West Park Farm can be mitigated wherever practicable, and therefore is undertaking, and encourages further, engagement with relevant stakeholders through the DCO process. Following the written representations submitted at Deadline 1 and 1A relating to horses and equine businesses, the Applicant is considering the technical information provided in detail and will provide further commentary at Deadline 3.
WPF-012	Description and DCO Process	Equine Assessment	From our review, key gaps in IGP's current equine assessment include: No assessment of movement, angle change, or shifting reflections as behavioural stimuli	The Applicant confirms that the approach to equestrian and PROW impacts and highway safety are under discussion with Wiltshire Council's Countryside Access Team and Highways Team (as part of discussions with Wiltshire Council in general). Progress on each of these discussions is set out in the relevant Statements of Common Ground with

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				each of these parties to be submitted at Deadline 1.
WPF-013	Socio-Economics, Recreation and Tourism Transport and Access	Equine Assessment	From our review, key gaps in IGP's current equine assessment include: Rural lanes and PRowWs downgraded based on low user numbers	The Applicant seeks to clarify that the Scheme does not propose to alter the designation of any PRow or highway, and instead seeks to ensure PRowWs are protected throughout the Scheme's lifetime through the measures secured by the Outline PROWPPMP [REP1-104] by Requirement 16 of Schedule 2 to the Draft DCO [REP1-007]. The potential impact of the Scheme on non-motorised users (NMU) is assessed in ES Volume 1, Chapter 13: Transport and Access [REP1-019] which concludes that there would be no significant impact on NMU as a result of the Scheme. Highway widths of construction routes have been assessed and provide sufficient opportunities and width for HGV traffic to comfortably pass cyclists, equestrians and pedestrians. ES Volume 1, Appendix 13-1: Transport Assessment [REP1-057]

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				and REP1-059] concludes that the level of flow change will not result in a step change in fear and intimidation as defined in the IEMA guidance at Tables 3.1, 3.2 and 3.3. An Outline CTMP [REP1-112] and Outline PROWPPMP [REP 1-104] support the DCO Application and include outline measures to ensure impacts to NMU along highways and PROW are minimised as far as practicable.
WPF-014	Socio-Economics, Recreation and Tourism	Equine Assessment	From our review, key gaps in IGP's current equine assessment include: Equine businesses (including stud farms) not treated as sensitive receptors	The Applicant confirms that the assessment in ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068] has considered impacts on equestrian facilities primarily as recreational or recreation-dependent businesses. Whilst economic businesses to individual businesses have not been assessed, this has been included as part of the likely impact to visitor and recreation-dependent industries. Table 2-10 in ES Volume 3, Appendix 16-2: Tourism and Recreation Receptor Tables [APP-241] provides a

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				description of which equestrian facilities were identified in the Study Area around the Scheme and indicates whether they were taken forward for full assessment. The Applicant considers that the Environmental Statement has fully assessed the impacts of the Scheme on all receptors. Nonetheless, the Applicant is committed to ensuring impacts on equestrian facilities such as West Park Farm can be mitigated wherever practicable, and therefore is undertaking, and encourages further, engagement with relevant stakeholders through the DCO process. Following the written representations submitted at Deadline 1 and 1A relating to horses and equine businesses, the Applicant is considering the technical information provided in detail and will provide further commentary at Deadline 3.
WPF-015	Noise and Vibration	Equine Assessment	From our review, key gaps in IGP's current equine assessment include: Noise impacts (construction and operational) not assessed in terms of equine response	Paragraph 14.1.2 of ES Volume 1, Chapter 14: Noise and Vibration [REP1-021] clarifies that the scope of the noise assessment is limited to human receptors. Nevertheless, with prior warning of noisy events

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				during the construction phase, as committed to in Table 8 of the Outline CEMP [REP1-096], and low level continuous operational noise, no undue disturbance to horses is anticipated. This is a conclusion accepted by the Secretary of State in considering the Sunnica Energy Farm application, as outlined in paragraphs 4.182 and 4.183 of the decision letter (https://nsip-documents.planninginspectorate.gov.uk/published-documents/EN010106-006023-Sunnica%20SoS%20Decision%20Letter%20signed%2012%20July%202024.pdf). Additionally, the potential impact this may have on local equestrian facilities (primarily for recreation but also as businesses) is covered in ES Volume 1, Chapter 16: Socio Economics, Tourism and Recreation [APP-068]. Following the written representations submitted at Deadline 1 and 1A relating to horses and equine businesses, the Applicant is considering the technical

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				information provided in detail and will provide further commentary at a later deadline if needed.
WPF-016	Socio-Economics, Recreation and Tourism Human Health	Equine Assessment	From our review, key gaps in IGP's current equine assessment include: Welfare risks effectively transferred to riders, handlers and businesses	The Applicant confirms that the approach to equestrian and PROW impacts is under discussion with Wiltshire Council's Countryside Access Team (as part of discussions with Wiltshire Council in general), the British Horse Society, and the Wiltshire Bridleway Association. Progress on each of these discussions is set out in the relevant Statements of Common Ground. The Applicant considers that the Environmental Statement has fully assessed the impacts of the Scheme on all receptors. Nonetheless, the Applicant is committed to ensuring impacts on equestrian facilities such as West Park Farm can be mitigated wherever practicable, and therefore is undertaking, and encourages further, engagement with relevant stakeholders through the DCO process. Following the written representations submitted at Deadline 1 and 1A relating to horses

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				and equine businesses, the Applicant is considering the technical information provided in detail and will provide further commentary at Deadline 3.
WPF-017	Scheme Description and DCO Process	Equine Assessment	From our review, key gaps in IGP's current equine assessment include: Impacts considered "operationally accommodatable" without evidence	The Applicant understands this terminology is used for glint and glare impacts to airfields in ES Volume 1, Chapter 20: Other Environmental Matters [APP-072] . This is not used for the assessment of equestrian facilities in ES Volume 1, Chapter 16: Socioeconomics, Tourism and Recreation [APP-068] . The Applicant has therein found that there are no significant adverse effects to the facilities at West Park Farm, finding a long-term moderate minor adverse effect during the Scheme's operation.
WPF-018	Description and DCO Process	Stud Farm	Lime Down Solar does not represent a compatible land use alongside stud farms and I hope this gives you a better understanding of the devastating impact it would have for us and many others. It is no exaggeration to say that our business would have to close if this proposal goes ahead.	The Applicant notes this comment and refers to all responses made above. The Applicant is confident that the assessment of effects to West Park Farm has been robust, and as such reiterates that no significant residual effects to the operation, business or recreational use to the facility have been identified. The Applicant is furthermore confident

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				that the Scheme design and mitigation measures as set out in the Outline LEMP [APP-283] , Outline CEMP [REP1-096] , Outline OEMP [REP1-098] , Outline CTMP [REP1-112] , and Outline PRowPPMP [REP1-104] , secured through Requirements 5, 7, 13, 14, 15, and 16 of Schedule 2 to the Draft DCO [REP1-007] are sufficient to ensure that the business at West Park Farm would not be significantly affected.
Chippenham Wheelers/British Cycling REP1-159				
CW-001	Socio-Economic, Recreation and Tourism	Cycling	I would like to speak at the next OFH2 regarding my concerns about Lime Down. I have been a member of Chippenham Wheelers since 1974 and the lanes that will be affected are essentially our "Playground". I run a regular Saturday Morning 40 mile ride that uses the same route through Hullavington, Fosseway etc. Many of our regular mid week, Saturday and Sunday Leisure rides all use those roads regularly.	The Applicant notes this comments and welcomes requests by Interested Parties to speak at hearings.
KMT Farming and Consultancy REP1-164				

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
KMT-001	Description and DCO Process	Land	This Written Representation is submitted on behalf of the Owners of Manor Farm which lies between the proposed Rodbourne and Hullavington solar sites either side of the A429. The Farm extends to approximately 415 acres in total and is farmed by the Owners and their family. The main enterprises at Manor Farm are arable and sheep. Please see the attached plan. The land affected is identified within the DCO Book of Reference and Land Plans as parcels: 05-043, 06-001, 06-002, 06-003, 06-004, 06-005 and 06-006. These parcels together comprise a substantial and functionally important part of an active agricultural business. Approximately 70 acres are included within the draft DCO that will be subjected to extensive powers for the compulsory acquisition of rights for the Development.	The Applicant notes the comments made by the respondent on behalf of the owners of Manor Farm. Through engagement to date, the Applicant is aware of the farming enterprises being carried out over the land identified within the Book of Reference [REP1-011].

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
KMT-002	Description and DCO Process	Introduction	This representation focuses on the principal issues for the Examining Authority and underpins the Owners objection to the Development. These issues are: • Inadequate consultation and engagement by the Promoter; • Disproportionate and excessive compulsory acquisition powers sought; • Lack of design maturity and scheme definition; • Failure to genuinely pursue voluntary agreement; • Significant impacts on a viable farming business	The Applicant notes this comment and has responded in detail to the matters raised under KMT-003 to KMT-007.
KMT-003	Consultation and Engagement	Consultation	2. Inadequate Consultation and Engagement The Promoter has failed to undertake meaningful and proportionate consultation with the Owners, despite the extent of land affected. In particular: The Owners have not been provided with an anticipated layout	In addition to the engagement detailed in the Land Rights and Negotiations Tracker [REP1-246], the Applicant most recently provided to the respondent via email, on 20th April 2026, a series of documents and explanatory notes covering: • AIL Internal Access Road Cross – Sections from ES Volume 3, Appendix

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			for cable routes, highways works, access roads or working areas within the identified parcels. There has been no clear explanation of construction access routes and working compounds including whether these parcels will be used for primary construction logistics and for what period of time.	3-3 Illustrative Drawings [REP1A-004]. - Transport Assessment drawings relating to Solar PV Sites: Access 10 from ES Volume 3, Appendix 13-1 Transport Assessment [REP1-057 and REP1-059]. - Transport Assessment drawings relating to Solar PV Sites: Access 18 from ES Volume 3, Appendix 13-1 Transport Assessment [REP1-057 and REP1-059]. - Extract from project Access Plan [APP-010]. An Indicative working area layout explanatory note was also provided, supplemented by an offer from the Applicant to engage in discussions relating to mitigation measures available to reduce disruption to the existing farming operations. There has been ongoing dialogue between the Applicant's consultant land agent and the respondent in

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				relation to construction and operational access routes, temporary working areas, and construction logistics. This dialogue has been carried out with direct reference to the Works Plan [REP1-005] in meetings held.
KMT-004	Consultation and Engagement Description and DCO Process	Refinement of Land	Engagement has not resulted in any meaningful reduction or refinement of land take since the Promoter presented the initial proposals to the Owners, despite these concerns being raised from the outset. Given that parcels 05-43 and 06-001 to 06-006 form a continuous corridor between two principal scheme components, a significantly higher standard of engagement would reasonably be expected. The absence of such engagement indicates that the application has been brought forward with insufficient design maturity, relying instead on wide parameters and extensive powers.	The Applicant has taken consistent and meaningful steps to engage fully with the Affected Party, providing transparency regarding all the plots in the corridor under the Eavis ownership and does not consider the engagement held to date to be inadequate Following the engagement to date as set out in KMT-003 meetings with the Affected Party, alongside the respondent, detail that feedback has been received and progression made. The Applicant has then taken reasonable measures to mitigate the impact to the Affect Party's land holding through voluntary negotiations and welcomes further engagement.
KMT-005	Description and DCO Process	Compulsory Acquisition	3. Disproportionate Compulsory Acquisition	As set out in the Statement of Reasons [APP-018] , the Order

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			The extent of land included within the draft DCO limits across the identified parcels is excessive and not justified. The Applicant seeks powers over approximately 70 acres, including rights not only for a cable route but also for: • Construction compounds; • Welfare facilities; • Offices; • Temporary and permanent access; • Bell mouth access into site from A429.	Limits have been carefully defined to ensure that all land included is no more than is reasonably required for the construction, operation and decommissioning of the Scheme (see section 7.2). The Applicant has undertaken a detailed assessment of land requirements on a plot-by-plot basis and has limited the extent of land sought to that necessary to deliver the Authorised Development (paragraph 7.2.5). The Applicant has also adopted a proportionate approach to the type of powers sought. Where permanent rights are not required, only temporary possession powers are sought (section 5.5), thereby minimising permanent land take. In addition, the use of a wider construction corridor with subsequent narrowing of permanent rights (paragraph 5.5.3) ensures that only the minimum area is retained following construction.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				Furthermore, the extent of land sought reflects the need to retain flexibility at the detailed design stage, including the micro siting of infrastructure within defined corridors and the ability to respond to ground conditions and environmental constraints (paragraphs 3.4.2–3.4.3). The Applicant has also actively sought to minimise land take through design iteration and has pursued voluntary agreements with landowners wherever possible (Sections 7.5 and 7.8). However, compulsory acquisition powers are required to ensure that all land necessary for the Scheme can be assembled and delivered (paragraph 1.4.5). Accordingly, the Applicant considers that the land and rights included within the Order Limits, including those required for construction compounds and access, are necessary, proportionate and

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				justified, and satisfy the requirements of section 122 of the Planning Act 2008.
KMT-006	Description and DCO Process	Option Area	3.1 Excessive "Option Area" Approach The inclusion of an "option area" approximately 70 acres, without a more defined layout of the final scheme footprint, is indicative of a precautionary or convenience-based approach, rather than one based on demonstrable need. The main components of the Development required in this area should be available to the Promoter at this stage of the project. The Promoters approach: • Prevents proper scrutiny of impacts; • Unfairly transfers design risk from the promotor to the landowner; • Conflicts with the requirement to demonstrate that land is no more than is reasonably required.	As noted in the response provided in relation to compulsory acquisition above the extent of land sought reflects the need to retain flexibility at the detailed design stage, including the micro siting of infrastructure within defined corridors and the ability to respond to ground conditions and environmental constraints (paragraphs 3.4.2–3.4.3 of the Statement of Reasons [APP-018]).

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
KMT-007	Climate Change and Energy Need	Need for the Scheme	3.2 Failure to demonstrate Necessity and Proportionality The Promoter has not demonstrated: • Why each of the identified parcels is required to the extent proposed; • Why alternative, less intrusive solutions have not been adopted; • Why temporary use areas (e.g. compounds) cannot be reduced or relocated; • The scale of land included suggests that the draft DCO limits are compensating for a lack of design certainty, rather than reflecting a justified land requirement.	The Statement of Need [REP1-085] explains why solar development is required at this scale to meet the Government's targets as set out in the Clean Power 2030 Action Plan. It is the Government's policy to support the development of large-scale schemes in order to meet the urgent need for unprecedented levels of clean electricity. Relevant planning policy (specifically NPS EN-1 paragraph 3.3.12) recognises that meeting the country's energy needs requires the use of largescale, centralised electricity generating facilities via a high-voltage transmission system, which enables the pooling of both generation and demand, which in turn offers a number of economic and other benefits, such as more efficient bulk transfer of power and enabling surplus generation capacity in one area to be used to cover shortfalls elsewhere. NPS EN-3 paragraph 2.10.31 recognises that at this scale, solar development is likely to use some agricultural land.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				Regarding consideration of alternative solutions, the Applicant has considered alternative sites for solar (see ES Volume 3, Appendix 4-1: Site Selection Assessment Report [APP-185], and alternative technologies, as set out in ES Volume 1, Chapter 4: Alternatives and Design Evolution [APP-056]. Section 4.10 of ES Volume 1, Chapter 4: Alternatives and Design Evolution [APP-056] details the consideration of alternative generation technologies. As the Applicant is a solar PV and energy storage developer, no alternative types of low carbon electricity generation have been considered in the development of the Scheme. However, it is considered that the Site would not be suitable for other forms of renewable energy generation at the same scale as the Scheme. For example, due to the Scheme's location away from the coast, tidal power and offshore wind are deemed unviable.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				The Applicant is supportive of smaller scale schemes (including rooftop and distributed schemes) but aligns with the Government's position, for reasons described in the Statement of Need [REP1-085] that such schemes are needed alongside, rather than as an alternative to, large-scale schemes such as this Scheme. Temporary Construction Compounds are necessary for the construction of the Scheme to store materials, house facilities for construction workers, and implement mitigation measures to manage construction work such as wheel washing facilities and storage bins for recyclables and other waste. Locating the Temporary Construction Compounds within the Scheme Site also minimises movement of personnel, equipment and materials between the Site and from offsite facilities if these were used as an alternative.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				The ES identifies the parameters used for the environmental impact assessment within ES Volume 1, Chapter 3: The Scheme [APP-055], including the construction compounds. Potential effects arising from construction compounds on ecological features are assessed in ES Volume 1, Chapter 9: Ecology and Biodiversity [REP1-015]. The assessment concludes that no significant adverse effects on ecology and biodiversity are anticipated as a result of impacts associated with construction compounds. Construction compounds have been carefully sited to avoid sensitive habitats/areas for wildlife. For instance, as set out in ES Volume 1, Chapter 9: Ecology and Biodiversity [REP1-015] they will not be sited within any defined Wiltshire Impact Zones for Bats, which are areas considered to be of crucial

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				importance for local populations of bats. The noise assessment makes the worst-case assumption that construction activities could take place in the compound areas. Even then, with best practice mitigation measures in place, as described in Section 14.9 of ES Volume 1, Chapter 14 Noise and Vibration [REP1-021], no significant adverse effects from construction noise or vibration are expected. Measures to manage minimise construction effects are set out in the Outline CEMP [REP1-096]. Requirement 13 in Schedule 2 to the Draft DCO [REP1-007] secures that prior to construction, a CEMP must be submitted to and approved by the relevant planning authority, and that CEMP must be substantially in accordance with the Outline CEMP [REP1-096]. All construction works will be carried

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				out in accordance with the approved CEMP. With regard to the scale of land within the DCO limits and design certainty, as set out in the Statement of Reasons [APP-018], the Order Limits have been carefully defined to ensure that all land included is no more than is reasonably required for the construction, operation and decommissioning of the Scheme (see section 7.2). The Applicant has undertaken a detailed assessment of land requirements on a plot-by-plot basis and has limited the extent of land sought to that necessary to deliver the Authorised Development (paragraph 7.2.5). The Applicant has also adopted a proportionate approach to the type of powers sought. Where permanent rights are not required, only temporary possession powers are sought (section 5.5), thereby minimising permanent land take. In addition, the use of a wider construction corridor

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				with subsequent narrowing of permanent rights (paragraph 5.5.3) ensures that only the minimum area is retained following construction. Furthermore, the extent of land sought reflects the need to retain flexibility at the detailed design stage, including the micro siting of infrastructure within defined corridors and the ability to respond to ground conditions and environmental constraints (paragraphs 3.4.2–3.4.3). The Applicant has also actively sought to minimise land take through design iteration and has pursued voluntary agreements with landowners wherever possible (Sections 7.5 and 7.8). However, compulsory acquisition powers are required to ensure that all land necessary for the Scheme can be assembled and delivered (paragraph 1.4.5).

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				Accordingly, the Applicant considers that the land and rights included within the Order Limits, including those required for construction compounds and access, are necessary, proportionate and justified, and satisfy the requirements of section 122 of the Planning Act 2008.
KMT-008	Description and DCO Process	Compulsory Acquisition	3.3 Imbalance Between Rights Sought and Compensation Approach The proposed approach—where compensation is linked to the eventual easement width, while significantly wider areas are controlled and disrupted—creates a clear imbalance. The landowner is exposed to: Extensive temporary possession; Operational disruption across multiple parcels; Long-term effects from the Compulsory Acquisition rights contained in the DCO (even if not utilised) across the entire Title of	In terms of compensation, the Statement of Reasons [APP-018] confirms that all persons affected by the exercise of compulsory acquisition or temporary possession powers are entitled to compensation. This includes compensation for both permanent acquisition of rights and for any loss or damage arising from temporary possession. Any disputes are capable of determination by the Upper Tribunal (Lands Chamber), ensuring an independent and established mechanism for resolving such matters. The Applicant also notes that the inclusion of compulsory acquisition powers does not result in

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			the property, which will create extensive rights (or hold the threat of them) many years into the future. This further underlines the disproportionate nature of the Development.	uncontrolled or indefinite impacts across landholdings. The exercise of such powers is governed by the Draft DCO [REP1-007], which clearly defines the extent, nature and duration (being 5 years from the date on which the Order comes into force) of the powers, as contained within Part 5 (Powers of Acquisition).
KMT-009	Description and DCO Process	Compulsory Acquisition	4. Failure to Genuinely Pursue Voluntary Agreement The Promoter asserts that attempts have been made to secure voluntary agreements. However, the nature and substance of those discussions raise serious concerns. The engagement to date: Has not adequately reflected the scale of impact across parcels 05-43 and 06-001 to 06-006; Has been based on incomplete information, particularly in relation to cable routing and construction use;	The Applicant has undertaken a comprehensive programme of engagement and negotiation with landowners and occupiers, in accordance with the requirements of the Planning Act 2008 and relevant guidance. This has included a formal land referencing exercise, issue of Land Interest Questionnaires, and ongoing dialogue with affected parties to understand the impacts of the Scheme and seek to reach agreement wherever practicable. The Statement of Reasons [APP-018] confirms that negotiations are ongoing and that the Applicant will continue to seek to acquire land and

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			Has not meaningfully addressed the operational needs of the farming business. Offers and discussions have therefore been conducted in a context where: The landowner cannot fully understand the extent of the impact; The Applicant has retained maximum flexibility through wide Order limits; The burden of uncertainty lies entirely with the landowner. In these circumstances, it is reasonable to question whether these efforts constitute a genuine attempt to secure voluntary agreement, or whether they are primarily intended to demonstrate procedural compliance in support of compulsory acquisition powers. A genuine negotiation would be expected to include: A more clearly defined scheme;	rights by agreement alongside the application for compulsory powers. This approach is expressly supported by national guidance and reflects established practice for DCO projects, whereby compulsory acquisition powers are sought in parallel to negotiations to ensure deliverability.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			A demonstrably minimised land take; Proper recognition of business and commercial impacts; Iterative refinement in response to landowner feedback. These elements have been notably absent thus far.	
KMT-010	Description and DCO Process	Scheme Definition	5. Lack of Scheme Definition A fundamental issue remains the lack of clarity as to how the scheme will be delivered across the affected parcels. Projects of this nature and construction elements of this type should be more mature by this stage of the Development.	The Applicant disagrees that there is a lack of clarity of how the Scheme will be delivered. ES Volume 1, Chapter 6, EIA Methodology [APP-058] has provided transparent and comprehensive information in the Environmental Statement which sets out worst-case scenarios including the design parameters and locations for the solar panels and associated infrastructure. The impact assessments are informed using the "Rochdale Envelope" approach, which is an industry standard for Nationally Significant Infrastructure Projects, and defines the maximum envelope of the Scheme's parameters and design optionality.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				As established in the Statement of Need [REP1-085], this approach allows the Applicant to secure necessary design flexibility to incorporate technological innovation and improvements, such as more efficient solar panel models, that may be available at the time of construction. A full description of the Scheme and its associated physical parameters are provided in Table 3-1 of ES Volume 1, Chapter 3: The Scheme [APP-055], and throughout Section 2: "Design Parameters and Commitments" of the Design Principles and Parameters [REP1A-008] where details of the technical specifications and maximum dimensions used to inform these worst-case scenarios for the environmental assessment are set out.
KMT-011	Description and DCO Process	Cable Route	5.1 Cable Route Uncertainty The absence of a defined cable	The Applicant disagrees that there is uncertainty in defining the Cable Route Corridor. ES Volume 1, Chapter 3: The Scheme [APP-

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			alignment within the relevant parcels prevents: Proper assessment of permanent land take; Identification of the most sensitive areas of the holding; Effective mitigation of impacts.	055] and Volume 3, Appendix 3-2 Cable Route Construction Method Statement [APP-183] describe the Cable Route Corridor and associated works. The full extent or 'worst case' effects arising from the Scheme are identified and reported in the ES [APP-052 to APP-265 and updated by REP1-015 to REP1-084]. The ES has been undertaken adopting the principles set out in the Planning Inspectorate's Advice Note Nine: Rochdale Envelope. 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 Environmental Impact Assessment (EIA) to assess likely worst-case variations to ensure all foreseeable significant environmental effects of the Scheme are considered. Considering a reasonable worst case is standard practice for EIA in the UK. Each technical chapter [APP-059 to APP-072 and updated by REP1-015 to REP1-028] has assessed the

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				design identified to be the likely worst-case scenario for that discipline in order to determine effect significance. For the Cable Route Corridor, The Order Limit width is typically 50 m with the width increasing in places (such as road and rail crossings) up to 665 m to allow flexibility for final crossing design alignment and to allow space for temporary compounds. The actual construction working width (i.e. the area of land fenced off and utilised during construction) within the Order Limit will be a maximum of 25m, however the whole the Order Limits has been assessed within the EIA to ensure impacts sensitive constraints are properly assessed. Where necessary and appropriate, the technical chapters also set out mitigation measures that would be implemented as part of the Scheme to address the effects identified. Measures to manage and minimise effects are set out in the outline management plans [APP-277 to APP-287 and updated by REP1-096 to REP1-113] for the Scheme. The

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				preparation, approval and implementation of detailed management plans, substantially in accordance with the outline plans, are secured through Schedule 2 of the Draft DCO [REP1-007] , ensuring that effects associated with the Scheme are appropriately controlled.
KMT-012	Transport and Access	Construction Access	5.2 Construction Access There is no clear commitment to or limitation on: Movement of heavy plant and equipment; Use of temporary access roads across the land; Duration and phasing of construction activities. There is a credible concern that the affected parcels will function as a primary construction corridor and construction compounds, significantly increasing disruption beyond what is currently disclosed.	Construction vehicle movements and routing will be managed through a Construction Traffic Management Plan. An Outline CTMP [REP1-112] has been prepared and submitted with the DCO application. The aim of the CTMP is to ensure that the effect of the construction phase on the local highway network is minimised. The Outline CTMP [REP1-112] sets out measures to coordinate construction deliveries by HGVs to arrive and depart between 09:30 and 16:30 where possible, to avoid peak network hours of 08:00–09:00 and 17:00–18:00. It also includes a community liaison element to keep local communities informed about the construction process and to provide a contact for feedback should any

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				issues arise. Compliance with the final CTMP will be monitored by the Developer, Contractor and Wiltshire Council as local highway authority. The preparation, approval and implementation of the final CTMP, substantially in accordance with the Outline CTMP [REP1-112], 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. It will also confirm the final duration and phasing of construction activities in substantial accordance with the Outline CTMP [REP1-112].
KMT-013	Transport and Access	Local Highway Constraints	5.3 Local Highway Constraints The surrounding road network is not evidently suitable for the scale of construction activity implied. There are ditches, drains and culverts along the A429 that will be impeded by the Development and the DCO does not demonstrate that impacts on	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 on the proposed construction routes as

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			these can be safely or effectively managed.	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] 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. The Outline CTMP [REP1-112] submitted at Deadline 1 included further clarifications as to what detailed drawings will be provided for accesses in the Final CTMP.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
KMT-014	Soils and Agriculture Socio-Economics, Recreation and Tourism	Agricultural Operations	6. Impact on Agricultural Operations The affected parcels form an integral part of a working agricultural unit. The proposed powers would: • Disrupt farming operations across multiple seasons; • Disrupt the outcomes achieved under government backed environmental schemes (SFI and Countryside Stewardship); • Restrict access and internal field connectivity; • Introduce uncertainty affecting cropping and land management decisions. The use of land for compounds and temporary works is particularly harmful, as it extends both the geographic scope and duration of impact. These effects have not been	The effects of construction on agricultural land and soils in the Cable Route Corridor have been included in the assessment in ES Volume 1, Chapter 17: Soils and Agriculture [APP-069]. Disruption to agricultural land within the Cable Route Corridor will primarily be short-term, with soil excavated for cable trenches being reinstated as soon as possible and in agreement with the landowner, as noted in paragraphs 1.8.26-1.8.29 of the Outline Soil Resources Management Plan (SRMP) [APP-280]. The works would be scheduled following liaison between the contractor, landowner and a designated Agricultural Liaison Officer, with the aim of minimising disruption to the farming operations as far as possible. The Outline CEMP [REP1-096] confirms that existing access

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			properly quantified or addressed within the DCO.	tracks would be utilised where possible, that any new tracks and compounds required would be sited on the lowest quality land available where practicable, and that site access points would be regularly cleaned and maintained, to further minimise disruption and impacts on connectivity. Land proposed for the siting of temporary compounds and access tracks will also be managed according to several management plans, including the SRMP. The Outline SRMP [APP-280] prescribes best practice measures for handling soils, including during topsoil stripping, storage and reinstatement activities.
KMT-015	Cultural Heritage	Heritage	7. Heritage Considerations The local landscape and the village of Corston has historic context which may be adversely affected by extensive works proposed. Given the absence of detailed design information, it is not	ES Volume 1, Chapter 12 Cultural Heritage [APP-064], and the supporting appendices in ES Volume 3, Appendices 12-1 to 12-7 [APP-219 to APP-231] has assessed the potential impact of the scheme on identified archaeological assets and designated assets within the village of Corston and the local area. Where required appropriate mitigation has

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			currently possible to conclude that: Heritage impacts have been properly assessed; Adequate mitigation measures can be secured.	been proposed (see Section 12.9 of ES Volume 1, Chapter 12 Cultural Heritage [APP-064] for embedded mitigation). The Applicant notes that detailed design information will follow later and the Outline CEMP [REP1-096], Outline LEMP [APP-283] and the Outline CTMP [REP1-112] have therefore been amended to include appropriately worded mitigation measures that allow flexibility to respond to the final design.
KMT-016	Description and DCO Process Consultation and Engagement	Compulsory Acquisition	The Promoter has therefore failed to demonstrate a compelling case in the public interest for the powers sought over Manor Farm. It is respectfully submitted that development consent should not be granted in respect of these parcels unless and until: • The scheme is materially refined; • Land requirements are demonstrably reduced to the reasonable minimum necessary; • A genuine and informed process	Please refer to the response given in respect of Compulsory Acquisition and the justification for powers given above.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			of engagement with the landowner has been undertaken.	
Whatley Manor REP1-192				
WMH-001	Socio-Economics, Recreation and Tourism	Introduction	Whatley Manor is a long-established luxury hotel operating within a highly sensitive rural landscape. We have demonstrated a strong and measurable commitment to sustainability, holding Silver Certification with EarthCheck since 2019. Our guests—99% of whom arrive by car due to the absence of viable public transport— choose Whatley Manor specifically for its tranquillity, landscape quality and rural seclusion. The hotel also serves local residents and spa members who similarly rely on private vehicle access. The proposed development threatens the very qualities that underpin our business model and the wider visitor economy.	The Applicant notes this comment and has responded in detail to the matters raised under WMH-0002 to WMH-008.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
WMH-002	Socio-Economics, Recreation and Tourism Transport and Access	Traffic and Highway Impacts	Traffic and Highway Impacts The rural road network surrounding the site is wholly unsuited to a project of this magnitude. The anticipated construction traffic would: Overwhelm narrow country lanes already operating at capacity. Create severe congestion and unpredictable journey times for guests, staff and suppliers. Undermine the hotel's viability by deterring visitors who expect reliable access and a stress-free rural experience. Impede staff recruitment and retention due to extended and unreliable commuting conditions. Increase operational costs through delayed deliveries and service disruptions. Cause significant surface degradation, resulting in muddy, hazardous conditions during wet periods.	Annex J of ES Volume 3, Appendix 13-1: Transport Assessment [REP1-057 and REP-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-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.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			The absence of appropriate infrastructure is a fundamental flaw in the proposal and raises serious questions about the suitability of the chosen location.	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. 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

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				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

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				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; • 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

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				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; 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].

Reference	Theme	Issue	Comments/Issue Raised	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

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				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

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				[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 the highway and verges during the construction period. The details of these surveys will be confirmed as part of the Final CTMP.
WMH-003	Noise and Vibration Socio-Economics, Recreation and Tourism Air Quality	Noise and Disturbance	Noise and Disturbance The hotel sits within a quiet valley where sound travels easily across the landscape. Construction on elevated land opposite the hotel would result in unavoidable and intrusive noise impacts.	With regards to the noise concerns, Whatley Manor is approximately 1.5 km from the closest part of the Scheme boundary. At such a distance construction noise is unlikely to be perceptible. Whilst the Applicant could not guarantee that construction noise would never be heard, average levels at Whatley

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
	Construction and Decommissioning Ecology and Biodiversity		We anticipate: Disturbance to wildlife and the ecological value of our grounds. Dust deposition across the estate, increasing operational burdens and diminishing guest experience. Reputational damage arising from a compromised environment, with guests likely to seek alternative destinations. Significant disruption to guest accommodation, spa facilities and outdoor areas marketed specifically for rest and recuperation These impacts are incompatible with the operation of a luxury hospitality business and would cause long-term harm to our brand and economic sustainability.	Manor during the worst-case working day would be well below the Lower Adverse Effect Level (LOAEL), which, as defined in Table 14-3 of ES Volume 1, Chapter 14: Noise and Vibration [REP1-021]. The LOAEL is set to the level of the existing ambient environment, which are presented in Table 14-18 of ES Volume 1, Chapter 14: Noise and Vibration [REP1-021]. Noise measurements at receptors R38, R39 and R40 give an idea of the typical level of ambient noise in the Foxley area which is 46 dB LAeq,T, and quieter than typical conversation. In terms of dust deposition, an assessment of the effects of construction activities on air quality is provided in ES Volume 1, Chapter 15: Air Quality [REP1-023]. The assessment concludes that, with embedded mitigation measures in place, construction-phase air quality effects as a result of the Scheme would not be significant for any receptors within the relevant study

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				areas. As indicated in ES Volume 3, Appendix 15-1: Construction Dust Methodology and Assessment [APP-238], the highest level of mitigation measures have been proposed, in accordance with best practice guidance. These measures are set out in the Outline CEMP [REP1-096] and the Outline CTMP [REP1-112]. These include measures such as dust suppression, site management controls, routing and scheduling of construction traffic, and management of plant and machinery. The preparation, approval and implementation of detailed construction management plans, substantially in accordance with the outline plans, are secured through Schedule 2 of the Draft DCO [REP1-007], ensuring that air quality impacts during construction are appropriately controlled. Regarding the ecological impacts on Whatley Manor, given that the hotel is located wholly outside of the Order

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				Limits, no direct impacts to the ecological value of the hotel and its grounds are anticipated. Measures set out in the Outline CEMP [REP1-096] have been incorporated to avoid indirect impacts on a wide range of ecological features within and outside the Order Limits during the construction phase, and further measures are outlined in the Outline Ecological Protection and Mitigation Strategy [REP1-106] (particularly in Method Statement 3, which relates to pollution prevention measures). With these measures in place, no significant effects relating to wildlife within the grounds of the hotel are anticipated during the construction phase.
WMH-004	Landscape and Visual Socio-Economic, Recreation and Tourism	Landscape Character	Impact on Landscape Character and Hotel Setting The proposed development would fundamentally alter the character of the surrounding countryside. The introduction of industrial-scale	Regarding the concerns around Landscape Character and Setting, the Applicant confirms Whatley Manor is approximately 1.5 km from the closest part of the Scheme boundary and there is no visual relationship with the Scheme. It was not scoped

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			solar infrastructure in close proximity to Whatley Manor would: Replace a pastoral landscape with an industrialised visual environment. Degrade views that form a core part of our guest experience. Undermine the sense of tranquillity and rural authenticity that defines both our brand and the wider Cotswolds identity. For a destination whose value is intrinsically tied to landscape quality, these impacts are severe and unacceptable.	into the Landscape and Visual Impact Assessment. The LVIA in ES Volume 1, Chapter 8 Landscape and Visual Impact Assessment (LVIA) [APP-060] does however recognise there will be Moderate Adverse (Significant) effects on the character of the Landscape during construction as a result of the Scheme and the change from agricultural land to a solar infrastructure. However, this reduces to non-significant levels by Year 15 as a result of the mitigation measures. The LVIA also recognises that there will be Significant Beneficial Moderate 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 Enhancements of ES Volume 1, Chapter 8 Landscape and Visual

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				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 Groundcover 702.8 ha.
WMH-005	Socio-Economic, Recreation and Tourism Cumulative and In-Combination Effects Transport and Access	Enjoyment of Local Area	Impact on Enjoyment of the Local Area Whatley Manor actively promotes walking and cycling routes that rely on the area's rural charm and safety. The project would: Erode the authenticity of these routes through construction activity, fencing and altered views.	Regarding the concerns around walking and cycling routes, the potential impact of the Scheme on non-motorised users (NMU) is assessed in ES Volume 1, Chapter 13: Transport and Access [REP1-019] which concludes that there would be no significant impact on NMU as a result of the Scheme. Highway widths of construction routes have been assessed and provide

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
	Hydrology, Flood Risk and Drainage		Increase traffic on narrow lanes, creating unsafe conditions for walkers, cyclists and horse riders. Pose risks to the river running through our property, a key environmental and amenity asset. Damage the wider Cotswolds tourism economy, which depends heavily on the preservation of landscape character and rural tranquillity. The cumulative effect would be a significant reduction in the attractiveness of the area for visitors.	sufficient opportunities and width for HGV traffic to comfortably pass cyclists, equestrians and pedestrians. ES Volume 1, Appendix 13-1: Transport Assessment [REP1-057 and REP-059] concludes that the level of flow change will not result in a step change in fear and intimidation as defined in the IEMA guidance at Tables 3.1, 3.2 and 3.3. An Outline CTMP [REP1-112] and Outline PROWPPMP [REP 1-104] support the DCO Application and include outline measures to ensure impacts to NMU along highways and PROW are minimised as far as practicable. Regarding the concerns about the river running through Whatley Manor the assessment presented in ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [REP1-017] concludes that, with the embedded mitigation and drainage

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				controls in place no significant effects are predicted on flood risk or water quality. The Applicant confirms assessment of the impact of the Scheme to the tourism economy has been undertaken in ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068] which finds a peak temporary loss of up to 50 FTE tourism-dependent jobs during construction. This is not considered to have a significant effect on the local tourism economy as this represents less than 0.7% of tourism-based employment in the 5 km Study Area (and thus in the Cotswolds). The Applicant furthermore confirms that the Cotswolds National Landscape has been assessed in its own right as a tourism destination in ES Volume 3, Appendix 16-2: Tourism and Recreation Receptor Tables [APP-241], finding no significant effects to the CNL at any phase of the Scheme as a result of the Scheme's design

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				and visual mitigation as secured through Requirements 5 and 7 of Schedule 2 to the Draft DCO [REP1-007] .
WMH-006	Landscape and Visual Socio-Economic, Recreation and Tourism	Brand Alignment	Brand Alignment and Sustainability Perception Although we support renewable energy, the proposed development raises serious concerns regarding sustainability credibility and brand coherence: The juxtaposition of a vast industrial energy installation with a destination marketed as an “unspoilt countryside escape” is fundamentally incompatible. Guests would struggle to reconcile our positioning as a tranquil retreat with the presence of one of the UK’s largest solar farms on our doorstep. There is no evidence that the project has been assessed against the UN Sustainable Development Goals, several of which—SDG 8,	In relation to the point raised about brand coherence and sustainable development, Section 2.6 of NPS EN-1 is relevant, setting out at Paragraph 2.6.3 <i>“The planning framework set out in this NPS and the suite of energy NPSs takes full account of the objective of contributing to the achievement of sustainable development and this has been tested through the Appraisal of Sustainability (AoS).”</i> Paragraph 2.6.4 goes on to state that <i>“The AoS has examined whether the NPS framework for the development of new energy infrastructure projects is consistent with the objectives for sustainable development, including consideration of other government policies such as those for the environment, economic development, health and transport.”</i>

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			SDG 11 and SDG 15—appear to be in direct conflict with the proposal.	Lastly, paragraph 2.6.5 states <i>“Whatever incentives, rules or other signals developers are responding to, the government believes that the NPSs set out planning policies which both respect the principles of sustainable development and can facilitate, for the foreseeable future, the consenting of energy infrastructure on the scale and of the kinds necessary to help us maintain safe, secure, affordable and low carbon supplies of energy.”</i> Therefore, as demonstrated, sustainable development is an integral part of the energy National Policy Statements. The Applicant has assessed the Scheme against relevant national and local planning policy, and the Secretary of State is required to determine the DCO Application in accordance with the relevant National Policy Statements, the Local Impact Report as well as other important and relevant matters which includes local planning policy.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				Furthermore, the Scheme seeks to contribute to the Government's energy objectives in relation to net zero, and provide low carbon renewable energy, for which there is an urgent need, as set out in paragraph 3.2.6 of NPS EN-1. The LVIA in ES 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 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). Adverse effects on landscape character at Year 1 of operation and maintenance is acknowledged but, by Year 15, the

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				effects of the mitigation will reduce the adverse effects on landscape to non-significant levels. As a result of the physical separation of the Scheme from Whatley Manor (1.5km), construction impacts are anticipated to be negligible. Furthermore, as a result of the commitment to landscape screening during the Scheme's operational lifetime, it has been assessed in ES Volume 3, Appendix 16-2: Tourism and Recreation Receptor Tables [APP-241] (based on the location of the Aquarius Spa) that there would be no significant effect to the Whatley Manor complex, to its guests, or the ability for the hotel to continue promoting itself as a countryside escape, or meet its sustainability objectives. 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

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				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 are outlined in Tables 8-11 and 8-12 of ES Volume 1, Chapter 8: LVIA [APP-060]. 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

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				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.
WMH-007	Soils and Agriculture	Farmland	The loss of surrounding farmland would directly undermine our ability to source hyper-local produce, a cornerstone of our culinary identity.	As stated in ES Volume 3, Appendix 17-1: Agricultural Land Classification and Soil Resource Survey Report [REP1-063] approximately two-thirds of the land within the Solar PV Sites is in

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				Subgrade 3b and Grade 4, which is not considered to be among the Best and Most Versatile agricultural land. The Applicant acknowledges that the volume of food produced on the land within the Order Limits that is directly entering local supply chains and reaching local consumers is unknown, however, the arable land is primarily under a standard cereal rotation and is not used for high value fruits or vegetables.
WMH-008	Climate Change and Energy Need	Emissions	Whatley Manor has reduced its Scope 1 and 2 emissions by 98% in just five years. By contrast, the proposed development is understood to have a carbon payback period exceeding 50 years, raising serious questions about its true climate benefit and proportionality.	The development is not anticipated to have a carbon payback in excess of 50 years. The applicant is preparing a separate technical note to fully address the points made around carbon payback which will be submitted at Deadline 3. In addition to the climate benefits quantified in ES Volume 1, Chapter 7 Climate Change [APP-059], Section 4 of the Statement of Need [REP1-085] describes how the Scheme will support the capture

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				of climate benefits associated with the electrification of transport, heat and industrial processes. These benefits have not been quantified by the Applicant but clearly could only be captured through the supply of a sufficient quantity of low-carbon electricity to displace the fossil fuels currently used. Section 2.9 of the Statement of Need [REP1-085] describes that 'Clean Power by 2030' prepares the UK for the rapid growth in power demand expected over the 2030s and 2040s and therefore seeks to prioritise projects needed for 2030, while maintaining a robust pipeline of projects required beyond 2030.
Craig Fuller Property S&A Ltd REP1-161				
CFP-001	Description and DCO Process	The Applicant	I would like to raise two issues that I believe remain outstanding and that have not been considered to date by either PINS nor by the developer in relation to Lime Down Industrial Solar Complex; The First relates to the	Where the Applicant has entered into option agreements with landowners, this has been supported throughout by independent legal and professional advice, ensuring all parties are properly informed of the full implications of the process and

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			landowners: I believe that as a result of the "cloak and dagger" approach from the very start of this process to date, has not taken into consideration the position of the landowners who signed options agreements at the very outset of this planning process; Five of the landowners I have known since childhood for over 50 years; in many cases their parents or direct relations.	the proposals. The Applicant maintains that consultation with all landowners from the outset has been carried out in full accordance with the statutory requirements of the Planning Act 2008. Furthermore, the Applicant confirms that landowner negotiations, and any subsequent agreements, are confidential between the parties, as is standard practice in legal negotiations of this kind, including property transactions for example. The Applicant therefore disagrees with the suggestion that this amounts to a "cloak and dagger" approach, as characterised by the respondent.
CFP-002	Description and DCO Process	The Applicant	At the stage and time that the options agreements were signed or agreed in outline, these Parties had very little information at all of the overall scale and size of the proposal that they were signing up to; furthermore they had, in most, if not all cases, of the implications	The Applicant maintains that all landowners were provided, from the earliest stages of the Scheme's development, with comprehensive information confirming the Scheme's scale and size, including its 500MW generation capacity, and that this was clearly understood by all parties, and

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			and the scale of the objections from the community as whole that would be forthcoming. I believe it is not only fair, but vital that these Parties should be directly involved in this process of examination	legal and professional advisors involved.
CFP-003	Description and DCO Process	The Applicant	The proposed term by IGP of Lime Down, of 60 years, I don't believe was ever made clear to the landowners, nor has this terms be agreed by ALL of the landowners; therein I feel that there maybe cause to consider that IGP have misled, or failed to be clear in terms of fair CONSULTATION of the implications of the option agreements signed, nor the full scale or terms of the proposed development. There are three, (if not more), of the landowners, if given the option to withdraw their land from this application, without legal consequence, would potentially withdraw their land forthwith.	Again, the Applicant confirms that consultation with all landowners from the outset has been carried out in full accordance with the statutory requirements of the Planning Act 2008. The proposed operational term for the Scheme is up to 60 years, and this has been openly communicated from the earliest formal stages of the planning process and has been public record since the EIA Scoping phase in August 2024. National Policy Statement (NPS) EN-3 explicitly allows for differing periods of operation. Further, the Applicant is seeking a time limited consent for up to 60 years, as would be secured by Requirement 20 of the Draft DCO [REP1-007], which provides that the date of decommissioning for each part of the authorised development (i.e. the

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				Scheme) must be no later than 60 years following the date of final commissioning. As set out on page 24 of the Written Summary of the Applicant's Oral Submissions and Responses at Issue Specific Hearing 1 and Responses to Action Points [REP1A-012] the Post Hearing Note states: The terms of the Option Agreements are confidential and the Applicant cannot provide details without the landowner's consent. However, as an example, the Applicant has the landowner's consent to confirm that the Option Agreement dated 21 February 2023 in respect of Site E is for a maximum term of 40 years and therefore any extension to 60 years would be by agreement. In response to the Examining Authority's queries relating to the planning balance, the Applicant notes that Requirement 20 provides a maximum time period during which

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				the Scheme can operate. There is no obligation on the Applicant to operate the generating station for a prescribed or minimum amount of time and this is consistent with the approach taken in made solar DCOs to date. For the purposes of assessment, the Applicant considers that assessing a 60-year operational period represents the reasonable worst case as it takes into account the GHG emissions during the maximum operational period which includes emissions associated with replacement activities.
CFP-004	Description and DCO Process	The Applicant	This makes clear, that the true implications of their action to sign options agreements, was done without the clear and responsible guidance and explanation from IGP the developer of the full implications. The option agreement process in its self, I dont believe have followed the true process of CONSULTATION, albeit that this	The Applicant maintains that the process of engaging and negotiating with landowners has been fully transparent and conducted in full accordance with the statutory requirements of the Planning Act 2008 as demonstrated in the points above. Additionally, the Applicant provided the opportunity to all option holders to review and sign

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			may of been required within the bounds of the Landowners alone.	off key submission documents prior to the application for a development consent order being made on 19 September 2025, and all parties involved confirmed their agreement with the submission.
CFP-005	Description and DCO Process	Land Agents	I further question that the land agents, responsible for the measured and calculated view on the options agreements at the outset, where provided with a clear and transparent understanding of the full scale of the proposal. This has and remains hidden by a mesh of maze of NDA agreements preventing a clear understanding of what these landowners are signing up to. Surely it is only fair and just for these landowners all to be asked to reassure the Examination - that the process to date has been, and remains transparent and clear, and that they have NOT been misled in terms of Scale and Term of the project from first discussion, to Option and to date.	The Applicant clarifies that land agents, acting as professional representatives for landowners, have been provided with comprehensive information from the earliest stages of the project to enable them to provide a "measured and calculated view" for their clients. In line with standard industry practice, the Applicant has actively encouraged all landowners to obtain independent legal and professional advice and confirms that all agreements have been signed with this independent advice. This ensures that landowners are represented by experts whose duty is to protect their interests and ensure they fully understand the commercial and planning implications of any agreement related to the Scheme. Assurances regarding ongoing and concluded negotiations to date are

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				provided in the Land and Rights Negotiations Tracker [REP1-246] , which is regularly updated in Examination and demonstrates the Applicants effort to reach voluntary agreements in order to deliver the Scheme.
CFP-006	Socio-Economics, Recreation and Tourism Description and DCO Process	Property Value	The Second relates to property and land value; In very simple terms I am not looking at percentages of value lost as a result by the simple application, nor that of what will happen it a DCO is granted; I simply look at this, as a respected and well know residential buying agent across the Cotswolds, that we can all clearly agree - " the desire to live anywhere close to over 2,000 acres of solar and a massive BESS" is simply something that everyone would avoid at all costs; the suggestion to buy a house anywhere close to a development of this scale is simply a no; The result is clear and undisputable, the effect on prices and demand would be VERY significant; there is no desire to move to nor live close	Impacts of the Scheme on property prices have not been assessed as these have been agreed by the Planning Inspectorate to be scoped out of assessment in the ES, as set out in ES Volume 3, Appendix 1-2: Scoping Opinion Response Table [APP-181] .

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			to an Industrial Complex of this scale.	
B&W Equine Vets REP1-158				
BWEV-001	Description and DCO Process	Introduction	I have been asked to comment and discuss veterinary concerns over the development of a large solar energy plant development project in the North Wiltshire area. I have been provided with a description of the development phase of the project along with a description of the completed site. My comments are restricted to my professional capacity as an Equine Veterinary surgeon and do not include my personal opinions on the environmental impact of the development that I have documented and submitted elsewhere. My comments will include welfare and commercial concerns.	The Applicant notes this comment.
BWEV-002	Description and DCO Process	Introduction	I have been a veterinary surgeon for 43 years and for most of that time have been in purely equine practice. In particular, I have been involved in equine reproduction and stud medicine and I am the retained vet for a number of large	The Applicant notes this comment regarding the respondent's experience and client types.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			studs within our practice area. I am employed by B&W Equine Vets, a large multi centred practice covering Gloucestershire and Wiltshire. I am based at the Willesley branch which is situated approximately 5 miles from the centre of the proposed development. B&W have the following client types within a 5 mile radius of the site: 1. Stud clients. 8 commercial studs producing thoroughbred or sports horses for sale. 2. Professional competition yards. This category includes eventing, dressage, showjumping and polo yards. 3. Hunting yards. Primarily associated with the Beaufort Hunt. 4. Private yards. Family run yards with pleasure horses and children's ponies. Numbers per yard vary between 1 and 5 horses. There will be other veterinary practices that service clients included in the above categories in	

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			the development area over and above those serviced by B&W.	
BWEV-003	Transport and Access Noise and Vibration	Noise Impact	Noise both during the development process and ongoing operational considerations. The development process will necessitate huge numbers of lorries and HGV vehicles in the area along with construction noise including chain saws and pile driving.	The noise and vibration impacts arising from construction activities are assessed in Section 14.10 of ES Volume 1, Chapter 14: Noise and Vibration [REP1-021]. The Applicant confirms this assessment includes piling activities. Solar PV piling uses small mini-piling rigs, which are quieter than the worst-case assumption in ES Volume 1, Chapter 14: Noise and Vibration [REP1-021]. As a reasonable worst-case this assessment includes noise from piling rigs that are larger and louder than those used in practice. Noise from the installation of solar PV panels will be spread across the site over the course of the construction period and therefore will only be at the levels presented in Table 14-18 of ES Volume 1, Chapter 14: Noise and Vibration [REP1-021] for the closest set of works and would occur for a short period of the full construction programme. The

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				assessment also includes the noise from construction traffic and no significant effects are anticipated. Mitigation measures are committed to through the Outline CEMP [REP1-096]. With these measures in place, the assessment concluded that no significant effects from construction noise or vibration are expected. A noise monitoring programme agreed with Wiltshire Council will be carried out during construction. The preparation, approval and implementation of the final CEMP, substantially in accordance with the Outline CEMP [REP1-096], is secured through Requirement 13 in Schedule 2 of the Draft DCO [REP1-007], ensuring that construction noise and vibration are appropriately controlled. The noise impacts from the operation of the Scheme and its components are assessed in Section 14.10 of ES Volume 1, Chapter 14: Noise and

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				Vibration [REP1-021]. As shown in Table 8 of ES Volume 3, Appendix 14-4: Noise Modelling [REP1-061], levels would typically be below or slightly above the existing background sound in the area. No significant operational noise effects are identified. The Outline OEMP [REP1-098] commits to noise levels from the Scheme at residential dwellings being the same as or below those modelled in the ES. The preparation, approval and implementation of the detailed OEMP, substantially in accordance with the outline plan, are secured through Requirement 14 of Schedule 2 of the Draft DCO [REP1-007], ensuring operational noise is appropriately controlled throughout the lifetime of the Scheme. Regarding the concerns relating to construction traffic, as concluded in ES Volume 1, Chapter 13: Transport and Access [REP1-

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				019] the impacts of construction traffic would be temporary and would not result in any significant transport effects.
BWEV-004	Noise and Vibration	Noise Impact	Ongoing noise will include inverters and associated infrastructure. Horses are flight animals and there are real risks of injury to themselves and their riders from unusual noise. They have very good hearing, far better than human hearing. Young horses (foals, weanlings and yearlings) are particularly susceptible to noise, and I have had numerous examples where they have been spooked by loud noise and have injured themselves either by galloping and slipping within the field or by breaking through fencing. Lacerations from the latter have been extensive and in some cases life threatening. Horses from all categories can react unpredictably when being handled (groomed, shod, veterinary treatment etc) to	Paragraph 14.1.2 of ES Volume 1, Chapter 14: Noise and Vibration [REP1-021] clarifies that the scope of the noise assessment is limited to human receptors. With regards to horses, as there is currently no established regulatory guidance for assessing noise induced behavioural change in livestock or horses, the approach where noise for humans and horses are considered in terms of a receptor are addressed as potential amenity impacts on equestrian facilities, including private stables, paddocks, stud farms and riding schools, which have been assessed in ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068] and its supporting ES Volume 3, Appendix 16-2: Tourism and Recreation Receptor Tables [APP-241]. The chapter concludes there would be no significant residual effects to their

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			unusual noise, again risking injury to themselves or their handler. Young horses are particularly sensitive, so stud clients probably will quite rightly be most concerned about potential implications.	operation or recreational use as a result of noise impacts, subject to implementation of embedded and additional mitigation measures with any mitigation requirements (such as noise screening and visual screening between onsite infrastructure and neighbouring paddocks). These are secured through the Outline LEMP [APP-283] and Outline CEMP [REP1-096] by Requirements 7 and 13. The approach where noise for humans and horses are considered in terms of a receptor are addressed as potential amenity impacts on equestrian facilities, including private stables, paddocks, stud farms and riding schools aligns with an accepted methodology based on expert advice in other DCO's, including Sunnica Energy Farm, where the Secretary of State (SoS) agreed with the methodology that an animals processing of decibel levels is sufficiently similar to a humans' that the established human-noise

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				threshold is a fair benchmark for noise impacts to be considered. The Scheme's approach has assessed the likely direct impact of construction on equestrian facilities, and accessibility and amenity impacts on those facilities and surrounding rights of way used for hacking. The Applicant considers that the Environmental Statement has fully assessed the impacts of the Scheme on all receptors. Nonetheless, the Applicant is committed to ensuring impacts on equestrian facilities can be mitigated wherever practicable, and therefore is undertaking, and encourages further, engagement with relevant stakeholders through the DCO process. Following the written representations submitted at Deadline 1 and 1A relating to horses and equine businesses, the Applicant is considering the technical information provided in detail and will provide further commentary at Deadline 3.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
BWEV-005	Transport and Access Noise and Vibration	Noise Impact	Clients riding pleasure horses will be at risk from the noise and appearance of construction traffic during the development period. Riders must use country roads as part of their excursions and many are narrow and winding. Lorry and other HGV drivers do not always have the knowledge or consideration to slow down or stop when approaching horses that other rural road users do. Injury to horse or rider or both may result.	Regarding the concerns on noise from bridleways, Paragraph 4.1.2 of the Outline PRowPPMP [REP1-104] commits to all Scheme infrastructure, including fencing, being at least 15 m away from any PRow. This means that noise levels from inverter units with silencers would be below 52 dB on PRow. With reference to ES Volume 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 bridleways. 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

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				the sound level experienced, is not expected to be significantly adversely affected by the operation of the Scheme. Regarding the concerns around the impact of traffic on equine users, the potential impact of the Scheme on non-motorised users (NMU) is assessed in ES Volume 1, Chapter 13: Transport and Access [REP1-019] which concludes that there would be no significant impact on NMU as a result of the Scheme. Highway widths of construction routes have been assessed and provide sufficient opportunities and width for HGV traffic to comfortably pass cyclists, equestrians and pedestrians. ES Volume 1, Appendix 13-1: Transport Assessment [REP1-057 and REP1-059] concludes that the level of flow change will not result in a step change in fear and intimidation as defined in the IEMA guidance at Tables 3.1, 3.2 and 3.3.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				An Outline CTMP [REP1-112] and Outline PRowPMP [REP1-104] support the DCO Application and include outline measures to ensure impacts to NMU along highways and PRow are minimised as far as practicable.
BWEV-006	Transport and Access	Access	2. Access All equestrian properties necessitate a certain amount of light service traffic in and out. Feed merchants, farriers, staff and clients are examples. Most veterinary visits are not emergencies but occasionally they are. Delays in attending because of construction diversions, temporary road closures and slow HGV traffic could have disastrous consequences. This has occasionally been an issue with roads closed for other reasons, but would be a higher risk during the development phase.	The Applicant makes note of this comment. There are no proposals to implement diversions or temporary road closures on the proposed construction routes during the construction, operational or decommissioning phases. The speed of traffic along the construction routes is unlikely to be materially affected.
BWEV-007	Air Quality	Dust and Toxic gas	Dust and toxic gas	An assessment of the effects of construction activities on air quality is

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			Horses are athletic animals and reliant on a healthy respiratory system for performance. Inhalation of dust or toxic gases can cause primary disease and an increased likelihood of developing chronic respiratory conditions such as inflammatory airway disease and equine asthma. There will be risk from dust during the development process, particularly for properties immediately adjacent to the development site.	provided in ES Volume 1, Chapter 15: Air Quality [REP1-023]. The assessment concludes that, with embedded mitigation measures in place, construction-phase air quality effects as a result of the Scheme would not be significant for any receptors within the relevant study areas. As indicated in ES Volume 3, Appendix 15-1: Construction Dust Methodology and Assessment [APP-238], the highest level of mitigation measures have been proposed, in accordance with best practice guidance. These measures are set out in the Outline CEMP [REP1-096] and the Outline CTMP [REP1-112]. These include measures such as dust suppression, site management controls, routing and scheduling of construction traffic, and management of plant and machinery. The preparation, approval and implementation of detailed construction management plans, substantially in accordance with the

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				outline plans, are secured through Schedule 2 of the Draft DCO [REP1-007], ensuring that air quality impacts during construction are appropriately controlled. The Applicant recognises that animals, including horses, can be sensitive to dust and construction activity. The management measures described above are specifically designed to minimise dust at source and reduce the potential for construction related emissions to affect nearby receptors, including equestrian properties.
BWEV-008	Other Environmental Matters - Major Accidents and Disasters	BESS	Probably more concerning is the risk from a hazardous incident at the Battery energy storage system site. The implications of this have been discussed and submitted for consideration in detail elsewhere. In brief, a fire at the site could result in the release of a toxic gas plume consisting of a variety of gases with hydrogen fluoride being the most concerning. I would see this as a constant worry during the	As now mandated under NFPA 855 (2026) the Applicant will only be able to select a BESS system that has undertaken Large Scale Fire Testing (LSFT). At the detailed design stage, the selected BESS LSFT data will be leveraged to fully inform inputs for risk assessment tools which will be utilised together with detailed consequence modelling to provide a comprehensive site operations and

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			lifespan of the site and could result in significant injury and disease to the horses of my clients in the area.	emergency response safety audit, this is stipulated in the Outline BSMP [REP1-110] pre-construction requirements (Section 6). The Applicant has also committed to commissioning an additional Plume Analysis Study at the detailed design stage as stipulated in Section 5.5.9 of the Outline BSMP [REP1-110] and secured through the DCO: <i>"..at the detailed design stage a BESS system and site specific Plume Analysis study will be conducted to assess the environmental impact of a site incident to sensitive receptors within a 1 km radius. Toxic gas emissions to sensitive receptors must be below relevant public health exposure limit guidelines when the battery system of a BESS is fully consumed (burnt out), production of Particulate Matter (PM) and a visibility impact assessment on any transport links within a 1 km radius of the BESS area will also be included. The ERP produced at the detailed design stage (template outlined in Section 5.4.4) will</i>

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				<i>incorporate all necessary emergency response procedures and actions based upon thermal runaway test data supplied by the BESS system provider."</i> The Applicant can confirm that outdoor workplaces such as stables, grazing areas, arable farmland, etc. can be included as sensitive receptors under NFCC guidance if they are located within the 1 km radius of the BESS area. The Applicant also commissioned BESS fire emissions assessment (as detailed in ES Volume 3, Appendix 15-2: BESS Fire Emissions Modelling [APP-239]) to ensure the selected BESS area would have no significant off-site impacts if credible BESS failure scenarios occurred. The study has been undertaken using professional judgement in the absence of specific regulatory guidance, and adopts a conservative, worst case approach throughout. The assessment demonstrates that, even under worst case assumptions, a BESS fire would not result in

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				significant effects on human health or safety. The modelling assumes: • Worst case BESS fire locations within the BESS area closest to sensitive receptors; • Worst case release height, temperature and plume parameters; and • Use of five years of hourly meteorological data, with the maximum predicted concentration extracted at each receptor, assuming the fire coincides with the poorest dispersion conditions. Given the inherent uncertainty in available BESS fire emissions data, a sensitivity test was also undertaken whereby emission rates were doubled. Even under this highly conservative sensitivity test, predicted concentrations remained well below the relevant health-based thresholds. Six worst case BESS fire locations (i.e. locations within the BESS Area closest to sensitive receptors) have

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				been modelled as depicted in ES Volume 2, Figure 15-5: BESS Fire Emissions Study Area, Receptors and Modelled BESS Locations [APP-166]. The Concentrations of carbon monoxide (CO), formaldehyde, hydrogen chloride (HCl), hydrogen cyanide (HCN), hydrogen fluoride (HF), ammonia (NH₃), nitrogen dioxide (NO₂) and particulates from a potential BESS fire have been modelled using an air quality dispersion model to determine the likely effects on human health. ES Volume 3, Appendix 15-2: BESS Fire Emissions Modelling [APP-239] concludes that there would be no significant air quality effects as a result of a BESS fire incident and visibility issues were not predicted.
BWEV-009	Socio-Economics, Recreation and Tourism	Business Impact	4. Commercial considerations As described, B&W Equine vets have a large number of clients in the vicinity of the Lime Down development. The concerns 1 – 3 listed above will be at the least an	An assessment of the likely effects of the Scheme on the local economy and employment is provided in ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]. This chapter considers potential impacts on

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			annoyance to some clients, and at the worst have considerable deleterious commercial implications for other clients. As a practice and business, we are concerned that some clients may decide to move themselves and their horses and businesses elsewhere. This would affect us and the rest of the local community who are dependent on the equine establishments in the area for their business.	construction and engineering sectors, agricultural activity, tourism-related businesses, and wider local economic conditions during construction, operation and decommissioning. Supporting evidence is provided in ES Volume 3, Appendix 16-3: Socio Economics, Tourism and Recreation – Summary of Non-Significant Effects [APP-239], which summarises that effects on the local economy and economic prosperity are assessed as negligible to minor beneficial, with construction expenditure and employment generation contributing positive, temporary effects on local economic activity. The assessment therefore concludes that the Scheme would not result in significant adverse effects on local businesses or the wider local economy, and that socio economic benefits, including job creation and local supply-chain opportunities, are expected during the construction

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				phase, with more modest economic and skills and supply chain opportunities during the operational phase. The Applicant has sought to minimise long term adverse effects on local businesses through the mitigation measures set out in the Outline OEMP [REP1-098], Outline CTMP [REP1-112], and Outline PRoWPPMP [REP1-104], secured respectively by Requirements 14, 15, and 16 in Schedule 2 to the Draft DCO [REP1-104]. Equestrian facilities, including private stables and paddocks, studs, riding schools, and on public rights of way such as bridleways and byways have been considered as specific recreational receptors in the assessment in the ES Volume 1, Chapter 16: Socio Economics, Tourism and Recreation [APP-068]. The likely effects on these locations and receptors are specifically and individually assessed in ES Volume 3, Appendix 16-2:

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				Tourism and Recreation Receptor Tables [APP-241]. The Applicant has committed to ensuring the operation or recreational use of equestrian facilities and PRoWs is protected as much as practicable through the implementation of embedded and additional mitigation measures set out in the Outline CTMP [REP1-112] and Outline PRoWPPMP [REP 1-104], secured respectively by Requirements 15 and 16 in Schedule 2 to the Draft DCO [REP1-007].
Sherston Boule Festival and Tournament Committee REP1-166				
SBFT-001	Description and DCO Process	Introduction	Representing the Sherston Boule Festival and Tournament Committee, I would like to strongly object to the Lime Down Solar Park. The annual festival, celebrating its 40th year, is one of the largest and oldest Pétanque competitions in the country and is of significant cultural, social, and economic importance to the local communities.	The Applicant notes this comment.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
SBFT-002	Landscape and Visual	Visual Impact	The Sherston Boule Festival attracts visitors from across the UK and Europe. Its appeal is rooted in the "tranquil, quintessential Cotswold character" of the village. The proposal to surround Sherston with 4.5-metre-high solar arrays and security fencing will transform the approach to the village into an industrial corridor	The Scheme is located to the south of Sherston and is set back from the boundary of the CNL to avoid adverse effects on the CNL and its historic Cotswold villages such as Sherston. The avoidance of panels in A11 and A12, where there is a visual relationship with Sherston, indicate that the Scheme has been landscape led and has taken measure to avoid harm to the National 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 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

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				landscape once operational (e.g. at year 1 and year 15).
SBFT-003	Socio-Economics, Recreation and Tourism	Visual Impact	Visitors come for the historic, open-field setting. Replacing 2,000 acres of rolling Wiltshire countryside with "an ocean of glass and steel" will permanently damage the village's reputation as a tourist destination, leading to a decline in festival attendance and associated revenue for local pubs, B&Bs, shops and cafes.	The Applicant refers to their response to SE-33 in the Applicants Response to Relevant Representations (Part 2) [REP1-117] and confirms that impacts on the Sherston Conservation Area (in which the annual boules competition and the annual duck race are located) have been assessed in ES Volume 3, Appendix 16- 2: Tourism and Recreation Receptor Tables [APP-241] .
SBFT-004	Transport and Access	Impact on Roads	Furthermore, the festival relies on the village's narrow rural road network for the safe arrival of hundreds of attendees and equipment. The construction phase anticipates over 20,000 HGV movements. The narrow lanes surrounding Sherston are already ill-equipped for this volume and the timing of the Tournament in July conflicts with the peak construction season. Heavy plant	Regarding the concerns around the number of HGV movements associated with the Scheme, the Applicant confirms that the proposed HGV construction routes are set out in Figure 4.1 and Figure 4.2 do not route through Sherston on the B4040. As set out in the Outline CTMP [REP1-112] HGV delivery times on Saturday's are restricted (09:30-12:30) with no operation on

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			machinery and road closures on key access routes (like the B4040 and lanes toward Malmesbury) would make hosting a large-scale public event logistically impossible and potentially unsafe.	Sunday's. The Outline CTMP [REP1-112] also sets out a commitment to stopping construction deliveries during Badminton Horse Trials. Any further measures required during major events at Castle Combe Race Circuit, WOMAD, or at other local events will be included in the Final CTMPs following consultation with the Local Highway Authority.
SBFT-005	Socio-Economics, Recreation and Tourism	Impact on PRowWs	Many of the festival-goers utilize the surrounding Public Rights of Way (PRowW) during the festival weekend.	The assessment in ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068] and the supporting ES Volume 3 Appendix 16-2 Tourism and Recreation Receptor Tables [APP-241] have assessed the likely impacts of the Scheme at construction, operation, peak replacement, and decommissioning on public rights of way and tourism destinations within the Study Area. The assessment finds no significant adverse effects to PRowWs or recreational

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				routes located within areas most likely to be accessed from Sherston. Furthermore, the assessment has directly assessed the likely impact on the Cotswolds National Landscape and Sherston Conservation Area as tourism destinations. The assessment in ES Volume 1, Chapter 16: Socio Economics, Tourism and Recreation [APP-068] concludes that there is no residual significant adverse effect to these tourism destinations at any phase of the Scheme.
SBFT-006	Landscape and Visual	Security Fencing	Encasing these historic paths in 3-metre security fencing destroys the "sense of place" that defines the Sherston experience.	The Applicant acknowledges that the experience for users of existing 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,

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				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]. The landscape and visual effects of the Scheme in ES Volume 1, Chapter 8: Landscape and Visual Assessment [APP-060] assesses the effects on users of PRow public rights of way, and identifies 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

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				of the area as well as long term significant adverse effects to 10 Visual Receptors, all of which are local PRoW which are either within or directly adjacent to the proposed arrays.
SBFT-007	Socio-Economics, Recreation and Tourism	Boule Festival	The Boule Festival is a non-profit, volunteer-led event that fosters community cohesion. The overwhelming local opposition (99% of representations) highlights a community under immense stress. The long-term "industrial overshadowing" of the village threatens the very community spirit required to organize and sustain such a complex annual festival. A festival that is a major fundraiser, annually donating around £10,000, to local charities, community groups and village infrastructure. Any project that reduces the attractiveness of the village or disrupts the festival's operation directly depletes the "Social Value" of the area.	Please refer to the Applicant's responses to reference ID SBFT-001 to SBFT-006.
Foxley Road Nurseries REP1-162				

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
FRN-001	Transport and Access	Traffic Impact	From our experience over the last 40 years, when there is excessive traffic on the local narrow roads, the number of customers is greatly reduced. Whenever there is incident at Kingway Bridge on the A429, eg flooding under the bridge or a lorry stuck under the bridge, traffic is diverted via Norton and Foxley along Foxley Road. There is no guarantee that the construction traffic will follow their designated routes once they discover a local short cut. The pig unit at Cowage Farm was granted planning permission on the condition that HGVs would not use Foxley Road into Malmesbury, but this still often happens.	The Applicant can confirm that access to Lime Down E will be made via the A429, as presented in ES Volume 2, Figure 13-1: Study Area Solar Sites [APP-146]. Therefore, the routes mentioned do not form part of the construction routes and would not be impacted by the Scheme. In addition, the Outline CTMP [REP1-112] includes measures to manage the routes used by construction traffic which are secured under Requirement 15 of Schedule 2 of the Draft DCO [REP1-007]. Compliance with the final CTMP will be monitored by the Developer, Contractor and Wiltshire Council as local highway authority. The Planning Act 2008 also contains enforcement provisions regarding compliance with the terms of a DCO. The DCO process itself incorporates enforceable mechanisms to regulate Scheme delivery. Any breach of

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				development consent order or failure to comply with Requirements can result in enforcement action.
FRN-002	Transport and Access	Traffic Impact	The route which we currently recommend for caravans from the M4 Junction 17, brings them through Hullavington, Norton and Foxley, the narrow roads make reversing a caravan difficult when meeting large oncoming vehicles and this route will be significantly affected by construction traffic. The alternative route through the centre of Malmesbury is unsuitable for caravans. We anticipate that our regular visitors will choose to stay elsewhere to avoid a difficult journey. The Applicant admits that the scheme may have an adverse effect on tourism, specifically the visual and amenity aspects, but does not have a solution. Many of our visitors come to walk and cycle in the local area and we believe that the scheme will severely limit their options.	The Applicant reiterates their response to comments to FRN-004 and FRN-012 in the Applicant's Responses to Relevant Representation (Part 1) [PDA-009] .
FRN-003	Transport and Access	Traffic Impact	We have members of staff coming to work from local villages and their journeys to work will be made more difficult, especially in the	The applicants makes note of this comment. The comment appears to relate to diversions which do not

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			winter when the roads are frequently flooded and diversions are in place.	relate to the scheme. Construction vehicle movements will be managed through a CTMP. An Outline CTMP [REP1-112] has been prepared and submitted with the DCO application. The aim of the CTMP is to ensure that the effect of the construction phase on the local highway network is minimised. The Outline CTMP [REP-112] sets out measures to coordinate construction deliveries by HGVs to arrive and depart between 09:30 and 16:30 where possible, to avoid peak network hours of 08:00–09:00 and 17:00–18:00. This seeks to minimise impact at the times when users are most likely to make their journey to work. It also includes a community liaison element to keep local communities informed about the construction process and to provide a contact for feedback should any issues arise. Compliance with the detailed CTMP will be monitored by the

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				Developer, Contractor and Wiltshire Council as local highway authority. The preparation, approval and implementation of the final CTMP, substantially in accordance with the Outline CTMP [REP1-112], 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. The Applicant acknowledges that local roads can be affected by existing flooding during winter conditions. This is a baseline issue on the local highway network and is not caused by the Scheme. The Scheme has been assessed to determine whether it would materially increase flood risk on or off site. ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [REP1-017] and ES

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				Volume 3, Appendices 11-1 to 11-9: Flood Risk Assessment and Drainage Strategies [REP1-037 to REP1-054] conclude that the Scheme would not materially increase runoff or flood risk to local roads. The panelled areas remain permeable and drain to ground. Runoff from impermeable infrastructure will be attenuated and controlled. Construction-phase risks, including soil compaction, sediment mobilisation and temporary drainage disruption, are controlled through the Outline CEMP [REP1-096] and Outline Soil Resources Management Plan [APP-280].
FRN-004	Hydrology, Flood Risk and Drainage	Flooding	Although the Applicant says there will be no increase in flooding, as a long term resident and knowing how quickly the river rises in heavy rainfall around Norton, Cowage, Malmesbury and Corston, I do not understand how installing hundreds of thousands of square metres of panels to cover land plus a great deal of concrete can possibly have no impact on sensitive water systems and will	The concern is understood, but the Scheme would not cover the land with concrete or create a continuous impermeable surface. Solar PV panels are elevated above ground, and rainfall drains to the ground beneath and between the arrays. The panelled fields remain permeable. The hydrological response is governed by

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			not lead to increased instances of flooding roads. Anything which increases the run off or reduces the areas of land which can absorb the rainfall must surely increase the amount of water the ditch and river systems round here have to cope with. This could have potentially major consequences. Could the Examining Authority please ensure that all the assurances and statements made by the Applicants are fully tested and can be justified.	ground condition, vegetation cover and hydraulic connectivity, not by panel surface area alone. Genuinely impermeable infrastructure is limited and will be managed through formal drainage principles. The detailed drainage design will follow the drainage hierarchy, with discharge locations confirmed post-consent within the secured parameters. Where runoff from formal infrastructure is generated, it will be attenuated and controlled so that discharge does not exceed the agreed greenfield-equivalent rate, with attenuation provided for the relevant design storm up to and including the 1 in 100 year event plus climate change allowance. Local rivers, ditches, surface water flow routes and flood risk are assessed in ES Volume 1, Chapter 11: Hydrology, Flood Risk and

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				Drainage [REP1-017] and the ES Volume 3, Appendices 11-1 to 11-9: Flood Risk Assessment and Drainage Strategies [REP1-037 to REP1-054] . The Scheme would not materially increase runoff to local ditch or river systems.
FRN-005	Socio-Economics, Recreation and Tourism	Employment	For many of our staff working in a peaceful rural environment is a major reason for choosing to work for us – the Applicant's response that "Employment preference by individuals has not been assessed due to its subjectivity and as it would be disproportionate to the scope of assessment required for DCO consent" is an inadequate one.	The Applicant reiterates their response to comment to FRN-004 in the Applicant's Responses to Relevant Representation (Part 1) [PDA-009] . The scope of the methodology of ES Volume 1 Chapter 16: Socio-Economics, Tourism and Recreation [APP-068] has been agreed with Wiltshire Council and is reflected in the Statement of Common Ground submitted at Deadline 2.
FRN-006	Soils and Agriculture	BMV Land	The Applicant's assessment of the proposed land identifies that the majority of agricultural land affected is not Best and Most Versatile (BMV) land, comprising predominantly Subgrade 3b and Grade 4 land, which is not considered high quality agricultural land in planning terms, however	The Applicant notes this comment.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			local farmers including tenant farmers have grown food and earned a living from that land over many centuries	
FRN-007	Soils and Agriculture Construction and Decommissioning	Decommissioning	At the end of the lifetime of the scheme, disposal of the panels, concrete, etc will have a huge environmental impact and will involve another extended period of HGV movements. Severe compaction of the ground will be extremely difficult to remedy. It is hard to believe that the entire area will be reinstated as farmland.	The environmental impact in relation to materials and waste has been assessed in ES Volume 1, Chapter 20 Other Environmental Matters [APP-072] Section 20.3 Materials and Waste. The decommissioning waste assessment in paragraph 20.3.90-20.3.94 concludes that significant waste effects are not likely during decommissioning of the Scheme. The Outline Decommissioning Strategy [REP1-100] submitted with the DCO Application sets out the commitment of the Applicant to maximise reuse and recycling of Scheme components at the end of their life. As outlined in the Outline Decommissioning Strategy [REP1-100] a detailed Site Waste Management Plan (SWMP) will be prepared before commencement of decommissioning and will be implemented by the contractor, once appointed.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				The Outline Soil Resources Management Plan (SRMP) [APP-280] sets out best practice for handling soils, including prescriptions for identifying suitable handling windows and soil moisture states, for the purpose of minimising the risk of ground compaction and damage to soils. Paragraph 1.8.33 states that any compaction identified during construction will be remediated prior to panels being fixed such that the soil enters the operational phase of the Scheme in an uncompacted state and will remain largely undisturbed until decommissioning. The principles of the SRMP will continue to apply at decommissioning. The SRMP is secured by Requirement 17 in Schedule 2 of the Draft DCO [REP1-007]. As outlined in the Outline Decommissioning Strategy [REP1-100], the traffic management mitigation measures set out in

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				the Outline CTMP [REP1-112] are also applicable to decommissioning. The measures defined in the Decommissioning Strategy will ensure that the impacts from decommissioning traffic on the local community (including local residents and businesses and users of the surrounding transport network) are minimised, where reasonably practicable.
FRN-008	Cultural Heritage	Heritage Assets	How can cultural and heritage assets be appreciated in an appropriate context when they will be surrounded by an alien landscape which bears no relation to the history of the area.	The potential effects of the Scheme on the significance of heritage assets, including the contribution made by their setting, are assessed in ES Volume 1, Chapter 12: Cultural Heritage [APP-064] , supported by ES Volume 3, Appendix 12-1: Heritage Statement [APP-219] . The assessment considers likely effects arising from change within the wider landscape context during construction, operation and decommissioning. Embedded mitigation measures to avoid or reduce potential effects are set out in Section 12.9 of ES

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				Volume 1, Chapter 12 [APP-064] , including layout refinement and landscape planting. The assessment concludes that identified effects on heritage assets would be either neutral or less than substantial harm in NPPF terms and not significant in EIA terms.
FRN-009	Construction and Decommissioning	Disposal of Infrastructure	The Applicant currently has no definitive scheme in place for disposal and recycling of the batteries and solar panels and infrastructure. The Applicant should have a full and detailed restoration scheme in place before commencement of the Scheme.	The Outline Decommissioning Strategy [REP1-100] submitted with the DCO Application sets out the commitment of the Applicant to maximise reuse and recycling of Scheme components at the end of their life. Recycling routes are generally available for component replacement waste at present, and it is likely that there will be even greater opportunities for recycling in the future, not least because the recycling market will have expanded to meet demand as solar PV installations increase. Private sector waste companies will develop these facilities to respond to market demands. At present, solar PV panel waste generation is low, therefore

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				there is a limited demand for facilities and their associated limited available capacity. It is therefore expected that the facilities which reuse, recycle, or recover end of-life solar PV panels will be developed as the quantities of this waste stream increase. As outlined in the Outline Decommissioning Strategy [REP1-100] a detailed Site Waste Management Plan (SWMP) will be prepared before commencement of decommissioning and will be implemented by the contractor, once appointed. Submission of a Decommissioning Plan substantially in accordance with the Outline Decommissioning Strategy [REP1-100] to the relevant planning authority is a requirement of the Draft DCO [REP1-096]. No decommissioning works must be carried out until the relevant planning authority has approved.
The Renewable Energy Coalition for Academia REP1-190				

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
RECA-001	Description and DCO Process	Sentiment	2.1 Extraordinary Public Opposition 4,958 Representations received; 99% Objection rate; 54 Wiltshire solar sites; 3,000 acres already taken. This is one of the most heavily opposed NSIP applications in recent memory. Wiltshire already bears a disproportionate burden of solar development - it is one of the most intensively developed solar counties in Europe. The cumulative impact on this specific landscape has not been adequately assessed.	The Applicant notes this comment and acknowledges the number of relevant representations made to the Planning Inspectorate regarding the Scheme. All of the submitted representations have been responded to in the Applicant's Response to Relevant Representations Part 1 [PDA-009], Part 2 (Rev 2) [REP1-117], and Part 3 [REP1-133]. Cumulative effects have been assessed in accordance with the relevant legislation, national planning policy, local planning policy and guidance as listed within ES Volume 1, Chapter 21: Cumulative and In-Combination Effects [APP-073], pages 1-5. The Applicant has responded to comments relating to cumulative effects in detail in on page 806-807 and page 870-871 of the Applicant's Response to Relevant Representations (Part 1) [PDA-009], where it is explained that full and extensive engagement,

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				consideration, assessment and reporting of intra- and inter-project cumulative effects has been undertaken with the conclusions set out within ES Volume 1, Chapter 21: Cumulative and In-Combination Effects [APP-073] .
RECA-002	Soils and Agriculture	Agricultural Land	2.2 Agricultural Land & Food Security The Scheme proposes to remove 878 hectares of land from active food production for a period of 60 years. Thirty percent of the site is classified as Best and Most Versatile (BMV) agricultural land - Grade 3a - which national planning policy affords the highest protection. Wiltshire Council confirmed: The scheme risks the loss of agricultural and tourism jobs, removal of 878 hectares of land from food production, as well as adverse effects on local businesses and communities.	Approximately one-third of the agricultural land within the Solar PV Sites is classified as BMV quality mostly in Subgrade 3a, but two-thirds is of Subgrade 3b or Grade 4 quality, which is not BMV and not considered to be the most productive agricultural land. The land is under standard cereal rotations and is not used for high value crops such as fruits and vegetables. Although the primary arable use of the land in the Solar PV Sites would change during the operation and maintenance of the Scheme, the Applicant notes there are no known covenants or restrictions that would prevent the land being grazed by livestock which is an option for future management although has not been relied upon in any of the assessments. Grazing by

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				sheep would represent some continued agricultural use of the Site, alongside energy generation. ES Volume 1, Chapter 17: Soils and Agriculture [REP1-025] sets out that the Scheme will result in a temporary, long-term and reversible loss of agricultural land for the operational life of the Scheme. Section 17.10 of ES Volume 1, Chapter 17: Soils and Agriculture [REP1-025] assesses the effects on agricultural and BMV land to be significant. This effect is reported in the ES and are a matter for the Secretary of State to weigh in the planning balance against the Scheme and its wider benefits. There are no significant permanent effects on agricultural land, as all land will be returned to its original use and condition as far as practicable following decommissioning, as set out in paragraphs 2.1.3 to 2.1.5 of the Outline DS [REP1-100] which is

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				secured by Schedule 2, Requirement 20 of the Draft DCO [REP1-007]. Paragraph 8.3.251 of the Planning Statement [REP1-087] states that, in compliance with NPS EN-3, the design of the Solar PV Sites is compatible with certain farming practices, such as sheep grazing, which could continue during operation of the Scheme. Therefore, whilst the land would not be available for crop production, there may be an opportunity to limit the effects on agricultural production during the Scheme's lifetime through other forms of agricultural practice. The Applicant confirms that where employment may be affected as a result of the Scheme, affected workers would be eligible for accessing skills and employment support measures as secured through the Outline SSCEP [REP1-108], secured by Requirement 18 in Schedule 2 to the Draft DCO [REP1-007], subject to the final SSCEP

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				being agreed by Wiltshire Council and any other stakeholders. 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.
RECA-003	Soils and Agriculture	Agricultural Land Use	The UK imports nearly half of its food by value. Locking Grade 3a land out of production for six decades - during a period of increasing global food insecurity - is not a reversible decision in any meaningful policy sense. Sixty years of intensive weed suppression, compaction, and altered soil drainage will materially change the character of this land regardless of restoration commitments.	The UKRI's Roadmap for Resilience: A UK Food Plan for 2050, addresses future food security and self-sufficiency, which it notes would be achievable <i>"but only with coordinated policy on production, diets and land use."</i> The three core principles for the UK to become self-sufficient are: resilient agricultural production, which includes reducing livestock numbers and supporting farm diversification; integrated land use to sequester

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				carbon and reduce agricultural emissions; and changing dietary choices, namely consuming less meat. The Applicant does not consider that cessation of arable production on a majority moderate to low quality agricultural land in Subgrade 3b and Grade 4 would significantly affect the UK's food security or ability to become self-sufficient in food production. The Outline SRMP [APP-280] describes best practice for handling soils, such that the risk of compaction and damage will be minimised, and sets out a requirement for continuous monitoring during construction in order than compaction can be identified and remediated promptly. Most of the land within the Solar PV Sites will remain in-situ, with the mounting frames for the panels being driven into the ground using piles which do not require excavations. There is

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				not anticipated to be any adverse effect on soil drainage through the operational phase of the Scheme. The Outline DS [REP1-100] confirms that when the operation and maintenance phase ends, the land will be returned to its original use and condition as far as is practicable and returned to the landowner, and that all infrastructure will be removed, including cutting foundations to 1.2 m below ground level for the soil to be reinstated above. The depth of 1.2 m is the standard depth for assessing agricultural soil profiles. In this way, agricultural operations are expected to be able to resume, although the Applicant acknowledges that the final land use would be a decision for the landowner to make.
RECA-004	Climate Change and Energy Need	Carbon Savings	2.3 The Carbon Payback Crisis Critical finding - Wiltshire Council: While the scheme could deliver net carbon savings over its lifetime, construction emissions mean carbon break-even would not occur until 2076.	It is not accepted that the carbon break-even would occur in 2076. This is a complex issue and the idea of a carbon payback can only be considered in relation to a 'without project' baseline. Ultimately, with the project in place, there will be less

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				emissions than without it due to the UK's increasing energy demand and need to provide this energy using clean energy. The assessment in ES Volume 1, Chapter 7: Climate Change [APP-059] has considered a conservative baseline using a forecast of 2029 baseline grid emissions which already account for a significant makeup of renewables. A detailed technical note is being prepared to respond to the points around carbon payback which will be available at Deadline 3. Section 4 of the Statement of Need [REP1-085] describes how the Scheme will support the capture of climate benefits associated with the electrification of transport, heat and industrial processes. These benefits have not been quantified by the Applicant but clearly could only be captured through the supply of a sufficient quantity of low-carbon electricity to displace the fossil fuels

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				currently used. Section 2.9 of the Statement of Need [REP1-085] describes that 'Clean Power by 2030' prepares the UK for the rapid growth in power demand expected over the 2030s and 2040s and therefore seeks to prioritise projects needed for 2030, while maintaining a robust pipeline of projects required beyond 2030.
RECA-005	Climate Change and Energy Need	Carbon Emissions	This is not a peripheral concern - it is a fundamental disqualification. The UK's statutory net zero target is 2050. Lime Down Solar Park would not break even on its own construction carbon until 26 years after that target date. The Examining Authority is asked to consider: how does a project that is net carbon-positive through the entire net zero window serve the Clean Power 2030 Action Plan? The panels, cabling, 3-metre perimeter fencing, substations, inverters, and battery systems all carry substantial embodied carbon - manufactured predominantly overseas in high-carbon supply chains.	As in the response to RECA-004, the finding that the Scheme is net carbon positive is not accepted which is set out within ES Volume 1, Chapter 7: Climate Change [APP-059] . It is accepted that products associated with the Scheme, including Solar PV Panels, cabling, substations, inverters and BESS will contain embodied carbon and this has been assessed within ES Volume 1, Chapter 7: Climate Change [APP-059] using industry standard methodology (DESNZ greenhouse gas accounting factors, ISEP guidance) including con

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				servative assumptions of country of origin where relevant.
RECA--006	Landscape and Visual Ecology and Biodiversity Cultural Heritage Hydrology, Flood Risk and Drainage	LVIA	2.4 Landscape, Heritage and Ecology Wiltshire Council's formal Relevant Representation to PINS sets out that: - The project causes substantial, long-term harm to landscape character over 749 hectares in a sensitive location near the Cotswolds National Landscape - Compliance with Core Policy 51 (protect and enhance landscape character) is impossible at this scale - Surveys for key species and habitats remain incomplete, particularly along the 22km cable route corridor - Heritage assets including Bradfield Manor and Rodbourne Conservation Area have been under-assessed	The LVIA in ES Volume 1, Chapter 8: Landscape and Visual [APP-060] has been undertaken with consideration of the appropriate and relevant guidance and robustly assesses both the landscape and visual effects of the Scheme independently to ensure both the impacts and effects on the fabric and character of the landscape are taken into account as well as views and visibility. The LVIA fully and transparently acknowledges adverse effects to both landscape character and visual amenity as a consequence of the Scheme whilst also identifying embedded mitigation and long-term 'legacy landscape' restoration measures. In regard to the ecological surveys, the Applicant maintains that a sufficiently robust assessment of impacts of the Scheme on ecology and biodiversity has been undertaken, and is presented

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			Potential for flooding and groundwater contamination has not been adequately scoped	within ES Volume 1, Chapter 9: Ecology and Biodiversity [REP1-015]. This assessment is based on extensive suite of baseline surveys. Habitat surveys have been undertaken across the entirety of the Cable Route Corridor, including approximately 17 ha of land following submission of the DCO Application. The results of these surveys were provided at Deadline 1 and did not materially change the outcome of the assessment. The scope of ecological and species-specific survey across the Order Limits has been completed using a proportionate, risk-based approach. These have been targeted to areas and features where there was a reasonable likelihood of significant effects, rather than applied uniformly across the Order Limits irrespective of risk or potential impacts. The Applicant considers the baseline survey data to be sufficiently robust to underpin the assessment presented in ES Volume 1, Chapter

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				9: Ecology and Biodiversity [REP1-015]. The Applicant disagrees that heritage assets, such as Bradfield Manor and Rodbourne Conservation Area, have been underassessed. 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 terms). The Applicant submitted a technical note at Deadline 1A, 9.20 ES Technical Addendum to Chapter 12 Cultural Heritage - Bradfield Manor Visualisations [REP1A-014], 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.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				Site visits were undertaken with Historic England on the 28 March 2025 and the Wiltshire County Council Conservation Officer on the 11 April 2025, which included visiting land adjacent to Grade I Listed Bradfield Manor and Rodbourne Conservation Area. A second site visit with Historic England was undertaken in the grounds of Bradfield Manor on the 22 May 2025 (see table 12-2 in ES Volume 1, Chapter 12: Cultural Heritage [APP-064]). Feedback provided during the site visits was used to inform the Scheme design and assessment provided in ES Volume 1, Chapter 12: Cultural Heritage [APP-064]. With consideration to Rodbourne Conservation Area, embedded mitigation including the removal of Fields E5 and E8 from the Order Limits, removal of Solar PV Panels from Fields E7, E9 and E10, offsets to PRoW and enhanced screening of existing hedgerows are

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				considered sufficient mitigation to remove any adverse impacts to the Conservation Area. As stated in Section 3.7 of the Outline CEMP [REP1-096], construction traffic routes have been identified to avoid large increases in HGV movements near to heritage assets. Highway improvement works would cause, at most, temporary construction effects and would not result in harm to the Conservation Area's significance. Therefore, a neutral effect was identified as a result of the Scheme to the Conservation Area. 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 updated the Outline CEMP [REP1-096] at Deadline 1 to include provision that the Wiltshire Council Conservation

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				Officer should be consulted on the approval of design for the access Works Number 8b. The Applicant does not agree that flooding or groundwater contamination has been inadequately scoped. The point is a broad assertion and does not identify any specific omission in the submitted assessment. Flood risk has been assessed in ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [REP1-017] and ES Volume 3, Appendices 11-1 to 11-9: Flood Risk Assessment and Drainage Strategy [REP1-037 to REP1-054]. This includes fluvial, surface water, groundwater, sewer, reservoir and artificial sources of flooding across the Solar PV Sites, BESS, substations and Cable Route Corridor. The assessment confirms that the majority of the Scheme is located in Flood Zone 1, with limited Flood Zone 2 and 3 interaction primarily at Lime Down

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				D and Lime Down E2, associated with Gauze Brook and Gabriel's Well. Where floodplain interaction is material, this has been assessed through site-specific hydraulic modelling, Manning's/open channel assessment and floodplain displacement calculations, as appropriate. This is set out in the relevant site-specific appendices of ES Volume 3, Appendices 11-1 to 11-9: Flood Risk Assessment and Drainage Strategy [REP1-037 to REP1-054]. The assessment concludes that the Scheme would not materially increase flood risk elsewhere, with solar PV infrastructure elevated above ground level and formal drainage provided for impermeable infrastructure where required. Potential impacts to groundwater and controlled waters have also been assessed through ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [REP1-017], ES

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				Volume 1, Chapter 19: Ground Conditions and Contamination [REP1-027], 7.11 WFD Assessment [REP1-094], and ES Volume 3, Appendices 11-1 to 11-9: Flood Risk Assessment and Drainage Strategy [REP1-037 to REP1-054] specifically considers construction-phase pathways including trenching, HDD and other below-ground works, and concludes that with embedded mitigation no deterioration in WFD water body status is anticipated. Mitigation and control measures are secured through the Outline CEMP [REP1-096], Outline OEMP [REP1-098], Outline DS [REP1-100], Outline SRMP [APP-280], and the associated Requirements in the Draft DCO [REP1-007]. These include surface water management, pollution prevention, silt control, spill response, soil management, flood response procedures, water quality monitoring and groundwater protection measures. For substations

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				and BESS, containment and isolation principles are also set out in 9.8 Firewater Containment and Drainage Strategy – Lime Down D Battery Energy Storage System [REP1-124] and 9.9 Firewater Containment and Drainage Strategy - Lime Down Substation [REP1-125] .
RECA-007	Landscape and Visual	LVIA	The application's own Environmental Impact Assessment excluded landscape views beyond 5km and failed to assess the effect on trees within the project area — a significant omission for a scheme of this scale.	The scope of the visual assessment within the LVIA in ES Volume 1, Chapter 8 Landscape and Visual Impact Assessment [APP-060] extends to 2 km. With the aid of ZTVs and extensive site visits, it was found that there is no visual relationship from outside of the 2 km Study Area where significant effects would be likely. This is due to the undulating character of Hullavington lowland and the dispersed nature of the Scheme.
RECA-008	Climate Change and Energy Need	Efficiency	2.5 Peak vs. Real-World Output The headline figure of 500MW is a peak capacity claim. It does not represent the energy this scheme actually delivers to the grid.	The Applicant confirms that the figure of 500 MW represents the secured grid connection AC export capacity that the Scheme has contracted with the NESO for connection to the NETS at the

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			Key fact: On average, solar delivers maximum power for approximately 2.6 hours per day in the UK. The average annual output of Lime Down would be approximately 50MW - one tenth of the headline claim. Communications to the Secretary of State and the public consistently use the 500MW figure. The Examining Authority should be clear that the real-world contribution, averaged across the year, is a fraction of what is claimed, and should weigh the land-use cost against this corrected output figure.	Existing 400 kV Melksham Substation. The Scheme is specifically designed to maximise energy delivery at this 500 MW connection level. Over the lifetime of the Scheme, ES Volume 1, Chapter 7: Climate Change [APP-059] anticipates a total generation output from the solar element of the Scheme to be 23 TWh over a 60-year operational lifetime. While the Applicant acknowledges that solar generation is not a constant delivery due to its inherent reliance on daylight and photovoltaic rays, and provides a range of generation across seasons, it plays an important role in the energy mix. To further optimise capacity, the Scheme includes a BESS. The BESS allows the Scheme to store abundant energy generated during peak sunlight hours and release it to the grid during periods of high demand or lower solar irradiance, thereby providing flexibility

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				and improving the overall dependability of the energy supply. As set out in Section 3.6.3 of the Statement of Need [REP1-085] which confirms that the NPS demonstrate that the need for solar technology (as a renewable source) in Great Britain is urgent and significant and has increased, with Nationally Significant solar technology now defined as CNP infrastructure. The claim that the Scheme on average effectively delivers 50 MW misrepresents how NSIPs and electricity infrastructure are assessed. The use of the 500 MW capacity figure is consistent with the statutory definition of NSIPs, which are classified based on their secured generating capacity as exceeding the 100 MW threshold. Furthermore, NPS EN-1 and EN-3 establish that substantial weight must be given to the need for low-carbon generation at this scale. The 50MW average output

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
RECA-009	Description and DCO Process	Funding	2.6 Foreign Profit Extraction Island Green Power is 100% owned by Macquarie Asset Management, an Australian investment group. The financial returns from 60 years of electricity generation on North Wiltshire farmland - underwritten by British consumers through energy pricing - will flow offshore. There is no meaningful community ownership model. The community benefit package offered does not compensate for the permanent transfer of productive farmland revenue to overseas investors for six decades.	The Applicant, Lime Down Solar Park Limited is a 100% subsidiary of IGP UK Projects Limited. Both are registered in England and Wales and subject to UK tax law and regulations. In summer 2022, Macquarie Asset Management, via Macquarie Green Investment Group Renewable Energy Fund 2 (MGREF2) acquired a 50% stake in IGP. In May 2025, Macquarie Asset Management, through two other funds, purchased an additional 50% stake in IGP. These funds are managed on behalf of a diverse range of investors, including UK pension funds. This ownership structure is common in the energy sector and ensures the Scheme is privately financed, enabling the development of essential infrastructure without reliance on public funds or risk to the UK taxpayer. The Applicant clarifies that Macquarie has a strong record of long-term UK

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				investment, having invested more than £65 billion into UK infrastructure since 1999, supporting over 33,000 UK jobs. Furthermore, the Applicant has a strong track record of developing NSIPs, notably the consented Cotton Solar Project and West Burton Solar Project, alongside a strong pipeline of further applications coming forward.
RECA-010	Transport and Access	Construction Traffic	2.7 Highways and Construction Impact The 22km underground cable route requires trenching across farmland, tunnelling under the M4, and HGV movements on narrow rural roads between North Wiltshire villages. Wiltshire Council has confirmed that mitigation commitments are inadequate and passing place provision insufficient, with the council having insufficient control over works on the public highway.	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

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				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).

Reference	Theme	Issue	Comments/Issue Raised	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

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				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; • 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]).

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				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

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				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; • 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

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				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:

Reference	Theme	Issue	Comments/Issue Raised	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 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

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				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). 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

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				on the draft Protective Provisions Wiltshire Council might have, the Applicant intends to include these protective provisions in the draft DCO at a future deadline. 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 more condensed timeframes to provide the Applicant with certainty of delivery. Wiltshire will be able to effectively coordinate, and control works on the public highway.
RECA-011	Description and DCO Process	Sentiment	The Examining Authority is asked to consider whether the energy output that Lime Down promises can be delivered through a demonstrably superior alternative. RECfA presents that alternative. 3.1 What the RECfA is	The Applicant notes the principle of the RECfA programme and supports the role rooftop solar has to play in the UK's decarbonisation, however it cannot be considered as a direct alternative to the Scheme. The Statement of Need [REP1-085] describes the Government's

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			The Renewable Energy Coalition For Academia is a UK government-backed programme that enables schools, colleges and universities to deploy onsite clean energy generation - principally rooftop solar PV combined with battery energy storage. RECfA operates in active engagement with the Department for Energy Security and Net Zero (DESNZ) and the Department for Education (DfE). RECfA does not require Development Consent Orders. It does not require planning applications to the Planning Inspectorate. It works within existing permitted development rights, on existing buildings, on already-developed land.	policy view in Section 3.2 and discusses large scale vs. smaller scale schemes (such as the individual components of the RECfA proposal). Specifically, government's position is that it does not believe smaller scale developments, including decentralised and community energy schemes, will replace the need for new large-scale electricity infrastructure to meet their energy objectives. NPS EN-1 (2023) Paragraph 3.3.12 describes that connecting large-scale generation facilities via high voltage transmission systems enables the pooling of generation and demand and enables the efficient bulk transfer of power between areas with surplus and areas in deficit and therefore demonstrates support for large-scale ground mount solar schemes alongside the development of smaller decentralised and community energy schemes including on rooftops.

Reference	Theme	Issue	Comments/Issue Raised	Applicant’s Response							
				Section 2.9 of the Statement of Need [REP1-085] explains that the Clean Power capacity ranges have been established to deliver Clean Power by 2030 and keep power clean thereafter. Paragraph 2.9.12 explains that the government anticipates additional smaller scale schemes to be delivered as well as those prioritised through the capacity ranges, adding further weight to its view – with which the Applicant concurs – that both smaller scale and large-scale schemes are needed in the fight against climate change. Therefore, the RECfA proposals may be needed as well as, rather than instead of, the Scheme.							
RECA-012	Site Selection and Alternatives	Alternatives	3.2 The Scale of the UK Educational Estate	The Applicant refers to its earlier comment on the RECfA proposals, however, the presentation of the table of institutions offers an opportunity for further context. The Applicant notes that the table sets out an ideal scenario for the roll-out of rooftop solar across							
	<table><tr><th>Institution Type</th><th>Count (UK)</th><th>Avg Sy stem Size</th><th>Total Capac</th></tr><tr><td>Primary School</td><td>~16,800</td><td>30 kWp</td><td>504 MWp</td></tr></table>		Institution Type		Count (UK)	Avg Sy stem Size	Total Capac	Primary School	~16,800	30 kWp	504 MWp
	Institution Type		Count (UK)		Avg Sy stem Size	Total Capac					
Primary School	~16,800	30 kWp	504 MWp								
Climate Change and Energy Need											

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			Secondary Schools ~4,200 100 kWp 420 MWp Special & Other Schools ~ 8,500 40 kWp 340 MWp FE Colleges ~253 300 kWp 76 MWp Universities ~296 1,000 kWp 296 MWp Total Educational Estate ~30,000+ 1,500-2,000 MWp The RECfA programme, fully deployed, delivers three to four times the installed capacity of Lime Down Solar Park - without consuming a single hectare of agricultural land, without any NSIP consenting process, and without any landscape or heritage impact.	educational facilities in the UK, and notes that the use of 30,000 rooftop spaces across the UK could achieve up to four times the capacity of the Scheme. The respondent, however, has not accounted for the vast geographically dispersion of the locations involved and the inability of these schemes to provide generation to the wider transmission network, as identified by government. Nor does it consider the financial implications that would be placed on each educational facility in order to acquire such systems, even with a subsidised scheme to support. While rooftops do not generally require planning permission, roof spaces may be subject to lease restrictions or incompatible roof angles, meaning that a proportion of these roof spaces would not be able to physically accommodate solar PV panels.

Reference	Theme	Issue	Comments/Issue Raised			Applicant's Response
RECA-013	Site Selection and Alternatives	Alternatives	3.3 Direct Comparison: Lime Down v. RECfA			Additionally, the size of each scheme (i.e. 16,800 kWp) for a single primary school, is likely to meet only some of the energy needs of the school itself, with minimal to no power being exported into the local distribution network. When viewed in the context of the total number of educational estates, approximately 30,000, it is likely that the majority of this power would be consumed behind the meter by the premises themselves. This alone does not address the critical national need for low carbon energy generation across the wider UK network as confirmed above, though the Applicant does agree that principle of the RECfA scheme would complement national energy objectives. The Applicant refers to its earlier comment on the RECfA proposals and the carbon payback of the Scheme.
	Description and DCO Process		Factor	Lime Down	RECfA (F Programm	

Reference	Theme	Issue	Comments/Issue Raised			Applicant's Response
	Community Benefit		Peak capacity	500 MWp	1,500-2,000 MWp	Regarding the financial and investment structure, the Applicant clarifies that Lime Down Solar Park Limited and its parent company are registered in England and Wales and are subject to all applicable UK tax laws and regulations. Private financing through experienced infrastructure investors like Macquarie, who have invested over £65 billion in UK energy and infrastructure since 1999, is a common and robust structure used to deliver essential national projects faster and more efficiently while easing pressure on public finances. The Scheme will deliver significant domestic value, including providing clean electricity for 115,000 homes, generating business rates for the local authority, and supporting local recruitment and skills uplifting through the Outline SSCEP [APP-285] . Further benefits of the Scheme are set out in Section 5.3 of the Planning Statement [REP1-087] and include the delivery of large amounts of affordable, secure, and
	Soils and Agriculture		Land consumed	479.5 ha agricultural	Zero – rooftops only	
	Climate Change and Energy Need		Carbon payback	Not until 2076	Within 2-4 years	
			Planning route	DCO / NSIP – years	Permitted development months	
			Food security impact	878 ha removed for 60 years	None	
			Landscape impact	Substation & long-term	None	
			Community financial benefit	Profits to Macquarie, Australia	Savings stay in schools	
			Ownership	Foreign private equity	Public institutions	
			Government backing	Developer-led	DESNZ and DfE engaged	
			Annual savings to institutions	None	Up to £25,000 per site	

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				low carbon electricity which will help the UK to achieve net zero by 2050, ecological and landscape enhancements, biodiversity net gain, permissive paths, employment generation, economic benefits and skills training.
RECA-014	Site Selection and Alternatives Soils and Agriculture	Alternatives	3.4 Government is already moving in this direction This is not a theoretical proposition. Great British Energy has already committed £255 million to install solar and battery storage across 250 schools and colleges, with up to an estimated £220 million in lifetime savings. RECfA is the programme that takes this from 250 to 30,000. The Secretary of State is asked to consider: if the government's own energy company has validated the rooftop educational model, why should the same Secretary of State simultaneously consent to destroying 878 hectares of Wiltshire farmland to achieve a fraction of the same capacity?	The ExA is required to consider the Scheme in accordance with the 2024 NPSs and any other applicable policy or considerations the ExA deem to be important and relevant. The PA2008 makes it clear that in making a decision, the SoS " <i>must decide the application in accordance with any relevant NPS</i> " (s104(3)), subject to certain provisos. The ExA clarified in the Rule 6 Letter [PD-006] that the SoS is entitled to disregard any representations that relate to the merits of the designated NPSs. This element of this representation goes towards questioning the merits of

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				the designated NPSs it can therefore be disregarded in examination, for the reasons the Applicant have clarified above from the Government's stated policy position.
RECA-015	Site Selection and Alternatives	Alternatives	3.5 Speed of delivery Lime Down, if consented today, could not be operational before mid-2029 at the earliest. RECfA rooftop deployments can be consented and commissioned within months per site, operating in parallel across hundreds of institutions simultaneously. The UK's Clean Power 2030 target demands speed. Rooftop solar delivers it.	Government's Clean Power Capacity Ranges were established at the end of 2024 to support NESO's prioritisation of the Connection Queue to ensure that those projects which are more ready and more able to be connected earlier, are delivered before others which may take longer. The Applicant has been informed that the Scheme has been prioritised as a Gate 2 Phase 1 project with connection indicated before the end of 2030. The Applicant notes that rooftop solar is not included in the Government's Clean Power capacity ranges, further supporting the Government's view (with which the Applicant agrees) that rooftop solar is needed alongside rather than instead of large-scale schemes. The reasons for this have been stated above and are explained

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				further in the Statement of Need [REP1-085] .
RECA-016	Site Selection and Alternatives Soils and Agriculture Community Benefit	Alternatives	4. Consultation and Request The Question Before the Examining Authority Is it necessary and proportionate to remove 878 hectares of Wiltshire farmland from food production for 60 years — in a county already among the most solar-intensive in Europe, with a carbon payback date of 2076, generating returns for an Australian investment fund - when a credible, government-backed, operationally proven alternative can deliver three to four times the capacity on existing rooftops, saving public money, harming nothing, and benefiting everyone?	The embodied carbon and associated emissions from the cables and BESS are assessed within ES Volume 1, Chapter 7: Climate Change [APP-059]. With regards to the Carbon Pay Back Time, a separate detailed Technical Note is being prepared and will be submitted at Deadline 3. There are several limitations with using this approach as put forward by Stop Lime Down. The GHG assessment considers global emissions (e.g. shipping from China, embodied carbon from products sourced outside of the UK) and compares this to a UK only emissions value which does not consider the embodied carbon from developing energy infrastructure. The high-level approach used in the ES chapter is illustrative that even with this point of comparison, there remains a net negative change in emissions.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				The assessment considers that future operational emissions associated with replacement products will be the same as those in the baseline operational year. E.g. replacement panels will have the same embodied carbon emissions in 40 years as they do in the assessment year of 2025. In reality, as global efforts move towards Net Zero from all sources, this is a highly conservative approach and in reality emissions in future are likely to be far lower. This approach has been taken so as to be conservative and in the absence of forecast emissions reductions approaches. The point of comparison against a forecast UK grid average was chosen so as to compare against a realistic but low grid average for emissions. Previous assessments have compared against other energy generating methods such as CCGT. Should the scheme be compared against CCGT and the same methodology applied, the 'pay back' would occur within 2 years'.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				Should the scheme be compared against existing UK grid average emissions, (i.e. not forecast) the scheme would 'pay back' emissions within 4 years.
RECA-017	Site Selection and Alternatives Description and DCO Process Soils and Agriculture	Alternatives	I respectfully submit that the answer is no and I request that the Examining Authority: • Refuse consent for Lime Down Solar Park DCO application in its current form • Direct the applicant to demonstrate why rooftop and brownfield alternatives cannot meet the stated energy output objective before any ground-mount consent is considered • Formally note the RECfA programme is a viable, government-backed, land-neutral alternative capable of exceeding the capacity proposed here Recommend to the Secretary of State that policy guidance be	The Applicant refers to its responses above which confirm that: • It is supportive of rooftop solar • Rooftop solar must be delivered alongside rather than instead of large-scale ground mount solar, therefore RECfA and any other similar programmes are not alternatives to the Scheme because they are also needed (and have also not yet been delivered) • That this representation may be disregarded because it goes towards the merits of the Government's policy as set out in the designated NPSs As set out in ES Volume 3, Appendix 4-1: Site Selection Assessment Report [APP-185], the Applicant reviewed brownfield land

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			strengthened to require applicants to demonstrate exhaustion of rooftop and brownfield options before agricultural land is considered for solar development.	registers for local authorities within the area of search including Wiltshire Council, South Gloucestershire Council, Bath and Northeast Somerset Council, and Somerset Council. The assessment concluded that there were no sites within the search area of sufficient size to accommodate a large-scale solar development, either individually or cumulatively. The sites assessed were too small to support the proposed Scheme and were largely allocated for housing or mixed-use development, in line with local planning policies, thereby creating a conflict with the intended use for renewable energy infrastructure. Therefore, it was concluded that there was no available or suitable brownfield land for the purposes of the Scheme.

5 The Applicant's responses to town councils, parish councils and parish meetings

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
Easton Grey Parish Meeting REP1-141				
EGPM-001	Scheme Description and DCO Process	Funding	Summary Preliminary points The Parishes Relevant Representations are repeated and expanded by our additional written comments. Disparity of resource: The Parish had a £825 annual precept, (now raised to £1,500) versus the Applicants' £1 billion, one volunteer Chairman versus multiple employees and hired "experts". However, the Parish has reliable local knowledge of its own community, landscape, environment, and flood risks coupled with commonsense. Accordingly, the Examining Authority are requested to ask the Applicant the pertinent questions we highlight in our written comments.	The Applicant notes this comment.
EGPM-002	Landscape and Visual	Visual Impact	Land Use, Landscape and Visual	The Scheme is located to the south of Easton Grey and is set back from the

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			Parts of our Parish will have directly impacted sight lines. The beauty of Easton Grey, a conservation area and Parish within the Cotswold National Landscape, will have its setting assailed by the adverse impact of two storey high panels.	boundary of the CNL to avoid adverse effects on the CNL and its historic Cotswold villages such as Easton Grey. ES 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 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 mitigation measures mature by Year 15. Mitigation and enhancement measures are detailed in the Outline LEMP [APP-283] and the Outline EPMS [REP1-106], which set out habitat creation, species protection measures, buffer zones and long-

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				term ecological management. Existing and proposed hedgerow will be managed to 4.5m to screen the solar infrastructure. 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 Development Consent Order [REP1-007].
EGPM-002	Cultural Heritage	Heritage Assets	All residents and visitors to and from our village and our scheduled monuments or listed buildings will have to go past these panels.	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 designated heritage assets. No direct impacts have been identified to designated heritage assets. Identified impacts to designated heritage assets would be indirect and related to elements of their setting that contribute to their significance, including consideration

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				of intervisibility between heritage assets, surrounding landscape and the Scheme. The Applicant acknowledges that views of the Scheme may be experienced from surrounding roads and routes used by residents and visitors; however, the presence of views towards Solar PV Panels within the wider landscape does not in itself result in harm to the significance of heritage assets. The assessment therefore considered the extent to which the Scheme would affect those aspects of setting which contribute to the significance and appreciation of designated heritage assets.
EGPM-003	Soils and Agriculture	Agricultural Land Use	Without justification, the fields to be covered are high quality and versatile agricultural land.	The agricultural land within the Solar PV Sites is classified as approximately one-third Best and Most Versatile (BMV) mostly in Subgrade 3a, and two-thirds non-BMV, in Subgrade 3b and Grade 4, as set out in ES Volume 3, Appendix 17-1: Agricultural Land Classification and Soil Resources Survey [REP1-063].

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				An appraisal of alternative sites is presented 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 assessment considered alternative sites within a 20 km radius of the existing National Grid Melksham Substation and concludes that there are no more suitable locations within the defined search area than the proposed Site. The Site Selection Assessment explains how brownfield land, industrial land, previously developed land and lower grade agricultural land were considered in accordance with policy.
EGPM-004	Socio-Economics, Recreation and Tourism	PRoWs	Much loved Rights of way, used by walking, cycling or horse-riding members of our community and its visitors, will be blighted,	The Applicant notes this comment and refers to Table 2.57 within the Written Summary of the Oral Submissions at the Open Floor Hearing 1 and the Applicants Responses [REP1A-013] . Where the Applicant responds to George Clark on the impacts to public rights of way for walkers, cyclists and horse riders.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
EGPM-005	Noise and Vibration	Noise Impact	not least by the tunnel effect and noise of the proposed development.	The noise impacts from the operation of the Scheme and its components are assessed in Section 14.10 of ES Volume 1, Chapter 14: Noise and Vibration [REP1-021]. As shown in Table 8 of ES Volume 3, Appendix 14-4: Noise Modelling [APP-237], levels would typically be below or slightly above the existing background sound in the area. The levels have been calculated, using the appropriate international standard, on a worst-case assumption that wind is blowing from the source of the noise to the receptor locations, as stated in paragraph 14.4.15 of ES Volume 1, Chapter 14: Noise and Vibration [REP1-021]. The Outline Operational Environmental Management Plan (OEMP) [REP1-098] commits to noise levels from the Scheme at residential dwellings being the same as or below those modelled in the ES. This provides assurance that significant effects from operational noise will be avoided,

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				while allowing flexibility in how this is achieved. The preparation, approval and implementation of the detailed OEMP, substantially in accordance with the outline plan, are secured through Requirement 14 of Schedule 2 of the Draft DCO [REP1-007], ensuring operational noise is appropriately controlled throughout the lifetime of the Scheme. A tunnel effect requires tall hedgerows to both sides of a route. Although it is recognised that the mitigation measures as set in the Outline Landscape and Ecological Mitigation Plan [REP1-029 to REP1-032] will cause this effect in places, due to the dispersed nature of the Lime Down Sites, much of the landscape will retain its current character.
EGPM-006	Socio-Economics,	Tourism Health Impact	The benefits to mental and physical health and tourism will be severely disrupted or just ruined.	Impacts on physical and mental health and wellbeing are assessed in ES Volume 1, Chapter

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
	Recreation and Tourism			18: Human Health [APP-070]. This chapter provides a comprehensive assessment of the Scheme's potential effects on human health, through consideration of a broad range of health determinants with physical and mental health pathways. The assessment finds no significant adverse effects to mental or physical health at any phase of the Scheme. Impacts on tourism are assessed in ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068] with individual receptors assessed in ES Volume 3, Appendix 16-2: Tourism and Recreation Receptors [APP-241]. The assessment finds a worst-case loss of up to 50 FTE tourism jobs during construction, reducing to 11 FTE jobs during the Scheme's operational lifetime. The Applicant has sought to mitigate adverse effects on local businesses through measures to secure local skills training, employment, and establishment of localised supply

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				chains where practicable through the Outline 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 Schedule 2 to the Draft DCO [REP1-007] .
EGPM-007	Socio-Economics, Recreation and Tourism	Mental Health Impact	Falls in property prices, or an inability to sell will cause mental and financial distress.	The Applicant notes the concerns around the impacts on property prices and confirms that this matter has been scoped out of the assessment, a position agreed upon by the Planning Inspectorate in the EIA Scoping Opinion as set out in the Consultation Report Appendix B: EIA Scoping [APP-024] . The Scheme has been designed to minimise direct impacts on residential properties by offsetting a minimum of 50m between the property boundaries of any residence or residential areas and where solar panels & associated infrastructure are to be placed as set out in Section 2.2.1, Table 2-1 of Design Principles and Parameters [REP1A-008] .

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				Furthermore, the Applicant has implemented further offsets where appropriate to protect long term privacy and amenity for residential properties. To acknowledge the comments raised around property prices, the Applicant considers there is a lack of empirical evidence to suggest that solar farms result in significant long-term adverse effects on property values. While there have been studies from the USA and Netherlands, they indicate that external factors, such as broader property market trends, are more influential drivers of property price fluctuations. Furthermore, the Applicant points to a need to differentiate between potential short-term impacts on property saleability i.e. during a construction peak, and the maintained long-term value once the Scheme is operational and scenarios such as the planned landscape mitigation have matured. The Applicant notes that consent has not been given to the Scheme, and

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				therefore no construction or operational phase has taken place.
EGPM-008	Transport and Access	Safety and Access	Traffic and Transport Displaced traffic, to and from Malmesbury and Sherston, will be pushed onto the single track road between Norton and Easton Grey. This road has a highly dangerous crossroads and junction for a designated cycle route.	The HGV construction routes are shown in Figure 4.1 and Figure 4.2 of the Outline CTMP [REP1-112] . None of the proposed HGV construction routes will route via Easton Grey. The assessment presented in the updated Annex J of ES Volume 3, Appendix 13-1: Transport Assessment [REP1-057 and REP1-059] submitted at Deadline 1 demonstrates adequate carriageway width or frequency of passing place opportunity to pass at least an HGV and a light vehicle on the proposed construction routes. An Outline CTMP [REP1-112] supports the DCO Application and presents outline measures which restrict construction deliveries to the proposed construction routes and times outside of highway network peak hours. A final Construction Workers Travel Plan will also be submitted as part of the Final CTMP, setting out the preferred routes to the site.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				Further to the above there is no reason to suggest that a material volume of traffic would be displaced onto the route between Norton and Easton Grey.
EGPM-009	Transport and Access	Cable Route Corridor	We do not understand how cable routes will be taken under roads, motorways and railways or what disruption will be caused.	Horizontal Directional Drilling (HDD) will be used at points where cable routes are routed beneath roads, motorways and railways. Further details are provided in ES Volume 1, Chapter 3: The Scheme [APP-055] .
EGPM-010	Construction and Decommissioning	Decommissioning	Decommissioning: Absent, for example bonded guarantees, criminal sanctions or claims for breach are both toothless and prohibitively costly for the relevant entities and taxpayers to enforce. The Bank behind this applicant has a [Redacted] only a SPV [Redacted] of and offshore owners.	The Applicant confirms that the Development Consent Order (DCO) process itself incorporates enforceable mechanisms to regulate Scheme delivery. Any breach of development consent order or failure to comply with Requirements can result in enforcement action. A detailed Decommissioning Strategy will be prepared substantially in accordance with the Outline Decommissioning Strategy [REP1-100] and must be submitted to and approved by the relevant local

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				planning authority prior to the commencement of decommissioning. This is secured through Requirement 20 in Schedule 2 of the Draft DCO [REP1-007]. In addition, the Applicant is seeking a time-limited consent for the Scheme to have an operational period of 60 years, with decommissioning to take place following cessation of operation. This is secured by Requirement 20 in Schedule 2 of the Draft DCO [REP1-007]. The Applicant confirms that, if consent is granted, it has the capability to build, own, and operate the Scheme. Regardless of any future ownership, the undertaker as defined in the Draft DCO [REP1-007] will remain bound by the legally enforceable requirements of the DCO. Finally, the Funding Statement [APP-019] submitted with the DCO application demonstrates that the Scheme is financially viable and

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				adequately funded to deliver the Scheme in full.
EGPM-011	Hydrology, Flood Risk and Drainage	Run-off	Hydrology and Flood risk whilst the Applicant itself is The Applicants responses demonstrate ignorance, or a misunderstanding of the comments being made and the landscape impacted. The 1.8 million square metres of panels seem designed to concentrate water towards places that already flood or are very prone to flooding. All the examples we identify for the adverse effects of run-off are the highest risk Flood Zone 3. The critical rail route to Wales that sits in a cutting though the site is already noted as high risk due to climate change. The Applicant addresses the security of their assets with an apparent disregard for the run-off flood risk to homes and sewage systems being born by the community that will not benefit from the scheme.	The concern that runoff from panelled areas could reach locations that already flood is understood, particularly where those locations are within Flood Zone 3. Surface water will naturally move downslope towards ditches, watercourses and floodplain areas. That is part of the existing baseline hydrological behaviour of the catchment. The relevant question is not whether water ultimately flows towards lower-lying Flood Zone 3 areas, but whether the Scheme would materially increase the rate, volume or concentration of runoff reaching those areas. The Scheme is not designed to collect runoff from the panelled areas and route it to existing flood-prone locations. Solar PV panels are elevated above ground and rainfall drains to the ground beneath and between the arrays. They do not operate as a connected roof,

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				hardstanding area or piped drainage system. Panels can redistribute rainfall locally at drip-lines. The relevant control is to prevent that local redistribution becoming connected, accelerated runoff to ditches, watercourses or downstream receptors. This is secured through vegetation cover, soil protection, compaction management, permeable tracks and retained overland flow routes, as set out in the Outline CEMP [REP1-096], Outline SRMP [APP-280] and Outline OEMP [REP1-098]. Flood Zone 3 and known local flood locations are important baseline considerations. They have informed the assessment in ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [REP1-017] and ES Volume 3, Appendices 11-1 to 11-9: Flood Risk Assessment (FRA) & Drainage Strategies [REP1-037 to REP1-054].

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				The assessment concludes that the Scheme would not materially increase flood risk to existing flood-prone areas.
EGPM-012	Description and DCO Process	Scale	Conclusion Lime down is the wrong scale and in the wrong place. The harm caused will be substantial and permanent.	As concluded in ES Volume 3, Appendix 4-1: Site Selection Assessment Report [APP-185], there are no more suitable and available locations within the 20 km search area than the proposed location for the Scheme, based on the criteria identified. The Scheme's location is therefore assessed to be suitable for the scale of solar development proposed. NPS-EN1 sets out at paragraph 3.1.1 that the government sees a need for significant amounts of new large scale energy infrastructure and at paragraph 3.1.2 recognises that it will not be possible to develop the necessary amounts of such infrastructure without some significant residual adverse impacts and that these effects will be minimised

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				through the application of policy set out in NPS EN-1. Furthermore, the Scheme is not permanent. The application is for a period of up to 60 years operational life, at which point the development would be required to be decommissioned, and the land returned to landowners.
EGPM-013	Description and DCO Process Hydrology, Flood Risk and Drainage	General Remarks	Parish of Easton Grey's supplemental comments to Lime Down's written response dated 9.3.2026 [PDA 009] The purpose of this statement is to repeat and add to the Parishes responses to both the Statutory Consultation (9.3.25) and targeted consultation (8.7.25) (excluding attachments copied as annex 1 and 2 below) and now the 7 pages of Relevant Representations made by the Parish of Easton Grey dated December 2025 (allocated a reference EGPM-001 to -014 by Lime Down). We reference the earlier responses to statutory consultations since many of the	The Applicant notes this comment.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			points raised there remain unanswered and the Plan as submitted simply, by omission, did not deal with the points. This statement refers to, and comments on, the Lime Down (the "Applicant") 30 page (excluding the thousands of pages of referenced documents) response. That response appears at pages 1702 to 1733 of [table 5-15 RR1220]. The Grid references and place names are, in this document, taken from the OS Explorer map 168 for Stroud Tetbury and Malmesbury.	
EGPM-014	Description and DCO Process	Funding	The Applicant's response comes across as both patronizing and dismissive of the well founded concerns of our community. Many parts of the response, and referenced documents, are difficult follow and full of abbreviations, acronyms and other technical jargon. The Applicant condescends to an acknowledgment that we as a Parish "may not have access to specialist expertise" and refers us	The Applicant notes the comments regarding the feeling of resource disparity between the parties and the technical nature of the submission documents. The Applicant use of experienced, specialist technical consultants is a necessary component of the DCO process to ensure the Scheme is designed to meet rigorous environmental standards. Alongside this, the

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			to EA Volume 4, Non-Technical Summary a document that, excluding all the other material referred to, is itself in excess of 140 pages. It is to that document that we will primarily refer in understanding the Applicant's response. As a Parish we are struggling to cope with this highly iterative process not least due to our lack of resource in comparison to those of the Applicant. To put the disparity of resource between the Easton Grey Parish Meeting and the Applicant into perspective we note the following. The Applicant, with no real assets itself, is however ultimately funded by an investment fund that has in excess of £1 billion to promote, but probably not build, this and other schemes. By contrast the Easton Grey Parish's only source of funds was a precept of £825 per year. As will be seen in the next set of accounts, that we will file, this precept has been raised to £1,500. This is to enable the parish to contribute to Wiltshire	Applicant acknowledges the importance of local knowledge and has sought to use community feedback to inform the iterative design of the Scheme. The Applicant wishes to clarify that in response to earlier comments regarding difficulty navigating documents, pointing to the Non-Technical Summary (NTS) is to aid, not condescend. The NTS is a standard, well used mechanism in DCO applications aimed to assist those without technical advisors with an accessible overview of the proposals. The Applicant is open to discussion with Easton Grey Parish Meeting representatives regarding planned flood relief measures and signage, noting support with matters such as this could be facilitated via the Community Benefit Fund which the Applicant has committed to should the scheme be granted consent.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			County Council in part for completed flood relief measures to the road by our bridge and additionally for signage aimed at reducing the traffic that already exists. These funds are thus already earmarked for these measures without any resource to deal with this Scheme. Having almost doubled the precept to meet non-lime down challenges we cannot raise it again. Even if we did it would never be enough to deal with this. That disproportionate financial resource is mirrored in the number of people and available time between the Parish and the Applicant. We have no employees and have only a volunteer Chairman who doubles up as Treasurer. However, we do have an abundance of local knowledge of our home environment and its history, including weather and flood patterns. We do have common sense. We are not hired "experts" paid to give views and opinions that the Applicant needs to express however flawed and unsustainable	Noting funding for this specific action may already be available, the Applicant would welcome any input regarding similar needs within the Parish.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			they are. We also hope to make up for this deficit by asking the Examining Authority to ask the questions (highlighted in bold below) of the Applicant, the answers to which questions the Examining Authority will need to have in considering this application.	
EGPM-015	Socio-Economics, Recreation and Tourism	Community Impact	In addition to asking the Examining Authority to ask questions of the Applicant we also have some observations by way of example on matters where we think the Applicant is, either not answering the point raised or talking nonsense. We note that the "Applicant acknowledges that there will be impacts on the community.....which may be a source of concern for local residents" but this misses by a country mile the extent of harm this Scheme, if implemented, will do to our and other communities. We are already seeing asking prices for properties adjacent to the Lime Down dropping by up to 25% and still not selling this will cause mortgage renewal problems. Even	The Applicant seeks to respond to all comments in a clear, concise and factual manner and is not seeking to undermine any concerns raised by local communities. The Applicant has responded to this comment under EGPM-007.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			more distressing is properties that need to be sold due to divorce or death which seem to be unsellable even now with the uncertainty alone. This causes great financial distress and mental health issues.	
EGPM-016	Landscape and Visual	Visual Impact	Land Use, Landscape and Visual In total Lime Down propose erecting in excess of 1.8 million square meters of solar panels that are two storeys high. These are spread out into 5 separate areas of congregation covering an area that is 10 x 5 kilometres. That is 50 square kilometres of land that stands as a gateway to the Cotswold National Landscape. In our community those who occupy the houses called The Plain and probably The Plain Farm will suffer long term visual effects from the panels by the road between the splash at Norton and the crossroads at The Plain Farm. From the right-angle bend in the road at grid ref 880 857 even at ground level, the panels in those fields will be visible from parts	The Plain (Receptor RI160) and The Plain Farm (Receptor RI150) have been assessed in the LVIA presented in ES Volume 1, Chapter 8 Landscape and Visual Impact Assessment (LVIA) [APP-060] and were not carried forward into the assessment due to the level of intervening vegetation between the properties and the Scheme. The section of the road referred to is part of the Fosse Way (Receptor TR145 which extends southwest towards Grittleton on roads and an unsurfaced byway) which was assessed as having Moderate Adverse Significant effects during construction and Year 1 but this is due to Lime Down Site C to the south.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			of Malmesbury. This road is the main route for those visiting or leaving the village from or towards Norton and the M4 beyond. The village of Easton Grey is a Conservation Area and within the Cotswold National Landscape.	The Applicant recognises that Malmesbury Abbey is just visible on the skyline in views from the right-angle bend in the road at grid ref 880 857 across low clipped hedgerows on this corner and across Field B6. However, in reverse views from Malmesbury (at a distance of 5.7km) proposed infrastructure within field B6 will not be perceivable with the naked eye due to aerial or atmospheric perspective where distant objects have less contrast between themselves and the background. Any intervisibility will be Negligible.
EGPM-017	Cultural Heritage	Heritage Assets	These panels are within 300 metres of the start of the Cotswold National Landscape and will have a horrible visual impact on all those that use the Fosse Way. The Fosse Way is made up of both metalled highway and unmade track a point that the Applicants and their experts appear to be unaware of or choose to downplay in their responses. The Fosse Way is in parts a scheduled monument. This is the case in relation to Easton Grey where the	The potential effects of the Scheme on the Roman Roads (i.e. the Fosse Way), as well as other Roman archaeological assets and designated assets such as listed buildings are fully assessed in ES Volume 1, Chapter 12: Cultural Heritage [APP-064] , supported by detailed technical appendices in ES Volume 3, Appendices 12-1 to 12-7 [APP-219 to APP-231] . Where an adverse effect has been identified to Roman archaeological assets appropriate

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			area of the settlement at the crossing of the Avon is a monument scheduled under the Ancient Monuments and Archaeological Areas Act 1979 and listed in 1994 under the number 1011635. Likewise, the village bridge is Grade II listed, Entry Number:1356034 and much visited by tourists and residents alike. The village also has other listed buildings.	mitigation is proposed. See Section 12.9 of ES Volume 1, Chapter 12: Cultural Heritage [APP-064] for embedded mitigation and Section 12.11 for additional mitigation. An overarching archaeological mitigation strategy is provided in ES Volume 3, Appendix 12.6 Archaeological Mitigation Strategy [APP-230]. Since the design presented at PEIR stage, Field C26, the westernmost part of Field C25, and the majority of Field C13 have been entirely removed from the Order Limits. Solar PV Panels have also been removed entirely from within Fields B1-B5, C24-C25, and C13. A number of fields abutting the Fosse Way within which Solar PV Panels will be erected have had offsets established with their boundaries with Fosse Way, including Fields B6, C10-C12, and C22-C23. Appendix 12.1: Heritage Statement [APP-219] identified that the overall setting and significance of the Fosse Way will remain intact, and

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				the asset will retain its legibility as a roadway within a largely agrarian landscape. Consequently no significant effects were identified to the asset. Likewise, no impact was identified as a result of the Scheme to the Scheduled Romano-British settlement, earthwork enclosure and a section of the Fosse Way, 415m west of Whatley Manor (NHLE reference 1013354). The Scheme lies adjacent to the CNL; Site A, B and C are within the setting of the CNL. The proposed development has been set back from the CNL to protect land within its setting. This land will be utilised for positive enhancement of the CNL and 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 inclusion of wildflower meadow verges

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				on the edge of set aside land in A11, A12 and C10 to provide attractive buffers in views from public roads; and Hedgerow enhancements including the re-establishment of historic hedgerows within the setting of the CNL.
EGPM-018	Soils and Agriculture	Agricultural Land Use	In terms of Land use those fields around Easton Grey, Area B, upon which it is proposed to place the panels are mostly, on the Applicants own evidence, of the best and most versatile of agricultural land subgrade 3a with a small amount of subgrade 3b. So far as we have been able to discern the Applicant has put forward no justification as to why this is necessary. [see Overarching National Policy Statement for Energy (EN-1) at 5.11.34]. The same comment pertains to the land in Area D. See the Agricultural Land Classification Mapping at APP-172 https://national-infrastructureconsenting.planninginspectorate.g	An appraisal of alternative sites is presented 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 assessment considered alternative sites within a 20 km radius of the existing National Grid Melksham Substation and concludes that there are no more suitable locations within the defined search area than the proposed Site. The Site Selection Assessment explains how brownfield land, industrial land, previously developed land and lower grade agricultural land were considered in accordance with policy.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			ov.uk/projects/EN010168/documents	
EGPM-019	Landscape and Visual	Visual Impact	In addition, and again by way of example to the parts of the Scheme nearest to Easton Grey, Alderton and Sherston, the following public rights of way which are much used by the community and visitors will be rendered ghastly. 1) The Bridleway from Lordswood Farm to the Sherston roads, 2) The 1 plus km. of by way that extends from Commonwood Lane to the motorway, 3) those numerous footpaths that join what is the triangle formed between Sherston, Alderton and Farleaze farm 4) the designated cycle route that runs between Malmesbury, through Foxley, to Sherston and 5) by way of final example the footpath that joins Foxley and the Vine Tree pub at Norton. The latter is a vibrant local community pub with a hard to come by reputation for food and hospitality.	The Applicant acknowledges that the experience for users of existing 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 PRow 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 [REP1-29 to REP1-032] and are secured through the Outline LEMP [APP-

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			How the Applicant in its Landscape and Visual Impact assessment can conclude that they can minimise the number of locations that will be visually impacted is a mystery. To state that the effect will be mitigated by year 15, the equivalent of a life sentence in jail terms, is as extraordinary as it is in any event wrong in relation to the examples identified. To say that on the basis of these unsupportable claims a panel height of 4.5 meters is "not considered excessive" is just nonsense.	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 [APP-060] assesses the effects on users of Public Rights of Way (PRoW) and identifies 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 (including the footpath from Lordswood Farm to Sherston Roads (WT SHER 16, Receptor TP097), all of which are local PRoW which are either within or directly adjacent to the proposed arrays. For the Byways between the Commonwood Lane and the Railway line (Receptors TP089 and TP092) Moderate Adverse effects were recorded during Construction and Year 1, reducing to Moderate

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				/Minor Adverse at Year 15 as a result of the proposed mitigation. For the Wiltshire Regional Cycle route which follows the Fosse Way (Receptor TR145) through the Lime Down Scheme, the LVIA recognises that there will be Moderate Adverse effects during Construction and Year 1, reducing to Moderate /Minor Adverse at Year 15 as a result of the proposed mitigation. For the footpath between Foxley and the Vine Tree (Receptor TP037, the LVIA recorded Major/Moderate (Significant) effects during Construction and Year 1, reducing to Minor Adverse at Year 15 as a result of the proposed mitigation.
EGPM-020	Cultural Heritage	Heritage Assets	In summary the back roads and much-loved Rights of way used by walking, cycling or horse-riding members of our community and its visitors, will be blighted, not least by the tunnel effect and noise. See	Since the design presented at PEIR stage, Solar PV Panels have been removed entirely or set back within proximity to designated heritage assets along Athelstans Pilgrims Way. No significant effects have been

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			for example the Athelstan's Pilgrims way which crisscrosses the Area of Lime down Solar with walking and cycle routes please see the athalstanpilgrimway.org website and also the komoot.com website and the cycling around sherston section	identified as a result of the Scheme on any of these assets (see ES Volume 1, Chapter 12: Cultural Heritage [APP-064] , supported by Volume 3, Appendix 12.1: Heritage Statement [APP-219]).
EGPM-021	Socio-Economics, Recreation and Tourism	PRoWs	The benefits to mental and physical health and tourism will be severely disrupted, curtailed or just ruined. In addition, as already noted the effect on property values and the prospect that a required sale is required and may not be possible at all is and will cause huge distress.	The assessment in ES Volume 1, Chapter 18: Human Health [APP-070] also considers the physical and mental health impacts of changes to recreation and countryside access under the assessment topic 'open space, leisure and play', and concludes that no significant adverse effects are anticipated at any phase of the Scheme. The Applicant confirms that existing PRoW are to be protected as far as practicable within the Scheme design, with management measures set out in the Outline PROWPPMP [REP1-104], confirmed as embedded mitigation in Section 16.9 of ES Volume 1, Chapter 16: Socio-

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				Economics, Tourism and Recreation [APP-068]. New permissive access routes have been incorporated into the Scheme design, shown 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]. These are identified as additional mitigation and enhancement measures in Section 16.11 of ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]. The PRow and Permissive Paths Management Plan is secured through Requirement 16 of Schedule 2 of the Draft Development Consent Order [REP1-007]. The preparation, approval and implementation of the detailed Construction Environmental Management Plan and Construction Traffic Management Plan, substantially in accordance with the outline plans, are secured through

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				Requirements 13 and 15 respectively in Schedule 2 of the Draft Development Consent Order [REP1-007], ensuring that impacts on PRow and recreational routes are appropriately managed during construction. The approach to recreation and access has been discussed with Wiltshire Council's Public Health team and is under discussion with Wiltshire Council's Countryside Access Team and is set out in the relevant Statement of Common Ground to be submitted at Deadline 2 (Statement of Common Ground with Wiltshire Council (Rev 1) [EN010168/EXAM/8.2]). The Applicant has responded to comment 'CC-021' above on property prices.
EGPM-022	Landscape and Visual Description and DCO Process	Mitigation Measures	The Applicants reference "Mitigation measures to address landscape and visual effects are set out in ES Volume 1, Chapter 8: Landscape and Visual [APP-060],	Measures for the implementation (including species and sizes), management, monitoring and replacement of landscape and ecological mitigation are set out in

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			Figure 3-4-1 to 3-4-5.2 Landscape and Ecology Mitigation Plan [APP-084] and secured within the Outline Landscape and Ecological Mitigation Plan (LEMP) [APP-283] and the Outline Ecological Protection and Mitigation Strategy (EPMS) [APP-284]. These documents include proposals for new and enhanced planting, retention of existing hedgerows and woodland, and landscape integration measures to reduce visual effects over time" These are only plans. How can the Examiners be sure that these proposals will be fulfilled and, importantly, that new trees and hedges will flourish?	the Outline LEMP [APP-283]. The detailed LEMP will need to substantially in accordance with the Outline LEMP [APP-283] and will be secured through Requirement 7 in Schedule 2 of the Draft DCO [REP1-007]. The draft DCO also includes a Requirement for submission of a written 'ecological protection and mitigation strategy' (EPMS) for the LPA's approval as prescribed by DCO Requirement 8, under schedule 2, which must be substantially in accordance with the Outline EPMS [REP1-106]. The preparation, approval and implementation of detailed landscape and ecological management plans, substantially in accordance with the Outline LEMP [APP-283] and EPMS [REP1-106], are secured through requirements in Schedule 2 of the Draft DCO [APP-007], ensuring that the identified mitigation measures are delivered

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				and maintained throughout the lifetime of the Scheme. The Applicant confirms that the DCO process itself incorporates enforceable mechanisms to regulate Scheme delivery. Any breach of development consent order or failure to comply with Requirements can result in enforcement action.
EGPM-023	Description and DCO Process	DCO Commitments	The applicant is an SPV with ultimate ownership being a fund which will not bear responsibility, which is anyway unlikely to develop but to sell, probably to an offshore company. What safeguards are there to force an ultimate owner to comply with terms in a DCO, will they have the resources to do so and who will be responsible to take enforcement measures?	The Applicant confirms that the Development Consent Order (DCO) incorporates the enforceable mechanisms to regulate Scheme delivery, operation and decommissioning. Any breach of development consent order or failure to comply with Requirements can result in enforcement action. The SPV- "Lime Down Solar Park" is attached to the DCP directly, so all consent obligations, requirements and operational responsibilities remain legally and financially secured with this entity. The Applicant confirms that, if consent is granted, it has the capability to build, own,

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				and operate the Scheme. The Applicant may also consider the option to sell or transfer the Scheme to another suitably qualified party. Regardless of any future ownership, the undertaker as defined in the Draft DCO [REP1-007] will remain bound by the legally enforceable requirements of the DCO. Finally, the Funding Statement [APP-019] submitted with the DCO application demonstrates that the Scheme is financially viable and adequately funded to deliver the Scheme in full.
EGPM-024	Construction and Decommissioning Soils and Agriculture	BESS	The Applicants also state that "Built aspects of the Scheme such as the BESS Area and substations are also subject to the proposal to return the land to its original use and condition, which is primarily agricultural land of Subgrade 3b quality, with some Subgrade 3a at the BESS Area." Can the Examiners please question this	As set out within Section 2 of the Outline Decommissioning Strategy (Rev 2) [REP1-100] , when the operation and maintenance phase ends, the Solar PV Sites would be decommissioned and the land returned to its original use and condition as far as practicable and returned to the landowner. All Solar PV Panels, mounting structures,

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			and ask; How can land which is under tons of concrete with deep piles be returned to its original use and condition?	cabling, inverters, transformers, switchgear, BESS Area, substations and access tracks would be removed from within the Solar PV Sites and recycled or disposed of in accordance with good practice and market conditions at that time. Complete removal of piled foundations will be avoided if practicable so as not to create potential pathways to underlying groundwater resources or create structural deficiencies in the surrounding soils. Foundations and other below ground infrastructure will be cut to 1.2 m below the surface to enable future ploughing and capped with a reinforced concrete cap. Should piled foundations be completely removed, the methodology will take into account the type of pile used and the properties of the surrounding soils, and the resultant void will be immediately backfilled with an appropriate material such as bentonite slurry.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				The depth of 1.2m is the standard depth considered for an agricultural soil profile and would enable grading to be determined in accordance with the established guidelines for grading agricultural land, as re-issued by Defra and the Welsh Government in a joint publication in 2025. The Decommissioning Strategy is secured by Requirement 20 in Schedule 2 of the Draft DCO [REP1-007] and must be approved by the relevant local planning authority and must be in substantial accordance with the Outline Decommissioning Strategy [REP1-100] .
EGPM-025	Transport and Access Socio-Economics, Recreation and Tourism Ecology and Biodiversity	Recreation	The comments we make concerning walking, cycling and horse riding also, again by way of exmple apply to the back road between Alderton and Sherston. As a snapshot of the usage, we attach images below that were taken on Friday 24th April between 10.45 and 11.00am on a morning exercise ride from a yard in Luckington. In that short time window, we saw two parties of cyclist, one runner and one	Figure 4.1 in the Outline CTMP [REP1-112] illustrates the proposed HGV construction routes in the vicinity of the Solar PV sites. The back road between Alderton and Sherston does not form part of the proposed construction routes. The Applicant understands the importance of the local highway network for recreational users including equestrians, walkers, and cyclists linking between settlements

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			collection of birdwatching walkers. The views are as follows:- 1. From grid 846 840 looking SSE to Area C Horseriders 2. From grid 849 843 looking NE to Area A Horseriders and walking birdwatchers foot path to left 3. From grid 852 849 looking SSE to area C Horseriders 4. From grid 852 846 looking SSE to area C Horseriders and cyclists 5. From grid 852 846 looking East to Area A Horserider. It is also worth noting that at this time of year the hedgerows that have been established for generations abound with birds and other wildlife, not least Yellow Hammers.	and PRoWs, and has therefore assessed this in ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]. The assessment therein finds no significant adverse effect to the recreational use of the local highway network as a result of the Scheme at any phase. The value of the hedgerow network across the Order Limits is fully recognised by the Applicant, and all hedgerow types were considered to be of District level importance in the ecological assessments, as noted in Table 9-8 of ES Volume 1, Chapter 9 Ecology and Biodiversity (Rev 2) [REP1-015]. This document also details that hedgerow loss has been avoided wherever practicable, through measures such as the utilisation of existing access points and tracks wherever possible. As noted in Paragraphs 9.10.137 and 9.10.138, in total, approximately 343 m of existing

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				hedgerow is anticipated to be lost across the Solar PV Sites, and 1.43 km is anticipated to be lost across the Cable Route Corridor, with all remaining hedgerows (approximately 73.44 km across the Solar PV Sites and 41.51 km across the Cable Route Corridor) being either retained or enhanced. In addition, the majority of hedgerow losses within the Cable Route Corridor will be reinstated following the completion of cable works, as noted in Paragraph 9.10.138, and approximately 25.17 km of new species rich hedgerows and lines of trees will be created at the Solar PV Sites, as noted in Paragraph 9.12.6. In conclusion, it is considered that the Scheme would result in a significant increase in both hedgerow extent and quality within the Order Limits. 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

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				enhancement measures. This is quantified through the use of the DEFRA published Statutory Biodiversity Metric (Rev 2) [REP1-093] with further details provided with the Biodiversity Net Gain (BNG) Assessment Report (Rev 2) [REP1-089] which demonstrates in excess of 10% BNG will result from the Scheme. An assessment of the potential impacts on protected and notable species of wildlife, including breeding birds such as yellowhammer, supported by the hedgerow network within the Order Limits is also provided within ES Chapter 9 [REP1-15]. The assessment identifies avoidance, mitigation and enhancement measures to address potential impacts on habitats and protected and notable species, including breeding birds. It also identifies opportunities for ecological enhancement, including the creation and long-term management of habitats, and delivery of biodiversity net

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				gain. With identified embedded and additional mitigation measures in place, the assessment concludes that no significant adverse effects on ecology and biodiversity are anticipated as a result of the Scheme, with the exception of hedgerows (further detail is provided below), and ground-nesting birds of open habitats. Residual significant adverse effects on these receptors are anticipated at a local-level of geographical importance only for skylark and hedgerows, and at site level for other ground-nesting bird species.
EGPM-026	Cultural Heritage	Statement of Common Ground	Cultural Heritage Under the heading of Cultural Heritage, the "Applicant Notes that the approach to the assessment has been agreed with Wiltshire Council and the methodology for the mitigation strategy is being discussed with Wiltshire Council and is set out in the relevant Statement of Common Ground to be submitted at Deadline 1. This dubious statement is repeated in other places, and we would ask that the Panel ask whether that	The Applicant notes this comment and confirms that the approach to the assessment has been agreed with Wiltshire Council and the methodology for the mitigation strategy is being discussed with Wiltshire Council. The Statement of Common Ground with Wiltshire Council, which remains a live document, has been submitted at Deadline 2.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			statement is correct. If at the time the statement was made it was not correct, then that calls into question the veracity of the statements made by the Applicant elsewhere. So far as Easton Grey is aware no Statement of Common Ground has been agreed with Wiltshire Council. In addition, why have Easton Grey not been consulted?	
EGPM-027	Socio-Economics, Recreation and Tourism	Tourism	Tourism Under the heading of Tourism, the Applicant asserts that they assess a long-term loss of jobs at 11 and a short-term loss at 50. For example, we have a country spa hotel and a local pub whose businesses will suffer adverse, if not existential, financial impacts. Can the Examiners please ask how these figures are assessed, i.e. on what evidence is this conclusion based? This estimate appears to be far too low and most probably stems from assumptions that are at best highly questionable or just wrong. The extent of farmland, farms, equine, pubs, and hotels and other businesses implicated are	The assessment methodology for ES Chapter Volume 1, Chapter 16 Socio-Economics, Tourism and Recreation [APP-068] is set out under section 16.6. The methodology has been agreed with Wiltshire Council and will be set out in the Statement of Common Ground which is submitted at Deadline 2. Where losses to tourism employment have been identified, these are worst-case estimates based on likely significant effects from the assessment of individual tourism and recreation receptors as set out

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			considerable. No detail is provided concerning "alternative operational and management opportunities". Can the Examiners please ask what these operational and management opportunities are, how they will be filled by the local community, not least by those that will lose their jobs?	in ES Volume 3, Appendix 16-2: Tourism and Recreation Receptors [APP-241]. The magnitude of impacts to these receptors have been considered against the quantum of employment in tourism-dependent sectors (accommodation, food and drink services, retail, culture, arts, and sports and recreation) in localised areas as set out in the Business Registry and Employment Survey (or 2023 as the latest year at the point of assessment). From this, an estimate for the overall worst-case employment loss in each localised area has been aggregated at each phase of the Scheme to give the total anticipated job losses. For example, where a 'low' magnitude impact was anticipated, an estimated 1% of local jobs would be affected, or where a 'medium' magnitude impact was anticipated, an estimated 10% of local jobs would be affected. The anticipated worst-case peak temporary loss of 50 FTE jobs is

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				approximately 0.7% of tourism employment in the 5 km Study Area around the Scheme. This is based on embedded mitigation only, and the Applicant has committed to additional mitigation to reduce employment losses, support skill uplifting and retraining, and focussing on enhancing opportunities to develop local supply chains and employment. These measures are secured through the Outline SSCEP [REP1-108] by Requirement 18 of Schedule 2 to the Draft DCO [REP1-007].
EGPM-028	Noise and Vibration	Construction Noise Impact	Noise and Vibration Under the heading of noise and vibration the Applicant, see "Construction Environmental Management Plan [APP-277], concludes that "no significant effects from construction noise or vibration are expected. Can the Examiners please ask how the Applicant can they justify saying there will be no significant effect when they are installing 600,000 piles plus other infrastructure?	The noise and vibration impacts arising from construction activities are assessed in Section 14.10 of ES Volume 1, Chapter 14: Noise and Vibration [REP1-021]. Mitigation measures are committed to through the Outline CEMP [REP1-096]. As a reasonable worst-case this assessment includes the noise from piling rigs that will be larger and louder than those used in practice. Average daily construction noise

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				levels are presented in Table 14-18 of ES Volume 1, Chapter 14: Noise and Vibration [REP1-021] and show that these are typically around 55 dB which is level of regular conversation. As such, the assessment concludes that daily noise exposure levels would not breach significant effect thresholds. A noise monitoring programme agreed with Wiltshire Council will be carried out during construction. The preparation, approval and implementation of the Construction Environmental Management Plan, substantially in accordance with the Outline CEMP [REP1-096], is secured through Requirement 13 in Schedule 2 of the Draft DCO [REP1-007], ensuring that construction noise and vibration are appropriately controlled.
EGPM-029	Transport and Access	Construction Traffic	Traffic and Transport Displaced traffic, to and from Malmesbury and Sherston, avoiding the routes being used in construction will be pushed onto the single-track road between	The HGV construction routes are shown in Figure 4.1 and Figure 4.2 of the Outline CTMP [REP1-112] . None of the proposed HGV construction routes will route via Easton Grey.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			Norton and Easton Grey. This road is already suffering from increased traffic and is falling apart in many places. In addition, there is with a highly dangerous crossroads at Plains Farm. That crossroads has already experienced near fatal accidents, and this can only get worse. This crossroad is also the junction for a designated and much used cycle route on the road that runs from Malmesbury, through Foxley, to Sherston. Despite asking for details, in responses to the targeted consultation, in relation to the Applicants intentions and methodology on how they will lay cables we still have no details and whether this will include road closures. This is a sensitive matter for the roads in our parish as, save for the B4040 they are all single track with many blind corners and summits. Bland references to method statements and details yet to be produced makes it impossible to comment or take a	The assessment presented in the updated Annex J of ES Volume 3, Appendix 13-1: Transport Assessment [REP1-057] submitted at Deadline 1 demonstrates adequate carriageway width or frequency of passing place opportunity to pass at least an HGV and a light vehicle on the proposed construction routes. An Outline CTMP [REP1-112] supports the DCO Application and presents outline measures which restrict construction deliveries to the proposed construction routes and times outside of highway network peak hours. A final Construction Workers Travel Plan will also be submitted as part of the Final CTMP, setting out the preferred routes to the site. Further to the above there is no reason to suggest that a material volume of traffic would be displaced onto the route between Norton and Easton Grey and

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			view on what is actually being proposed.	materially impact the crossroads at Plain Farm. Road closures to facilitate the cable route will be avoided where possible through Traffic Management. The updated Outline CTMP [REP1-112] submitted at Deadline 1 also 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 more condensed timeframes 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 to minimise impact on users.
EGPM-030	Construction and Decommissioning	Decommissioning	Decommissioning Under the heading of decommissioning the Applicant states "Should the Scheme change ownership before the decommissioning stage any new owner remains bound by the	The Applicant confirms that the DCO process itself incorporates enforceable mechanisms to regulate Scheme delivery. Any breach of development consent order or failure to comply with Requirements can result in enforcement action.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			commitments and obligations set out with in the DCO and associated management plans". There are similar statements elsewhere but as Easton Grey Parish noted absent financial security criminal sanctions or claims for breach are toothless. Absent, for example some sort of bonded guarantees, there is no real enforcement mechanism and, to the extent that it proved necessary, any enforcement would be a burden on the Wiltshire County Council or the police and CPS and therefore ultimately the taxpayers including local council taxpayers. The Bank behind this applicant has a [Redacted] whilst the Applicant itself is a SPV with [Redacted] investors rendering enforcement a "mirage" in any event.	A detailed Decommissioning Strategy will be prepared substantially in accordance with the Outline Decommissioning Strategy [REP1-100] and must be submitted to and approved by the relevant local planning authority prior to the commencement of decommissioning. This is secured through Requirement 20 in Schedule 2 of the Draft DCO [REP1-007]. In addition, the Applicant is seeking a time-limited consent for the Scheme to have an operational period of 60 years, with decommissioning to take place following cessation of operation. This is secured by Requirement 20 in Schedule 2 of the Draft DCO [REP1-007]. The Applicant confirms that, if consent is granted, it has the capability to build, own, and operate the Scheme. The Applicant may also consider the option to sell or transfer the

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				Scheme to another suitably qualified party. Regardless of any future ownership, the undertaker as defined in the Draft DCO [REP1-007] will remain bound by the legally enforceable requirements of the DCO. Finally, the Funding Statement [APP-019] submitted with the DCO application demonstrates that the Scheme is financially viable and adequately funded to deliver the Scheme in full.
EGPM-031	Hydrology, Flood Risk and Drainage	Flood Risk	Hydrology and Flood Risk What the applicant references as EGPM 003 Hydrology, Flood risks and drainage the Applicant's comments disclose what seems to be either ignorance or a complete misunderstanding of the points set out in the Eason Grey Relevant Representations. Our area is prone to flooding on an annual basis and frequently more regularly than that. We can and do monitor when flooding is likely by observing the height and flow of water through	The detailed local examples of flooding around Easton Grey, Luckington, Sherston, Norton, Foxley, the railway and the wider River Avon corridor are acknowledged. These examples are useful in describing how the existing catchment behaves, including the role of small watercourses, ditches, road crossings, floodplain areas and the River Avon. The examples cited, including raised walkways on the Macmillan Way, flood protection at Sherston, road flooding at Norton

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			the many ditches and small watercourses that criss-cross our countryside and flow by multiple routes into the River Avon. The proposed development seems to be designed to direct water concentrations towards areas that already regularly flood or are very prone to flooding. It is as well to give some commonsense examples of where the built environment that has been in place for generations to mitigate this concentration of water. The extent of high-water events is monitored in our area at the Fosse Way measuring station (just downstream from Easton Grey) and the regularity and extent of flooding is subsequently mimicked by the peaks recorded at that measuring station. Our area along the river Avon is in the highest flood zone bracket (see the flood map for planning Gov UK website) and many of those areas identified as	Splash and Easton Grey, flooding near Cowage Farm and flood risk to the railway corridor, are all existing floodplain or surface water receptor issues. They are not caused by the Scheme and do not demonstrate that the Scheme would increase flood risk. The presence of existing flood defences, raised walkways, dropped kerbs, road flooding and Flood Zone 3 land is not disputed. These matters confirm that parts of the existing catchment are already sensitive to fluvial and surface water flooding. Where the examples fall within Flood Zone 3, that is consistent with the baseline fluvial flood risk already identified through Environment Agency mapping and considered in the submitted assessment. The raised walkways, dropped kerbs, gabion works and flood protection measures described are existing responses to existing flood mechanisms. They do

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			Flood Zone 3, flood annually already. Example 1 On the Macmillan Way National Trail by Luckington Manor at grid 839 841 the route sits on top of a walkway raised by a metre plus along a length of some 30 meters so as to make the path accessible on those frequent occasions when the water rises. Flood Zone 3. Example 2 On the B4040 road at grid 844 850 midway between Sherston and Luckington the riverbank has been raised, most recently with Gabion Baskets filled with stone, to mitigate those frequent occasions when the water rises and would otherwise render the road impassable. Flood Zone 3. Example 3 On the Macmillan Way National Trail where it reaches Sherston at grid 851 856 there is a flood defence around the retail unit to mitigate those frequent occasions when the water rises	not indicate that the proposed panelled areas would create a new drainage pathway or direct additional runoff to those locations. That existing sensitivity does not, of itself, demonstrate that the Scheme would increase flood risk. The assessment question for the DCO is whether the Scheme would materially increase runoff rates, runoff volumes, flow concentration or downstream flood risk when compared with the existing baseline. Surface water already drains downslope through the local ditch and watercourse network towards lower-lying floodplain areas and the River Avon. The Scheme does not create a new connected drainage system across the panelled fields which would collect and discharge water towards the locations listed in the representation. Solar PV panels are elevated above ground and rainfall drains to

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			and would otherwise render the retail unit unusable. Flood Zone 3 Example 4 On the Norton side of the bridge in Easton Grey at grid 880 873 during recent road works construction took (see the Easton Grey flood plan dated 30.9.24). That construction includes the provision of dropped curbs to the roadway to allow the water to overflow round the bridge and over the road. This is to mitigate those frequent occasions when the water rises and would otherwise render the road impassable. It is also in place to mitigate the risk of flooding to those properties and sewage plant identified in the Easton Grey flood plan. Flood Zone 3. Example 5 At the road junction by the Norton Splash at grid 886 844 there is a raised stone walkway and bridge so as to at least make a footpath accessible on those frequent occasions when the water rises and renders the road itself impassable. This is on the main	the ground beneath and between the arrays. The key controls are maintaining vegetated ground cover, managing soil compaction, avoiding connected bare flow routes, using permeable access tracks and retaining existing overland flow routes. Formal drainage areas will follow the drainage hierarchy. Where discharge is required, runoff will be attenuated and controlled within the secured drainage parameters, including allowance for the relevant design storm and climate change. The baseline flood context, including Flood Zone 3 areas, watercourses, ditches and downstream receptors, has been assessed through ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [REP1-017] and ES Volume 3, Appendices 11-1 to 11-9 FRA & Drainage Strategies [REP1-037 to REP1-054]. The submitted assessment concludes

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			road access for the residents and visitors of Easton Grey going to or from the M4. Flood Zone 3. Example 6 The Mill, by Cowage Farm in Foxley at grid 903 863 has flooded in recent years despite efforts to try and mitigate the flood risk, the adjacent footpath and Bridle way are also frequently rendered impassable. Flood Zone 3. Example 7 The road between Norton and Bradfield Manor around grid 895 835 frequently floods in two places (also of note the panels at this point are proposed on land that is the best and most versatile of agricultural land Subgrade 3a). The road is regularly impassable to vehicles other than SUVs with a higher wheelbase. Frequently cars break down having attempted to pass through this flood area. This is on the main road access for the residents and visitors of Easton Grey going to or from the M4. It is identified as a long term flood	that the Scheme would not materially increase flood risk.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			risk see the technical map on the GOV UK website check your long-term flood risk. Example 8 The railway line between Bradfield Manor at grid 895 828 and the tunnel by Broadmead Covert at grid 849 825. This is a key transport route to Wales and is identified as a long term flood risk with the highest rating again see the technical map on the GOV UK website check your long-term flood risk.	
EGPM-032	Hydrology, Flood Risk and Drainage	Flood Risk	In addition to the above the Examiners will need to take account of those places where there is frequent flooding in and around Malmesbury (not least in the area of the mills and homes around St John's Bridge and Street), the Somerfords, Gauze Brook and Gabriels Well where those living locally will have far better information than appears to be available to, or is ignored by the Applicants "experts" whose principal or only concern appears to be to ensure that their solar PVs and infrastructure is not impacted.	Local knowledge of frequent flooding around Malmesbury, the Somerfords, Gauze Brook and Gabriel's Well is recognised. These locations are important in understanding the existing flood risk baseline. The baseline flood risk assessment is set out in ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [REP1-017], Section 11.7, and the site-specific ES Volume 3, Appendices 11-1 to 11-9: Flood Risk Assessment and Drainage Strategy [REP1-037 to REP1-054].

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				Gauze Brook and Gabriel's Well have been specifically identified as locations where material fluvial interaction required closer consideration. The assessment methodology is set out in ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [REP1-017], Section 11.6. Targeted modelling and floodplain assessment have been undertaken where justified, including at Lime Down D as reported in ES Volume 3, Appendix 11-6: Flood Risk Assessment and Drainage Strategy - Lime Down D / BESS [REP1-047], Section 2.3, and Lime Down E2 as reported in ES Volume 3, Appendix 11-8: Flood Risk Assessment and Drainage Strategy - Lime Down E2 [REP1-052], Section 2.3. The concern that the assessment is only concerned with protecting solar PV infrastructure is not accepted. The FRA & Drainage Strategy [REP1-037 to REP1-054] considers flood risk to and from

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				the Scheme, including whether off-site flood risk would be increased. Existing flooding in the wider catchment does not automatically mean the Scheme would worsen that flooding. Surface water already moves through the catchment towards ditches, watercourses and floodplain areas. The relevant question is whether the Scheme would materially increase the rate, volume or concentration of that runoff. Panelled land remains permeable and will not be drained as hardstanding. The relevant construction controls are secured through the Outline CEMP [REP1-096], Section 3.6, Table 5. Formal drainage areas will follow the drainage hierarchy and will be controlled through secured drainage parameters, including attenuation and controlled discharge where required, as set out in ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [REP1-017], paragraphs

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				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 and 6.5. The submitted assessment, including ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [REP1-017] and the FRA & Drainage Strategy [REP1-037 to REP1-054], concludes that, with the secured controls, the Scheme would not materially increase off-site flood risk.
EGPM-033	Hydrology, Flood Risk and Drainage	Flood Risk	The Applicants Non-Technical Summary states that the scheme has been designed as “far as practical” to avoid and reduce the impacts and effects on Hydrology, Flood risk and Drainage. Thus, by definition, where impractical nothing has been done to avoid and reduce the impacts and effects on Hydrology. Can the Examiners please closely question what the Applicant means by “where practical”. What design features do the Applicants consider “practical” and what design features are not?	The phrase “as far as practicable” does not mean that no hydrology, flood risk or drainage measures would be provided where avoidance is not possible. It reflects the normal design hierarchy: avoid risk where possible, reduce risk through layout and design where avoidance is not possible, and then control residual risk through secured mitigation. In practical terms, the Scheme has avoided and reduced hydrology and flood risk impacts through a series of

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				design measures. The majority of the Scheme is located in Flood Zone 1. The BESS and substations are located in Flood Zone 1 where practicable. Limited floodplain interaction is primarily associated with solar PV panels at Lime Down D and Lime Down E2, which are flood-compatible and raised above ground. Existing overland flow routes and watercourse buffers are retained. Access tracks are permeable where appropriate. Runoff from genuinely impermeable infrastructure is attenuated and controlled. Construction risks, including soil compaction, sediment mobilisation and drainage disruption, are controlled through the Outline CEMP [REP1-096] and Outline Soil Resources Management Plan [APP-280]. The Applicant has not left hydrology impacts uncontrolled where full avoidance is not practicable. The submitted ES Volume 1, Chapter 11: Hydrology, Flood Risk and

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				Drainage [REP1-017] and FRA & Drainage Strategy [REP1-037 to REP1-054] set out how the design and embedded mitigation avoid, reduce and control flood risk and drainage effects.
EGPM-034	Hydrology, Flood Risk and Drainage	Flood Risk	There are statements that there is no evidence that solar panels increase run off – but no details of that evidence. This is particularly important in circumstances where no solar “farm” of the magnitude of Lime Down has been built and there is no evidence as to how tracking panels, which would be horizontal at night, would cause heavy rainfall to dissipate. It defies common sense to suggest that covering land with over 1.8 million square metres of impermeable surface will not reduce the short-term absorption capacity of the ground beneath the panels with the consequence that the water would be channelled more quickly into the ditch and river systems downhill of the panels. If one looks at 7.6.7 of the summary there is a list of 8 bullet pointed mitigation measures but not one of these	The concern is understood. A large area of solar panels can reasonably appear, at first sight, to behave like a large impermeable surface. That is not how the Scheme would function hydrologically, and it is not the basis on which solar PV is treated in NPS EN-3, paragraph 2.10.84, ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [REP1-017] and the FRA & Drainage Strategy [REP1-037 to REP1-054]. Solar PV panels are not equivalent to roofs connected to gutters or drains. They are elevated above ground, whether fixed or tracking, and rainfall drains to the ground beneath and between the arrays. The panel surface area does not equate to the same area of lost infiltration. This distinction is addressed in ES

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			seems to deal with the increased flooding risk that the concentration and acceleration of water from the panels will engender. The Applicant's bullet points seem to be all about how their solar panels and their proposed infrastructure is protected from flood damage. This has the smack of "I am alright Jack" alongside a patronising sentiment of "don't worry your little head". But, with good cause, we do worry and we do not think the points are being adequately addressed if at all. We are a neighbourhood of small communities and even if Easton Grey may be less affected than other communities downstream from us all these communities need to be considered. If permitted, we believe the Lime Down Solar project will increase flood risk outside of its boundaries and we do not see how it could possibly be said to reduce flood risk overall.	Volume 1, Chapter 11 [REP1-017], paragraphs 11.10.8 to 11.10.12, and ES Volume 3, Appendix 11-1: Flood Risk Assessment and Drainage Strategy Covering Report [REP1-037], Section 5.1. Panels can redistribute rainfall locally at drip-lines, including when in a more horizontal position. The relevant question is whether that local redistribution becomes connected, accelerated runoff to ditches, watercourses or downstream receptors. The submitted assessment has considered that pathway and identifies soil compaction, vegetation condition and connected flow routes as the relevant controls, rather than treating the panel surface as impermeable hardstanding. The evidence relied upon by the Scheme, including the assessment approach set out in ES Volume 1, Chapter 11 [REP1-017], ES Volume 3, Appendix 11-1 [REP1-037] and published research on solar panel

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				runoff, including Cook and McCuen, shows that material increases in runoff are principally associated with degraded ground cover, bare soil, compaction and connected flow pathways. The Scheme addresses those matters through vegetation establishment and management, soil protection, controlled trafficking, reinstatement and permeable access tracks, secured through the Outline CEMP [REP1-096], Section 3.6, Table 5, and the Outline Soil Resources Management Plan [APP-280]. The mitigation is not limited to protecting panels or electrical infrastructure. It includes measures to manage runoff, compaction, erosion, pollution and drainage effects so that flood risk is not increased elsewhere. Formal drainage areas will follow the drainage hierarchy. Where discharge is required, drainage will be attenuated and controlled within the

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				secured parameters, including climate change allowance, as set out in ES Volume 1, Chapter 11 [REP1-017], paragraphs 11.10.33 to 11.10.39 and ES Volume 3, Appendix 11-1 [REP1-037], Sections 6.4 and 6.5. Panelled land will continue to drain to ground and will be managed through secured construction, soil and operational controls. The submitted FRA & Drainage Strategies [REP1-037 to REP1-054] concludes that, with the secured controls in place, the Scheme would not materially increase off-site flood risk.
EGPM-035	Hydrology, Flood Risk and Drainage	Flood Risk	In Summary all the examples we identify for the adverse effects of run-off are the highest risk Flood Zone 3. The critical rail route to Wales that sits in a cutting though the site is already noted as high risk due to climate change. The Applicant addresses the security of their assets with an	The concern regarding existing Flood Zone 3 areas, the railway corridor and the potential burden on local communities is understood. Flood Zone 3 identifies areas already at higher probability of fluvial flooding. Surface water from the wider catchment will naturally move

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			apparent disregard for the run-off flood risk being born by the community that will not benefit from the scheme. The Lime Down Solar project provides no sustainable benefits since the electricity to be generated will not be of benefit to our community. The people who benefit are an overseas investment fund managed by Macquarie bank or those who buy the SPV after the grant of a DCO. On the other hand, the flood risk will be carried over a long period of time by the community that stands to receive no benefit.	towards lower-lying ditches, watercourses and floodplain areas. The key question is whether the Scheme would materially increase the rate, volume or concentration of runoff reaching those areas. The submitted flood risk assessment is not limited to whether the Applicant's assets are safe. It assesses flood risk to and from the Scheme, including whether off-site flood risk would be increased. That assessment is provided in ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [REP1-017] and the FRA & Drainage Strategies [REP1-037 to 43P1-054]. The Scheme does not create a connected impermeable drainage catchment across the panelled fields. Panels are elevated and rainfall drains to ground. The relevant controls are vegetation cover, soil protection, reinstatement,

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				permeable tracks and retained flow pathways. Formal drainage areas, including substations, BESS and associated infrastructure, will follow the drainage hierarchy and be controlled through secured principles and parameters. This includes attenuation and controlled discharge where required. For assets such as the railway, detailed drainage design will need to ensure that runoff is managed within the Order Limits and is not directed as uncontrolled discharge towards third-party infrastructure. The Applicant acknowledges the comments regarding the benefits of the Scheme, and is confident in its response provided to the parish council under reference EGMP-013 in the Applicant's Response to Relevant Representations [PDA-009]. The Applicant acknowledges that any adverse effects from the Scheme are more likely to be felt locally than the largely wider-

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				scale benefits of the Scheme. The Scheme is anticipated to help meet the UK's net zero requirements for energy production, which is considered a critical national priority and set out in National Policy Statements for Energy NPS EN-1 (section 4.2) and EN-3. This will therefore benefit the national population rather than just the local population. The benefits of the Scheme are set out in Section 5.3 of the Planning Statement [REP1-087] and include the delivery of large amounts of cheap, secure and low carbon electricity which will help the UK to achieve net zero by 2050, ecological and landscape enhancements, biodiversity net gain, permissive paths, employment generation, economic benefits and skills training. The Funding Statement [APP-019] provides details of the corporate structure of Lime Down Solar Park Limited and how the Scheme is funded. The Applicant is owned by

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				three investment funds managed by Macquarie on behalf of a range of investors, which importantly includes a number of UK pension funds. This ownership structure is common in the energy sector which ensures the Scheme is securely financed privately, enabling the development of essential infrastructure without reliance on public funds or risk to the UK taxpayer. Lime Down Solar Park Limited is a 100% subsidiary of IGP UK Projects Limited. Both are registered in England and Wales and subject to UK tax law and regulations. The Applicant is committed to providing a Community Benefit Fund (CBF) to allow for community-driven benefits that are not necessarily associated with the Scheme itself. The purpose is to establish a means to recognise local community needs that the Applicant wants to be able to contribute towards in recognition of the local impact of the Scheme. The

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				Applicant welcomes suggestions and engagement from Easton Grey Parish Meeting regarding how best the CBF could serve the Parish.
EGPM-036	Hydrology, Flood Risk and Drainage	Flood Risk	A commonsense view on the impact on flood risk from Lime down Solar As noted we understand that from extrapolating information provided by the Applicant there will be in excess of 1.8 million square meters of solar panels that at night will be in a horizontal position. This is the equivalent of in excess of 440 Acres or in excess of 250 Premier league football pitches. As noted above each of those panels will create a rain shadow where the ground below will be dry and removed from the ground that would otherwise be available for the absorption of rain fall. At the same time the panels, like roofs will act to consolidate and accelerate run off in an area that either cannot cope, or is only just coping, with the current effects of rainfall events be they of long and persistent volume or short but high volume. The height of the panels	The roof analogy is understood, but it does not reflect how the solar arrays would operate at catchment scale. A roof normally collects rainfall and discharges it through gutters, downpipes and a connected drainage system. The solar arrays would not operate in that way. The panels would be raised above ground and rainfall would drain to the ground beneath and between the panel rows. The panel surface area is therefore not equivalent to the same area of impermeable hardstanding. The Scheme is also not fixed on a single panel technology at this stage. The assessment is based on the design parameters for the Scheme and is not reliant on whether fixed or tracking panels are selected. In either case, the panelled

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			will also increase the energy at which the water falls to the ground. The way in which water run-off consolidates and accelerates is observable to the common person looking at a roof that has no gutters. The rain splashes the soil every which way with the water concentrated into rivulets of water which then conjoin. This effect will be magnified by an enormous factor given the number, and combined surface area, of these panels. Not only will the panels affect run off they will also shade the ground beneath from the sun. As any gardener knows lack of sun and lack of water produce very negative effects on plant growth. In relation to flood risk the Applicants State "The representation raises concern that solar panels would act as a roof, reduce infiltration and concentrate runoff into receiving watercourses. The submitted assessment presented in ES Volume 3, Appendix 11-1 Flood Risk Assessment and Drainage Strategy - Lime Down Covering Report [APP-210J reflects	areas remain permeable land and would not be positively drained to watercourses. Panels can create local rain shadow and drip-line effects. Those effects are recognised. Local redistribution of rainfall at panel edges does not, by itself, equate to increased catchment runoff or increased downstream flood risk. The relevant question is whether runoff becomes connected, accelerated and conveyed to ditches, watercourses or downstream receptors. That depends on vegetation condition, soil compaction, surface roughness and hydraulic connectivity. The submitted assessment addresses those pathways. ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [REP1-017], paragraphs 11.10.8 to 11.10.12, and ES Volume 3, Appendix 11-1: Flood Risk Assessment and Drainage Strategy Covering Report [REP1-037], Section 5.1, identify that

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			established hydrological evidence that the addition of solar panels over a vegetated field does not materially increase runoff volumes, peak discharges or response times, and that changes in hydrologic response are primarily associated with alterations to ground cover beneath the panels rather than the panels themselves. Panelled areas are therefore designed so rainfall continues to drain to ground, with no creation of extensive impermeable surfaces and with controls in place to avoid any increase in discharge to watercourses." [our emphasis]	the principal runoff risk is associated with ground condition, including compaction and vegetation cover, rather than treating panels as impermeable hardstanding. This is also consistent with NPS EN-3, paragraph 2.10.84, and published research on solar panel runoff, including Cook and McCuen, which identifies ground cover and soil condition as key controls. The existing baseline is not a fixed, perfect infiltration condition. It is actively managed agricultural land, with seasonal crop cycles, machinery trafficking, tramlines, cultivation and periods of bare or reduced ground cover. The relevant comparison is therefore between that agricultural baseline and a solar scheme with secured soil, vegetation and drainage controls. The Scheme addresses the relevant runoff pathways through permanent ground cover, soil protection, controlled trafficking, reinstatement,

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				permeable tracks and retention of existing overland flow routes. These controls are secured through the Outline CEMP [REP1-096], Section 3.6, Table 5, and the Outline Soil Resources Management Plan [APP-280]. Operational management would maintain vegetated cover beneath and around the arrays, rather than leaving bare soil exposed. Formal drainage areas are dealt with separately. Where hardstanding or engineered infrastructure creates a formal runoff pathway, drainage will follow the drainage hierarchy and will be attenuated and controlled within the secured parameters, including climate change allowance, as set out in ES Volume 1, Chapter 11 [REP1-017], paragraphs 11.10.33 to 11.10.39 and ES Volume 3, Appendix 11-1 [REP1-037], Sections 6.4 and 6.5. The mitigation is not limited to protecting panels or electrical infrastructure. It includes measures to

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				manage runoff, compaction, erosion, pollution and drainage effects so that flood risk is not increased elsewhere. The submitted FRA & Drainage Strategies [REP1-037 to REP1-054] concludes that, with the secured controls in place, the Scheme would not materially increase off-site flood risk.
EGPM-037	Hydrology, Flood Risk and Drainage	Drainage	In respect of the above could the Examiners please ask the following Questions: - How can panels, with a surface area of 1.8 million square meters, not change the absorption qualities of land?	The concern is understood. A panelled surface of this scale can reasonably appear to reduce the land available to absorb rainfall, but panel surface area is not the same as impermeable ground area. This distinction is recognised in NPS EN-3, paragraph 2.10.84, and is reflected in ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [REP1-017] and the FRA & Drainage Strategies [REP1-037 to REP1-054]. The ground beneath and between the panels is not sealed. Rainfall intercepted by the panels drains off

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				the panel edges and reaches the ground within the panelled area. That changes the local distribution of rainfall, particularly around drip-lines, but it does not remove the underlying soil from the hydrological system. This is addressed in ES Volume 3, Appendix 11-1: Flood Risk Assessment and Drainage Strategy Covering Report [REP1-037], Section 5.1 and Section 6.4. The key issue is therefore not whether the panels change where rainfall first lands. They do. The key issue is whether that redistribution materially reduces infiltration or creates faster, connected runoff to ditches, watercourses and Flood Zone 3 areas. The submitted assessment identifies the controlling factors as soil structure, vegetation cover, compaction, antecedent wetness and connectivity to existing drainage pathways. These matters are addressed in ES Volume 1, Chapter 11 [REP1-017],

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				paragraphs 11.10.8 to 11.10.12, and ES Volume 3, Appendix 11-1 [REP1-037], Sections 5.1 and 6.4. The existing baseline is also not a fixed or perfect greenfield condition. Much of the Order Limits is actively managed agricultural land, with seasonal crop cover, harvesting, cultivation, machinery trafficking, tramlines, shallow rooting crops and periods of bare or reduced ground cover. Those conditions already influence infiltration and runoff. The Scheme secures the relevant controls through construction soil management, trafficking controls, remediation of compaction, permanent vegetated cover, permeable access tracks and operational land management. These controls are secured through Requirement 13: CEMP, Requirement 14: OEMP, Requirement 18: Soil Management, and Requirement 7: LEMP of the Draft DCO [REP1-007]. The relevant outline documents

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				are the Outline CEMP [REP1-096], Section 3.6, Table 5, the Outline Soil Resources Management Plan [APP-280], the Outline OEMP [REP1-098], Section 3.6, Table 5, and the Outline LEMP [APP-283]. The assessment therefore compares an actively managed agricultural baseline with a solar scheme subject to secured soil, vegetation and drainage controls. It does not assume a perfect baseline and it does not treat the solar panels as conventional hardstanding. Formal drainage from impermeable infrastructure is assessed separately. Where hardstanding or engineered infrastructure creates a formal runoff pathway, drainage will be managed through the drainage hierarchy, attenuation and controlled discharge where required. This is addressed in ES Volume 1, Chapter 11 [REP1-017], paragraphs 11.10.33 to 11.10.39, and ES Volume 3,

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				Appendix 11-1 [REP1-037], Sections 6.3 to 6.5. The submitted FRA & Drainage Strategies [REP1-037 to REP1-054] conclude that, with the secured controls in place, the Scheme would not materially increase off-site flood risk. The Scheme secures the relevant controls through construction soil management, trafficking controls, remediation of compaction, permanent vegetated cover, permeable access tracks and operational land management. The assessment therefore compares an actively managed agricultural baseline with a solar scheme subject to secured soil, vegetation and drainage controls, rather than assuming a perfect baseline and a worst-case solar condition.
EGPM-038	Hydrology, Flood Risk and Drainage	Runoff	What kind of control can be put in place to avoid any increase in discharge, i.e. runoff, to watercourses when it rains?	Controls to avoid an increase in discharge to watercourses are secured in two ways: through ground management across the panelled

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				areas and through formal drainage controls for infrastructure. Across the panelled areas, the purpose of the controls is to avoid creating bare, compacted or connected flow routes that could accelerate runoff to ditches or watercourses. These controls include maintaining permeable ground beneath and between panels, establishing and maintaining vegetated cover, controlling construction trafficking, remediating compacted soils, using permeable access tracks at existing ground levels, and maintaining existing overland flow routes. These measures address the actual runoff mechanism. Panels can redistribute rainfall locally at drip-lines, but increased discharge to watercourses would only arise if that local redistribution became connected runoff. The secured controls are designed to prevent that.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				For formal drainage areas, including substations, BESS and other infrastructure, detailed drainage design will follow the drainage hierarchy. Discharge locations will be confirmed through detailed design, having regard to ground conditions, receiving drainage features, watercourse constraints and third-party receptors. Where discharge is required from formal drainage areas, runoff will be attenuated and controlled so that discharge does not exceed the agreed greenfield-equivalent rate. Attenuation will be provided for the relevant design storm up to and including the 1 in 100 year event plus climate change allowance. Exceedance routes will also be considered through detailed design. Pollution prevention, treatment, isolation and containment measures will be included where required, particularly for infrastructure areas where potentially

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				contaminated runoff or incident water could arise. These controls are set out in the FRA & Drainage Strategies [REP1-037 to REP1-054] and secured through the Outline CEMP [REP1-096], Outline SRMP [APP-280], Outline OEMP [REP1-098], and relevant DCO Requirements.
EGPM-039	Hydrology, Flood Risk and Drainage	Assessment	What modelling has been done to assess this particular area and the use of panels of this size and type and in this quantity?	The assessment has not modelled the panelled areas as impermeable hardstanding because that would misrepresent the way solar PV interacts with rainfall and runoff. The relevant hydrological effect of panels is local redistribution of rainfall, principally at drip-lines. The panels do not collect rainfall into gutters, pipes or a connected drainage system. Rainfall drains to ground beneath and between the arrays. For that reason, the key assessment issue is not the total panel surface area alone. It is whether the ground beneath and between the

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				panels remains vegetated, whether soils are protected from compaction, whether access tracks create preferential pathways, and whether any local runoff becomes connected to ditches or watercourses. Targeted modelling and calculations have been used where the mechanism is fixed and capable of meaningful assessment. That includes material watercourse interaction and smaller watercourse assessment where proportionate. Formal drainage areas are controlled through drainage principles and parameters, with final detailed design secured post-consent. A field-scale model of every panelled area would not provide a more reliable decision basis. It would require assumptions about future vegetation condition, soil compaction, surface roughness, infiltration, track construction, maintenance activity and hydraulic

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				connectivity. Those assumptions would drive the result. The Scheme instead secures the controls that manage those variables in practice. This includes soil protection, remediation of compaction, permanent ground cover, permeable access tracks, retained overland flow routes and controlled drainage for formal infrastructure. The size and type of panels do not change that fundamental mechanism. Rainfall still drains from the panels to the ground. The relevant question is whether that rainfall becomes accelerated, connected runoff. The submitted assessment and secured controls address that risk through ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [REP1-017], the FRA & Drainage Strategies [REP1-037 to REP1-054], Outline CEMP [REP1-096], Outline SRMP [APP-280] and Outline OEMP [REP1-098].

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
EGPM-040	Hydrology, Flood Risk and Drainage	Runoff	With the mainline railway passing through cuttings and being surrounded by proposed panels and other infrastructure how can the Applicant's experts ensure runoff will not be diverted into the cutting - as happened further down the line in Storm Claudia?	The concern regarding the railway cutting is understood, particularly where existing railway drainage and cutting stability can be sensitive to surface water inflows. The Scheme does not propose to collect runoff from the panelled fields and discharge it towards the railway cutting. The panelled areas are not connected hardstanding. Rainfall drains to ground beneath and between the panels, and the relevant controls are vegetation cover, soil condition, compaction management and avoidance of connected preferential flow routes. Access tracks are to be permeable and constructed at existing ground levels, with cross-drainage where required. This is intended to avoid tracks acting as linear flow paths that could intercept and redirect runoff.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				Where substations, access tracks or other infrastructure are located near the railway, detailed drainage design will follow the drainage hierarchy and will need to demonstrate that surface water is managed within the Order Limits and not directed as uncontrolled discharge towards Network Rail assets. Runoff from formal drainage areas will be attenuated and controlled within the secured drainage parameters. Exceedance routes will also be considered through detailed design so that residual flows are managed safely and do not create an uncontrolled pathway to the railway cutting. Drainage principles, pollution control and detailed design requirements are set out in FRA & Drainage Strategies [REP1-037 to REP1-054] and secured through the Outline CEMP [REP1-096], Outline OEMP [REP1-098], Commitments Register

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				[REP1-114] and relevant DCO Requirements. Further detail can be provided to Network Rail through the detailed design and protective provisions process.
EGPM-041	Description and DCO Process	Cable Route Corridor	How will tunnelling for cables under minor roads, the M4 and the two railway lines be done and what disruption will be caused.	As set out within ES Volume 1, Chapter 3: The Scheme [APP-055] and ES Volume 3, Appendix 3-2: Cable Route Construction Method Statement [APP-183], a number of Avoidance Areas have been identified, including at the M4, where non-intrusive installation methods will be used to avoid direct impacts (refer to ES Volume 2, Figure 3-2: Key Construction Phase Features [APP-082]). The non-intrusive installation methods may comprise a number of trenchless techniques (refer to ES Volume 3, Appendix 3-2: Cable Route Construction Method Statement [APP-183]). The construction phase has been assessed by each technical ES

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				chapter [APP-059 to APP-072]. Of particular relevance, the impact on the HDD locations ES Volume 1, Chapter 9: Ecology and Biodiversity [REP1-015], Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [REP1-017], ES Volume 1, Chapter 13: Transport and Access [REP1-019], ES Volume 1, Chapter 14: Noise and Vibration [REP1-021] and ES Volume 1, Chapter 19: Ground Conditions [REP1-027]. These conclude that there are no significant impacts as a result of HDD with appropriate mitigation in place. Any works relating to trenchless techniques will be undertaken in line with a Method Statement. This commitment is secured via the Outline CEMP [REP1-096]. Strict adherence to the Method Statement will be required when undertaking HDD with any changes requiring approval from the Contractors Project Manager and documented risk

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				assessments. The Method Statement will cover project details, equipment setup, drilling procedures, and the handling of drilling fluids, emphasizing adherence to safety measures and risk assessments. Measures to manage and minimise construction effects, including reinstatement of land following installation, are also set out in the Outline CEMP [REP1-096]. Requirement 13 in Schedule 2 to the Draft DCO [APP-016] secures that prior to construction, a CEMP must be submitted to and approved by the relevant planning authority, and that CEMP must be substantially in accordance with the Outline CEMP [REP1-096]. All construction work will be carried out in accordance with the approved CEMP.
EGPM-042	Transport and Access	Statutory Consultees	Have the relevant Highways and Rail authorities been consulted and had an opportunity to comment on the detailed plans being proposed. If yes then the Examiners should see those detailed plans and	The Applicant makes note of this comment. The Applicant has liaised with the relevant highway and rail authorities throughout the process and has responded to all matters of detail raised. Details of liaison with highway authorities is provided

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			comments. If no detailed plans how can the Examiners take any view on the appropriateness or otherwise of this scheme? How can the examiners conclude that a proper consultation has taken place?	in Table 13-2 of ES Volume 1, Chapter 13: Transport and Access [REP1-019] .
EGPM-043	Landscape and Visual Description and DCO Process	General Remarks	Conclusion Lime Down is of the wrong scale and in the wrong place. For multiple reasons the proposal will do substantial and permanent harm to an area of outstanding beauty.	The Scheme has been set back from the CNL (formerly known as an Area of Outstanding Beauty) to protect land within its setting. This land will be utilised for positive enhancement of the CNL. Throughout the iterative design process, appropriate multipurpose avoidance and mitigation measures have been incorporated into the development of the layout. The mitigation measures have been embedded into the Scheme design and have looked to modify the scale and layout of the Scheme or introduce appropriate interventions in order to reduce significant adverse effects and to ensure compliance with planning policy for the CNL. These measures

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				include the removal of panels within the setting of the CNL in Sites A, B, and C where there is a strong visual relationship between the CNL and the Scheme. This includes: • Site A: The northern part of fields A1, A11 and A12. • Site B: B12. • Site C: C1, C6, C8, part of C9 and the majority of C10. Rather than being removed from the Scheme these fields are proposed for positive enhancement to further the purposes of the CNL and include: • 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 inclusion 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; and

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				Hedgerow enhancements including the re-establishment of historic hedgerows within the setting of the CNL. In relation to scale, the Statement of Need [REP1-085] explains why solar development is required at this scale to meet the Government's targets as set out in the Clean Power 2030 Action Plan. It is the Government's policy to support the development of large-scale schemes in order to meet the urgent need for unprecedented levels of clean electricity. Relevant planning policy (specifically NPS EN-1 paragraph 3.3.12) recognises that meeting the country's energy needs requires the use of large scale, centralised electricity generating facilities via a high-voltage transmission system, which enables the pooling of both generation and demand, which in turn offers a number of economic and other benefits, such as more efficient bulk transfer of power and enabling surplus generation capacity in one

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				area to be used to cover shortfalls elsewhere. In relation to location, an appraisal of alternative sites is presented 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 assessment considered alternative sites within a 20 km radius of the existing National Grid Melksham Substation and concludes that there are no more suitable locations within the defined search area than the proposed Site.
Great Somerford Parish Council REP1-142				
GSPC-001	Hydrology, Flood Risk and Drainage	Flood Risk	Applicant's response to GSPC-002 refers to displacement from E2. Great Somerford Parish Council has concerns for all displacements from the developments, excluding the cable route, as these will increase the flow of the River Avon within the Parish of Great Somerford and the subsequent flood events	Floodplain displacement from the Scheme would not increase flows in the River Avon within Great Somerford. Floodplain displacement is only relevant where infrastructure occupies floodplain storage. It is not a whole-Scheme effect and is not generated by panelled fields outside relevant flood extents. Floodplain interaction has been assessed where it is material, including at Lime Down

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			particularly when the water table is high and the ground is saturated.	D and Lime Down E2, as set out in ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [REP1-017] and the site-specific FRA & Drainage Strategies [REP1-037 to REP1-054]. Panelled infrastructure is raised and does not materially displace floodwater. Supports and frames have negligible volume relative to floodplain storage and do not operate as a barrier to flood flows. Formal drainage from impermeable infrastructure is managed through the drainage hierarchy and controlled within secured drainage parameters. This is secured through Requirement 11: Surface Water Drainage of the Draft DCO [REP1-007], with operational management secured through Requirement 14: OEMP. Panelled fields drain to ground and are managed through soil and vegetation controls secured through Requirement 13: CEMP, Requirement 14: OEMP, Requirement 18: Soil Management, and Requirement

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				7: LEMP of the Draft DCO [REP1-007] . The presence of high groundwater levels or saturated catchment conditions is recognised as part of the baseline. It does not mean the Scheme would increase River Avon flows.
GSPC-002	Hydrology, Flood Risk and Drainage	Flood Risk	Peak flows from tile/plastic underdrainage schemes, which have been maintained, discharge at high rates immediately after intense periods of rain into watercourses and subsequently into the River Avon, particularly when the soil is at or near full capacity. On the assumption that these watercourses will have to be maintained to avoid localised flooding this will increase the rate of flow to the watercourses off site, and subsequently into the River Avon. At present it would appear some of the on site watercourse have not been adequately maintained to provide free flow from drain outlets. There will also be increased flows from	The comment describes existing agricultural underdrainage behaviour, including rapid discharge from tile or plastic drainage after intense rainfall. The existing agricultural baseline is not a perfect or fixed greenfield condition. It includes seasonal crop cycles, machinery trafficking, tramlines, cultivation, periods of bare or reduced ground cover, and existing underdrainage systems that may already discharge rapidly when soils are saturated. The Scheme does not rely on increasing discharge from existing underdrainage systems. Existing field drainage will be considered during detailed design and construction planning. Where drains are encountered, they would

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			the proposed mitigation measures for the developments outside the PV panel areas. (Accepting some of these may be restricted to greenfield run off rates.)	be protected, diverted, repaired or reinstated as appropriate. This is addressed through the detailed design and construction control framework set out in the FRA & Drainage Strategies [REP1-037 to REP1-054] and the Outline CEMP [REP1-096] and secured through Requirement 13: CEMP of the Draft DCO [REP1-007] . Formal infrastructure drainage will follow the drainage hierarchy and be controlled within secured parameters, including attenuation and controlled discharge where required, secured through Requirement 11: Surface Water Drainage . Soil handling, compaction control and reinstatement are secured through the Outline Soil Resources Management Plan [APP-280] and Requirement 18: Soil Management . Panelled land will remain permeable and will be managed through soil protection, vegetation cover and retained flow pathways, with operational land management secured through Requirement

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				14: OEMP and Requirement 7: LEMP.
GSPC-003	Hydrology, Flood Risk and Drainage	Drainage	Response to GSPC-003. The applicant acknowledges the flooding mechanisms described at Great Somerford effects the increase in flooding. The applicant's response to NFP-004 (p.1695) states, 'the Scheme would not result in a material increase in off-site flood risk). Great Somerford has recorded increased flows over the last few years, and these are probably attributed to a number of FR assessments, which have SUDS and report 'the Development would not result in a material increase'. Developments in Malmesbury and Royal Wootton Bassett all contribute to the increased flows.	The concern regarding cumulative catchment flooding is noted. The relevant question for this Examination is whether Lime Down would materially increase flood risk. The submitted assessment concludes that it would not. This assessment is set out in ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [REP1-017] and the FRA & Drainage Strategies [REP1-037 to REP1-054] . Other developments in the wider catchment are subject to their own flood risk and drainage controls through their own consenting regimes. The presence of existing or perceived cumulative flooding does not show that this Scheme would increase runoff rates or volumes. Formal drainage from impermeable infrastructure will follow the drainage hierarchy and be controlled through secured parameters, including attenuation and controlled discharge where required. This is secured through Requirement 11: Surface

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				Water Drainage of the Draft DCO [REP1-007]. Construction runoff, sediment mobilisation and compaction risks are controlled through the Outline CEMP [REP1-096] and Requirement 13: CEMP. Operational land management and drainage maintenance are secured through the Outline OEMP [REP1-098] and Requirement 14: OEMP. Panelled fields remain permeable and are governed by soil condition, vegetation cover and connectivity, with soil and vegetation controls secured through Requirement 18: Soil Management and Requirement 7: LEMP. The Scheme does not create a connected hard drainage catchment discharging to the River Avon.
GSPC-004	Hydrology, Flood Risk and Drainage	Flood Risk	Response to GSPC-004 The Parish council representation was highlighting the flooding on access roads to the village. The response refers to access roads for Lime Down E.	The concern relates to existing flooding on access roads to Great Somerford. Existing road flooding is recognised as baseline context. It does not demonstrate that the Scheme would increase flood risk on those roads. The assessment of flood

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				risk to and from the Scheme is provided in ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [REP1-017] and the FRA & Drainage Strategies [REP1-037 to REP1-054]. The hydrology and drainage assessment considers whether the Scheme would materially alter runoff rates, runoff volumes or flow routes. The Scheme retains overland flow routes, controls drainage from formal infrastructure and manages the key construction risk of soil compaction through secured management measures. Construction-phase runoff, sediment and soil compaction risks are controlled through the Outline CEMP [REP1-096] and secured through Requirement 13: CEMP of the Draft DCO [REP1-007]. Formal drainage areas will follow the drainage hierarchy and be controlled within the secured drainage parameters through Requirement 11: Surface Water Drainage. Operational maintenance is secured

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				through Requirement 14: OEMP . Panelled land will remain permeable and will not be drained as hardstanding.
GSPC-005	Soils and Agriculture	Soils	Response to GSPC-006 states 'Reduced disturbance during operation allows soil to recover from previous intensive agricultural use, with benefits to soil structure and soil biology'. What evidence is there for this statement without comprehensive base data as various areas have been farmed under different systems, which will result in different structure and soil biology.	There is now a wide evidence base showing that reduced tillage or no-till agricultural systems result in improvements to soil structures among several other parameters compared with conventional till systems, and the literature covers all soil types. The Soil Association published a report summarising the state of UK soils and the benefits of healthy soils, and sets out seven main actions needed to slow soil degradation and decline in a way that benefits both soils and agriculture. The report draws upon 68 different references in the literature and states key actions as increasing plant matter in fields, reducing tillage and chemicals, covering bare soil with continuous plant cover, and reducing soil compaction from machinery. Reverting land from arable to

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				continuous grass cover under solar panels would positively contribute to these actions. Base data on the soils have been collected in the surveys undertaken, with a schedule of all soil profile data and descriptions of soil structures included at ES Volume 3, Appendix 17-1: Agricultural Land Classification and Soil Resources Report [REP1-063].
GSPC-006	Ecology and Biodiversity	Planting	It will be difficult to establish the seed mixtures recommended under the panels and before full establishment run off from the edges of the panels will create some bare patches which will become colonised by weeds.	The Outline LEMP [APP-283] contains prescriptions for the establishment of grassland habitats and for the control of weeds which may affect grassland establishment. Paragraph 1.3.18 states that seeding would preferentially be conducted in autumn to minimise the risk of a flush of annual weeds, and that weeds would be controlled by hand pulling or spot herbicide treatments.
GSPC-007	Hydrology, Flood Risk and Drainage Soils and Agriculture	Drainage	There will also be waterlogged areas where panel fixings damage the tile/plastic underdrainage schemes. Some of these drainage schemes may have been designed	The concern regarding existing tile and plastic underdrainage is noted. Existing agricultural drainage systems are part of the baseline land management context. Their detailed

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			to be mole ploughed at regular intervals which will not now be possible. Should a fixing damage a main carrier pipe there will be long term damage to the soil structure and the soil biology as areas become waterlogged.	location and condition is often not fully recorded and would be confirmed where encountered during detailed design and construction. The Scheme will need to manage existing field drains so that drainage function is not inadvertently compromised. Where drains are affected by construction, they would be protected, diverted, repaired or reinstated as appropriate through detailed construction controls. The risk of waterlogging due to construction disturbance is controlled through the Outline CEMP [REP1-096], Outline SRMP [APP-280] and relevant DCO Requirements. The survey of agricultural land and soils, reported in ES Volume 3, Appendix 17-1: Agricultural Land Classification and Soil Resources Survey [REP1-063], identified two main soil types across the Solar PV Sites. One is shallow brashy soil over limestone in which there is no artificial

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				underdrainage, and the other is deep clay, in which no evidence of underdrainage was found.
Grittleton Parish Council REP1-143 and REP-163				
GPC-001	Transport and Access	Construction Traffic	The draft Construction Traffic Management Plan (CTMP) is missing information regarding the permanent & temporary changes required to the road network by location for construction traffic, excluding abnormal loads.	Annex I of ES Volume 3, Appendix 13: Transport Assessment [REP1-057 and REP-059] submitted at Deadline 1 includes details of the proposed highway mitigation works to accommodate construction traffic. Proposed access works are set out in Annex C and D of ES Volume 3, Appendix 13: Transport Assessment [REP1-057 and REP-059] Table 13-10 and 13-11 state where these works are temporary or permanent (i.e. for construction or construction operation).
GPC-002	Transport and Access	Construction Workers	The CTMP makes a number of assumptions regarding construction workers modes of transport, we require these to be stress tested to assess the impact on the road network.	On a peak day, assuming the construction of all Solar PV Sites concurrently, there is expected to be a peak of 622 workers spread across the Solar PV Sites. For assessment, construction workers have been spread across the Solar PV Sites on a proportional basis, based on the

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				size of each area. The assessment of peak daily flows across the whole Construction Phase represents a worst-case scenario. Construction worker shifts will be scheduled so that workers are not traveling during the network peak hours of 08:00-09:00 and 17:00-18:00. An Outline CTMP [REP1-112] is submitted with the DCO application. This includes a measure for the provision of shuttle buses to transport construction workers to and from the Order Limits. This is particularly important for non-local workers, who will stay in local accommodation and be transported to the Order Limits. It can also be utilised by other workers as appropriate. It is expected that a mixture of coaches and minibuses will be used. On average, it is expected that a shuttle bus will be able to accommodate 20 workers. In addition, workers who drive will be

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				encouraged to car share where practicable. With this in mind, it is assumed that 50% of workers will be non-local to the Order Limits and will stay in local accommodation, arriving by shuttle bus. The remainder will arrive by car with an assumed 1.5 construction workers per car. This is a similar proportion to other DCO applications. For example: • Longfield Solar Farm (PINS reference EN010118) - 55% non-local arriving by shuttle bus • West Burton Solar Farm (PINS reference EN010132) – 50% nonlocal arriving by shuttle bus Cottam Solar Farm (PINS reference EN010133) – 50% non-local arriving by shuttle bus
GPC-003	Human Health	Health Impacts	GPC – 001 – Wellbeing of Residents, the applicant acknowledges states: With respect to human health, the assessment outcome that there is	No significant adverse effects have been identified in the assessment in ES Volume 1, Chapter 18: Human Health [APP-070].

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			no significant adverse effect to health generated by the Scheme has been agreed by the UK Health Security Agency in their relevant representation [RR-4798]. The term no significant adverse effect implies that there will be some, this must be further analysed as part of the examination process.	The assessments methodology is outlined under Section 18.6 of ES Volume 1, Chapter 18: Human Health [APP-070]. The degree of significance of impacts, in respect of the assessment of human health environment, is determined using the matrix in Table 18-6, taking into consideration both receptor sensitivity to change and magnitude of change to baseline conditions for each receptor. Effects assessed to be major, major/moderate, moderate or moderate/minor are deemed to be significant in terms of EIA as in accordance with ISEP guidance. Generic definitions are provided under Table 6-5 of ES, Volume 1, Chapter 6: EIA Methodology [APP-058] for example a minor effect (not significant) may be raised as local issues and may be of relevance in the detailed design of the project but are unlikely to be critical in the decision-making process. Whereas a moderate effect (significant), if adverse, are likely to be important at

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				a local scale and on their own or in combination of other effects. Moderate effects could have a material influence in the decision-making process. In regard to Human Health specifically, ISEP provides guidance on Determining Significance for Human Health in Environmental Impact Assessment. As guidance, it is suggested for example, a minor effect is considered not significant as the change is within a regulatory threshold/statutory standard or it is considered there is likely to be a slight change in the baseline of the population, including as evidenced by the effect size and/or scientific literature showing there is only a suggestive relationship between changes that would result from the project and changes to health outcomes. Whereas a moderate effect could result in a regulatory threshold or statutory standard being approached or there is likely to be a small change in the health baseline of

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				the population, including as evidenced by the effect size and scientific literature showing there is a clear relationship between changes that would result from the project and changes to health outcomes. The assessment of likely significant impacts and effects is provided under Section 18.10 of ES Volume 1, Chapter 18: Human Health [APP-070], this section considers the potential impacts outlined in Section 18.8 and, taking into account the committed mitigation measures as detailed in Section 18.9. Each potential impact is allocated a significance including outlining those which are not significant in line with the methodology as detailed in Section 18.6. The Scheme has been designed, as far as practicable, to avoid and reduce impacts and effects on human health through the process of embedding measures into the design. Whilst no significant effects to human

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				health receptors have been identified in the assessment in Chapter 18: Human Health [APP-070], additional mitigation measures will be implemented to reduce the impacts of the Scheme for which the significance can be improved. Additional mitigation measures are to be secured by requirements in the Draft DCO [REP1-007] with reference to the Outline CEMP [REP1-096] and Outline Decommissioning Strategy [REP1-100] .
GPC-004	Soils and Agriculture	Agricultural Land Classification	GPC 002 – The response from the applicant requires further analysis: The assessment confirms that land would be taken out of arable rotation during the operational period of the Scheme but would remain productive and would be reinstated and returned to agricultural use as far as practicable following decommissioning. The Agricultural Land Classification (ALC) should be based on historic	The Agricultural Land Classification (ALC) is based around a long-established methodology, originally published in 1988 and reissued by Defra and the Welsh Government in a joint publication in December 2025, not from historical data on crop yields, nor from desktop study of historic maps. ES Volume 3, Appendix 17-1: Agricultural Land Classification and Soil Resources Survey [REP1-063] sets out the survey methodology, the soil and site conditions, and reasoning for all

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			data from recent arable rotation not a desk top exercise based on historic maps. The impact of sourcing arable crops lost from elsewhere should be taken into account assessing the projects impact. What is meant by the statement – but would remain productive. Grazing a few sheep is not considered to be productive use of the land How much land will be permanently lost from arable production given the statement - as far as practicable.	of the land classifications. The methodology was discussed with and approved by Natural England. The ALC results are supported by laboratory analysis of soil samples and a photographic record of the soil types present. Grazing of livestock is an alternative productive use of agricultural land, in terms of agricultural production, food production, and supporting ecosystem services such as nutrient cycling. As noted in ES Volume 1, Chapter 3: The Scheme [APP-055], it is anticipated that all infrastructure will be removed at decommissioning, but is also acknowledged that the end management of the land will be a decision for the landowner to make. The Applicant understands that landowner preference at the time may be for the land to remain as ecological habitat, rather than revert back to intensive agricultural use. It is therefore not possible at this stage to state the quantum of land that will

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				remain removed from arable production, however no land will be lost.
GPC-005	Landscape and Visual	Mitigation	GPC – 003 – Landscape & Visual, the applicant states that there will be some harm is only mitigated after 15 years (25% of the project life). Such a time period is unacceptable as the Secretary of State has a statutory duty to ensure that the natural beauty of the CNL is conserved, and, if the scheme is approved, the SoS should explicitly address how that duty has been discharged with the submitted plans.	In landscape and visual impact assessments, a 15-year timeframe is commonly used to define the "mature" stage of planting mitigation, where proposed trees and shrubs have grown sufficiently to provide screening of the development. While initial effects may be adverse, this period allows for established green infrastructure to integrate the site into the surrounding landscape. 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 [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

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				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 [APP 197]. The assessments methodology is outlined under Section 18.6 of ES Volume 1, Chapter 18: Human Health. The degree of significance of impacts, in respect of the assessment of human health environment, is determined using the matrix in Table 18-6, taking into consideration both receptor sensitivity to change and magnitude of change to baseline conditions for each receptor.
GPC-006	Cumulative and In-Combination Effects	Assessment	GPC – 004 – Cumulative impact, the 10km study area is too restrictive and should be extended to 20km.	The study area was developed and agreed as part of ongoing technical engagement with Wiltshire Council and statutory consultees during 2025-2026 as set out in ES Volume 1, Chapter 21 Cumulative and In Combination Effects [APP-073]. 10km was agreed [Row 2, Table 21-3 APP-073] as it provides a sufficient and robust distance to allow cumulative effects of solar

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				development on the wider landscape to be taken into consideration.
GPC-007	Transport and Access	Construction Traffic	GPC 008 – The CTMP does not recognize school traffic before 08:00 and the afternoon travel period for children returning from school between 15:00 & 17:00. Given the location of Nursery/Preschool & Primary School facilities in the area there is considerable inter village traffic at the beginning and end of the school day. Older children (Aged 11 – 16) travel to secondary schools from the area to either Chippenham or Malmesbury using either school buses or private vehicles, some of which will be on the road before 08:00. The construction traffic movement restrictions should be extended to start at 07:30 in the morning and the afternoon extended to start at 15:00 and finish at 18:00.	The Outline CTMP [REP1-112] sets out measures to coordinate construction deliveries by HGVs to arrive and depart between 09:30 and 16:30 where possible, to avoid peak network hours of 08:00–09:00 and 17:00–18:00. It also includes a community liaison element to keep local communities informed about the construction process and to provide a contact for feedback should any issues arise. Compliance with the CTMP will be monitored by the Developer, Contractor and Wiltshire Council as local highway authority. There are no schools located directly off any of the main HGV construction routes. The preparation, approval and implementation of the final CTMP, substantially in accordance with the Outline CTMP [REP1-112], are secured through Requirement 15 of Schedule 2 of the Draft DCO [REP1-007], ensuring construction

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				traffic impacts are appropriately managed throughout the construction phase of the Scheme.
GPC-008	Socio-Economics, Recreation and Tourism	Tourism	There are two other approved schemes for 49.9mgw solar farms in close proximity to this scheme – Leigh Delamere & Red Barn (Kington St Michael). How will the applicant ensure that construction does not overlap, this will also have a detrimental impact on the availability tourist accommodation.	Leigh Delamere Solar Farm and Red Barn Solar Farm are both included within the short list of Cumulative Schemes and have been taken into account as part of the cumulative assessment. The schemes are shown as ID 221 and ID 243 within ES Volume 1, Chapter 21 Cumulative and In-Combination Effects [APP-073] . Both schemes are located south of the M4. Due to their scale and distance from the Lime Down scheme, no traffic and transportation cumulative effects are identified. Notwithstanding, ES Volume 1, Chapter 21 Cumulative and In-Combination Effects [APP-073] sets out that wherever possible, inter project communication will take place to minimise effects, for example through the co-ordination of construction planning and construction vehicle deliveries and routes.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				The Applicant has furthermore committed to construction accommodation being located within 20 km of the Scheme where capacity is greatest to ensure regular occupancy by tourists and short-stay visitors (or residnets) are not unduly affected. This is secured through the Outline CEMP [REP1-096] by Requirement 13 of Schedule 2 to the Draft DCO [REP1-007] .
GPC-009	Socio-Economics, Recreation and Tourism	Tourism	GPC – 009 - Given the number of construction workers that will require accommodation the temporary impact on the Tourism trade will be felt in a wider area than the 5km stated. Study area should be extended to 20km. The statistics stated are incorrect, they imply that 7,150 people are employed in tourism within 5km of the site, whilst it is stated that 29,000 are employed across Wiltshire, one of these must be wrong.	In ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068] , the primary Study Area for socio-economic effects comprises all electoral ward areas falling within 20 km of the Scheme, as set off from the outermost extent of the Solar PV Sites and Cable Route Corridor. This is a near approximation of a 30-minute commuting distance from the Scheme and has been judged as a reasonable assumption for the area in which employment and derived economic effects are anticipated to be greatest.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
GPC-010	Transport and Access	Construction Traffic	GPC – 010 – Transport & Access, the responses provided are considered in adequate, as already stated, the school travel period in the afternoon should be recognized.	The Outline CTMP [REP1-112] sets out measures to coordinate construction deliveries by HGVs to arrive and depart between 09:30 and 16:30 where possible, to avoid peak network hours of 08:00–09:00 and 17:00–18:00. It also includes a community liaison element to keep local communities informed about the construction process and to provide a contact for feedback should any issues arise. Compliance with the CTMP will be monitored by the Developer, Contractor and Wiltshire Council as local highway authority. There are no schools located directly off any of the main HGV construction routes.
Hullavington Parish Council – REP1-144				
HPC-001	Description and DCO Process	General Remarks	Dear Members of the Examining Authority, Please accept this correspondence and the attached document as the formal Written Representation of Hullavington Parish Council regarding the proposed Lime Down Solar Park	The village of Hullavington (Receptor RS010) was assessed in the LVIA in ES Volume 1, Chapter 8 Landscape and Visual Impact Assessment (LVIA) [APP-060]. The full assessment sheets are presented from page 16 of ES Volume 3, Appendix 8-3-2-1 Visual Assessment Sheets (Non-

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			(EN010168). This submission serves as a response to Section 5.13 of the Applicant's Response to Relevant Representations (Part 1). The Parish Council maintains its position that the Applicant's response is insufficient. It relies primarily on high-level, scheme-wide conclusions and fails to engage with the specific, evidence-based concerns we have raised regarding the impact of the development on Hullavington as a distinct settlement. In the attached representation, we detail why we believe the Applicant has not: • Adequately characterised the local landscape baseline; • Addressed the settlement-level experience of our residents; or • Demonstrated that the proposed mitigation is appropriate for the parish's specific rural context.	Significant). Following the baseline description of the village, the initial assessment notes: <i>"the village is assessed in the context of Lime Down D. At a distance of approximately 922m, there are views from the northern edge of the village towards Site D. The intervening railway line is situated on an embankment where it crosses Gauze Brook and rising landform between the village and Gauze Brook restricts views. Although intervisibility between the Site and the Receptor is limited, the potential above ground development could be visible. From high ground to the northeast of the village there are long distance views east in the direction of Rodbourne"</i>. The effects of the Scheme were assessed as Minor Adverse during Construction and Year 1 reducing to Minor Neutral and No effect at Year 15 and Decommissioning respectively. The LVIA in ES Volume 1, Chapter 8 Landscape and Visual Impact

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			As the elected representatives and stewards of this Parish, we have a solemn duty to protect our community's character, its local ecology, and the interests of current and future generations. We respectfully request that the Examining Authority considers these unresolved matters as crucial to determining the weight that can be placed on the Applicant's current conclusions. We appreciate the Examining Authority's time and consideration of our concerns, and we look forward to participating further in the examination process. Yours faithfully, , Chair, Hullavington Parish Council	Assessment (LVIA) [APP-060] has been informed by the Wiltshire Landscape Character Assessments as set out in Appendix 8-4 Landscape Character Area Descriptions [AP-195]. The approach to mitigation has also been informed by the guidance within the Landscape Character Assessments as well as Wiltshire's Nature Recovery Strategy. The LVIA in ES Volume 1, Chapter 8 Landscape and Visual Impact Assessment (LVIA) [APP-060] recognises that there will be Moderate Adverse (Significant) effects on the character of the Landscape within the 1km Study Area during construction and Year 1 (which includes Hullavington) as a result of the Scheme and the change from agricultural land to a solar infrastructure. The effects of the Scheme on Landscape Character reduces to non-significant levels as proposed mitigation matures. It is also recognised that the effects of the

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				Scheme dissipate with distance and that Hullavington is physically and relatively visually separated from the nearest Lime Down Site D by the railway line and its associated treed embankments.
HPC-002	Landscape and Visual	General Remarks	Executive Summary This Written Representation identifies material respects in which the Applicant's response in Section 5.13 of EXAM/9.1 does not engage with the parish-specific concerns raised by Hullavington Parish Council. In particular, the Applicant relies on scheme-wide conclusions and cross-references to its own Environmental Statement rather than addressing evidence concerning the settlement-level experience of Hullavington and the character of its surrounding landscape. The Parish Council considers that this failure to engage with the adequacy of the local landscape baseline undermines the reliability of the assessment of effects and the	Please see detailed response in reference ID HPC-001.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			effectiveness of the proposed mitigation. As a result, key matters remain unresolved and are relevant to the weight that can properly be attached to the Applicant's conclusions.	
HPC-003	Description and DCO Process	General Remarks	1. Introduction 1.1 Hullavington Parish Council submits this Written Representation in response to the Applicant's document EXAM/9.1 – Applicant's Response to Relevant Representations (Part 1), specifically Section 5.13 (Hullavington Parish Council). 1.2 This submission explains where the Parish Council considers that the Applicant's response does not adequately address the parish-specific concerns raised and where matters therefore remain unresolved for examination. 1.3 The sections below address, in turn, the principal themes raised in the Parish Council's Relevant Representation, including the treatment of Hullavington as a	Please see detailed response in reference ID HPC-001.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			settlement, landscape character and baseline assessment, the siting of battery energy storage infrastructure, construction impacts, traffic and rural roads, and cumulative effects.	
HPC-004	Description and DCO Process	General Remarks	2. General comment on the Applicant's response (Applicant response, Section 5.13) 2.1 The Applicant's response relies largely on cross-references to scheme-wide Environmental Statement chapters and outline management plans. 2.2 While these references describe the general approach taken to the Scheme, they do not explain how the conclusions reached apply to Hullavington as a parish and settlement, nor why the impacts experienced locally should be regarded as acceptable. 2.3 The Parish Council considers that the response demonstrates a continuing reliance on generic conclusions rather than engagement with specific, well-evidenced local concerns.	Please see detailed response in reference ID HPC-001.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
HPC-005	Landscape and Visual	Visual Impact	3. Effects on Hullavington as a settlement (Applicant response, Section 5.13 – landscape and local impacts) 3.1 A principal concern raised by the Parish Council relates to the effect of the Scheme on Hullavington as a village, including its setting and its relationship with the surrounding countryside. 3.2 The Applicant's response refers to assessments undertaken at wider study-area levels but does not assess Hullavington as a settlement receptor in its own right. 3.3 In particular, the response does not explain: • how the village would experience the scale and proximity of nearby solar development; • how the associated land-use change affects the village's rural setting; or • whether these changes alter the character and identity of the settlement.	The village of Hullavington (Receptor RS010) was assessed in the LVIA in ES Volume 1, Chapter 8 Landscape and Visual Impact Assessment (LVIA) [APP-060]. The full assessment sheets are presented from page16 of ES Volume 3, Appendix 8-3-2-1 Visual Assessment Sheets (Non-Significant). Following the baseline description of the village, the initial assessment notes: <i>"the village is assessed in the context of Lime Down D. At a distance of approximately 922m, there are views from the northern edge of the village towards Site D. The intervening railway line is situated on an embankment where it crosses Gauze Brook and rising landform between the village and Gause Brook restricts views. Although intervisibility between the Site and the Receptor is limited, the potential above ground development could be visible. From high ground to the northeast of the village there are long distance views east in the direction</i>

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			3.4 As a result, the Parish Council considers that settlement-level effects remain insufficiently addressed.	<i>of Rodbourne</i>". The effects of the Scheme were assessed as Minor Adverse during Construction and Year 1 reducing to Minor Neutral and No effect at Year 15 and Decommissioning respectively. The LVIA in ES Volume 1, Chapter 8 Landscape and Visual Impact Assessment (LVIA) [APP-060] recognises that there will be Moderate Adverse (Significant) effects on the character of the Landscape within the 1km Study Area during construction and Year 1 as a result of the Scheme and the change from agricultural land to a solar infrastructure. The effects of the Scheme on Landscape Character reduces to non-significant levels as proposed mitigation matures. It is also recognised that the effects of the Scheme dissipate with distance.
HPC-006	Landscape and Visual	Visual Impact	4. Landscape and visual impacts affecting the parish (Applicant response, Section 5.13 – LVIA and mitigation)	As noted in response to Reference ID HPC-005, the village of Hullavington (Receptor RS010) was assessed in the LVIA in ES Volume 1, Chapter 8 Landscape and Visual Impact

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			4.1 The Parish Council questioned whether the scale and extent of the Scheme would result in unacceptable landscape and visual impacts as experienced from within and around Hullavington. 4.2 The Applicant's response relies on conclusions from the Landscape and Visual Impact Assessment, including assertions that adverse effects reduce over time as mitigation matures. 4.3 This does not address the Parish Council's concern regarding: - the severity and duration of landscape and visual impacts during the early and mid-operation phases, which are material in planning terms; and - whether the mitigated landscape outcome would be compatible with the existing character of the parish. Taken together, this approach fails to demonstrate that the Scheme	Assessment (LVIA) [APP-060]. The full assessment sheets are presented from page16 of ES Volume 3, Appendix 8-3-2-1 Visual Assessment Sheets (Non-Significant). The effects of the Scheme were assessed as Minor Adverse during Construction and Year 1 reducing to Minor Neutral and No effect at Year 15 and Decommissioning respectively. The LVIA in ES Volume 1, Chapter 8 Landscape and Visual Impact Assessment (LVIA) [APP-060] recognises that there will be Moderate Adverse (Significant) effects on the character of the Landscape within the lkm Study Area during construction and Year 1 as a result of the Scheme and the change from agricultural land to a solar infrastructure. The effects of the Scheme on Landscape Character reduces to non-significant levels as proposed mitigation matures. It is also recognised that the effects of the Scheme dissipate with distance.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			responds appropriately to the underlying landscape strategy and character objectives applicable to this area.	The LVIA also recognises that there will be Beneficial Moderate Beneficial (positive) Significant effects on Landscape Fabric at Year 15. These are recorded in ES Volume 1, Chapter 8 Landscape and Visual Impact Assessment (LVIA) [APP-060]. This is as a result of the Scheme delivering 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 (LVIA) [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

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				- Proposed Ponds and Wader Scrapes 14 - Groundcover 702.8 ha. Mitigation and enhancement measures are detailed in the Outline LEMP [APP-283] and the Outline EPMS [REP1-106], which set out habitat creation, species protection measures, buffer zones and long-term ecological management.
HPC-007	Landscape and Visual	Visual Impact	4A. Landscape baseline and reliability of mitigation (Applicant response, Section 5.13 – reliance on ES conclusions) 4A.1 The Parish Council remains concerned that the Applicant has not engaged with the substance of its objection regarding the characterisation of the local landscape baseline. 4A.2 The Applicant's response consistently relies on the conclusions of its own Environmental Statement, without addressing the Parish Council's evidence that the local landscape and settlement pattern around	The LVIA in ES Volume 1, Chapter 8 Landscape and Visual Impact Assessment (LVIA) [APP-060] has been informed by the Wiltshire Landscape Character Assessments as set out in Appendix 8-4 Landscape Character Area Descriptions [AP-195]. The approach to mitigation has also been informed by the guidance within the Landscape Character Assessments as well as Wiltshire's Nature Recovery Strategy.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			Hullavington are interconnected, sensitive, and experienced at a finer, settlement-level scale than reflected in the assessment. 4A.3 Where the adequacy of the landscape baseline has not been demonstrated, the Parish Council considers that the effectiveness of the proposed mitigation cannot be properly assessed, as it is predicated on that baseline characterisation. This includes mitigation relied upon to address ecological effects, habitat function, and landscape-scale connectivity for wildlife. 4A.4 The Applicant's response does not resolve this issue, and the reliability of the mitigation conclusions therefore remains a matter for examination.	
HPC-008	Landscape and Visual	Visual Impact	4A.5 In addition, the Parish Council notes that the Applicant's response does not engage with the concern raised regarding the proposed location and presence of battery energy storage infrastructure. The response relies on generic	As noted in response to HPC-007, the LVIA in ES Volume 1, Chapter 8 Landscape and Visual Impact Assessment (LVIA) [APP-060] has been informed by the Wiltshire Landscape Character Assessments as set out in Appendix 8-4

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			conclusions relating to scheme design and mitigation, without addressing whether the siting of this infrastructure is appropriate in relation to Hullavington's settlement context and local landscape character. In the absence of a settlement-level landscape baseline, the Parish Council considers that the effects of this element of the Scheme have not been properly assessed.	Landscape Character Area Descriptions [AP-195]. The approach to mitigation has also been informed by the guidance within the Landscape Character Assessments as well as Wiltshire's Nature Recovery Strategy.
HPC-009	Construction and Decommissioning	Construction Impact	5. Construction phase impacts (Applicant response, Section 5.13 – construction management) 5.1 Concerns were raised regarding the construction phase of the Scheme, including disruption, duration, and effects on a rural community. 5.2 The Applicant's response refers to outline construction management measures but does not clearly describe: • how construction activity would be experienced locally in Hullavington;	The full extent or 'worse case' effects arising from the Scheme are identified and reported in the ES [APP-052 to APP-265 and updated by REP1-015 to REP1-084]. The ES has been undertaken adopting the principles set out in the Planning Inspectorate's Advice Note Nine: Rochdale Envelope. 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 Environmental Impact Assessment (EIA) to assess likely worst-case variations to ensure all foreseeable significant

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			• how uncertainty arising from design flexibility would be managed at parish level; or • how prolonged construction activity would affect residents over time. 5.3 Reliance on future approval of outline plans does not amount to an assessment of the worst-case construction scenario for the parish.	environmental effects of the Scheme are considered. Considering a reasonable worst case is standard practice for EIA in the UK. Each technical chapter [APP-059 to APP-072 and updated by REP1-015 to REP1-028] has assessed the design identified to be the likely worst-case scenario for that discipline in order to determine effect significance, including impacts of the Construction phase in Hullavington. Of particular relevant are ES Volume 1, Chapter 13: Transport and Access [REP1-019] and ES Volume 1, Chapter 14: Noise and Vibration [REP1-021] which conclude that average construction noise levels in the worst affected area, north of Hullavington, would be below the existing ambient sound level, as shown for receptors R10 and R11 in Table 14-18 of ES Volume 1, Chapter 14: Noise and Vibration [REP1-021].

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				Where necessary and appropriate, the technical chapters also set out mitigation measures that would be implemented as part of the Scheme to address the effects identified. Measures to manage and minimise effects are set out in the outline management plans [APP-277 to APP-287 and updated by REP1-096 to REP1-0113] for the Scheme. The preparation, approval and implementation of detailed management plans, substantially in accordance with the outline plans, are secured through Schedule 2 of the Draft DCO [REP1-007] , ensuring that effects associated with the Scheme are appropriately controlled. The Outline CEMP [REP1-096] sets out that a Community Liaison Officer would be appointed to lead discussions with local communities during construction.
HPC-010	Transport and Access	Construction Traffic	6. Traffic and rural roads (Applicant response, Section 5.13 – transport matters) 6.1 The Parish Council continues to have concerns regarding the	Annex J of ES Volume 3, Appendix 13-1: Transport Assessment [REP1-057 and REP1-059] demonstrates adequate carriageway width or frequency of

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			suitability of rural roads serving Hullavington for construction and operational traffic associated with the Scheme. 6.2 The Applicant's response refers to traffic management processes but does not demonstrate that: - the physical constraints of parish roads have been adequately accounted for; or - impacts on safety, amenity, and road condition would be avoided rather than managed reactively. 6.3 The Parish Council remains unconvinced that the acceptability of traffic impacts on local roads has been demonstrated. Additionally, the Fosse Way, an iconic Roman road runs through the middle of the proposed site. With protected sections, the steps taken to recognise the significance of this	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-C via the Fosse Way, 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. The Outline CTMP [REP1-112] includes mitigation that will limit the impact of the Fosse Way. A booking system will be set up

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			archaeological feature seem pitifully weak.	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. 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

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				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

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				[REP1-112]. There will be no HGV trips outside of these hours; • 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

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				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

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				the Outline CTMP [REP1-112]. There will be no HGV trips outside of these hours; • 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 widening of the existing rural route to allow two HGVs to pass would be over engineering, because of the following reasons:

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				• 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

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				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

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				[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 the highway and verges during the construction period. The Fosse Way will be included as part of these surveys. The details of these surveys will be confirmed as part of the Final CTMP.
HPC-011	Cumulative and In-Combination Effects	Assessment	7. Cumulative effects (Applicant response, Section 5.13 – cumulative assessment) 7.1 The scale of change experienced within the parish, considered cumulatively with other development in the wider area, was a central concern. 7.2 The Applicant's response concludes that cumulative effects are limited but does not explain cumulative experience from within	ES Volume 2, Figure 21-1: Location of Short List Cumulative Developments [APP-178] and ES Figure 21-2: Location of Cumulative Solar Infrastructure in Proximity to Lime Down Index [APP-179] illustrate that all existing solar and BESS schemes and all proposed developments (including solar and BESS) within an approximate 9km radius of Hullavington have been taken into

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			the parish or along routes linking Hullavington to its surroundings. 7.3 Cumulative effects have been considered at a strategic level, but not at the parish or settlement scale, which the Parish Council considers critical to understanding real-world impacts.	consideration as part of the cumulative assessment. The Applicant submits that the cumulative assessment has been undertaken to allow full consideration of effects at an appropriate scale.
HPC-012	Landscape and Visual	Visual Impact	8. Matters remaining unresolved 8.1 Having reviewed the Applicant's response, Hullavington Parish Council considers that a number of material matters remain unresolved. 8.2 In particular, the Applicant has not demonstrated that the effects of the Scheme on Hullavington as a settlement have been properly assessed. The response continues to rely on scheme-wide conclusions without engaging with concerns regarding settlement-level experience and landscape character.	As noted in response to Reference ID HPC-005, the village of Hullavington (Receptor RS010) was assessed in the LVIA in ES Volume 1, Chapter 8 Landscape and Visual Impact Assessment (LVIA) [APP-060] . The full assessment sheets are presented from page 16 of ES Volume 3, Appendix 8-3-2-1 Visual Assessment Sheets (Non-Significant) . The effects of the Scheme were assessed as Minor Adverse during Construction and Year 1 reducing to Minor Neutral and No effect at Year 15 and Decommissioning respectively.
HPC-013	Landscape and Visual	Visual Impact	8.3 The Parish Council remains concerned that the local landscape baseline has not been adequately characterised.	The LVIA in ES Volume 1, Chapter 8 Landscape and Visual Impact Assessment (LVIA) [APP-060] has been informed by the Wiltshire

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			In the absence of engagement with this issue, the reliability of the assessment of effects and of the proposed mitigation has not been demonstrated.	Landscape Character Assessments as set out in ES Volume 3, Appendix 8-4 Landscape Character Area Descriptions [AP-195] . The approach to mitigation has also been informed by the guidance within the Landscape Character Assessments as well as Wiltshire's Nature Recovery Strategy.
HPC-014	General Comments	General Remarks	8.4 The Applicant's response does not resolve concerns relating to: • landscape and visual impacts during the early and mid-operation phases; • construction impacts as experienced locally; • the suitability of rural roads serving the parish; and • cumulative effects affecting Hullavington and its surroundings. 8.5 Taken together, these unresolved matters are relevant to the weight that can properly be attached to the Applicant's conclusions regarding the	The Applicant notes Hullavington Parish Council's comments and has responded to the detailed points raised in the responses HPC-001 to HPC-0013.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			acceptability of the Scheme's impacts on the parish.	
HPC-015	Landscape and Visual	General Remarks	9 Conclusion 9.1 The Parish Council considers that the Applicant's response does not adequately address the parish-specific concerns raised. 9.2 In particular, the Applicant has not engaged with identified shortcomings in the landscape baseline assessment, and this omission has implications for the reliability of the conclusions presented on effects and mitigation. 9.3 The Parish Council invites the Examining Authority to take these matters into account when considering the adequacy of the Applicant's response and the weight that can be attached to its conclusions. 9.4 In summary, the Applicant's assessment lacks any meaningful engagement with the heartbeat of Hullavington. By relying on generic, scheme-wide conclusions, they have failed to acknowledge	The Applicant notes Hullavington Parish Council's comments and has responded to the detailed points raised in the responses HPC-001 to HPC-0013.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			the actual people and habitats that make up our parish and our lived reality. The Parish Council exists to protect this community, and we cannot remain silent as our local landscape is treated as 'disposable' for the sake of misplaced energy infrastructure. We have a duty to ensure that this generation does not bequeath a compromised, damaged parish to those who will live here long after this project is finished.	
Kington Langley Parish Council REP1-145				
KLPC-001	Description and DCO Process	General remarks	Kington Langley Parish Council has previously objected to the Lime Down Solar Project and believes it registered as an interested party. KLPC noticed from reviewing the applicant's responses to submissions made by interested parties that its objection was not included. KLPC remains concerned about the Lime Down Solar Project as detailed in the attached document.	A Relevant Representation by Kington Langley Parish Council was not provided in the Examination Library or the Relevant Representation Library on the Planning Inspectorate's website. The Applicant has responded in detail to the parish council's Written Representation, submitted at Deadline 1.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
KLPC-002	Description and DCO Process	General Remarks	To: Planning Inspectorate KLPC Proposed Objection to the Lime Down Solar Park Proposal Kington Langley Parish Council (KLPC) remains concerned about the proposed Lime Down Solar Park development and objects to it. While the PC supports the responsible development of renewable energy, this proposal is fundamentally flawed due to its location, scale, and the irreversible harm it would cause to the Cotswolds and surrounding communities.	The Applicant notes this comment.
KLPC-003	Landscape and Visual	Visual Impact	1. Inappropriate Location in a Protected Landscape The proposed site lies within the nationally important Cotswold landscape, a region recognised for its beauty, tourism value, and heritage. Lime Down would be the first Nationally Significant Infrastructure Project (NSIP) solar park in this area, which would compromise the integrity of the Cotswolds.	A standalone Assessment on the CNL and its Special Qualities has been undertaken in ES Appendix 8-6 Assessment of Effects on the Cotswolds National Landscape and its Special Qualities [APP-197]. The Scheme lies adjacent to the CNL; Site A, B and C are within the setting of the CNL. The proposed development has been set back from

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				the CNL (formerly known as an Area of Outstanding Beauty) to protect land within its setting. This land will be utilised for positive enhancement of the CNL and 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 inclusion 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; and • Hedgerow enhancements including the re-establishment of historic hedgerows within the setting of the CNL.
KLPC-004	Landscape and Visual	Visual Impact	2. Excessive Scale and Disruption to Rural Communities The project spans 878 hectares across nine villages, affecting an estimated 50 square kilometres.	ES Volume 1, Chapter 8 Landscape and Visual [APP-060] recognises that the Scheme comprises a series of independent Sites which are set across an extensive agricultural

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			This vast footprint would dominate the area and severely disrupt the settlement pattern of rural Wiltshire. The village of Norton, in particular, would be encircled by industrial infrastructure.	landscape, with large areas of land between each of the Sites helping assist with assimilation. Each Site is set apart by their associated features such as robust hedgerows, woodland and tree cover, intervening settlements and the road and rail infrastructure and the changing topography. The discrete areas of land in the Scheme are placed so far apart that the Scheme would not be perceived in its entirety and the solar panels are distributed 'in and amongst' the landscape features to assimilate them into the landscape. The strong framework of existing vegetation means that this would 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.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				The existing vegetation also acts as a backdrop for the panels and helps them integrate, particularly in views towards the horizon. The introduction of solar arrays and associated infrastructure is not expected to become a defining feature of the landscape once mitigation measures 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
KLPC-005	Cultural Heritage	Heritage Assets	3. Harm to Heritage Assets The development would engulf the historic Fosse Way, a Scheduled Ancient Monument and a key walking and bridleway route. In addition, Bradfield Manor, a Grade	The potential effects of the Scheme on the Fosse Way and Bradfield Manor Farmhouse are fully assessed in ES Volume 1, Chapter 12: Cultural Heritage [APP-064] , supported by detailed technical appendices in ES Volume 3,

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			I listed building, would suffer severely damaging visual impacts.	Appendices 12-1 to 12-7 [APP-219 to APP-231]. Since the design presented at PEIR stage, Field C26, the westernmost part of Field C25, and the majority of Field C13 have been entirely removed from the Order Limits. Solar PV Panels have also been removed entirely from within Fields B1-B5, C24-C25, and C13. A number of fields abutting the Fosse Way within which Solar PV Panels will be erected have had offsets established with their boundaries with Fosse Way, including Fields B6, C10-C12, and C22-C23. ES Volume 3 Appendix 12.1: Heritage Statement [APP-219] identified that the overall setting and significance of the Fosse Way will remain intact, and the asset will retain its legibility as a roadway within a largely agrarian landscape. Consequently no significant effects were identified to the asset. The Applicant submitted a technical note at Deadline 1A 'ES Technical Addendum to Chapter 12 Cultural

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				Heritage - Bradfield Manor Visualisations' [REP1A-014] , which included the visualisations as requested by WC and Historic England, which support the results of the assessment of harm on Bradfield Manor Farmhouse as being less than substantial at the lower end of the scale.
KLPC-006	Landscape and Visual	Visual Impact	4. Adverse Impact on the Cotswolds AONB The site is adjacent to the Cotswolds Area of Outstanding Natural Beauty (AONB). The Cotswolds National Landscape Board has raised concerns and the proposal appears to breach Section 85 of the Countryside and Rights of Way Act 2000, which requires public bodies to have regard for the purpose of conserving and enhancing natural beauty.	The Applicant notes this comment. The 'duty of regard' has been strengthened to the "seek to further" duty introduced by Section 245 of the Levelling-Up and Regeneration Act 2023.
KLPC-007	Landscape and Visual	Visual Impact	5. Overbearing Infrastructure The proposed 4.5-metre-high solar panels are disproportionate and would be damagingly intrusive across the rural	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

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			landscape, impacting many communities.	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 dispersed nature of the Scheme which comprises a series of independent Sites set across an extensive agricultural landscape, with large areas of land between each of the Sites assists with assimilation of the Scheme into the landscape. 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

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				perceived in its entirety and the solar panels are distributed 'in and amongst' the landscape features to assimilate them into the landscape.
KLPC-008	Other Environmental Matters	BESS	6. Battery Energy Storage Risks The project includes two large Battery Energy Storage Systems (BESS) located between Corston and Hullavington. These pose risks of noise pollution, chemical fires, and toxic gas release. One BESS is proposed near the London to Cardiff mainline railway, creating a national infrastructure risk.	The Applicant confirms that robust safety measures are inherent in the BESS design plans to fully mitigate any potential impacts on railway operations. An Outline Battery Safety Management Plan (BSMP) [REP1-110] has been prepared for the Scheme using guidance from Dorset and Wiltshire Fire and Rescue Service and incorporating recommendations of the National Fire Chiefs Council. The safety objectives for the design of the BESS site are listed in Section 2.4 of the Outline BSMP [REP1-110]. The OBSMP has been amended at Deadline 1 to fully accommodate the latest BESS safety requirements contained in NFPA 855 (2026) ensuring that any credible risks associated with battery storage are either prevented or fully mitigated if a BESS failure occurs.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				Section 2.4.2 of the Outline BSMP [REP1-110] stipulates that: <i>"Final BESS design and site layout will have been validated through mandatory Large Scale Fire Testing (LSFT) and rigorous consequence modelling to minimise the requirement for any D&WFRS intervention in a thermal runaway incident. LSFT must establish minimum equipment spacing distances that demonstrate there is no fire propagation to adjacent BESS enclosures or ESS equipment. D&WFRS intervention in worst case scenarios would typically be limited to boundary cooling of adjacent BESS and Energy Storage System (ESS) units to prevent the fire from spreading.</i> <i>This strategy will be finalised with D&WFRS and be clearly communicated in the Emergency Response Plan (ERP);</i> <i>To ensure that fire, smoke, and any release of</i>

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				<i>toxic gases does not significantly impact site operatives, first responders, and the local community; and</i> <i>• To ensure that firewater run-off is contained and tested before release or, if necessary, removed by tanker and treated offsite."</i> As now mandated under NFPA 855 (2026) the Applicant will only be able to select a BESS system that has undertaken Large Scale Fire Testing (LSFT). At the detailed design stage, the selected BESS LSFT data will be leveraged to fully inform inputs for risk assessment tools which will be utilised together with detailed consequence modelling to provide a comprehensive site operations and emergency response safety audit, this is stipulated in the Outline BSMP [REP1-110] pre-construction requirements (Section 6). The objective of the test is to evaluate the thermal exposure impacts from a

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				developed BESS enclosure, to determine propagation risk to adjacent BESS or equipment. Testing also defines the length of burn, duration of Peak Heat Release Rate, maximum burn temperatures, etc. Section 5 of the Outline BSMP [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. Final comprehensive risk assessment reports, BESS design and site-specific consequence modelling, and detailed Emergency Response Plans (ERPs) can only be drafted when based upon the specific BESS design selected at the detailed design stage. Key safety content requires that all equipment within the BESS area is defined, battery system operating limits and test data are fully defined, and the BESS failure protection system is defined. Incident response

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				tactics require significant test data and rigorous consequence modelling from the specific BESS design to develop safe protocols for incident response. Section 5.4.9 – 5.4.11 of the Outline BSMP [REP1-110] stipulates that the ERP will follow NFCC and NFPA 855 (2026) guidelines and stipulates the minimum content that an ERP must contain, including: <i>“Emergency procedures for all credible hazards and risks, including building, infrastructure and vehicle fire, wildfires, impacts on local respondents, impacts on transport infrastructure.”</i> 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) defines a safe BESS exclusion zone as follows:

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				"Potential debris impact radius is defined as 100 feet (ft) or 30.5 metres (m) i.e. this is a typical explosion risk safe exclusion zone radius as modelling and previous BESS incidents typically show 25 m to be maximum radius." The railway line referred to is located at a substantially greater distance, such that direct thermal effects, blast overpressure or debris impacts capable of affecting rail operations are not anticipated under credible worst-case scenarios. Further explosion prevention, mitigation, and safety requirements for the Scheme are stipulated in the Outline BSMP [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 Applicant also commissioned BESS fire emissions assessment (as detailed in ES Volume 3, Appendix 15-2: BESS Fire Emissions Modelling [APP-239]) to ensure the

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				selected BESS area would have no significant off-site impacts if credible BESS failure scenarios occurred. The study has been undertaken using professional judgement in the absence of specific regulatory guidance, and adopts a conservative, worst case approach throughout. The assessment demonstrates that, even under worst case assumptions, a BESS fire would not result in significant effects on human health or safety. The modelling assumes: • Worst case BESS fire locations within the BESS area closest to sensitive receptors; • Worst case release height, temperature and plume parameters; and • Use of five years of hourly meteorological data, with the maximum predicted concentration extracted at each receptor, assuming the fire coincides

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				with the poorest dispersion conditions. Given the inherent uncertainty in available BESS fire emissions data, a sensitivity test was also undertaken whereby emission rates were doubled. Even under this highly conservative sensitivity test, predicted concentrations remained well below the relevant health-based thresholds. Six worst case BESS fire locations (i.e. locations within the BESS Area closest to sensitive receptors) have been modelled as depicted in ES Volume 2, Figure 15-5: BESS Fire Emissions Study Area, Receptors and Modelled BESS Locations [APP-166]. The Concentrations of carbon monoxide (CO), formaldehyde, hydrogen chloride (HCl), hydrogen cyanide (HCN), hydrogen fluoride (HF), ammonia (NH₃), nitrogen dioxide (NO₂) and particulates from a potential BESS fire have been modelled using an air quality dispersion model to determine the likely effects on human health.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				ES Volume 3, Appendix 15-2: BESS Fire Emissions Modelling [APP-239] concludes that there would be no significant air quality effects as a result of a BESS fire incident and visibility issues were not predicted.
KLPC-009	Transport and Access	Construction Traffic	7. Inadequate Access and Traffic Risks The proposed access routes for construction vehicles are unsuitable. Narrow country lanes would be damaged, and rural communities disrupted. The Cotswolds National Landscape Board has already objected to the use of Junction 18 of the M4 for lorry access.	Please see the response to Reference ID HPC-010.
KLPC-010	Site Selection and Alternatives	Grid Connection	8. Distance from the National Grid The significant land take necessary for the 20km of 400kV underground cabling is a major concern. Proximity to a suitable grid connection should be a key driver in choosing a solar farm site to minimise loss of electrical energy in transmission and to protect the environment.	Please refer to reference ID SS-02 in the Applicant's Response to Relevant Representations Part 2 [REP1-117] which addresses this point. In summary, the Existing National Grid Melksham Substation was identified as the point of connection, and a search for solar development areas was undertaken within a 20 km radius from this point.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				Several factors were considered in the design evolution of the Cable Route Corridor, including a direct route which followed existing features, such as roads, and avoids sensitive receptors as far as practicable, and a large number of land interests.
KLPC-011	Soils and Agriculture	Agricultural Land Use	9. Loss of Productive Agricultural Land We understand your (IGP's) own surveys indicate that 30% of the site comprises Best and Most Versatile (BMV) agricultural land. At a time when the UK imports over 40% of its food, sacrificing such valuable land for profit is unacceptable.	The UKRI's Roadmap for Resilience: A UK Food Plan for 2050, addresses future food security and self-sufficiency, which it notes would be achievable "but only with coordinated policy on production, diets and land use." The three core principles for the UK to become self-sufficient are: resilient agricultural production, which includes reducing livestock numbers and supporting farm diversification; integrated land use to sequester carbon and reduce agricultural emissions; and changing dietary choices, namely consuming less meat. The Applicant does not consider that cessation of arable production on a

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				majority moderate to low quality agricultural land in Subgrade 3b and Grade 4 would significantly affect the UK's ability to become self sufficient in food production.
KLPC-012	Socio-Economics, Recreation and Tourism	Local Economy	10. Economic Harm to Wiltshire The development would offer no permanent local employment once construction is complete whilst threatening job losses in agriculture, its supply chains, and the tourism sector that is so important to our rural economy.	During operation, economic and direct employment benefits from the Scheme are recognised to be more modest and limited in scope, which the Applicant acknowledges. However, the Applicant has sought to ensure enhancement measures through the Outline SSCEP [REP1-108] are secured through Requirement 18 of Schedule 2 to the Draft DCO [REP1-007] to improve local employment opportunities. This includes through retaining, or re-training agricultural workers displaced by the Scheme, sourcing local supply chains where practicable, and supporting local skills uplifting opportunities to assist those who have been indirectly affected by the Scheme. These potential mitigation and enhancement measures have not been included in these calculations of

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				economic or employment effects, nor have potential community benefits financed through the Community Benefit Fund been included in the DCO (as it is agreed through a separate process). The Applicant is therefore confident that the assessment of employment effects in ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068] represents a realistic worst-case scenario.
KLPC-013	Construction and Decommissioning	Construction Impact	11. Irreversible Long-Term Damage Following 60 years of operation, there will be little means, realistically, for long-term damage to the landscape and heritage assets to be undone, given uncertainties about future ownership, economic viability, and restoration responsibilities. The cable and its concrete structures would be particularly difficult and expensive to undo, probably prohibitively so.	Information on decommissioning activities is provided within the ES [APP-052 to APP-265] and within the Outline Decommissioning Strategy [REP1-100]. The information is provided in accordance with the requirements of Part 1 of Schedule 4 of the EIA Regulations 2017 (as amended). At the end of the Scheme's operational life, all Solar PV Sites would be decommissioned and the land restored to its original use and condition as far as practicable. There will be opportunities for the retention

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				of a range of biodiversity improvements, including established habitats, hedgerows and woodland, beyond the decommissioning of the Scheme, ultimately enhancing the ecological value of the area. As set out within ES Volume 1, Chapter 3: The Scheme [APP 055], the mode of removing the Interconnecting Cables and Grid Connection Cables decommissioning would be dependent upon government policy and good practice at that time. Currently, the most environmentally acceptable option is considered to be leaving the cables in situ, as this avoids disturbance to overlying land and habitats and to neighbouring communities. Alternatively, the cables can be removed by opening up the ground at regular intervals 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.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
KLPC-014	Scheme Description and DCO Process	General Remarks	Conclusion The Lime Down Solar Park proposal is ill-conceived offering, on balance, little public or environmental benefit when weighed against purported benefits. It poses a serious and permanent threat to one of England's most important landscapes and rural communities. We strongly urge that the proposal be rejected in its entirety.	The Applicant's consideration of the planning balance is set out in Section 9.4 of the Planning Statement [REP1-087] where the positive, neutral and negative impacts of the Scheme are set out. Section 9.4 of the Planning Statement [REP1-087] concludes that having regard to all important and relevant matters, it is concluded that there are no adverse impacts of sufficient weight, either on their own or collectively, that would mean the DCO should not be made. The adverse impacts identified are clearly outweighed by the substantial public benefits that would arise from the provision of low carbon energy to meet the need identified in NPS EN-1.
Malmesbury Town Council REP1-136				
MTC-001	Scheme Description and DCO Process	General Remarks	At the Malmesbury Town Council meeting on 14th April 2026, responses have been prepared, to the responses from IGP and we attach these in a separate file.	The Applicant notes this comment.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
MTC-002	Scheme Description and DCO Process	General Remarks	Malmesbury Town Council – Interested party reference LDSF-SP029 At the Malmesbury own Council meeting on 14th April 2026, responses have been prepared, to the responses from IGP as follows:- MTC-001 – Description and DCO Process (Principle of Development & Consultation) MTC's issue is principled opposition to the scale of the development and to aspects of the consultation process. The Applicant's response merely acknowledges the comment and states that they respond to specific concerns "below". It does not address: • Why opposition "in principle" is said to be outweighed. • Why the DCO process is appropriate for this scale/location.	The Applicant remains confident in the level of consultation undertaken and the information presented. The Consultation Report [APP-022] describes the Applicant's approach to non-statutory, statutory and targeted consultation. The Applicant notes Adequacy of Consultation Responses [AoC-001 to AoC-012] where consultees provided their feedback on the adequacy of the consultation. The Applicant notes that these responses are taken into consideration by the Planning Inspectorate when deciding to accept an application for development consent. The Applicant is confident that appropriate and proportionate consultation with the community has been carried out. The DCO process is required as the Scheme is a Nationally Significant Infrastructure Project (NSIP) that comprises an onshore generating station in England (which does not

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			- Any flaws in consultation raised here. - Procedural rather than substantive: no justification of need, alternatives, or site selection. - Defers answers elsewhere, weakening transparency. Avoids engagement with democratic objection "in principle"	generate electricity from wind) with a generating capacity exceeding 100 MW and is therefore classed as a NSIP under sections 14(1)(a), 15(1) and 15(2) of the PA 2008. The Planning Act 2008 requires a DCO to be obtained for the development of NSIPs. In relation to need, alternatives and site selection, these matters are addressed 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].
MTC-003	Soils and Agriculture Landscape and Visual	Visual Impact	MTC-002 – Landscape, Visual Impact & Agricultural Land / Cotswolds National Landscape The Applicant provides extensive references to ES chapters and mitigation measures. Agricultural land loss is acknowledged as "significant adverse" but dismissed as "temporary and reversible".	The Applicant notes this comment.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			Impacts on the Cotswolds National Landscape (CNL) are said to be "minimal" or "short-term". Temporary loss argument is weak: 40+ years is functionally permanent for communities and farming businesses.	
MTC-004	Cumulative and In-Combination Effects	Assessment	No meaningful engagement with: Cumulative impacts.	The Applicant has responded to comments relating to cumulative effects in detail in on page 806-807 and page 870-871 of the Applicant's Response to Relevant Representations [PDA-009] , where it is explained that full and extensive engagement, consideration, assessment and reporting of intra- and inter-project cumulative effects has been undertaken with the conclusions set out within ES Volume 1, Chapter 21: Cumulative and In-Combination Effects [APP-073] .
MTC-005	Site Selection and Alternatives	Scale	The scale (11 sq miles) raised by MTC	Land within the Scheme Order Limits includes the Solar PV Sites, which comprise land for solar infrastructure, landscape and mitigation, covering an area of

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				approximately 749 ha. Of that total, approximately 479 ha is land required for the installation of the solar panels, BESS and associated electrical infrastructure. The remaining 269.5 ha comprises areas of land dedicated to ecological mitigation, biodiversity net gain delivery, landscaping offsets and land that would be agriculturally managed for environmental enhancement and habitat creation. The cable route corridor runs for approximately 22km from Lime Down D, where the 400 kV substation is to be located, to the National Grid substation at Melksham, covering an area of approximately 463.2 ha. In total, the Scheme covers an area of 1,237 hectares which equates to 4.7 square miles.
MTC-006	Landscape and Visual	Visual Impact	Reliance on future mitigation (Year 15 maturation) without certainty of outcomes. Downplays statutory duty to conserve and enhance the	Mitigation and enhancement measures are detailed in the Outline LEMP [APP-283] and the Outline EPMS [REP1-106], which set out habitat creation, species protection measures,

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			National Landscape by reframing harm as "setting only". Visual receptors described as "small number" without clarifying sensitivity (e.g. iconic views, visitors).	buffer zones and long-term ecological management. 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]. The Scheme has been designed sensitively to avoid harm to the CNL where Sites A, B and C are agreed to be in its setting following consultation with the CNL Board. 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 [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 relationship between the CNL and the Scheme. This includes:

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				• 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 CN but are were significant visual effects on receptors within the CNL were recorded at PEIR were subsequently removed from the Scheme following Statutory Consultation with the CNL Board. The Sensitivity all receptors have been robustly assessed in the LVIA as set out in ES Volume 1, Chapter 8: Landscape and Visual [APP-060] and the Assessment sheets in Appendix 8-3 [APP-189-194].
MTC-007	Noise and Vibration	Noise Assessments and Impacts	MTC-003 – Consultation, Visual Impact, Glare & Noise	The scope of visual assessment within the LVIA in ES Volume 1, Chapter 8 Landscape and Visual

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			MTC raised exclusion of Malmesbury residents and lack of balanced information on visual impact, glare, and noise. The Applicant response focuses almost entirely on noise modelling. There is no explanation for: • Why Malmesbury residents were omitted. • How glare was assessed or communicated. • Whether consultation boundaries were appropriate. • Fails to answer the core consultation fairness issue. • Technical noise assessment does not address trust, transparency, or democratic inclusion. • Assumes modelled compliance equals acceptability, ignoring lived experience.	Impact Assessment (LVIA) [APP-060] extends to 2km and excludes Malmesbury. Malmesbury is over 3.5 km from the closest point of the Scheme. Noise from the Scheme would not be audible in Malmesbury. The study area for the noise assessment is designed to capture any receptors potentially significantly adversely affected by noise. With reference to receptors R38-R40 in Table 14-18 of ES Volume 1, Chapter 14: Noise and Vibration [REP1-021] with regards to construction and Table 8 of ES Volume 3, Appendix 14-4 Noise Modelling [REP1-061] with regards to operation, the assessment shows that significant adverse effects are avoided in Foxley, which is much closer to the Scheme than Malmesbury, reinforcing the fact that the study area is appropriate and that adverse effects would not be apparent in Malmesbury.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			Glare and visual impact concerns are not addressed in this response at all	Glint and glare impacts towards roads and dwellings have an assessment area of 1km from the solar panel arrays, which Malmesbury lies outside of. Effects beyond 1km are considered not to be significant, as even if solar reflections are geometrically possible and visible, they would constitute a lesser proportion of a viewers field of view and be of a lesser intensity compared to receptors within the 1km boundary.
MTC-008	Socio-Economics, Recreation and Tourism	Tourism and Health	MTC-004 – Socio-Economics, Tourism, Recreation & Health Tourism impacts are quantified (job losses, GVA percentages). Health impacts are referenced via a separate ES chapter. Focus is on economic metrics rather than experiential or place-based impacts. Reductionist approach: Emotional wellbeing and sense of place are minimised. Tourism impacts framed as “statistically insignificant” rather than locally material.	An assessment of the likely effects of the Scheme on the local economy and employment is provided in ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]. This chapter considers potential impacts on construction and engineering sectors, agricultural activity, tourism-related businesses, and wider local economic conditions during construction, operation and decommissioning. Impacts of the Scheme on mental health and

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			Assumes recovery post-construction without evidence.	wellbeing are assessed in ES Volume 1, Chapter 18: Human Health [APP-070]. This chapter provides a comprehensive assessment of the Scheme's potential effects on human health, including mental health and wellbeing, through consideration of a broad range of health determinants. These include access to open space and recreation, transport and connectivity, community identity and cohesion, employment and income, noise and vibration, air quality, and access to health and social care services. The Likely Significant Effects to Tourism and Recreation Receptors is outlined in detail within Section 3 of ES Volume 3, Appendix 16-2: Tourism and Recreation Receptor Tables [APP-241]. The table includes description of effects including consideration towards aspects increased HGV use of the local highway network, visual and

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				amenity impacts, and impacts on the use of PROWs. Post construction, during the operational period, mitigation by the implementation of embedded landscape mitigation measures, set to mature over the Scheme's operational lifetime will reduce the visual impact on visitor attractions. There is a low risk that the Scheme itself becomes a deterrent to visitors travelling to the area by virtue of subjective opinion on its appearance and changes to views of the landscape as seen when travelling between visitor destinations, however the risk of impact on these medium and high sensitivity tourism destinations themselves is negligible. The Scheme, through its design and embedded mitigation set out in the Outline PRowPPMP [REP1-104], preserves the routing and access of all existing PRow and permissive recreation routes within the Order Limits throughout the

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				operational lifetime of the Scheme except during planned replacement periods. The greatest level of effects on high sensitivity long-distance recreational routes during the overall operational and maintenance phase are long-term moderate adverse effects to the Fosse Way, Palladian Way, and Wiltshire Way. These are therefore significant adverse effects. For Human Health, the primary Study Area for determining baseline conditions for human health comprises all electoral ward areas falling within 2 km of the Scheme. This has been judged as a reasonable assumption for the largest area for which most of the scoped in determinants of health (see Table 18-1 at ID 3.14.2) are likely to be significantly affected. An additional 5 km Study Area is used solely for assessing baseline provision of primary health services and likely significant effects upon these services.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				The Human Health assessment applies a health “lens” to the findings of relevant technical chapters and concludes that, with the embedded mitigation and additional measures secured through the relevant management plans [APP-277 to APP-287] secured by their respective requirements in Schedule 2 to the Draft DCO [REP1-007], the Scheme would not give rise to significant adverse effects on population health, including mental health and wellbeing. 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

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				lead to frustration, stress, anxiety, and associated mental health challenges for residents, where unaddressed. In assessing changes to 'community identity, culture, resilience and influence', a community's spatial relationship to the Scheme has been a key consideration in how sensitive to change that community is, and how large a magnitude of impact that community is likely to experience in regard to sense of place and rural identity. Cumulative effects are assessed under Section 16.13 of Volume 1, Chapter 16: Socio-Economics, Tourism [APP-068] and Recreation and Section 18.13 of Volume 1, Chapter 18: Human Health [APP-070]. Both chapters include consideration towards cumulative effects associated with all phases of the Scheme, including the construction phase.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
MTC-009	Consultation and Engagement	Adequacy of Consultation	MTC-005 – Summary Objection & Call for Further Consultation - The Applicant asserts compliance with statutory consultation requirements. - Points to the Consultation Report and Examination process as safeguards. - Compliance ≠ adequacy: does not address quality or fairness of consultation. - Does not engage with Wiltshire Council's call for supplementary consultation. - Leans on process defensiveness rather than reflecting on omissions or improvements. Treats Examination as cure-all, despite consultation being front-loaded by design.	The Applicant notes Adequacy of Consultation Responses [AoC-001 to AoC-012] where consultees provided their feedback on the adequacy of the consultation. The Applicant notes that these responses are taken into consideration by the Planning Inspectorate when deciding to accept an application for development consent. The Applicant is confident that appropriate and proportionate consultation with the community has been carried out.
MTC-010	Consultation and Engagement	Response to RRs	Overall Pattern of Weaknesses (Cross-Cutting) to MTCs response:	The Applicant refers to its response provided under reference ID CE-26 in Applicant's Response to

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			• Heavy deflection to ES documents rather than direct answers. • Over-reliance on: • Modelling • Future mitigation • Percentages that dilute local significance. • Consultation concerns repeatedly acknowledged but not remedied. • Community-level impacts reframed as technical or temporary. • Lack of clear balancing exercise between national policy benefits and local harm.	Relevant Representations (Part 2) (Rev 2) [REP1-117] regarding its approach to responding to submissions. Each RR submitted by the general public, and any other non-statutory parties not responded to at Deadline A, has been systematically reviewed and a summary of the issues raised has been prepared. These summaries are presented alongside the corresponding unique reference ID, enabling a clear audit trail between the original representation and the Applicant's response. The Applicant therefore had regard to all RRs received and has provided a response to the issues raised. The Examination process, led by the Examining Authority, will further consider all RRs, alongside the Applicant's responses and any subsequent submissions, in reaching a recommendation on the Scheme.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				The Applicant notes that the free-to-use Scheme communication channels remain open for anyone to contact the Applicant regarding questions about submissions and responses to comments.
MTC-011	Consultation and Engagement	Adequacy of Consultation	Planning Act 2008 – Adequacy of Consultation Relevant test: Whether consultation was adequate, fair and meaningful, not merely legally compliant. Weaknesses in the Applicant's responses: The Applicant relies almost exclusively on procedural compliance ("met statutory requirements") and does not address exclusion of Malmesbury residents from consultation materials. No explanation is given for: Why Malmesbury residents were excluded while residents outside the town boundary were included.	The Applicant refers the Town Council to its response in MTC-010 regarding comments on adequacy of consultation.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			• How this omission affected the balance or quality of feedback. • The Applicant conflates Examination participation with consultation, despite these being legally and practically distinct stages. Why this matters • Case law and Inspectorate practice are clear that minimum compliance does not cure a flawed consultation exercise. • A consultation that omits a materially affected settlement undermines: • Legitimacy of the Environmental Statement baseline, • Reliability of community impact conclusions, • Confidence in the weighting of local adverse effects.	

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
MTC-012	and DCO Process	Planning Balance	2. National Policy Statements (EN-1 / EN-3) – Planning Balance & Harm Relevant test: Whether identified harms are properly assessed, recognised, and weighed in the planning balance. Weaknesses The Applicant repeatedly: - Acknowledges harm (significant adverse effects on BMV land, amenity, tourism) Then relabels it as “temporary”, “small-scale”, or “not significant” without demonstrating why that weighting is justified. The responses rely heavily on percentages at county or regional scale, which: - Dilute town-level impacts	The Environmental Statement, Statement of Need [REP1-086] and the Planning Statement [REP1-087] provide an assessment of the adverse and beneficial effects associated with the Scheme, an explanation of why the Scheme is needed and the benefits of solar energy generation, and the other benefits proposed by the Scheme. Annex A of the Planning Statement [REP1-087] sets out the Scheme's compliance with NPS EN-1 NPS EN-3 and NPS EN-5 and Annex B of the Planning Statement [REP1-087] sets out the Scheme's compliance with local planning policy. It is considered that the Scheme is compliant with relevant local and national policies. The Planning Statement [REP1-087] considers the planning balance including consideration of the benefits it would deliver and the harm it may cause. As set out in the Planning

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			- Conflict with the requirement to assess local significance. Specific weaknesses - No transparent balancing exercise is shown between: - National energy benefits - Localised but severe landscape, amenity and economic harm. The planning balance is asserted, not demonstrated.	Statement [REP1-087] the benefits of the Scheme include the contribution the Scheme makes to achieve decarbonisation, the demand for electricity and the security of the supply of energy, ecological and landscape enhancements including substantial new hedgerow and tree planting, reinforcement planting and grassland habitat creation, biodiversity net gain in excess of 10%, the provision of 12.8km of permissive paths, employment generation and skills training. It is these benefits that are considered in the relevant policy tests that apply to the Scheme including: - In the case of designated heritage assets, where less than substantial harm is anticipated to seven designated assets. - The application of the exception test as set out in Annex C: Sequential Test and Exception Test of the Planning Statement [REP1-087].

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				• The use of best and most versatile agricultural land. • Development in a National Landscape. As demonstrated in the Planning Statement [REP1-087], overall, the Scheme accords with the relevant energy National Policy Statements and, where required, it has been demonstrated that any harm caused by the Scheme is outweighed by the substantial benefits that are delivered. In terms of the planning balance, the Applicant has addressed this in the Planning Statement [REP1-087] and sets out how it considers the planning balance should be applied (Section 9). The planning balance exercise takes account the positive, neutral and negative impacts of the Scheme, and applies the critical national priority presumption. The Applicant's position is that the balance is overwhelmingly

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				in favour of the development consent order being made.
MTC-013	Soils and Agriculture	Agricultural Land Use	3. Protection of Best and Most Versatile Agricultural Land Relevant test Whether loss of BMV land is: - Justified, minimized, demonstrably outweighed by benefits. Weaknesses Loss is acknowledged as "significant adverse", yet: - Framed as acceptable purely because it is "temporary". - No meaningful justification is provided for: - Site selection on high-quality agricultural land, - Why lower-grade land alternatives were not preferable. Critical flaw A 40-year operational period is treated as short-term, which conflicts with:	The agricultural land within the Solar PV Sites is classified as approximately one-third Best and Most Versatile (BMV) mostly in Subgrade 3a, and two-thirds non-BMV, in Subgrade 3b and Grade 4, as set out in ES Volume 3, Appendix 17-1: Agricultural Land Classification and Soil Resources Survey [REP1-063]. There is not anticipated to be any loss of agricultural land, although the primary agricultural use will cease for the duration of the Scheme. An appraisal of alternative sites is presented 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 assessment considered alternative sites within a 20 km radius of the existing National Grid Melksham Substation and concludes that there are no more suitable

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			Farming cycles, land stewardship expectations, practical irreversibility for current land users.	locations within the defined search area than the proposed Site. The Site Selection Assessment explains how brownfield land, industrial land, previously developed land and lower grade agricultural land were considered in accordance with policy. The operational period is assessed as temporary and long-term.
MTC-014	Landscape and Visual	Cotswolds National Landscape	4. Cotswolds National Landscape – Statutory Duty to “Conserve and Enhance” Relevant test Whether the scheme conserves and enhances, not merely avoids direct harm. Weaknesses Harm is downgraded by: • Treating impacts as affecting only the “setting” rather than the National Landscape itself. • Mitigation is relied upon to achieve compliance in the future (Year 15+), rather than at the point of consent.	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 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

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			• “Beneficial effects” (paths, biodiversity) are used to offset: • Loss of tranquillity, • Industrialisation of views, • Perceived erosion of landscape character. Why this is weak • Enhancement duties are positive obligations, not offsetting exercises. • Recreational infrastructure does not equate to landscape conservation.	reduce effects on the CNL and its setting. Panels along the edge of the CNL were 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 from fields C1, C6, C8, the western section of C9 and the majority of C10, with this land now proposed for ecological mitigation to protect the setting of the CNL. In addition, panels within fields A11 and A12 were have been avoided and the land repurposed for ecological mitigation to protect the setting of the CNL. 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. Section 3.5 of ES Volume 3, Appendix 8-6 [APP-197] sets out how the Scheme contributes to furthering the statutory purpose of

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				conserving and enhancing the natural beauty of the Cotswolds National Landscape which has been informed by the CNL Nature Recovery Strategy, the Cotswolds Management Plan and associated guidance including the Landscape Strategy and Guidelines.
MTC-015	Landscape and Visual	LVIA	5. Landscape & Visual Impact Assessment – Magnitude vs Sensitivity Relevant test Whether impacts are properly assessed in relation to sensitivity of receptors, not just number. Weaknesses: Repeated references to: • “small number of receptors” • “short-term adverse effects” • No proper consideration of: • Highly sensitive receptors (historic town, tourism economy, designated landscape),	The LVIA in ES Chapter 8: Landscape and Visual Impact [APP-060] and its associated Appendices have been prepared in accordance with the ‘Guidelines for Landscape and Visual Impact Assessment’ Third Edition (GLVIA3). The methodology for the assessment is set out in ES Volume 3, Appendix 8-1 Landscape and Visual Impact Assessment Methodology [REP1A-006]. The assessment of both landscape and visual effects correctly assesses the sensitivity of the individual receptors and considers the magnitude of change to the receptor as a result of the development to determine the significance of the effect. It should be noted that all receptors scoped into

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			Repeated, cumulative exposure over decades. Key flaw Visual harm is treated quantitatively rather than qualitatively; who is affected and why is not properly weighted.	the assessment have been assessed. However, ES Chapter 8: Landscape and Visual Impact [APP-060] reports on the Significant Effects of the Scheme.
MTC-016	Socio-Economics, Recreation and Tourism	Economic Impacts	6. Tourism & Socio-Economic Effects – Material Local Harm Relevant test Whether economic impacts are material at the local scale. Weaknesses Impacts are presented as: - Statistically small at Wiltshire scale, - Therefore acceptable. This approach ignores: - Tourism's disproportionate importance to Malmesbury, - The reputational and experiential factors driving repeat visits. Policy weakness	The Applicant notes this comment and refers to Table 5.16, reference MTC-004, within the Applicant's Response to Relevant Representations (Part 1) [PDA-009] .

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			Jobs lost are counted, but quality of place, visitor perception, and long-term brand damage are not properly assessed.	
MCT-017	Human Health	Human Health and Wellbeing – Scope of Assessment	7. Human Health & Wellbeing – Scope of Assessment Relevant test Whether all plausible health pathways have been considered. Weaknesses • Health assessment limited to a 2 km study area, potentially excluding: • Wider community impacts, • Indirect mental health stressors. • Emotional wellbeing and anxiety are acknowledged but treated as non-material due to modelling outcomes. Why this fails the test Modern planning practice increasingly recognises mental and emotional wellbeing as material	The assessment methodologies described within ES Volume 1, Chapter 18: Human Health [APP-070] have been developed in line with the relevant planning policy and industry guidance for assessing potential effects of the Scheme on human health; and this methodology has been adopted for other solar schemes. Consultation with Wiltshire Council's Public Health Team has informed the approach to mental health considerations, as documented in ES Volume 3, Appendix 18-1: Human Health Consultation [APP 244]. The assessment of human health is undertaken on the understanding that as defined by the Constitution of the World Health Organization (WHO) in 1948, "Health is a state of complete physical, mental and social well-being and not merely the absence of

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			considerations, especially for long-duration infrastructure.	disease or infirmity" (Ref 18-51). As such, the health and wellbeing of individuals and communities is based on a broad range of determinants of health, which have been modelled by Dahlgreen and Whitehead (1991), and Barton and Green (2006) respectively. The primary Study Area for determining baseline conditions for human health comprises all electoral ward areas falling within 2 km of the Scheme. This has been judged as a reasonable assumption for the largest area for which most of the scoped in determinants of health are likely to be significantly affected. However, an additional 5 km Study Area is used solely for assessing baseline provision of primary health services and likely significant effects upon these services. This is based on the largely rural character of the 2 km primary Study Area, and the resultant likely need for people to travel further than 2 km to access

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				primary healthcare, due to the location of available services. The 2 km and 5 km Study Areas for human health are shown in ES Volume 2, Figure 18-1: Study Areas for Human Health [APP-174]. An overview of Source to Receptor Pathway Links for Health Determinants is provided within Table 18-8. Drawing on the 2024 EIA Scoping Report (Ref 18-1), the following determinants of health, scoped into this assessment, and the relevant source to receptor pathways to potential impacts are set out in Table 18-8. The impacts of the Scheme on these determinants of human health are assessed using professional judgement, good practice, and drawing on other assessments within the ES.
MCT-018	Scheme Description and DCO Process	Management Plans	8. Reliance on Future Mitigation & Management Plans Relevant test Whether mitigation is:	The Applicant does not agree with the assumption that use of mitigation via management plans reduces certainty or enables harm to be consented. All mitigation measures proposed in the ES are secured through the suite of

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			• Certain, Deliverable, Enforceable, Adequate to offset harm. Weaknesses Heavy reliance on outline plans (OLEMP, EPMS, OEMP) that: • Defer critical detail post-consent, • Reduce certainty for affected communities. • Mitigation success is assumed, not evidenced. • Examination concern Harm is consented now, mitigation is promised later.	management plans documents secured by the Requirements in Schedule 2 to the Draft DCO [REP1-007]. These detailed management plans must be in accordance with the outline documents contained within Volume 7 of the ES and subsequently approved by the relevant statutory stakeholder, for example, Wiltshire Council in the case of the Outline CEMP [REP1-096] amongst others. If consented, the DCO becomes a statutory instrument, and thus failure to comply with, or breach of, any of the Requirements is a criminal offence. Moreover, it should be noted that this approach is consistent with the established practice of securing mitigation used across all Nationally Significant Infrastructure Projects in the UK.
MCT-019	Description and DCO Process	General Remarks	Executive Summary Weakness (Across All Tests) The Applicant repeatedly: • Acknowledges harm, • Downplays its significance,	The Applicant acknowledges that there will be some significant effects which cannot be mitigated as a result of the Scheme such as those set out above. The Applicant has made every effort to minimise these effects

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			Defers resolution to future mitigation, Frames compliance as acceptability.	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. It should be noted that a small number of significant effects can be expected across most Nationally Significant Infrastructure projects due to the scale of the Scheme's which require consent via this decision making process. To that regard, those effects are part of the reason which make the DCO process necessary and allow an external party (the Examining Authority) to come to an unbiased decision regarding whether to recommend consent to the Secretary of State. Responses to detailed points raised on specific topic areas and the notion that the Applicant is deferring resolution are set out in the responses provided to MCT-002 to MCT-019.
Melksham Without Parish Council REP1-147				

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
MWPC-001	Cumulative and In-Combination Effects	Assessment	In response to the comments made by the applicant on our comments submitted, Melksham Without Parish Council comments still stand as the applicant has still not considered the cumulative impact on the wider communities of Beanacre (where the Melksham substation is) and the connection through the villages of Whitley and Shaw.	Beanacre, Whitley and Shaw are all located within or immediately adjacent to the cumulative assessment study area shown on ES Figure 21-1: Location of Short List Cumulative Developments [APP-178] and Figure 21-2: Location of Cumulative Solar Infrastructure in Proximity to Lime Down Index [APP-179] . Cumulative effects have been fully considered and reported within ES Volume 1, Chapter 21 Cumulative and In-Combination Effects [APP-073] . Of the 41 short listed developments considered, based on proximity, those of particular relevance to the area are 123 underground cable laying to Melksham sub-station, 129 underground cable laying to Melksham sub-station and 328 22 new residential dwellings [APP-073 page 13-20] . Turning to Table 21-8 Summary of Cumulative Effects [APP-073] , each of these three schemes along with 38 others are listed with effects reported. For schemes 123, 129 and 328 no

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				significant cumulative effects are identified.
MWPC-002	Cumulative and In-Combination Effects	Assessment	The parish council strongly supports the comments made by CAWS Community Action: Whitley & Shaw who spoke at the hearing and are listed as Interested Party.	The Applicant notes this comment.
Sherston Parish Council REP1-148				
SPC-001	Description and DCO Process	Response to RRs	The applicant's responses rely predominantly on generalities and numerous referrals to reports and assessments, which are based on the inputs and assumptions of the applicant; these are not helpful in allowing us as a council to understand the impacts on our parish and community and do not give reassurance that our specific concerns, and those of our community, are being addressed.	The Applicant notes this comment. Potential effects from the Scheme have been assessed and reported in the ES [APP-053 to APP-265 and updated by REP1-015 to REP1-084] which considers the likely significant effects of the Scheme as a result of the construction, operation and decommissioning phases. These effects are fully reported in the ES and are a matter for the Secretary of State to weigh in the planning balance against the need for the Scheme and its wider benefits.
SCP-002	Landscape and Visual	LVIA	The applicant states that the LVIA found no long-term visual impact on residential properties; this suggests that the applicant	The assessment on Residential Receptors is set out in Table 8-19 Significant Visual Effects: Private Receptors in ES Volume 1, Chapter

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			recognises a very real short term impact, presumably around 15-20 years, which is not temporary in any normal lifespan. Moreover, we are concerned that the long term mitigation planned by the applicant, which we assume to be planting, will offer no mitigation during autumn and winter. During the aforementioned periods, the approach to these properties will be blighted. Anyone driving, cycling, walking and riding to Sherston from Hullavington/Norton, Grittleton and Luckington will experience at the glint and glare of panels and industrial infrastructure.	8: Landscape and Visual [APP-060]. This recognises that there are significant adverse effects on nine visual receptors during Construction and Year 1. Of operation. By Year 15, the effects of the mitigation will reduce the adverse effects of the Scheme to non-significant levels. The LVIA also recognises that there are adverse effects on a number of footpaths and local roads as set out in Table 8-20 Significant Visual Effects: Public Receptors and Table 8-21 Significant Visual Effects: Transport Receptors in ES Volume 1, Chapter 8: Landscape and Visual [APP-060]. Glint and glare impacts towards residents in the village of Sherston have been assessed within the ES Volume 3, Appendix 20-4 Solar Photovoltaic Glint and Glare Study [APP-261], as dwelling receptors 214 to 240. No significant impacts are predicted upon these receptors at any stage of the development's lifespan.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				Effects upon road users travelling to and from Sherston are assessed as no more than low impact as the routes are made up of local roads with relatively low traffic density.
SCP-003	Transport and Access	Construction Traffic	The applicant does not respond to our concerns as to the increased traffic on the rural lanes that link Sherston to Hullavington and Grittleton and the surrounding areas, nor acknowledge the risk to road users, particularly our aging population. Sherston has a high proportion of elderly residents because many choose to live their retirement in this area of outstanding natural beauty. They have raised concerns about having to face oncoming abnormally large vehicles and how they are going to navigate around them without an accident, particularly when reversing, which may be required for a significant distance. A number have raised fears that they will be too scared to drive locally during the period of	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]. Construction vehicle movements will be managed through a Construction Traffic Management Plan. An Outline CTMP [REP1-112] has been prepared and submitted with the DCO application. The aim of the CTMP is

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			construction, which, for some, will be their remaining lifetime.	to ensure that the effect of the construction phase on the local highway network is minimised. The Outline CTMP [REP1-112] sets out measures to coordinate construction deliveries by HGVs to arrive and depart between 09:30 and 16:30 where possible, to avoid peak network hours of 08:00–09:00 and 17:00–18:00. It also includes a community liaison element to keep local communities informed about the construction process and to provide a contact for feedback should any issues arise. Compliance with the CTMP will be monitored by the Developer, Contractor and Wiltshire Council as local highway authority. The preparation, approval and implementation of the final CTMP, substantially in accordance with the outline CTMP, are secured through Requirement 15 of Schedule 2 of the Draft Development Consent Order [REP1-007], ensuring construction traffic impacts are appropriately

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				managed throughout the construction phase of the Scheme
SCP-004	Transport and Access	Road Conditions	Residents are also concerned that the drivers connected to the project construction will choose to use smaller lanes as "cut throughs" rather than stick to the designated construction routes. The applicant needs to clarify what measures they will put in place to ensure that drivers of vehicles during construction, operation and decommission will stick to the defined routes and how this will be monitored/managed.	The Applicant has also updated the Outline CTMP [REP1-112] at Deadline 1 to provide further detail on matters requested by Wiltshire Council. Section 6.14 includes further clarifications as to what monitoring/reporting/actions would be implemented in cases where proposed construction routes are not followed. Drivers will receive training and be made aware of the routes to each access in advance of driving to the Site. The requirements of the DCO and Final CTMPs are legally binding and measures to enforce drivers to use construction routes will be set out in the Final CTMPs. Any drivers not following construction routes will receive retraining. Suppliers and subcontractors will be required to book delivery slots via a secure online portal or app. The booking system will also be used as a

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				means to monitor that drivers are using the appropriate routes.
SCP-005	Transport and Access	Construction Traffic	Our residents also worry as to how they will access the towns of Malmesbury and Chippenham (and its train station) as well as the M4 and M5 when the single track roads are blocked or hindered by transport of AILs. The inevitable increase in traffic both through the town and on the smaller lanes, combined with navigating around AILs on the larger ones, will we fear will lead to an increase in accidents. The applicant has not addressed these issues in their response.	ALL movements will be subject to Special Type General Orders (STGO)/Individual Special Orders (VSO) where required and will be separate to the DCO. This will be secured by the Final CTMP and undertaken using the standard process for managing AIL movements on the public highway. Abnormal loads will be escorted to site to maintain highway safety. This will either be undertaken by private escort or likely by police escort for larger abnormal load deliveries such as the transformers. The delivery of abnormal loads will be relatively infrequent and undertaken outside of highway peak hours to minimise disruption and limit impact on existing users.
SCP-006	Socio-Economics, Recreation and Tourism	Recreation	Sherston is a destination route for many cycling clubs, as well as individual cyclists and there are also a large number of horse riders and motorcyclists. The applicant appears not to have considered	The potential impact of the Scheme on non-motorised users (NMU) is assessed in ES Volume 1, Chapter 13: Transport and Access [REP1-019] which concludes that there would be no significant impact on

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			the impact on these road users, nor addressed how they will be protected, particularly during the construction period.	NMU as a result of the Scheme. Highway widths of construction routes have been assessed and provide sufficient opportunities and width for HGV traffic to comfortably pass cyclists, equestrians and pedestrians. ES Volume 1, Appendix 13-1: Transport Assessment [REP1-057 and REP1-059] concludes that the level of flow change will not result in a step change in fear and intimidation as defined in the IEMA guidance at Tables 3.1, 3.2 and 3.3. An Outline CTMP [REP1-112] and Outline PRowPPMP [REP1-104] support the DCO Application and include outline measures to ensure impacts to NMU along highways and PRow are minimised as far as practicable.
SCP-007	Landscape and Visual	The Fosse Way	The Parish Council notes that the scale of the development has been scaled back along the Fosse Way and edge of AONB. However, fields A11 and A12 and half of A1 are still included within the development boundary and not	Maintaining fields A11 and A12 and half of A1 within the Order Limits provides opportunities for positive enhancement measures within the setting of the CNL. Fields A11 and A12 will be maintained in agricultural production as set aside land and will

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			removed entirely. This means that these fields will undergo a change of use which will leave them less protected from development in the future. A11, A12 and non-solar panel area of A1 should be removed from project entirely in the same way those in the central part of Fosse Way were removed.	be managed for ground nesting bird mitigation. A margin of wildflower meadow is proposed to the northern boundaries of these fields on the edge of the CNL. The northern part of Field A1 is proposed as diverse wild flower meadow in line with the Wiltshire and CNL Nature Recovery Strategies. The Proposed Mitigation and enhancement measures are shown on ES Volume 2, Volume 2, Figure 3-4-1 to 3-4-5.2 Landscape and Ecological Mitigation Plan [REP1-029 to REP1-032] and detailed in the Outline LEMP [APP-283] and will be secured through Requirement 7 in Schedule 2 of the Draft DCO [REP1-007]. The land will not be less protected from development once the Scheme has been decommissioned as all land will be returned to the landowner as quickly as is practicable after decommissioning takes place.
SPC-008	Landscape and Visual	LVIA	The applicant recognises only minor/negligible short term visual effects with long term beneficial	The LVIA recognises there are adverse visual effects on a number of residential receptors, footpaths and

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			effects on biodiversity; we disagree. We recognise that the panels have been removed from A11 and A12 and also some of A1. However, the setting of Sherston as a rural village will be materially affected by the overwhelming majority of the project where the panels and infrastructure are maintained. The approach into the village from Hullavington and Grittleton will be industrial rather than rural/agricultural. Using a few fields of agricultural land for ecological mitigation of the industrial project does not seem beneficial to us. At present there is a huge variety of vegetation and wildlife within these fields and particularly within the richly biodiverse edges and hedgerows.	local roads as set out in Table 8-19 Significant Visual Effects: Private Receptors, Table 8-20 Significant Visual Effects: Public Receptors and Table 8-21 Significant Visual Effects: Transport Receptors in ES Volume 1, Chapter 8: Landscape and Visual [APP-060]. The LVIA [APP-060] 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 substantial 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. On the edge of the CNL towards Sherston, wildflower meadows are proposed in A1 and areas of set aside in Fields A11 and 12 for Skylark mitigation with wild

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				flower margins are proposed. Which will provide long term landscape and ecological benefits.
SPC-009	Ecology and Biodiversity	Wildlife Impacts	Ripping out natural habitats such as hedges and verges will destroy that habitat. The wildlife impact is absolute; we will lose it.	Potential impacts on ecology and biodiversity are fully assessed in ES Volume 1, Chapter 9: Ecology and Biodiversity (Rev 2) [REP1-015]. The assessment 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 (BNG). ES Volume 1, Chapter 9: Ecology and Biodiversity (Rev 2) [REP1-015] also details that hedgerow loss has been avoided wherever practicable, through measures such as the utilisation of existing access points and tracks wherever possible. As noted in Paragraphs 9.10.137 and 9.10.138, in total, approximately

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				343m of existing hedgerow is anticipated to be lost across the Solar PV Sites, and 1.43km is anticipated to be lost across the Cable Route Corridor, with all remaining hedgerows (approximately 73.44km across the Solar PV Sites and 41.51km across the Cable Route Corridor) being either retained or enhanced. In addition, the majority of hedgerow losses within the Cable Route Corridor will be reinstated following the completion of cable works, as noted in Paragraph 9.10.138, and approximately 25.17km of new species rich hedgerows and lines of trees will be created at the Solar PV Sites, as noted in Paragraph 9.12.6. In conclusion, it is considered that the Scheme would result in a significant increase in both hedgerow extent and quality within the Order Limits. 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

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				considerable habitat creation and enhancement measures. This is quantified through the use of the DEFRA published Statutory Biodiversity Metric (Rev 2) [REP1-093] with further details provided with the BNG Assessment Report (Rev 2) [REP1-089] which demonstrates in excess of 10% BNG will result from the Scheme.
SPC-010	Landscape and Visual	The Fosse Way	Furthermore, the fields along the Fosse are still going to be used for cabling whilst almost one and a half acres at the Grittleton junction end will be destroyed and used as an extra-long vehicle turning point. This area is where many local families and elderly people park to enjoy a flat and safe walk; it will be removed from them in the construction phase and returned substantially altered. The cabling will cause disturbance in the construction period and leave unsightly access panels in the long term. The applicant states that mitigation measures will reduce the visual effect over time. We would	ES Volume 1, Chapter 8 Landscape and Visual Impact Assessment (LVIA) [APP-060] recognises that users of the Fosse Way (Receptor TR145) through the Lime Down Scheme, will experience Moderate Adverse effects during Construction and Year 1, reducing to Moderate /Minor Adverse at Year 15 as a result of the proposed mitigation. For the purposes of the landscape and visual assessments in relation to planting and visual screening, a uniformed growth rate of 0.4m per year is assumed, leading to a minimum height of 7.5m in 15 years.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			ask how long this is anticipated to take; trees and hedgerows are unlikely to cover 4.5m panels in anything under 15 years.	This approach is considered reasonable for assessment purposes, provided that it is supported by an appropriate planting specification and suitable long-term management plan. In practice, growth rates are species-dependent and will also vary according to local conditions such as soil conditions and growth competition. For example, faster growing pioneer species such as alder, willow, or birch can achieve or exceed 0.4 metres per year under favourable conditions, whereas slower-growing native species such as oak, field maple or holly may establish more gradually. The uniform rate therefore represents an average rather than a site-specific prediction. The Outline LEMP [APP-283] defines species composition, planting densities, stock sizes, and management regimes suitable to the range of site conditions. Monitoring and replacement planting is secured

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				to address underperforming areas or slower-growing species; and subject to these provisions being secured through the DCO Requirements and detailed LEMP.
SPC-011	Soils and Agriculture	Land use	The applicant states that the loss of agricultural farmland is temporary. This is not the case. 60 years its a lifetime for many, and, as the applicant recognises, there is no certainty at all that the land will be suitable for agricultural purposes after this time. We are not satisfied with the applicant aiming to return the land to its original use and condition "as far as practicable". There are at present limited safeguards in the proposal to ensure even this relatively low aspiration. What measures can the Inspectorate enforce to ensure that the 'temporary' nature of the installation ensures that the land is returned 'usage' wise to greenfield land?	No agricultural land will be lost. The primary agricultural use will cease, however land beneath the solar panels will remain in-situ and largely undisturbed. ES Volume 1, Chapter 3: The Scheme [APP-055] details how the panel mounting structures will be installed with piles driven into the ground, which will not require excavation or intrusive disturbance to the land and soil. The Outline Decommissioning Strategy [REP1-100] notes that on decommissioning, foundations and below-ground infrastructure will be cut to 1.2m depth before a soil profile is reinstated. The depth of 1.2m is the standard depth considered for an agricultural soil profile, and would enable grading to be determined in accordance with the established guidelines for grading agricultural

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				land, as re-issued by Defra and the Welsh Government in a joint publication in 2025. The Decommissioning Strategy is secured by Requirement 20 in Schedule 2 of the Draft DCO [REP1-007] and must be approved by the relevant local planning authority and must be in substantial accordance with the Outline Decommissioning Strategy [REP1-100] .
SPC-012	Description and DCO Process	Scheme Lifespan	Temporary Nature of Project - The applicant states that the scheme is not permanent; 60 years is basically a lifetime. Any resident currently aged 20 and over will experience the impact from installation, through operation and decommission - this is NOT temporary.	The assessment reported in the Environmental Statement (ES) [APP-053 to APP-265 and updated by REP1-015 to REP1-084] considers the likely significant effects of the Scheme as a result of the 60 year operational phase. Effects associated with the long term, but temporary, operational phase have therefore been assessed. These effects are fully reported in the ES and are a matter for the Secretary of State to weigh in the planning balance against the need for the Scheme and its wider benefits.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
SPC-013	Human Health	Mental Health Impacts	Mental Health - The applicant states that the development would not give rise to significant effects on population health and that rates of poor mental health are lower than average in this area - in our opinion the current low rate of mental health is irrelevant. We believe that the current low levels of poor mental health in Sherston are linked to easy access to nature and beautiful countryside. Turning the countryside into an industrialised area will remove this easy access, and we know that many in the community are worried about the impact of the project on their mental health; this chimes with the high proportion of responses to the Inspectorate that cited mental health concerns if it were to go ahead (750 within the 5000 returned) and doesn't take into account that many may not have disclosed their personal health information.	The Applicant has sought to provide a robust and comprehensive assessment of mental health effects in ES Volume 1, Chapter 18: Human Health [APP-070]. The chapter provides a comprehensive assessment of the Scheme's potential effects on human health, including mental health and wellbeing, through consideration of a broad range of health determinants. These include access to open space and recreation, transport and connectivity, community identity and cohesion, employment and income, noise and vibration, air quality, and access to health and social care services. The assessment focuses on communities within a 2 km Study Area surrounding the Scheme, identified as those most likely to experience potential health-related effects. Baseline analysis demonstrates that rates of poor mental health within the Study Area are generally lower than

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				national averages. Table 5 of ES Volume 3, Appendix 18-2: Human Health Legislation, Policy and Guidance [APP-245] provides the Detailed Health Profile of Wards in the 2 km Study Area. For example for Sherston specifically, the Community Needs Index score is 60.7, which is lower than both the wider baseline study area average of 79.0 and the England average of 64.4. Within the 2 km Study Area, Community Needs Index scores range considerably from 39.0 to 112.4, with higher scores indicating a greater level of community wellbeing need. The assessment considers potential pathways by which the Scheme could influence mental wellbeing, including changes to environment, amenity, access and community factors. The Applicant notes that the assessment methodology for health and wellbeing has been agreed with Wiltshire Council's Public Health

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				team and is set out in the relevant Statement of Common Ground. The assessment applies a health "lens" to the findings of relevant technical chapters and concludes that, with the embedded mitigation and additional measures secured through the relevant management plans [REP1-096 to REP1-100] secured by their respective requirements in Schedule 2 to the Draft DCO [REP1-007], the Scheme would not give rise to significant adverse effects on population health, including mental health and wellbeing. 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,

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				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. In assessing changes to 'community identity, culture, resilience and influence', a community's spatial relationship to the Scheme has been a key consideration in how sensitive to change that community is, and how large a magnitude of impact that community is likely to experience in regard to sense of place and rural identity. In ES Volume 3 Appendix 18-2 Human Health: Legislation, Policy, Guidance, and Supporting Information [APP-245], the Applicant has explicitly identified Sherston as a location particularly sensitive to change due to their proximity to the Solar PV Sites. The Applicant has therefore included embedded design measures to remove Solar PV Site areas and

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				offset from PRowWs and highways, provide landscape screening and enhancement measures, and locate construction compounds away from the most sensitive receptors, to maintain the positive wellbeing to nature and the countryside. These are secured through the Design Principles and Parameters [REP1A-008], Outline LEMP [APP-283], and Outline CEMP [REP1-096] by Requirements 5, 7, and 13 of Schedule 2 to the Draft DCO [REP1-007]. The Applicant confirms that existing PRow are to be protected as far as practicable within the Scheme design, with management measures set out in the Outline PRowPPMP [REP1-104]. New permissive access routes have been incorporated into the Scheme design, shown as Work No. 10 on the Works Plan [REP1-005] and illustrated on ES Volume 2, Figure 3-4: Landscape and

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				Ecology Mitigation Plan [REP1-029 to REP1-032]. 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]. Residual effects of the Scheme on health following mitigation are assessed as not significant at any phase of the Scheme.
SPC-014	Socio-Economics, Recreation and Tourism	PRoWs	Footpath Impact - The applicant admits that there would be some significant effects on some footpaths. We are particularly	The Applicant understands the importance of character of PRoWs and has sought to ensure adverse impacts to the character

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			concerned about Sherston 16, 18 and 35 which will be surrounded by panels. The footpaths and bridleways will resemble industrial tunnels. Sherston 37 will also be dramatically changed and devalued by the vehicle turning area both in the contraction and post construction phase. The footpaths 11,13,14 and 15 which all start within the AONB of Sherston will be far less appealing as walkways once they lead into the industrial development of Lime Down. Walking is important to the community of Sherston. It has produced its own Sherston Walks booklet containing 10 circular walks used by many residents with upwards of 500 copies sold each year to visitors via our local business community - copy enclosed. Many of the local walks are also included in the White Walls Way publication	of PRowWs are mitigated or compensated through additional enhancement measures. The treatment of PRowWs through the operational lifetime of the Scheme is to offset onsite infrastructure from PRowWs by a minimum of 15 m on either side, provide enhancements to existing hedgerows and boundary treatments, plant biodiverse groundcover on field margins where PRowWs run, and improve the PRowW network connectivity through permissive paths. These measures are put in place to ensure adverse effects on PRowWs and their users are not significant. These measures are secured through the Outline LEMP [APP-283] and Outline PRowWPPMP [REP1-104] Requirements 7 and 16 of Schedule 2 to the Draft DCO [REP1-007]. Assessment of the likely impact on the CNL, in which Sherston Walks are included, has been considered

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				separately as both a landscape and visual impact in ES Volume 1, Chapter 8: Landscape and Visual [APP-060], and as a tourism destination in ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]. The assessment in ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068] concludes that there is no residual significant adverse effect to the CNL as a tourism destination. Furthermore, the assessment of individual receptors in ES Volume 3 Appendix 16-2 Tourism and Recreation Receptor Tables [APP-241] has assessed footpaths SHER11, 13, 14, 15, 18, bridleways SHER14 and 16, and byways SHER35 and 37 individually for each phase of the Scheme. With the mitigation measures described therein, no significant adverse effect is anticipated to any of these routes at any assessed phase of the Scheme.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
SPC-015	Socio-Economics, Recreation and Tourism	Local Tourism	Local Business/Tourism - The area, specifically Sherston, is a 'destination location' for tourism with the walking and cycle routes and bridleways attracting many visitors who also use the local cafes, restaurants, pub, shops B&B's and Airbnbs. The applicant does not appear to have considered the impact to these local businesses of a reduction in cyclist and walker visitors, nor the impact on tourism generally, and specifically during the construction phase, when it will be very difficult to get to the village. These businesses form part of our local community, with the visitors and through trade providing income to support them. Without this through trade, these businesses will almost certainly be forced to close, which will destroy a very vibrant community and leave behind a collection of houses with no 'heart'.	The Applicant is confident that the assessment undertaken in ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068] and its supporting ES Volume 3 Appendix 16-2 Tourism and Recreation Receptor Tables [APP-241], is robust and considers the likely significance of effect to tourism and recreation receptors in Sherston at all phases of the Scheme. The assessment has considered local PRoWs, and an overall impact on Sherston Conservation Area (covering the majority of the village centre and local businesses) and an overall impact to the Cotswolds National Landscape. The assessment finds no significant effect to any of the assessed receptors at any phase of the Scheme. This is subject to the Scheme design, landscape screening, and PRoW protection measures set out in the Design Principles and Parameters

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				[REP1A-008] , Outline LEMP [APP-283] , and Outline PROWPPMP [REP1-104] , secured by Requirements 5, 7, and 16 respectively in Schedule 2 to the Draft DCO [REP1-007] .
SPC-016	Socio-Economics, Recreation and Tourism	Local Businesses	There are specific concerns about the Badminton related trade which is regular annual boost to income for cafes, restaurants, pub, shops B&B's and Airbnbs. If people cannot easily gain access to and from Sherston during the construction period, such trade will move to another less-impacted village.	The Applicant also confirms that the Badminton Horse Trials has been assessed specifically as a tourism receptor in ES Volume 3, Appendix 16-2: Tourism and Recreation Receptor Tables [APP-241] in recognition of its international importance as an event. The Scheme is likely to have long-term moderate minor adverse effect on the event due to occluded long-distance views of the Scheme and influence on the surrounding area, with some amount of additional pressure on the road network (M4 Junction 18 and A46) during construction. These effects are not considered significant and are therefore not anticipated to adversely affect the wider area's reputation for equine businesses, nor the local cafés, restaurants, and

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				accommodation providers that benefit from the event.
SPC-017	Socio-Economics, Recreation and Tourism	Local Businesses	Residents also worry how they will manage to organise the annual Sherston Boules Festival in July each year, which attracts visitors from as far away as France. This event generates significant income for local and surrounding business as well as raising money for local charities. Access is needed to bring in equipment as well as people.	The Applicant refers to their response to SE-33 in the Applicants Response to Relevant Representations (Part 2) and confirms that impacts on the Sherston Conservation Area (in which the annual boules competition and the annual duck race are located) have been assessed in ES Volume 3, Appendix 16- 2: Tourism and Recreation Receptor Tables [APP-241]. The assessment therein identifies up to a long-term temporary minor adverse effect due to views of Lime Down A from some limited locations within the conservation area. This is not however a significant effect, and therefore is not anticipated to have a significant adverse effect on the popularity or undertaking of the events raised in this comment. The Applicant has committed to the mitigating design measures to have fields A1, A4, A11, and A12 wholly or

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				partially removed from the Solar PV array areas, as set out on the Work Plan [REP1-005] and secured by Requirement 5 in Schedule 2 to the Draft DCO [REP1-007] .
SPC-018	Socio-Economics, Recreation and Tourism	Local Employment	Employment - A reduction in visitors and tourism and the subsequent closure of businesses will inevitably lead to a loss of local employment. Other affected businesses would include a local stud farm which, as was noted in the owners representations, would most likely be forced to shut down and cause associated loss of employment both directly and indirectly to vets, farriers and feed merchants. The applicant has stated that the project will lead to very few employment opportunities to residents.	The Applicant notes this comment and refers to Table 2-1 in the Applicant response to the Local Impact Report [EN010168/EXAM/9.21] where effects to the local population and economy are discussed. 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

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				through measures to secure local skills training, employment, and establishment of localised supply chains where practicable through the Outline 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 Schedule 2 to the Draft DCO [REP1-007] .
SPC-019	Hydrology, Flood Risk and Drainage	Contamination	Water Pollution- We are aware that there is a natural spring in our local area (Malmesbury - Daniels Well) which dried up and reversed, thereby taking water into the spring rather than pushing it out. What assessments has the applicant undertaken on the land related to any springs that could potentially reverse? We are concerned that any reversal could pollute the aquifers which supply water as far as Bristol and much of North Wiltshire and some of Gloucestershire.	This particular feature is outside of the study boundary so is not considered as being potentially impacted by the scheme. With regards potential risk to groundwater receptors, this is considered in ES Volume 1, Chapter 19 Ground Conditions REP1-025] and in the associated Appendices [REP1-065 to REP1-080] . Mitigation to ensure protection of groundwater is presented in the Outline CEMP [REP1-096] , which also secures additional measures such as Foundation Works Risk Assessments, to ensure that no adverse impacts to potable drinking

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				water resources are realised. Similarly, the Outline CEMP and the Outline OEMP [REP1-098] secure measures to control possible impacts to surface water receptors, including run-off to reversed springs or other locations where ingress to groundwater could occur.
SPC-020	Description and DCO Process	Scheme Lifespan	40/60 years contract durations - we understand from the recent hearing that some contracts with landowners are under 40 year terms whilst others are under 60 year terms. Can the applicant clarify why there is this difference, which parcels are under which terms and whether the duration of the project will be 40 or 60 years? We note that if any of the contracts that cover land for the cable route are under 40 year terms then the whole project would be restricted to a 40-year life.	As set out in the Written Summary of the Oral Submissions at the Open Floor Hearing 1 and the Applicant's Responses [REP1A-013] , the terms of the Option Agreements are confidential and the Applicant cannot provide details without the landowner's consent. However, as an example, the Applicant has the landowner's consent to confirm that the Option Agreement dated 21 February 2023 in respect of Site E is for a maximum term of 40 years and therefore any extension to 60 years would be by agreement. As further stated, Requirement 20 of the Draft DCO [REP1-007] provides a maximum time period during which

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				the Scheme can operate. There is no obligation on the Applicant to operate the generating station for a prescribed or minimum amount of time and this is consistent with the approach taken in made solar DCOs to date.
SPC-021	Description and DCO Process	Scheme Components	Fixed vs Rotating Panels- During the recent hearing, one of the applicants's experts stated that fixed solar panels are in fact more efficient than rotating ones. The applicant's Counsel attempted to mitigate the difference by saying that rotating panels 'made the day longer'. This seems to be a somewhat inadequate response, and we would seek further details to support the applicant's decision to apply for rotating as opposed to fixed panels.	The Statement of Need [REP1-085] sets out in Section 6.5 that Tracking Solar PV Tables and Fixed Solar PV Tables have associated advantages and disadvantages. Generally, Tracking Solar PV Tables requires more land per megawatt (MW) peak (p) but have the potential to generate more MW-hour/MW(p) than Fixed Solar PV Tables. In other words Tracking Solar PV Tables have a higher energy yield than Fixed Solar PV Tables. However, other local characteristics such as location and land topography may determine which configuration or combination of configurations delivers the greatest benefit in terms of annual MW-hour generation from the Scheme while

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				considering the land area used, cost of installation and ongoing cost of operation and maintenance of specific developments. ES Volume 1, Chapter 3: The Scheme [APP-055] describes that the Applicant is bringing forward a scheme which optimises use of the available grid connection capacity from the suitable land available to the scheme through the installation of panels in a Tracking Solar PV Tables orientation while retaining the flexibility to install Fixed Solar PV Tables at the detailed design stage. Further detail is set out in the Written Summary of the Oral Submissions at the Open Floor Hearing 1 and the Applicant's Responses [REP1A-013] (page 63-64) where the benefits of tracker panels are explained, including that tracker panels can also act as a form of embedded mitigation for Glint and Glare effects (ES Volume 1, Chapter

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				20: Other Environmental Matters, Section 20.5 [APP-072]).
SPC-022	Description and DCO Process	Funding	Financial gearing - we would like the applicant to clarify the long term finance model from start of construction through to onward management and decommissioning (i.e. 60 year inflation linked bond/SWAP or other) and specifically how much is being set aside to return the land to its current state and what assumed inflation rate they are using for the term of the project. The applicant must explain the basis on which they have assessed the cost of decommissioning in 60 years' time and what considerations have been taken into account.	The obligation to decommission the site is a requirement of the draft DCO (Requirement 20) [REP1-007] and in the Outline Decommissioning Strategy [REP1-100]. Failing to comply with a DCO requirement is a criminal offence, providing the legal incentive for the Scheme's operator at the time of decommissioning to fulfil their obligations. Decommissioning is also covered in private legal agreements with landowners. These agreements include decommissioning securities specifically designed to cover the full cost of removal and site and restoration of land. Regular revaluation for inflation will be undertaken. Rather than using a single static inflation rate assumed at the outset, the amount of the decommissioning security is regularly revalued and topped up as necessary throughout the lifecycle of the Scheme. This process ensures that

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				the funds set aside remain sufficient to meet the actual costs of restoration at the time, regardless of long-term economic shifts or inflation
SPC-023	Description and DCO Process	Funding	Macquarie - Parish Council is concerned about the corporate structure of ownership; IGP being a subsidiary of Macquarie Asset Management and Lime Down being a subsidiary of IGP. What guarantees are there that either parent in the structure cannot walk away from LimeDown itself? Furthermore, given the likelihood that Macquarie will package ownership into various funds, what safeguards are in place to enforce financial and other responsibility from this opaque structure?	The Applicant is owned by three investment funds managed by Macquarie on behalf of a range of investors, which importantly includes a number of UK pension funds. This ownership structure is not opaque, and is common in the energy sector which ensures the Scheme is securely financed privately, enabling the development of essential infrastructure without reliance on public funds or risk to the UK taxpayer. Regardless of the corporate structure, the Applicant, and in the context of this response, the "undertaker"- "Lime Down Solar Park Limited" is the SPV which is bound by the legally enforceable requirements of the Development Consent Order (DCO) as set out in the draft DCO [APP-016]. These legally binding requirements are attached to the

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				Scheme and pass directly to any new operator throughout the lifetime of operation and decommissioning. Under the Planning Act 2008, failing to comply with a DCO Requirement is a criminal offence. This provides the legal mechanism for the enforcement of responsibility directly on the project operator, irrespective of its corporate structure or parentage.
SPC-024	The Applicant	Funding	Macquarie's track record of investing within public services in the UK demonstrates a total lack of concern for, and investment in, anti pollution measures, public health and asset care. We would therefore like to understand what monies are being ring fenced by IGP to ensure that any detrimental issues will be addressed in a timely manner and how/who will ensure that they held to account. What assurances has the applicant provided to ensure sufficient funds are reserved to pay for	With respect to the track record of Macquarie Asset Management, the Applicant clarifies that Macquarie has a strong record of long-term UK investment, having invested more than £65 billion into UK infrastructure since 1999, supporting over 33,000 UK jobs. Macquarie's involvement with one public sector entity, Thames Water, benefitted from significant improvements in water quality (ranked amongst the sector's best), water leakage was cut by around 22%, the second-best improvement in the sector over this time, and pollution incidents were down by 75%

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			decommissioning; these are notoriously difficult to enforce. Will funds be held in escrow?	between 2008 and 2012. The point on decommissioning securities is covered in the above response to SPC-022.
SPC-025	Description and DCO process	General Remarks	Inspectorate to 'do the right thing' and give us the comfort that our concerns can be mitigated or are proven to be unfounded. At the moment the responses appear abstract, unclear and lacking in detail when we need evidence, facts and figures.	The Applicant notes the comment and has responded in detail to the matters raised under Reference IDs SPC-002 to SPC-024.
SPC-026	Description and DCO process	General Remarks	The Parish Council appended 'Sherston Walks' to their Written Representation. This is a guide to the village including 10 circular walks with maps in the surrounding countryside.	The Applicant notes this comment.
Stanton St Quinton Parish Council REP1-149				
SSQPC-001	Landscape and Visual	Visual Impact	Ref SSQPC-001 – Landscape and Visual “The Stanton St Quinton Parish Council has extremely strong objections to this proposal. The objections relate to the vast scale of the development in open countryside”	The LVIA in ES Volume 1, Chapter 8 Landscape and Visual Impact Assessment (LVIA) [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

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			At 1237 hectares the Parish Council feels that this is an overlarge development for this location and the links of approximately 22 km to the Melksham Substation is far too long. How can a site of 1237 hectares in the countryside not have an Impact on the surrounding landscape and local villages. A development of this size is bound to affect everyone. The Parish Council feels that no mitigation could be undertaken that would alter this.	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). 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.
SSQPC-002	Transport and Access	Construction Traffic	Ref SSQPC-002 – Transport and Access "There would be an issue with increased traffic on the local narrow roads; impact on the local hospitality and tourism and impact on walkers and riders in the area The Parish Council disputes the comment "the assessment concludes that, with appropriate	Please refer to the Applicant's response given to HPC-010.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			mitigation in place, there would be no significant adverse impacts on the local highway network". What would the "appropriate mitigation" be. How can passing spaces be made in the already narrow lanes and what would happen if two large HFVs meet on these roads? There are numerous blind bends and increased traffic at school times. Would these lorries clear the Kingway bridge? The Parish Council does not believe that the construction traffic can operate without causing access problems to local residents.	
SSQPC-004	Socio-Economics, Recreation and Tourism	Local Businesses	Local businesses and tourism The report states "The assessment evaluates potential effects on the use, enjoyment and desirability of nearly tourist destinations. It also considers whether changes to landscape character or visual amenity could influence visitor behaviour"	The Applicant notes this comment and confirms 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

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			The Parish Council strongly believes that local businesses and tourism will be affected. No one will be coming to visit the Solar Farm!!	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 lifetime of the Proposed Scheme.
SSQPC-005	Socio-Economics, Recreation and Tourism	Recreation	Walkers and riders The Applicant confirms that the majority of significant adverse effects can be mitigated, however understands that some significant adverse effects to users of PROWs and unsurfaced roads in Lime Down E cannot be mitigated further during construction. The Parish Council believes that the construction will take a considerable amount of time and no-one will be able to walk during this time. The Parish Council awaits the assessment on these impacts from the Wiltshire Council's Countryside Access Team.	The Applicant notes this comment and confirms 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

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				human health and wellbeing during the lifetime of the Scheme.
SSQPC-006	Socio-Economics, Recreation and Tourism	Property prices	Ref SSQPC-003 – Socio-Economics, Tourism and Recreation “The development could also have a detrimental impact on the property prices” There is no answer to this in the report and there will obviously be an impact when people are trying to sell properties.	Impacts of the Scheme on property prices have not been assessed as these have been agreed by the Planning Inspectorate to be scoped out of assessment in the ES, as set out in ES Volume 3, Appendix 1-2: Scoping Opinion Response Table [APP-181]. Whilst property values are not a material planning consideration and are therefore not assessed in the ES, the potential effects of the Scheme on residential receptors have been assessed where relevant, including through the Landscape and Visual Impact Assessment (LVIA) presented in ES Volume 1, Chapter 8: Landscape and Visual [APP-060]. The LVIA assesses effects on residential properties and identifies where significant visual effects may occur. The assessment concludes that there would be no Significant Long Term Visual Effects

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				to Residential Properties as a consequence of the Scheme.
SSQPC-007	Hydrology, Flood Risk and Drainage	Flood risk	Ref SSQPC-004 – Hydrology, Flood Risk and Drainage “The rain storm run-off from the panels would cause severe flooding” Again there is no clear answer. There is already flooding which runs into the river as there is no adequate drainage. More information is needed on how Lime Down will deal with this	Severe flooding from panel runoff is not accepted as a likely effect of the Scheme. The concern appears to treat the panels as a connected roof surface. The Scheme would not operate in that way. Solar PV panels are elevated above ground and rainfall drains to the existing ground beneath and between the arrays. The panelled fields remain permeable and are not connected to a piped drainage system. Existing flooding in and around Stanton St Quintin is acknowledged as baseline context. That does not demonstrate that the Scheme would increase flood risk. The key runoff controls for the panelled areas are soil condition, vegetation cover and hydraulic connectivity. These are secured

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				through construction soil management, retained and established ground cover, permeable access tracks and reinstatement measures in the Outline CEMP [REP1-096], Outline SRMP [APP-280] and Outline OEMP [REP1-098]. Formal drainage areas, where required, will follow the drainage hierarchy and be managed through secured drainage principles, including attenuation and controlled discharge where applicable. The assessment in ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [REP1-017] and the FRA & Drainage Strategies [REP1-037 to REP1-054] concludes that the Scheme would not materially increase flood risk.
SSQPC-008	Cultural Heritage	Assets	Heritage features No definite answer is given	ES Volume 1, Chapter 12: Cultural Heritage [APP-064] , supported by detailed technical appendices in ES Volume 3, Appendices 12-1 to 12-7 [APP-219 to APP-231] has assessed the potential impact of the scheme on

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				heritage features. Where required appropriate mitigation is proposed. Embedded mitigation measures to avoid or reduce harm to heritage assets are set out in Section 12.9 of ES Volume 1, Chapter 12: Cultural Heritage [APP-064] , with additional mitigation detailed in Section 12.11. An overarching archaeological mitigation strategy is provided in ES Volume 3, Appendix 12-6: Outline Archaeological Mitigation Strategy [APP-230] .
SSQPC-009	Scheme Description and DCO Process	Scheme layout	In summary, the Stanton St Quintin Parish Council feels that the mitigation is not explained fully anywhere and has no idea what this will look like. This needs to be set out in full with more in-depth information.	The Commitments Register [REP1-114] submitted as part of the DCO Application sets out the environmental mitigation measures that would be adopted during the construction, operation and maintenance, and decommissioning phases of the Scheme. Table 1 of the Commitments Register [REP1-114] lists the environmental mitigation measures that would be adopted and identifies where that mitigation is secured within the DCO Application.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
SSQPC-010	Climate Change and Energy Need	Efficiency	There is continuing improvements in technology for plug in solar panels. Do we really need a 60 year commitment for a development of this immense scale? By the time this is connected it will already be out of date.	The Statement of Need [REP1-085] sets out in Section 6.3 that smaller decentralised and community energy schemes (which would include rooftops and newly proposed 'plug in solar panels' can make a valuable contribution to meeting on-site electricity demand for domestic and commercial users. The section also cites NPS EN-1 (2023) Paragraph 3.3.12 which demonstrates government's view that such schemes are needed alongside, but not instead of, large-scale ground mount solar schemes. This is because the bulk generation potential of large-scale schemes and their connection to the NETS enables their benefits to be felt more widely. The Applicant's approach to consent incorporates flexibility to enable use of the most appropriate and available technologies at the Scheme at the detailed design stage. The Applicant notes the Government's view that there is an urgent need for significant amounts of new energy

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				developments in meeting their energy objectives, including meeting the Clean Power Target (Section 2.9 of the Statement of Need [REP1-085] provides further information) and that "a secure, reliable, affordable, net zero consistent system in 2050 is likely to be composed predominantly of wind and solar" (NPS EN-1 (2023), Paragraph 3.3.20).
Yatton Keynell Parish Council REP1-150				
YKPC-001	Transport and Access	Construction Traffic	Yatton Keynell Parish Council Responses to Relevant Representations. (RR4941) YKPC 001 - The draft Construction Traffic Management Plan (CTMP) is missing information regarding the permanent & temporary changes required to the road network by location for construction traffic, excluding abnormal loads.	Annex I of ES Volume 3, Appendix 13: Transport Assessment [REP1-057 and REP1-059] submitted at deadline 1 includes details on the proposed highway mitigation works, including the identified Highway Improvement Area on Alderton Road.
YKPC-002	Transport and Access	Construction Traffic	The CTMP makes a number of assumptions regarding construction workers modes of transport, we require these to be stress tested to	On a peak day, assuming the construction of all Solar PV Sites concurrently, there is expected to be a peak of 622 workers spread across

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			assess the impact on the road network.	the Solar PV Sites. For assessment, construction workers have been spread across the Solar PV Sites on a proportional basis, based on the size of each area. The assessment of peak daily flows across the whole Construction Phase represents a worst-case scenario. Construction worker shifts will be scheduled so that workers are not traveling during the network peak hours of 08:00-09:00 and 17:00-18:00. An Outline CTMP [REP1-112] is submitted with the DCO application. This includes a measure for the provision of shuttle buses to transport construction workers to and from the Order Limits. This is particularly important for non-local workers, who will stay in local accommodation and be transported to the Order Limits. It can also be utilised by other workers as appropriate. It is expected that a mixture of coaches and minibuses will

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				be used. On average, it is expected that a shuttle bus will be able to accommodate 20 workers. In addition, workers who drive will be encouraged to car share where practicable. With this in mind, it is assumed that 50% of workers will be non-local to the Order Limits and will stay in local accommodation, arriving by shuttle bus. The remainder will arrive by car with an assumed 1.5 construction workers per car. This is a similar proportion to other DCO applications. For example: • Longfield Solar Farm (PINS reference EN010118) - 55% non-local arriving by shuttle bus • West Burton Solar Farm (PINS reference EN010132) – 50% nonlocal arriving by shuttle bus • Cottam Solar Farm (PINS reference EN010133) – 50% non-local arriving by shuttle bus

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
YKPC-003	Transport and Access	Construction Traffic	The CTMP does not recognize school traffic before 08:00 and the afternoon travel period for children returning from school between 15:00 & 17:00. Given the location of Nursery/Preschool & Primary School facilities in the area there is considerable inter village traffic at the beginning and end of the school day. Specifically there is a Primary School on The Street (B4039) in Yatton Keynell. A construction traffic ban on this stretch of road has been recognized another solar farm constructor. Older children(Aged 11 – 16) travel to secondary schools from the area to Chippenham using either school buses or private vehicles. The school buses to Chippenham leave the village at 08:00 having travelled around C roads to the north of Yatton Keynell.	The Outline CTMP [REP1-112] sets out measures to coordinate construction deliveries by HGVs to arrive and depart between 09:30 and 16:30 where possible, to avoid peak network hours of 08:00–09:00 and 17:00–18:00. It also includes a community liaison element to keep local communities informed about the construction process and to provide a contact for feedback should any issues arise. Compliance with the CTMP will be monitored by the Developer, Contractor and Wiltshire Council as local highway authority. There are no schools located directly off any of the main HGV construction routes. None of the main HGV construction route are proposed to route past Bybrook Primary School on The Street (B4039) in Yatton Keynell. The preparation, approval and implementation of the final CTMP, substantially in accordance with the Outline CTMP [REP1-112] ,

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				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.
YKPC-004	Soils and Agriculture	Agricultural land use	YKPC 002 – The response from the applicant is requires further analysis: The assessment confirms that land would be taken out of arable rotation during the operational period of the Scheme but would remain productive and would be reinstated and returned to agricultural use as far as practicable following decommissioning. The Agricultural Lad Classification (ALC) should be based on historic data from recent arable rotation not a desk top exercise based on historic maps. The impact of sourcing arable crops lost from elsewhere should be taken into account assessing the projects impact.	The Agricultural Land Classification (ALC) is based around a long-established methodology, originally published in 1988 and reissued by Defra and the Welsh Government in a joint publication in December 2025, not from historical data on crop yields, nor from desktop study of historic maps. ES Volume 3, Appendix 17-1: Agricultural Land Classification and Soil Resources Survey [REP1-063] sets out the survey methodology, the soil and site conditions, and reasoning for all of the land classifications. The methodology was discussed with and approved by Natural England. The ALC results are supported by laboratory analysis of soil samples and a photographic record of the soil types present.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
YKPC-005	Soils and Agriculture	Land restoration	How much land will be permanently lost from arable production given the statement - as far as practicable.	The Outline Decommissioning Strategy [REP1-100] notes that on decommissioning, all infrastructure will be removed, perhaps aside from underground cables, dependent on best practice at the time, but including foundations and below-ground infrastructure which will be cut to 1.2m depth before a soil profile is reinstated. The depth of 1.2m is the standard depth considered for an agricultural soil profile, and would enable grading to be determined in accordance with the established guidelines for grading agricultural land, as re-issued by Defra and the Welsh Government in a joint publication in 2025. ES Volume 1, Chapter 3: The Scheme [APP-055] notes that on decommissioning, the landowners would choose how the land would be used and managed. The Applicant acknowledges that this may result in some previously arable land continuing to function as ecological

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				habitat rather than reverting back to agriculture.
YKPC-006	Socio-Economics, Recreation and Tourism	Impact on employment sector	YKPC – 004 - Cumulative impact of solar farms in North Wiltshire - South Gloucestershire Damage caused to local economy as a result of reduced tourism. The response provided is inconsistent with a similar representation made by Grittleton Parish Council. Further work is required to show what the effects are on employment within the tourism sector in North Wiltshire. Response to YKPC – 004 – “Whilst the Scheme is anticipated to lead to some employment and economic losses to the tourism industry, these are not identified as significant adverse effects to the assessed 20 km economic Study Area” GPC - 009 - Impact on tourism during the construction period and going forward due to ruination of countryside, this will cause the loss of employment in the many	The Applicant's response to YKPC-004 in the Applicant's Responses to Relevant Representations (Part 1) [PDA-009] responds identifying that there are some employment and economic losses, but these are not considered to be significantly adverse. The response does also refer to "<i>The assessment in ES Volume 1 Chapter 16: Socio Economics, Tourism and Recreation [APP-068] and the supporting ES Volume 3 Appendix 16-2 Tourism and Recreation Receptor Tables [APP-241] have assessed the likely impacts of the Scheme at construction, operation, peak replacement, and decommissioning on tourism and recreation receptors, including all PROWs within 2 km of the Scheme.</i>" YKPC-004 also refers to the cumulative impacts of the Scheme and refers to the 20km Zone

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			tourist/hospitality businesses in the area. Response to GPC- 009 - The Applicant has assessed that there is a likely worst-case temporary loss of 50 FTE tourism industry jobs as a result of the Scheme, as set out in ES Volume 1, Chapter 16: Socio Economics, Tourism and Recreation [APP-068]. This accounts for less than 0.7% of tourism-based employment within 5 km of the Scheme (BRES, 2023 data), and approximately 0.17% of tourism employment across Wiltshire (29,000 estimate from Visit Wiltshire, 2021). Where losses to tourism have been identified, these are worst-case estimates based on likely significant effects from the Scheme and do not include for additional mitigation measures being applied. This is also a temporary effect, anticipated to occur during construction, with recovery to tourism	of Influence which is set out in in ES Volume 1, Chapter 21 Cumulative and In-Combination Effects [APP-073]. The comment raised under GPC-009 in Applicant's Responses to Relevant Representations (Part 1) [PDA-009] does not relate to cumulative effects but rather the impact on tourism during the construction period. The Applicant's responses provides further response on the impacts and how these have been considered in ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068] and what the numbers are before mitigation is applied.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			businesses anticipated to begin as soon as construction works are complete. During the Scheme's operational phase, the reduction in tourism compared to current conditions is anticipated to be equivalent to a loss of 11 FTE tourism-dependent jobs.	
Chippenham Without Parish Council REP1-140				
CWPC-001	Transport and Access	Construction traffic	The Parish Council has responded to all statutory consultations to date and has expressed local concerns on a broad range of issues. What is unknown is whether Wiltshire Council Highway Officers and others have investigated specific local aspects and arising implications or whether matters of detail have been left to later stages in this process should the Secretary of State consider that the Project can proceed.	The Applicant makes note of this comment. The Applicant has liaised with Wiltshire Council throughout the process and has responded to all matters of detail raised by Wiltshire Council Highway Officers.
CWPC-002	Transport and Access	Construction traffic	With this in mind the Parish Council has agreed that they should be proactive in raising	The Applicant notes this comment.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			areas of local concern at this time so that all are mindful of Parish views that need to be addressed at the appropriate time. The Council is concerned about two particular aspects that have severe highway implications for the Parish that relate to the favoured cable route from the solar park to the grid connection at Melksham. This route would run through parts of the western boundary of the Parish affecting also the adjoining Yatton Keynell, Biddestone and Corsham Parishes.	
CWPC-003	Transport and Access	Cable Route Corridor	It is understood that to support the cable laying activity it is planned to have two operation support sites for managing the excavations, and the parking and maintenance of plant and trucks. The Parish Council considers that these are major infrastructure requirements for the whole Project.	The Applicant makes note of this comment. The proposed construction compound locations are shown in ES Volume 2 Figure 13-12: Construction Access Locations: Cable Route Corridor [APP-157]. The construction compounds are temporary and will be removed on completion of the Construction Phase.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
CWPC-004	Transport and Access Arboriculture	Access routes	One site is within the Parish in the field bordered by Fowlswick Lane and the B4039, the through route from the A420 to Yatton Keynell, with the Golf Driving Range to the North. (DWG. B supplied identifies this). Access to this field is proposed from Fowlswick Lane about 200 metres from the existing crossroads. The proposed opening serving an access track will require considerable enlargement and metaling, as will the Fowlswick Lane itself, which would need to be widened down to the crossroads. (Identified yellow on DWG. B) This will potentially require the removal of the mature hedgerow along the 200 metre length with verge and also have highway drainage implications. The existing crossroads is a known accident black spot and is far from ideal for use by plant and heavy vehicles.	The cable route will be constructed in four separate 5.5km sections. One access in operation in each section at any one time as rolling construction. Each access will be operation for approximately 90 days. There are no proposals to widen Fowlswick Lane given the relatively low number of vehicle trips associated with each cable route corridor access (see para 13.10.66 of ES Volume 1, Chapter 13: Transport and Access [REP1-019] and on the basis that there are no current HGV restrictions along this route. The removal of the hedgerow in this location is therefore not required aside from the access entrance only, expected to be a maximum of 18 m wide.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
CWPC-005	Transport and Access Arboriculture	Access routes	The other potential access to this field is proposed to be directly onto the B4039, on the western boundary of the field, which is also a traffic hazard, and which will require a large, splayed access, with significant visibility splays and signage and a reduction in speed limit. (Identified green on DWG. B) It is considered that if either access proposal were adopted the entire length of mature hedgerow on the B4039 in the northern direction would need removal and replaced along a new visibility line to the crossroads. The change in landscape of this rural area required by these works to facilitate a safe highway arrangement would have significant detrimental impact on the overall character of the area.	As shown in ES Volume 2 Figure 13-12: Construction Access Locations: Cable Route Corridor [APP-157], a construction access will not be taken from the B4039 in this location. Cable route construction works will cross the B4039 but will not be used as a construction access. Cable works crossing the B4039 will be short-term and temporary and subject to appropriate Traffic Management to be approved and agreed with Wiltshire Council. Cable installation works are expected to require a maximum of 12 m of hedgerow removal at any one section which will be reinstated on completion of works, as set out in the Outline EPMS [REP1-106].
CWPC-006	Transport and Access	Access routes	The second proposed site borders the Parish in a field opposite Showell Farm, not within the Parish, but the problem here is	The cable route will be constructed in four separate 5.5km sections. One access in operation in each section at any one time as rolling construction.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			again one of access, which will have to be off the narrow Corsham Lane. (DWG. A supplied identifies this) However, Chippenham Without Parish has a significant interest in that the route to and from the proposed site is likely to be along Corsham Lane via Sheldon Corner and the A420 Allington Farm crossroads. (Identified yellow on DWG. A) The reason being that while the access using the Corsham Lane off the A4 is feasible for large construction traffic, exiting back on to the A4 would be difficult and extremely dangerous. (Identified green on DWG. A)	Each access will be operation for approximately 90 days. The number of vehicle trips associated with each cable route corridor access are relatively low (see para 13.10.66 of ES Volume 1 Chapter 13: Transport and Access [REP1-019]) and there are no current HGV restrictions or accident clusters at this point on the A4. Given the low increase in trips shown in Table 13-34 of ES Volume 1 Chapter 13: Transport and Access [REP1-019] there was no requirement for further assessment.
CWPC-007	Transport and Access	Construction Routes	Consequently, as other narrow country lanes towards Chequers Farm and Biddestone are entirely impractical for heavy use, it is considered that access to this site would therefore have to be through the Parish. Thus, there will be considerable highway safety	The cable route construction routes and access locations are shown in ES Volume 2 Figure 13-12: Construction Access Locations: Cable Route Corridor [APP-157]. This routing will be secured through the outline Outline CTMP [REP1-112] and secured in the draft

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			implications and potential disruption to this often rat run narrow artery of the Parish especially at the joining local lane junctions, the Sheldon Corner blind spot and the A420 Allington Farm crossroads which will be totally unacceptable from a highway safety point of view as all are existing accident black spots.	DCO [REP1-007] so there would be no change to the proposed routing through the parish.
Biddestone and Slaughterford Parish Council REP1-139				
Biddestone and Slaughterford Parish Council REP1-139	General	Sentiment	On behalf of Biddestone and Slaughterford Parish Council, I wish to submit a formal objection to the proposed Lime Down Solar Park.	The Applicant notes this comment.
BSPC-002	Landscape and Visual	AONB	Its proximity to and visibility from the Cotswolds Area of Outstanding Natural Beauty (AONB), a nationally protected landscape to which Section 85 of the Countryside and Rights of Way Act 2000 applies. The development would have a significant adverse visual and environmental effect on the setting of the AONB.	The Applicant has considered the impacts on the CNL in detail, including in relation to the section 85 duty under the Countryside and Rights of Way Act 2000. An assessment on the special qualities of the CNL has been provided at ES Volume 3, Appendix 8-6 Assessment of Effects on the

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				Cotswolds National Landscape and its Special Qualities [APP-197]. The Planning Statement [REP1-087] at paragraph 8.3.158 to 8.3.228 considers the section 85 duty and how it has been given effect to for the Scheme.
BSPC-003	Landscape and Visual	Cotswolds National Landscape	We understand that the strengthened “seek to further” duty introduced by Section 245 of the Levelling-Up and Regeneration Act 2023 has been in force since 26 December 2023, and now legally requires all relevant authorities in England—including the Planning Inspectorate and Secretary of State for NSIPs—to actively seek to further the conservation /and /enhancement of the Cotswolds National Landscape.	A standalone Assessment on the CNL and its Special Qualities has been undertaken in ES Volume 3, Appendix 8-6 Assessment of Effects on the Cotswolds National Landscape and its Special Qualities [APP-197]. Section 3.5 of ES Volume 3, Appendix 8-6 [APP-197] sets out how the Scheme contributes to furthering the statutory purpose of conserving and enhancing the natural beauty of the Cotswolds National Landscape which has been informed by the CNL Nature Recovery Strategy, the Cotswolds Management Plan and associated guidance including the Landscape Strategy and Guidelines.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
BSPC-004	Soils and Agriculture	BMV Land	The loss of Best and Most Versatile agricultural land, ALC grades 1,2 and 3a, which undermines national food security and contradicts planning guidance that seeks to protect productive farmland where alternatives exist.	As stated in ES Volume 3, Appendix 17-1: Agricultural Land Classification and Soil Resource Survey Report [REP1-063] approximately two-thirds of the land within the Solar PV Sites is in Subgrade 3b and Grade 4, which is not considered to be among the Best and Most Versatile agricultural land. There is no land of Grade 1 present within the Solar PV Sites or in the Cable Route Corridor. Land of Grade 2 quality is present in the east of the Solar PV Sites and amounts to approximately 4% of the area, and land of Subgrade 3a accounts for approximately 29%. The consideration of alternatives, including the availability and suitability of land of lower agricultural quality, 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 assessment explains how alternative sites, including areas of

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				brownfield land and lower grade agricultural land, were considered in accordance with planning policy.
BSPC-005	Cultural Heritage	Heritage Assets	Harm to designated heritage assets, including the setting of the Fosse Way (a scheduled monument) and Bradfield Manor (Grade I listed), contrary to the NPPF and statutory protections.	As detailed in Section 12.3 of ES Volume 1, Chapter 12: Cultural Heritage [APP-064], the cultural heritage assessment follows appropriate legislation, policy and guidance including the overarching NPS for Energy (EN-1) (January 2024), NPS for Renewable Energy Infrastructure (EN-3) (January 2024), the Wiltshire Core Strategy (2015), as well as guidance provided by Historic England and the Chartered Institute for Archaeology. The potential effects of the Scheme on the Roman Roads (i.e. the Fosse Way), as well as other Roman archaeological assets are fully assessed in ES Volume 1, Chapter 12: Cultural Heritage [APP-064], supported by detailed technical appendices in ES Volume 3, Appendices 12-1 to 12-7 [APP-219 to APP-231]. Where an adverse effect has been identified to Roman

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				archaeological assets appropriate mitigation is proposed. See Section 12.9 of ES Volume 1, Chapter 12: Cultural Heritage [APP-064] for embedded mitigation and Section 12.11 for additional mitigation. An overarching archaeological mitigation strategy is provided in ES Volume 3, Appendix 12.6 Archaeological Mitigation Strategy [REP1-106]. ES Volume 1, Chapter 12: Cultural Heritage [APP-064] , supported by ES Volume 3, Appendix 12.1: Heritage Statement [APP-219] , identified that there would be a moderate / minor (not significant) adverse effect to the asset (less than substantial harm at the lower end in NPPF terms) as a result of indirect (i.e. setting) impacts.
BSPC-006	Cumulative and In-Combination Effects	Cumulative Impact	The cumulative impact of these harms fail to meet the thresholds set out in relevant policy and legislation.	Cumulative effects have been assessed in accordance with the relevant legislation, national planning policy, local planning policy and guidance as listed within ES Volume 1, Chapter 21 Cumulative and In-Combination Effects [APP-073] ,

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				pages 1-5. The Applicant has responded to comments relating to cumulative effects in detail in on page 806-807 and page 870-871 of the Applicant's Response to Relevant Representations (Part 1) [PDA-009] , where it is explained that full and extensive engagement, consideration, assessment and reporting of intra- and inter-project cumulative effects has been undertaken with the conclusions set out within ES Volume 1, Chapter 21 Cumulative and In-Combination Effects [APP-073] .
Corsham Town Council REP1-134 and REP1-135				
CTC-001	Transport and Access	Mitigation	CTC-003- The Town Council is not confident that the mitigation measures set out in the Traffic Management Plan are sufficient to address the negative impacts of the development during, and immediately following, construction. This is especially critical considering the narrow country road network in rural Wiltshire.	The Applicant makes note of the comment. Construction vehicle movements will be managed through a Construction Traffic Management Plan. An Outline CTMP [REP1-112] has been prepared and submitted with the DCO application. The aim of the CTMP is to ensure that the effect of the

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				construction phase on the local highway network is minimised. 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 stringent monitoring and enforcement regime for construction routes, and a clearer process for addressing local road repairs during the construction phase. The Outline CTMP [REP1-112] sets out measures to coordinate construction deliveries by HGVs to arrive and depart between 09:30 and 16:30 where possible, to avoid peak network hours of 08:00–09:00 and 17:00–18:00. It also includes a community liaison element to keep local communities informed about the construction process and to provide a contact for feedback should any issues arise. Compliance with the

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				CTMP will be monitored by the Developer, Contractor and Wiltshire Council as local highway authority. The preparation, approval and implementation of the final CTMP, substantially in accordance with the Outline CTMP [REP1-112] are secured through Requirement 15 of Schedule 2 of the Draft DCO[APP-016], ensuring construction traffic impacts are appropriately managed throughout the construction phase of the Scheme. Drivers will receive training and be made aware of the routes to each access in advance of driving to the Site. The requirements of the DCO and Final CTMPs are legally binding and measures to enforce drivers to use construction routes will be set out in the Final CTMPs. Any drivers not following construction routes will receive retraining.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				Suppliers and subcontractors are required to book delivery slots via a secure online portal or app. The booking system will also be used as a means to monitor that drivers are using the appropriate routes.
CTC-002	Soils and Agriculture	Soil Structure	CTC-005-Whilst there are intentions to reinstate the agricultural land and hedgerows, the impact of the damage will be long-lasting, affecting farms and biodiversity, including many protected species of bats whose habitats will be lost.	Soil structure and biological activity are expected to improve over the operational phase of the Scheme such that the effect is assessed as a significant benefit in ES Volume 1, Chapter 17: Soils and Agriculture [REP1-025]. The Outline Landscape and Ecological Management Plan [APP-283] similarly acknowledges that benefits to soil health are anticipated to arise. The assessment in ES Volume 1, Chapter 9: Ecology and Biodiversity (Rev 2) [REP1-015] describes how the vast majority of hedgerows across the Order Limits will be retained, with suitably wide (15 m) undeveloped buffers instated from all key habitats for bats (namely hedgerows, tree belts and woodlands) at the Solar PV Sites, to

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				ensure key foraging and commuting habitat will be retained as part of the Scheme. In addition, habitats within the operational Scheme (predominately comprising permanent grassland at the Solar PV Sites) will be of significantly higher value for bats than the baseline of largely arable habitats subject to regular pesticide application. The assessment concludes that, after mitigation, no significant residual effects on bats are anticipated during the construction phase, and a significant beneficial effect on bats is anticipated during the operational phase.
CTC-003	Soils and Agriculture	Food security	Land taken out of food production, even temporarily, is a concern in terms of the UK's ability to be self-sufficient.	The UKRI's Roadmap for Resilience: A UK Food Plan for 2050, addresses future food security and self-sufficiency, which it notes would be achievable "but only with coordinated policy on production, diets and land use." The three core principles for the UK to become self-sufficient are: resilient agricultural production, which includes reducing livestock numbers

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				and supporting farm diversification; integrated land use to sequester carbon and reduce agricultural emissions; and changing dietary choices, namely consuming less meat. The Applicant does not consider that cessation of arable production on a majority moderate to low quality agricultural land in Subgrade 3b and Grade 4 would significantly affect the UK's ability to become self-sufficient in food production.
CTC-004	Landscape and Visual		CTC-008- Despite Lime Down's claims, the Scheme is not considered to be compliant with Policy CNP E3 of the Corsham Neighbourhood Plan. It is very clear that the scheme will cause severe environmental harm and in no way protect, conserve or enhance the special qualities of the landscape setting.	The village of Corsham is located to the west of the Cable Route Corridor which is outside of the CNL. The LVIA in ES Volume 1, Chapter 8: Landscape and Visual [APP-060] recognised there will be Minor / Negligible temporary Adverse landscape effects within the 0.5km Cable Route Study Area reducing to Negligible Neutral effects at Year 15 and Decommissioning. In relation to the LVIA, Corsham is not within the Cable Route Study Area.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				Annex B of the Planning Statement [REP1-087] considers Policy CNP E3 of the Corsham Neighbourhood Plan, which seeks to ensure that development proposals 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. In considering scheme compliance with Policy CNP E3, it is noted in Annex B of the Planning Statement that the Cable Route Corridor is located within this Neighbourhood Plan Area and will be located underground. Therefore, there would be no impact on the Cotswold National Landscape or the distinctive characteristics of the Landscape Setting of the Corsham Rolling Lowlands as a result of the Cable Route Corridor. Further details are provided regarding the Cotswold National Landscape.
CTC-005	Description and DCO Process	Decommissioning	CTC-010- The impact of the scheme will last considerably longer than 60 years as, once	The assessment reported in the ES [APP-053 to APP-265] and updated by [REP1-015 to REP1-

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			decommissioned, the land will take many more years to recover.	084] considers the likely significant effects of the Scheme as a result of the 60 year operational phase. Effects associated with the long term, but temporary, operational phase have therefore been assessed. These effects are fully reported in the ES and are a matter for the Secretary of State to weigh in the planning balance against the need for the Scheme and its wider benefits. Effects associated with the decommissioning of the Scheme have been assessed and reported in the Outline Decommissioning Strategy [REP1-100] which demonstrates how the mitigation measures relevant to decommissioning activities included in the ES will be implemented.
CTC-006	Transport and Access The Applicant		CTC-011 - There is a lack of clarity over the proposals for community liaison and messaging. This would need to be considerable and well planned to minimise disruption to	With specific regard to community liaison, this is directly secured through Requirement 4 in Schedule 2 to the Draft DCO [APP-016] through the provision of a community liaison group (CLG). This group will act as

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			residents and businesses. More details are required.	an intermediary between the public and the onsite contractors to ensure community concerns and any information they need are communicated and responded to, so as to reduce community anxiety. The appointment of the CLG is further secured prior to construction Outline CEMP [REP1-098] and the role will be active throughout the construction, operational and decommissioning phases to provide a direct point of contact for the public.
CTC-007	Scheme Description and DCO Process	Cable Route Corridor	CTC-012 (e) - The width of the cable route corridor is excessive throughout the scheme. It must be minimised to the limit the damage and disturbance which would be caused.	The Applicant disagrees that there is uncertainty in defining the Cable Route Corridor. ES Volume 1, Chapter 3: The Scheme [APP-055] and Volume 3, Appendix 3-2 Cable Route Construction Method Statement [APP-183] describe the Cable Route Corridor and associated works. The full extent or 'worst case' effects arising from the Scheme are identified and reported in the ES [APP-052 to APP-265] and updated by REP1-015 to REP1-084 . The ES

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				has been undertaken adopting the principles set out in the Planning Inspectorate's Advice Note Nine: Rochdale Envelope. 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 Environmental Impact Assessment (EIA) to assess likely worst-case variations to ensure all foreseeable significant environmental effects of the Scheme are considered. Considering a reasonable worst case is standard practice for EIA in the UK. Each ES technical chapter [APP-059 to APP-072] and updated by REP1-015 to REP1-028] has assessed the design identified to be the likely worst-case scenario for that discipline in order to determine effect significance. For the Cable Route Corridor, The Order Limit width is typically 50 m with the width increasing in places (such as road and rail crossings) up to 665 m to allow flexibility for final crossing

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				design alignment and to allow space for temporary compounds. The actual construction working width (i.e. the area of land fenced off and utilised during construction) within the Order Limit will be a maximum of 25m, however the whole the Order Limits has been assessed within the EIA to ensure impacts sensitive constraints are properly assessed. Where necessary and appropriate, the technical chapters also set out mitigation measures that would be implemented as part of the Scheme to address the effects identified. Measures to manage and minimise effects are set out in the outline management plans [APP-277 to APP-287 and updated by REP1-096 to REP1-0113] for the Scheme. The preparation, approval and implementation of detailed management plans, substantially in accordance with the outline plans, are secured through Schedule 2 of the Draft Development DCO [REP1-007], ensuring that effects associated

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				with the Scheme are appropriately controlled.
CTC-008	Transport and Access	Mitigation	CTC-017- The Town Council is not confident that the mitigation measures set out in the Traffic Management Plan are sufficient to address the negative impacts of the development during, and immediately following, construction.	The applicant makes note of the comment. Construction vehicle movements will be managed through a Construction Traffic Management Plan. An Outline CTMP [REP1-112] has been prepared and submitted with the DCO application. The aim of the CTMP is to ensure that the effect of the construction phase on the local highway network is minimised. 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 stringent monitoring and enforcement regime for construction routes, and a clearer process for addressing local road repairs during the construction phase.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				The Outline CTMP [REP1-112] sets out measures to coordinate construction deliveries by HGVs to arrive and depart between 09:30 and 16:30 where possible, to avoid peak network hours of 08:00–09:00 and 17:00–18:00. It also includes a community liaison element to keep local communities informed about the construction process and to provide a contact for feedback should any issues arise. Compliance with the CTMP will be monitored by the Developer, Contractor and Wiltshire Council as local highway authority. The preparation, approval and implementation of the final CTMP, substantially in accordance with the Outline CTMP [REP1-112], 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.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				Drivers will receive training and be made aware of the routes to each access in advance of driving to the Site. The requirements of the DCO and Final CTMPs are legally binding and measures to enforce drivers to use construction routes will be set out in the Final CTMPs. Any drivers not following construction routes will receive retraining. Suppliers and subcontractors are required to book delivery slots via a secure online portal or app. The booking system will also be used as a means to monitor that drivers are using the appropriate routes.

6 The Applicant's responses to parties mentioned in the Book of Reference

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
Matthew Gerard Newman REP1- 227				
MGN-001	Compulsory Acquisition	Land Rights Tracker	In response to my earlier representation IGP/LSD state they are "actively engaging" with our agent seeking "an amicable solution". In the "Land and Rights Tracker" we are listed "yellow" ... negotiations ongoing and confident of agreement. Neither of these statements reflects our view of the situation or indeed anything approaching it. I would describe it as no active engagement on the part of the applicant. There has been no acknowledgement of requests for surveys yet alone provision of them.	The Applicant notes the comments but disagrees with the statement that no active engagement has been made by the Applicant in relation to the progression of the Heads of Terms for the rights sought within Plot Number 08-006 in the Book of Reference [REP1-011] . Further detail in relation to these negotiations can be found in the Land and Rights Negotiation Tracker [REP1-246] . The Applicant has made and continues to make efforts to engage with the respondent's professional representative and will continue to engage in order to move the Heads of Terms negotiations forward.
MGN-002	Compulsory Acquisition	Land Rights Tracker	There is no noticeable movement on their HoT's whatsoever. The only landowners showing green are those part of the scheme and in one instance even part of their land affected is only yellow! This makes it impossible to "negotiate" with the	Whilst the Applicant and their appointed land agent have made continued attempts to progress the Heads of Terms, there has been an absence of substantive feedback from the respondent's professional representative. The Applicant continues

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			applicant as there is no flexibility on offer.	to seek this feedback and is hopeful that this will be forthcoming from the respondent's professional representative soon and will update the Land and Rights Negotiations Tracker [REP1-246] accordingly.
MGN-003	Compulsory Acquisition		It is thus reasonable to surmise that the applicant is assuming they will be granted compulsory acquisition rights as part of a DCO and can use this as leverage to force us to grant whatever rights they wish on whatever terms they desire. This does not in my view fulfil their obligation to engage with affected parties required in the granting of a DCO. If this is not the case, why no more agreements with affected landowners despite all their goodwill? Even if minded to grant a DCO the request for compulsory acquisition rights should be resisted.	The Applicant notes the comments made by the respondent. The Applicant confirms that it is committed to seeking agreement with all landowners within the Order Limits for the use of their land. Compulsory acquisition powers are included in the draft DCO in the event it is not possible to obtain the land and rights required by agreement, to ensure that there is no impediment to the delivery of this critical national priority infrastructure. Please also see paragraph 1.4.6 of the Statement of Reasons [APP-018] .
MGN-004	Socio-Economics, Recreation and Tourism		In our particular instance the cable corridor in question cuts our modest holding in two with us having no access to one half of the farm. Our economics are marginal now. This would end our business and 5 generations of farming.	The Applicant notes this was partially covered previously in PDA-009 in MGN-004 where the response details the Applicant will agree appropriate and reasonable accommodation works as well as compensation for reasonable

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				losses as a result of the Applicant's works. Further to this, as part of the negotiations for the Heads of Terms, the Applicant is committed to working with the respondent to mitigate temporary disturbance to the existing farming enterprise by providing suitable access across the working area to enable the continuation of farming practices. The Applicant does not wish to unduly sever land during the temporary construction phase and wishes to work collaboratively with the respondent to minimise disturbance as far as practicable. The Applicant seeks to ensure anticipated effects from the cable routing are temporary and restricted to the width of the Cable Route Corridor. The Outline CEMP [REP1-096] (as secured by Requirement 13 of Schedule 2 to the Draft DCO [REP1-007]) furthermore commits to the reinstatement of land affected by cabling works as soon as practicable to allow for agricultural work on the land to

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				recommence as usual as soon as construction of that section of cable route is complete.
Richard Charles Tanner REP1-236				
RCT-001	Scheme Description and DCO Process	Cable Route Corridor	As a landowner on the cable route I don't agree with the route, width and duration proposed.	The Applicant notes this response. Further information on how the Cable Route Corridor was selected is set out in ES Volume 1, Chapter 4: Alternatives and Design Evolution [APP-056] taking into account environmental and engineering constraints and statutory consultation comments. Further information on the Cable Route Corridor width and anticipated programme of works are set out within ES Volume 1, Chapter 3: The Scheme [APP-055] and Volume 3, Appendix 3-2 Cable Route Construction Method Statement [APP-183].
RCT-002	Compulsory Acquisition	Compensation	The compensation is inadequate too.	This has been covered in the Written Summary of the Oral Submissions at the Open Floor Hearing 1 and the Applicant's Responses [REP1A-013] in RT-003 where the Applicant states loss of revenue due to temporary

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				works will be managed via negotiations with the affected owners. Easement payments are consistent across the project, based on the impact on land value. Where landowners experience loss and damage due to the exercise of these powers for the carrying out of project works, compensation will be paid in accordance with the Compensation Code.
Ashton Hawker REP1-198				
AHA-001	Socio-Economics, Recreation and Tourism	Local businesses	My name is Ashton Hawker. I represent a long-established family farming business based in Hullavington. I am here to register our strong objection to Lime Down Solar Park proposal, focusing specifically on the damaging economic impact on our business, other local farms local employees, and the wider local businesses.	The Applicant notes this comment and refers to Table 2.1 in the Written Summary of the Oral Submissions at the Open Floor Hearing 1 and the Applicant's Responses [REP1A-013] where the Applicant has responded on concerns to the local economy and the respondents' farming business.
AHA-002	Socio-Economics, Recreation and Tourism	Local businesses	The proposal includes compulsory acquisition of land we own and 100 acres we rent. In addition, we currently buy 800 tons of locally grown grain and 1,000 tons of straw	The Applicant notes this comment and refers to Table 2.1 in the Written Summary of the Oral Submissions at the Open Floor Hearing 1 and the Applicant's Responses [REP1A-013] where the Applicant responded to

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			from one farm signed up to the Lime Down alone.	the effect of the compulsory acquisition powers over the rented 100 acres and how this will affect the viability of the business. The Applicant confirms that the final easement area temporarily affected within the 100 acres of rented land would equate to approximately 9 acres. Similarly, the final easement area on land within the ownership of AH002 would be approximately 5 acres. In both cases the effects are stated as temporary as the construction is for the cable route corridor and the land subject to the easement can still be used for agricultural purposes. Regarding the purchasing of grain and straw, this is covered in the Written Summary of the Oral Submissions at the Open Floor Hearing 1 and the Applicant's Responses [REP1A-013] in AHa-002 where the Applicant welcomes further input to inform negotiations. It also states the design of the scheme is such that it ensures impact to production is kept to a minimum.
AHA-003	Soils and Agriculture	Farming businesses	The Government constantly encourages Farmers to become more sustainable. And yet in this instance it is totally the reverse! The	This has been covered previously in the Written Summary of the Oral Submissions at the Open Floor Hearing 1 and the Applicant's

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			reduction in local availability of grain and straw, for ourselves and other any other livestock producers in the immediate area will disappear. Sourcing from further afield, not only adds substantial cost by way of staff time, fuel, wear and tear on machinery, but makes it difficult to secure enough feed for livestock due to cost constraints.	Responses [REP1A-013] in AHa-001 where the Applicant welcomes further input to address concerns around local supply chains. It continues to state that transport emissions for supply for grain/straw have not been specifically assessed but would not be significant in terms of the wider scheme impacts. The assessment in ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068] identifies a loss of up to 20 FTE jobs in the agricultural industry as a result of direct and indirect supply chain and downstream job losses. This is not significant as it accounts for less than 0.29% of agricultural employment in Wiltshire (BRES, 2023) and is therefore not anticipated to have a material effect on supply chains.
AHA-004	Climate Change and Energy Need	GHG emissions	It increases a farm's carbon footprint. Reducing admission is something we are constantly working towards in conjunction with the high-end supermarket we supply. Sustainability and food security is our goal.	The Greenhouse Gas assessment within ES Volume 1, Chapter 7: Climate Change [APP-059] considers embodied carbon, this is inclusive of extraction, processing and manufacture of materials. There is also analysis of the carbon benefit of the scheme and replacement of key components over the lifetime of the scheme within this

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				ES Chapter. The overall findings show that the scheme will have a positive effect on Climate Change. This has been covered previously in the Written Summary of the Oral Submissions at the Open Floor Hearing 1 and the Applicant's Responses [REP1A-013] in AHa-002 where the transport emissions would not be significant in terms of the wider scheme. Any emissions specifically generated on the respondent's land would be limited to the construction phase and the laying of the cable so would be temporary.
AHA-005	Socio-Economics, Recreation and Tourism	Local Businesses	his impact potentially jeopardises our ability to fulfil our supply contract for milk and beef. That contract represents generations of investment. If we cannot perform, we lose the contract. Our business becomes unviable. We are not just a farm. We support a wide network of local contractors, merchants, vets, and service providers, the potential knock-on	This has been addressed previously in the Written Summary of the Oral Submissions at the Open Floor Hearing 1 and the Applicant's Responses [REP1A-013] in AHa-002. The Applicant confirms that, if there is a loss of agricultural revenue, and so residual impacts on employment due to temporary works, this can be compensated for via voluntary agreement or, where powers of compulsory acquisition are used, under

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			effect will be felt across the immediate local economy. We employ 11 local staff and 10 to 20 seasonal roles every year. Should we be forced to downsize, redundancies will be unavoidable. Beyond that, our farm runs apprenticeship schemes and student placements. We train young people in vital rural skills. That pipeline of talent will end. In a time when we desperately need to attract young people into agriculture, this proposal shuts that door. Wiltshire Council's own analysis predicts the loss of up to 20 agricultural jobs – which I consider a big under estimation should the scheme gain approval. The Council has formally objected, citing 'substantial negative impact' on the local economy.	the Compensation Code. The Applicant notes the effects will be temporary in nature. It continues that, should there be redundancies as a result of the scheme, the affected workers would be eligible for accessing skills and employment measures via the Outline SSCEP [REP1-108]. The assessment in ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068] identifies a loss of up to 20 FTE jobs in the agricultural industry as a result of direct and indirect supply chain and downstream job losses. This is based on nine tenancies being directly affected in the long-term by the Scheme, with an estimate of 1.5 FTE workers on each farm, and a further 1.5 multiplier for indirect (supply chain and downstream) effects.
AHA-006	Soils and Agriculture	Food security	The government's energy security strategy says we must protect the best agricultural land for food security. Lime Down does the opposite. It removes productive land undermining food security and rural livelihoods.	The government's British Energy Security Strategy (2022) makes one reference to agricultural land being used for energy schemes, noting "<i>We will also support solar that is co-located with other functions (e.g. agriculture, onshore wind generation, or storage) to maximise the efficiency of land use.</i>"

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			33% of the principal scheme and 75% of the cable route is graded as 3a "best and most versatile land". As a Farmer I cannot understand why this land will be sacrificed. We have very successfully farmed predominantly grade 3b land on this farm since 1952!	The agricultural land within the Solar PV Sites is classified as approximately one-third Best and Most Versatile (BMV) mostly in Subgrade 3a, and two-thirds non-BMV, in Subgrade 3b and Grade 4, as set out in ES Volume 3, Appendix 17-1: Agricultural Land Classification and Soil Resources Survey [REP1-063]. The Applicant acknowledges that agricultural land in Subgrade 3b quality is moderate quality and capable of producing moderate yields of arable crops, in particular cereals. The differentiation in the sensitivity of the agricultural land resource is guided by policy which affords more weight to BMV. The land will not be lost. The soils in the Solar PV Sites will mostly remain in-situ and largely undisturbed; areas subject to disturbance for the BESS, substations, access tracks and compounds will be subject to temporary disturbance of varying duration. All soil movements will be managed according to the best practice principles in the Outline SRMP [APP-280], which will minimise the risk of any adverse effects on soil resources, and will be

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				effective throughout the construction, operation and decommissioning phases. Please refer to response ID SS-06 and SS-07 in the Applicant's Response to Relevant Representations (Part 2) [REP1-117] which addresses the use of agricultural land and consideration of alternatives. In summary, the Applicant has undertaken an appraisal of alternative sites which concludes that there are no more suitable or available locations within 20km of the grid connection at the Existing National Grid Melksham Substation than the proposed location for the Scheme. A sequential approach has been adopted in regard to agricultural land, with lower grade agricultural land considered first before the search area was expanded to higher grades of agricultural land. ES Volume 1, Chapter 4: Alternatives and Design Evolution [APP-056] details the design evolution of the Cable Route Corridor and the alternatives that have been considered. Several factors were considered and the corridor was designed to take a

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				direct route whilst following existing features, such as roads, and avoiding sensitive receptors as far as practicable, such as habitat designations, residential and commercial properties, heritage assets, and a large number of land interests, including private residences and gardens.
AHA-007	Socio-Economics, Recreation and Tourism	Local businesses	In the 1950's and 60's around 50% of all London's milk was supplied from the rich farmland of North Wiltshire – my farm included. We now produce in excess of 6 million litres of milk and 300 tons of beef per year, supplying a high-end supermarket. A fact we are very proud of.	The Applicant notes this comment and refers to Table 2.1 in the Written Summary of the Oral Submissions at the Open Floor Hearing 1 and the Applicant's Responses [REP1A-013] and Table 4.33 in the Applicant's Response to Relevant Representations (Part 1) [PDA-009] where the Applicant has responded to Mr Hawker on the impacts to his business.
AHA-008	Socio-Economics, Recreation and Tourism Soils and Agriculture	Local businesses	We are not anti- solar. We installed a 100-kilowatt rooftop system over a decade ago demonstrating our commitment to renewables. But this local area already has an overwhelming concentration of large-scale ground mounted solar, with more already approved in the pipeline or about to be developed.	The agricultural land within the Solar PV Sites is classified as approximately one-third Best and Most Versatile (BMV) mostly in Subgrade 3a, and two-thirds non-BMV, in Subgrade 3b and Grade 4, as set out in ES Volume 3, Appendix 17-1: Agricultural Land Classification and Soil Resources Survey [REP1-063] . There is

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			This rapid expansion is suffocating productive farmland and destroying long established supply chains.	not anticipated to be any loss of agricultural land, although the primary agricultural use will cease for the duration of the Scheme. Soil structure and biological activity are expected to improve over the operational phase of the Scheme such that the effect is assessed as a significant benefit in ES Volume 1, Chapter 17: Soils and Agriculture [REP1-025]. The Outline LEMP [APP-283] similarly acknowledges that benefits to soil health and the adjacent agricultural land are anticipated to arise from converting the land in the Solar PV Sites from arable to grass.
AHA-009	Socio-Economics, Recreation and Tourism	Local businesses	I ask the Planning Inspectorate to fully investigate the economic harm this scheme will cause. Not just to my family business, but to every worker, every apprentice, every local supplier who depends on the land in this area. Once this land is gone, the jobs are gone, and the skills are gone. That damage cannot be undone by solar panels. Please reject this proposal.	The Applicant notes this comment and refers to Table 2.1 in the Written Summary of the Oral Submissions at the Open Floor Hearing 1 and the Applicant's Responses [REP1A-013] and Table 4.33 in the Applicant's Response to Relevant Representations (Part 1) [PDA-009] where the Applicant has responded to Mr Hawker on the impacts to his business.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
Adrian Andrews REP1-193				
AA-001	Human Health	Mental health impacts	In addition to my original comments I have been very concerned about the impact on people's mental health given the overwhelming support the Stop Lime Down has received. I've talked to many people who feel truly devastated and let down that this project may succeed and completely destroy their precious environment and the livelihoods of so many locals. The negative impact on the land is without question horrific but the impact on people is even worse.	The Applicant has undertaken a comprehensive assessment of potential impacts on mental health and wellbeing during the construction, operation and decommissioning of the Scheme in ES Volume 1, Chapter 18: Human Health [APP-070]. This assessment identifies that while the prospect of the Scheme can cause distress and anxiety, the residual effects on population health and social wellbeing across the 2 km Study Area are assessed as not significant in planning terms. The Applicant acknowledges that the use of this term will not offer comfort to the respondent. To help mitigate concerns ahead of and during the construction phase, the Applicant is committed to establishing a Community Liaison Group (secured by Requirement 4 of Schedule 2 to the Draft DCO [REP1-007]) to act as a human intermediary between residents and the project team to ensure concerns are heard and responded to directly once consent is granted.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				Alongside the mitigation measures and offset distances between the infrastructure and the respondent's property, the Applicant is confident many concerns held will be addressed and avoided.
James Cole REP1-212				
JC-001	Socio-Economics, Recreation and Tourism	Local businesses	Impact and distribution of the proposed cable route on business and the anticipated unwanted increase in workload.	ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068] considers potential impacts across all phases of the Scheme. Appendix 16-2 Socio-Economics, Tourism and Recreation: Tourism and Recreation Receptor Tables [APP-241] provides a detailed assessment of tourism and recreation receptors within the Study Areas for tourism and recreation effects. 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 OSSCEP [REP1-108], with the intent of this having a legacy impact throughout the operational lifetime of

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				the Scheme. This is secured by Requirement 18 in Schedule 2 to the Draft DCO [REP1-007] .
Piers Dibben REP1-234				
PD-001	Transport and Access	Construction traffic	My name is Piers Dibben and I am a very regular cyclist around the area covered by Limedown and live adjacent to Area E. The construction phase of Limedown Solar will create a substantial increase in HGV movements across our rural lanes, many of which are used extensively by me and my fellow cyclists.	The Applicant makes note of this comment. An assessment of impacts on Non-motorised Users (NMUs) is included in ES Volume 1, Chapter 13: Transport and Access [REP1-019] .
PD-002	Cultural Heritage	The Fosse Way	The particularly applies to the Fosse Way and lanes between Hullavington and Norton, which form part of a highly popular cycling network. Publicly available heat mapping (e.g. from Strava), clearly demonstrates that these routes experience consistently high numbers of cyclists, including commuters, recreational and club-based.	The potential impact of the Scheme on non-motorised users (NMU) is assessed in ES Volume 1, Chapter 13: Transport and Access [REP1-019] which concludes that there would be no significant impact on NMU as a result of the Scheme. Highway widths of construction routes have been assessed and provide sufficient opportunities and width for HGV traffic to comfortably pass cyclists, equestrians and pedestrians.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				ES Volume 1, Appendix 13-1: Transport Assessment [REP1-057 and REP1-059] concludes that the level of flow change will not result in a step change in fear and intimidation as defined in the IEMA guidance at Tables 3.1, 3.2 and 3.3. An Outline CTMP [REP1-112] and Outline PProWPPMP [REP1-104] support the DCO Application and include outline measures to ensure impacts to NMU along highways and PProW are minimised as far as practicable. The lanes between Hullavington and Norton do not form part of the proposed HGV construction routes shown in Figure 4.1 and 4.2 of the Outline CTMP [REP1-112]. The assessment of impacts to tourism and recreation receptors in ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068] and its supporting ES Volume 3, Appendix 16-2 Tourism and Recreation Receptor Tables [APP-241] has assessed the impacts to each PProW on the approach to Norton,

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				and finds no significant adverse effects to these routes at any phase of the Scheme, subject to implementation of mitigation measures. A significant adverse effect to the Wiltshire Way cycle route during construction and decommissioning has been assessed, however this is predominantly as a result of direct views of the Scheme along the Fosse Way between Ladyswood and Grittleton, and for cyclist to be discouraged by potential HGV traffic, rather than as a result of reduced safety to cyclists. This will have to be considered as part of the planning balance when the DCO is determined.
PD-003	Socio-Economics, Recreation and Tourism Transport and Access	Cycle routes	North Wiltshire is an established cycling destination, supported by a network of well-known cyclist hubs and destinations. For example, The Flying Monk Café—located directly on the proposed HGV route—is a recognised meeting point for cyclists, while nearby Malmesbury and Sherston host a number of cafés regularly used by riders travelling from across the region. Riders are independent as well as from a range of local clubs such as:	See above response to PD-002. Cycling clubs have not been individually assessed as their operation is not directly impacted by the Scheme. Instead, PRow and long-distance or promoted cycling routes have been assessed in ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068] and its supporting ES Volume 3, Appendix 16-2 Tourism and Recreation Receptor Tables [APP-241] .

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			• Chippenham Wheelers • Malmesbury Cycling Club • Sherston Velo Club • Tetbury Velos • Grittleton Road Racers	
PD-004	Transport and Access	Construction traffic	The introduction of large numbers of HGV traffic on these narrow and blind bend lanes will have an obvious and material effect on our ability to cycle safely around the area. The proposed routes of construction traffic fails to adequately account for the established and well-evidenced use of these roads by cyclists, and introduces a significant safety risk. Without robust mitigation—such as alternative routing, strict traffic management controls, or physical safety measures—the development presents a material adverse impact on my anyone enjoying our lanes on bikes safety.	The potential impact of the Scheme on non-motorised users (NMU) is assessed in ES Volume 1, Chapter 13: Transport and Access [REP1-019] which concludes that there would be no significant impact on NMU as a result of the Scheme. Highway widths of construction routes have been assessed and provide sufficient opportunities and width for HGV traffic to comfortably pass cyclists, equestrians and pedestrians. ES Volume 1, Appendix 13-1: Transport Assessment [REP1-057 and REP1-059] concludes that the level of flow change will not result in a step change in fear and intimidation as defined in the IEMA guidance at Tables 3.1, 3.2 and 3.3. An Outline CTMP [REP1-112] and Outline PRowPPMP [REP1-104] support the DCO Application and include outline measures to ensure

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				impacts to NMU along highways and PRoW are minimised as far as practicable.
Susan J Hunt REP1-241				
SJH-001	Scheme Description and DCO Process Human health	Impact on landowners	The affected land owned by myself is where my horse and donkey are kept.the horse needing 24 hour care.also my dead husbands ashes are buried on my land. At My age i am finding the thought of losing my land is making me very concerned.And making me ill with stress.	The Applicant notes the comments made by the respondent. The Applicant is seeking to construct the Cable Route Corridor on land that is not within the respondent's ownership, but over which the respondent has a right of access only. The land affected is subject to temporary works to install the Grid Connection Cable. Where fields have been bisected by the Cable Route Corridor, working practices around cable laying works should allow for access to be maintained to allow for agricultural work, and therefore continued access to the respondent's land. The Outline CEMP [REP1-096] (as secured through Requirement 13 of Schedule 2 to the Draft DCO [REP1-007]) furthermore commits to the reinstatement of land affected by cabling works as soon as practicable
(Mary) Christine Hamilton REP1-223				

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
MCH-001	Scheme Description and DCO Process	Examination Hearings	I would like to speak at the next Open Floor Hearing on Tuesday 30th June.	The Applicant notes your request to speak at the Open Floor Hearing scheduled for Tuesday 30 June 2026. The decision regarding participation at hearings, including who may speak, is a matter for the Examining Authority.
MCH-002	Socio-Economics, Recreation and Tourism	Property values	I live at which is at the heart of this scheme. My husband and I are nearing [redacted] and will almost certainly be needing to downsize in the next few years. Currently, the mere threat of this development, has reduced the value of our house to less than we paid for it over 20 years ago.	Impacts of the Scheme on property prices and the saleability of properties have not been assessed as these have been agreed by the Planning Inspectorate to be scoped out of assessment in the ES, as set out in ES Volume 3, Appendix 1-2: Scoping Opinion Response Table [APP-181] .
MCH-003	Landscape and Visual	Visual impact - BESS	Not only is the whole scheme severely detrimental, but the BESS is proposed for immediately behind our house, visible from upstairs windows and from major parts of the garden.	The Applicant confirms that the minimum distance between the respondent's dwelling and any proposed BESS infrastructure is over 700m. The LVIA presented in ES Volume 1, Chapter 8: Landscape and Visual [APP-060] recognises that as a consequence of the Development, Significant Adverse visual effects have been identified on a number of residential receptors, as set out in

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				Table 8-19 Significant Visual Effects: Private Receptors in ES Volume 1, Chapter 8: Landscape and Visual [APP-060]. This includes Residential Receptor RI068, Bradfield Manor, Hullavington where Moderate (Significant) Adverse effects have been identified during Construction and Operation – Year 1, reducing to Moderate / Minor Adverse following establishment of the proposed landscape mitigation including a green corridor along the southern boundary of field D3 and hedgerow reinforcement along the boundaries of fields D1, D2, D3, D5 and the wider Site. The BESS Site is proposed to be enclosed by a 2m tall earth bund with a 3m acoustic barrier atop with the external slope of the bund planted with new native scrub and native trees. Once established, the mitigation proposed across Lime Down D would screen views of proposed infrastructure in the southern fields of Lime Down D, with the proposed vegetation integrating and reinforcing the existing vegetated field margins.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
MCH-004	Noise and Vibration	Noise impact	The noise from the inverters and cooling fans will be constant,	The Applicant has responded to comments related to noise and vibration in detail in Table 2-12, Section N-02, on Page 783 of the Applicant's Response to Relevant Representations (Part 2) [REP1-117], where it is explained that the Outline OEMP [REP1-098] commits to noise levels from the Scheme, including BESS, at residential dwellings being the same as or below those modelled in the ES. This provides reassurance that significant effects from operational noise will be avoided while allowing flexibility in how this is achieved.
MCH-005	Landscape and visual	Lighting	the floodlighting intrusive	Lighting is not required within the Solar Arrays for the operational phase. Motion sensing security lighting will be provided within substations and within the BESS to be used only for maintenance and security purposes. 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

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				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.
MCH-006	Other Environmental Matters	Thermal runaway	and we would have to live with the ever-present threat of thermal runaway.	The Applicant has responded to comments related to thermal runaway in detail in Table 2-15, Section O-19, on Page 951 of the Applicant's Response to Relevant Representations (Part 2) [REP1-117], where it is explained that an Outline BSMP [REP1-110] has been prepared for the Scheme using guidance from Dorset and Wiltshire Fire and Rescue Service and incorporating recommendations of the National Fire Chiefs Council. The Outline BSMP [REP1-110] ensures that risks associated with battery storage are appropriately mitigated. The Outline BSMP [REP1-110] will be amended at Deadline 1 to fully accommodate the latest BESS safety

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				requirements contained in NFPA 855 (2026) ensuring that any credible risks associated with battery storage are either prevented or fully mitigated if a BESS failure occurs.
MCH-007	Socio-Economics, Recreation and Tourism	Property saleability	Little wonder no-one would be interested in purchasing the house.	Impacts of the Scheme on property prices and the saleability of properties have not been assessed as these have been agreed by the Planning Inspectorate to be scoped out of assessment in the ES, as set out in ES Volume 3, Appendix 1-2: Scoping Opinion Response Table [APP-181]. As a result, other impacts on the local property market have not been assessed either. Notwithstanding, the Applicant has sought to minimise impacts upon residential properties and residential amenity through the mitigation measures secured by requirements in Schedule 2 to the Draft DCO [REP1-007]. The Applicant has also assessed likely impacts on community and social wellbeing, and on the impacts of the Scheme on sense of community and sense of place (under the assessment category 'community identity, culture, resilience and influence') in ES Volume 1

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				Chapter 18: Human Health [APP-070] . The assessment concludes that there are no significant adverse effects anticipated to population and community or social health and wellbeing.
MCH-008	Human Health	Mental health impacts	The impact on our lives would be catastrophic; indeed the mere proposal has already had a severely adverse impact on my mental health and well-being.	The Applicant recognises that large-scale infrastructure proposals can cause stress and anxiety for individuals, and that the prospect of change to the local environment can be unsettling. The Applicant has sought to provide robust and transparent information about the Scheme throughout the pre-application consultation process undertaken, as recorded in the Consultation Report [APP-022] and its supporting appendices [APP-023 to APP-051]. This has included the opportunity for all affected persons to make contact with the Applicant team through free-to-use services. This has been done to ensure residents and business owners have had access to as much material as practicable at each stage of the DCO process, to be able to reduce anxiety or concerns from being unsure

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				of what impacts the Scheme may have to them. The Applicant has undertaken a comprehensive assessment of potential impacts on mental health and wellbeing during the construction, operation and decommissioning of the Scheme in ES Volume 1, Chapter 18: Human Health [APP-070]. This assessment identifies that while the prospect of the Scheme can cause distress and anxiety, the residual effects on population health and social wellbeing across the 2 km Study Area are assessed as not significant in planning terms. The Applicant acknowledges that the use of this term will not offer comfort to the respondent. To help mitigate concerns ahead of and during the construction phase, the Applicant is committed to establishing a Community Liaison Group (secured by Requirement 4 of Schedule 2 to the Draft DCO [REP1-007]) to act as a human intermediary between residents and the project team to ensure

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				concerns are heard and responded to directly once consent is granted. Alongside the mitigation measures and offset distances between the infrastructure and the respondent's property, the Applicant is confident many concerns held will be addressed and avoided.
MCH-009	Transport and Access	Suitability of roads	The construction phase alone would make our lives a living hell with hundreds of lorries on totally unsuitable roads	The Applicant has responded to comments related to traffic and suitability of roads in detail in Table 2-13, Section T-01, on Page 809 of the Applicant's Response to Relevant Representations (Part 2) [REP1-117], where it is explained that 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. This included consideration of the capacity of local roads and infrastructure to accommodate construction vehicles with consideration of construction traffic volumes, vehicle types, route suitability, and network performance.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				The assessment concludes that the level of construction traffic associated with the Scheme is unlikely to materially affect road safety or delay on links within the Study Area, and no significant adverse effects on accident risk are anticipated.
MCH-010	Noise and Vibration	Noise impact	Endless noise from piling etc.	Average construction noise levels, as presented in Table 14-18 of ES Volume 1, Chapter 14: Noise and Vibration [REP1-021] , would typically be between 50 and 60 dB LAeq at residential properties. These levels are indicative of regular conversation. Additionally, solar PV piling uses small mini-piling rigs which are quieter than the worst-case assumption in ES Volume 1, Chapter 14: Noise and Vibration [REP1-021] and the duration of noise events from such activity would be short. As described in the Outline CEMP [REP1-096] , prior warning will be given to local residents of any noisy works and a noise monitoring programme agreed with Wiltshire Council will be carried out during construction.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				The preparation, approval and implementation of the Construction Environmental Management Plan, substantially in accordance with the Outline CEMP [REP1-096] , is secured through Requirement 13 in Schedule 2 of the Draft Development Consent Order [REP1-007] , ensuring that construction noise and vibration are appropriately controlled.
MCH-011	Site Selection and Alternatives	BESS location	Siting the BESS so close to our home, not to mention the main railway line and Hullavington village, is gratuitous and completely unnecessary. It could be sited anywhere down to the grid connection, away from all houses,	Please refer to reference ID SS-14 in the Applicant's Response to Relevant Representations Part 2 [REP1-117] . In summary, the location of the BESS was determined through an options appraisal and iterative design process, having regard to technical requirements, environmental constraints and potential effects on nearby receptors. The BESS location on Lime Down D was identified as the preferred option due to its central position within the Scheme, the presence of existing and proposed screening, its limited proximity to many residential properties, and its relationship with existing infrastructure, including the adjacent railway line. The Environmental Statement assesses the likely significant effects arising from

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				the BESS and identifies mitigation measures where necessary. In particular, the assessment considers the potential effects associated with the BESS in relation to topics including landscape and visual effects, noise and vibration, flood risk and drainage, traffic and transport, cultural heritage, ecology and ground conditions. An Outline BSMP [REP1-110] has been prepared for the Scheme using guidance from Dorset and Wiltshire Fire and Rescue Service and incorporating recommendations of the National Fire Chiefs Council. The safety objectives for the design of the BESS site are listed in Section 2.4 of the Outline BSMP [REP1-110]. The Outline BSMP [REP1-110] was amended at Deadline 1 to fully accommodate the latest BESS safety requirements contained in NFPA 855 (2026) ensuring that any credible risks associated with battery storage are either prevented or fully mitigated if a BESS failure occurs.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				Section 2.4.2 of the Outline BSMP [REP1-110] stipulates that: <i>"Final BESS design and site layout will have been validated through mandatory Large Scale Fire Testing (LSFT) and rigorous consequence modelling to minimise the requirement for any D&WFRS intervention in a thermal runaway incident. LSFT must establish minimum equipment spacing distances that demonstrate there is no fire propagation to adjacent BESS enclosures or ESS equipment. D&WFRS intervention in worst case scenarios would typically be limited to boundary cooling of adjacent BESS and Energy Storage System (ESS) units to prevent the fire from spreading. This strategy will be finalised with D&WFRS and be clearly communicated in the Emergency Response Plan (ERP);</i> • <i>To ensure that fire, smoke, and any release of toxic gases does not significantly impact site operatives, first responders, and the local community; and</i>

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				<i>To ensure that firewater run-off is contained and tested before release or, if necessary, removed by tanker and treated offsite."</i> As now mandated under NFPA 855 (2026) the Applicant will only be able to select a BESS system that has undertaken Large Scale Fire Testing (LSFT). At the detailed design stage, the selected BESS LSFT data will be leveraged to fully inform inputs for risk assessment tools which will be utilised together with detailed consequence modelling to provide a comprehensive site operations and emergency response safety audit, this is stipulated in the Outline BSMP [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. Section 5 of the Outline BSMP [REP1-110] covers all requisite firefighting requirements for the Scheme including

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				fire service access, firefighting water supply, and emergency planning requirements and is fully compliant with NFCC guidance. The Applicant has drafted a Statement of Common Ground with the Environment Agency [EN010168/EXAM/8.6] on Scheme environmental protection issues including the BESS area drainage strategy. The agreed strategy document will be 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. Final comprehensive risk assessment reports, BESS design and site-specific consequence modelling, and detailed Emergency Response Plans (ERPs) can only be drafted when based upon the specific BESS design selected at the detailed design stage. Key safety

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				content requires that all equipment within the BESS area is defined, battery system operating limits and test data are fully defined, and the BESS failure protection system is defined. Incident response tactics require significant test data and rigorous consequence modelling from the specific BESS design to develop safe protocols for incident response. Section 5.4.9 – 5.4.11 of the Outline BSMP [REP1-110] stipulates that the ERP will follow NFCC and NFPA 855 (2026) guidelines and stipulates the minimum content that an ERP must contain, including: “<i>Emergency procedures for all credible hazards and risks, including building, infrastructure and vehicle fire, wildfires, impacts on local receptors, impacts on transport infrastructure.</i>” 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

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				6.1.5 of the Outline BSMP [REP1-110]. NFPA 855 (2026) defines a safe BESS exclusion zone as follows: <i>"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."</i> The railway line referred to is located at a substantially greater distance, such that direct thermal effects, blast overpressure or debris impacts capable of affecting rail operations are not anticipated under credible worst-case scenarios. Further explosion prevention, mitigation, and safety requirements for the Scheme are stipulated in the Outline BSMP [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 Applicant has followed National Fire Chiefs Council (NFCC) guidance and commissioned a BESS fire

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				emissions assessment (as detailed in ES Volume 3, Appendix 15-2: BESS Fire Emissions Modelling [APP-239]) to model toxic gas emissions and visibility impacts from a BESS fire on all sensitive receptors within a 1km radius of the BESS area. The fire emissions modelled in the report were based upon recent UK Health Security Agency (UKHSA) requests for DCO BESS projects which explore both immediate air quality impacts together with annual UK air quality requirements. The UKHSA is a statutory consultee for the Scheme and has confirmed in their relevant representation [RR-4798] that <i>"Following our review of the submitted documentation the UKSHA are satisfied that the proposed development should not result in any significant adverse impact on public health"</i>. The Applicant commissioned the BESS fire emissions assessment (as detailed in ES Volume 3, Appendix 15-2: BESS Fire Emissions Modelling [APP-239]) to ensure the selected BESS area would have no significant off-site impacts if credible

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

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				Even under this highly conservative sensitivity test, predicted concentrations remained well below the relevant health-based thresholds. Six worst case BESS fire locations (i.e. locations within the BESS Area closest to sensitive receptors) have been modelled as depicted in ES Volume 2, Figure 15-5: BESS Fire Emissions Study Area, Receptors and Modelled BESS Locations [APP-239]. The concentrations of carbon monoxide (CO), formaldehyde, hydrogen chloride (HCl), hydrogen cyanide (HCN), hydrogen fluoride (HF), ammonia (NH₃), nitrogen dioxide (NO₂) and particulates from a potential BESS fire have been modelled using an air quality dispersion model to determine the likely effects on human health. A high-level visibility assessment has also been undertaken using the modelled particulates results to determine the effect of BESS fire emissions on visibility on the local road and rail network to inform the Outline BSMP [REP1-110].

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				ES Volume 3, Appendix 15-2: BESS Fire Emissions Modelling [APP-239] concludes that there would be no significant air quality effects as a result of a BESS fire incident and visibility issues were not predicted.
MCH-012	Climate Change and Energy Need	Carbon cost	If I thought this proposal would 'save the planet' I might think somewhat differently but it won't do any such thing. The carbon cost of construction, transportation and installing the panels etc, will take about 50 years to offset.	See above response on carbon payback year to response AH-004. A separate tailored technical response is being prepared and will be provided by Deadline 3 with regards to the carbon payback.
MCH-013	Community Benefits	Impact on local community	This scheme is about one thing and one thing only; [redacted] . It promises nothing for local people except the devastation of our daily lives and the destruction of peace and tranquillity for everyone who lives here. It would be grotesque imposition on thousands of innocent people.	The Applicant has sought to robustly and comprehensively assess the potential impacts of the Scheme in the ES [APP-052 to APP-265] and mitigate them as required through the management plans secured through the Requirements in Schedule 2 of the Draft DCO [REP1-007] . This has been done to fully demonstrate the potential impacts of the Scheme against its benefits (including but not limited to energy production, economic, employment and skills, local ecology and biodiversity benefits) so that these matters can be considered in the

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				planning balance when the DCO is determined. However, as with other DCO developments the Applicant recognises that there will be some significant effects which cannot be mitigated as a result of the Scheme such as the long term adverse effects on the Landscape Character of the area (as presented in ES Volume 1, Chapter 8: Landscape and Visual [APP-060]) as well as long term significant adverse effects to 10 Visual Receptors, all of which are local PRoW which are either within or directly adjacent to the proposed arrays. These are matters which will have to be considered in the planning balance when the DCO is determined by the Secretary of State. With regard to the concerns around mental health and local people, the impacts on communities have been considered as part of the assessment of "<i>community identity, culture, influence and resilience</i>" in ES Volume 1, Chapter 18: Human Health [APP-070].

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				The Applicant has considered how changes to perceptions of rurality, community sense of place, pride, engagement and difference in consideration of importance of different aspects of the Scheme (for example opposing views on harm versus benefits) may lead to a degree of impact to communities. The assessment has considered that this is likely to be up to a minor adverse effect on local communities and thus on residents' mental health and wellbeing. This is not considered a significant effect.
Jane Andrews REP1-213				
JA-002	Construction and Decommissioning Transport and Access	Construction impacts	Further to my original comments on my initial representation I now have grave concerns regarding the impact of 2 to 3 years construction timetable and the chaos this would cause with the number of large wagons on rural roads etc.	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

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				Comments' of the Wiltshire Council Relevant Representation [RR-4934]. 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. This included the capacity of local roads and infrastructure to accommodate construction vehicles. The assessment concludes that the level of construction traffic associated with the Scheme is unlikely to materially affect road safety on links within the Study Area, and no significant adverse effects on accident risk are anticipated. The assessment additionally concludes that with appropriate mitigation such as having the Outline CTMP [REP1-112] in place, there would be no significant adverse impacts on the local highway network during the construction, operation and

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				maintenance, and decommissioning phases of the Scheme. Construction vehicle movements will be managed through a Construction Traffic Management Plan. An Outline CTMP [REP1-112] has been prepared and submitted with the DCO application. The aim of the Outline CTMP [REP1-112] is to ensure that the effect of the construction phase on the local highway network is minimised. The preparation, approval and implementation of the final CTMP, substantially in accordance with the Outline CTMP [REP1-112], 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.
JA-003	Soils and Agriculture	Food security	I would also like to add that destroying farmland in the current world crisis is unacceptable. Food security is already a massive risk for an island population such as the UK.	The UKRI's Roadmap for Resilience: A UK Food Plan for 2050, addresses future food security and self-sufficiency, which it notes would be achievable " <i>but only with coordinated policy on production, diets and land use.</i> " The three core principles for the UK to

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				become self-sufficient are: resilient agricultural production, which includes reducing livestock numbers and supporting farm diversification; integrated land use to sequester carbon and reduce agricultural emissions; and changing dietary choices, namely consuming less meat. The Applicant does not consider that cessation of arable production within the Solar PV Sites, which are a majority moderate to low quality agricultural land in Subgrade 3b and Grade 4, would significantly affect the UK's ability to become self-sufficient in food production.
Paul Kirk REP1-233				
PK-001	Transport and Access	Current road works	I am not sure if this is the correct way to make a comment on an issue concerning the Lime Down application but here goes. The road from Grittleton to Hullavington is a narrow country lane with difficult passing conditions and has always been this way. Wiltshire Council has declared itself opposed to the plans and presumably this includes Wiltshire Highways	The road between Grittleton and Hullavington does not form part of the proposed HGV Construction routes as shown in Figure 4.1 and 4.2 of the Outline CTMP [REP1-112]. Any work being undertaken by Wiltshire Council on this section of the highway network is not related to the scheme.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			Authority. Recently however the road has been closed for many days to allow new passing places to be created. This has been done horribly badly and the road is even more untidy and scruffy than it has ever been. My point however is that the only reason for doing this work must be to facilitate the increased HGV traffic forecast as a result of the Lime Down plans. Can this possibly be right and fair or is there some way that the proposer can influence council policy so significantly? Or should we assume it is mere coincidence?? Yours sincerely Paul Kirk	
Rachel White REP1-235				
RW-001	Construction and Decommissioning	Cable Route construction	The proposed cable route will pass over our land at Yatton Keynell. Lime down solar park ltd needs to be more transparent and honest about the works.	As set out in the Land and Rights Negotiations Tracker [REP1-246] the Applicant and their consultant land agent have had extensive dialogue with the respondent's professional representative. The planned works and rights sought have been discussed in detail between the Applicant and the respondent's land agent with a view to

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				progressing the Heads of Terms, which are currently at an advanced stage.
RW-002	Description and DCO Process	Sentiment	Personally, I am against this project but know that this will be pushed through no matter what, it's the big boys against the minions! Thank you for your time.	The Applicant notes this comment. The Applicant has sought to robustly and comprehensively assess the potential impacts of the Scheme in the ES [APP-052 to APP-265] and mitigate them as required through the management plans secured through the Requirements in Schedule 2 of the Draft DCO [REP1-007]. This has been done to fully demonstrate the potential impacts of the Scheme against its benefits (including but not limited to energy production, economic, employment and skills, local ecology and biodiversity benefits) so that these matters can be considered in the planning balance when the DCO is determined. However, as with other DCO developments the Applicant recognises that there will be some significant effects which cannot be mitigated as a result of the Scheme. These are matters which will have to be considered in the planning balance when the DCO is determined by the Secretary of State.

7 The Applicant's responses to members of the public and all remaining organisations and businesses.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
January Farrington REP1-214 and REP1-215				
JF-001	Scheme Description and DCO Process	General remarks	Summary: This Written Representation focuses on IGP's response to my RR and areas where the evidence base in my view falls short, and where I respectfully ask the Examining Authority to look hard at what the Applicant has, and has not, demonstrated. The NSIP regime is, in my view, being used in a way that the Planning Act 2008 did not envisage.	The Applicant notes this comment. The Applicant has sought to robustly and comprehensively assess the potential impacts of the Scheme in the Environmental Statement (ES) [APP-052 to APP-265] and mitigate them as required through the management plans secured through the Requirements in Schedule 2 of the Draft DCO [REP1-007]. This has been done to fully demonstrate the potential impacts of the Scheme against its benefits (including but not limited to energy production, economic, employment and skills, local ecology and biodiversity benefits) so that these matters can be considered in the planning balance when the DCO is determined. However, as with other DCO developments the Applicant recognises that there will be some significant effects which cannot be mitigated as a result of the Scheme.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				These are matters which will have to be considered in the planning balance when the DCO is determined by the Examining Authority.
JF-002	Cumulative and In-Combination Effects	General remarks	My concerns include: Assessment of impacts: The Applicant repeatedly concludes "no significant effects" across multiple topics including flooding, landscape, construction, decommissioning, socio economic impact, equine welfare and mental health. I do not consider these conclusions to be supported by robust, site-specific evidence.	The Applicant notes this comment. Effects have been assessed through the Environmental Statement and detailed surveys, and appropriate mitigation has been provided. The LVIA in ES 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 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. by year 15).

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				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. The LVIA recognises that there are Significant adverse 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 Appendix 8-6 [APP-197].

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				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.
JF-003	Socio-Economics, Recreation and Tourism Construction and Decommissioning	Equine impacts	Equine impacts: The impact on and the wider equestrian and rural economy. Horses have been treated as recreational receptors. No equine-specific assessment has been undertaken, despite the site being located within a highly active equestrian and breeding landscape. The effects of construction activity, moving	This has been covered in REP1A-013 in JF-001 and JF-002 where the scheme's impact on West Park Farm has been considered as not a significant effect. Further no residual effects to operation, business or recreational use have been identified.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
	Noise and Vibration		tracker panels, operational noise and associated infrastructure on equine welfare and safety have not been properly assessed.	Although a specific equine assessment has not been undertaken, the EIA has sought to identify and minimise potential effects on sensitive receptors across a range of technical topics, with embedded mitigation and management measures incorporated where appropriate. Equestrian facilities, including private stables and paddocks, studs, riding schools, and on public rights of way such as bridleways and byways have been considered as specific recreational receptors in the assessment in the ES Volume 1, Chapter 16: Socio Economics, Tourism and Recreation [APP-068]. The likely effects on these locations and receptors are specifically and individually assessed in ES Volume 3, Appendix 16-2: Tourism and Recreation Receptor Tables [APP-241]. The likely effects on these locations and receptors are specifically and individually assessed in ES Volume 3, Appendix 16 2:

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				Tourism and Recreation Receptor Tables [APP-241]. The Scheme's approach has assessed the likely direct impact of construction on equestrian facilities, and accessibility and amenity impacts on those facilities and surrounding rights of way used for hacking. The Applicant confirms that the majority of significant adverse effects can be mitigated, however understands that some significant adverse effects to users of routes in Lime Down E cannot be mitigated further during construction. No significant residual effects are anticipated during the operational phase of the Scheme. The Applicant has committed to ensuring the operation or recreational use of equestrian facilities and PROWs is protected as much as possible through the implementation of embedded and additional mitigation measures set out in the Outline CTMP [REP1-096] and Outline PRoWPPMP [REP1-104], secured

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				respectively by Requirements 15 and 16 in Schedule 2 to the Draft DCO [REP1-007]. The Applicant confirms that the Scheme design includes provision of approximately 12.6 km of permissive paths for pedestrians, and for pedestrians, cyclists and equestrian users, to improve connectivity across the Sites and the wider public rights of way network. These are secured through the Outline LEMP [APP-283] and Outline PROWPPMP [REP1-104] Requirements 7 and 16 of Schedule 2 to the Draft DCO [REP1-007]. The Applicant confirms that the approach to equestrian and PROW impacts is under discussion with Wiltshire Council's Countryside Access Team (as part of discussions with Wiltshire Council in general), the British Horse Society, and the Wiltshire Bridleway Association. Progress on each of these discussions is set out in the relevant

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				Statements of Common Ground. The Applicant recognises that animals, including horses, can be sensitive to dust and construction activity. Management measures within the Outline CEMP [REP1-096] and the Outline CTMP [REP1-112] include measures such as dust suppression, site management controls, routing and scheduling of construction traffic, and management of plant and machinery which are specifically designed to minimise dust at source and reduce the potential for construction related emissions to affect nearby receptors, including equestrian properties. Glint and glare effects upon bridleway users have been assessed in Section 8 of ES Volume 3, Appendix 20-4: Solar Photovoltaic Glint and Glare Study [APP-261]. No significant effects are predicted as the sensitivity of receptors is considered to be low.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				There is no evidence that horses are significantly affected by solar reflections. Construction noise effects would be controlled through the implementation of the Outline CEMP [REP1-096], secured through Requirement 13 of Schedule 2 to the Draft DCO [REP1-007]. In particular, Sections 2.5 and 3.9 of the Outline CEMP [REP1-096] set out a range of embedded mitigation measures, including adherence to best practicable means in accordance with BS 5228, restrictions on core construction working hours, management of out-of-hours working through Section 61 agreements where required, use of temporary acoustic fencing around HDD compounds where necessary, and implementation of additional site specific mitigation measures where activities have the potential to affect nearby noise-sensitive receptors. Additional mitigation measures include the careful siting and orientation of temporary construction compounds and plant, use of quieter

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				plant where practicable, and offsetting noisy construction activities away from neighbouring paddocks and sensitive receptors where reasonably practicable. The Outline CEMP [REP1-096] also includes measures relating to lighting control and traffic management to minimise disturbance during construction. With regards to horses, as there is currently no established regulatory guidance for assessing noise induced behavioural change in livestock or horses, the approach where noise for humans and horses are considered in terms of a receptor are addressed as potential amenity impacts on equestrian facilities, including private stables, paddocks, stud farms and riding schools, which have been assessed in ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068] and its supporting ES Volume 3, Appendix 16-2: Tourism and Recreation Receptor Tables [APP-241]. The chapter concludes there would be no significant residual effects to their operation or recreational use as a

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				result of noise impacts, subject to implementation of embedded and additional mitigation measures with any mitigation requirements (such as noise screening and visual screening between onsite infrastructure and neighbouring paddocks). The approach where noise for humans and horses are considered in terms of a receptor are addressed as potential amenity impacts on equestrian facilities, including private stables, paddocks, stud farms and riding schools aligns with an accepted methodology based on expert advice in other DCO's, including Sunnica Energy Farm, where the Secretary of State (SoS) agreed with the methodology that an animals processing of decibel levels is sufficiently similar to a humans' that the established human-noise threshold is a fair benchmark for noise impacts to be considered. The Scheme's approach has assessed the likely direct impact of construction on equestrian facilities,

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				and accessibility and amenity impacts on those facilities and surrounding rights of way used for hacking. Furthermore, the Applicant, notes a summary from the British Horse Society from August 2025 which contains a section on glint and glare: <i>"The society has no evidence of 'glint and glare' from solar panels and no evidence of horses reacting to it or of it being detrimental to the health and wellbeing of horses. Reports from sites with both solar panels and horses, including a solar array beside an arena used for riding horses, indicate no reflection and no reaction from or impact on horse or rider."</i> The view put forward by the British Horse Society is that, whilst horses may initially react to new solar infrastructure, this is no different from how they might respond to any unfamiliar change in their environment, and is something they generally adapt to quickly. Any reaction is therefore attributed to a change in surroundings, rather than

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				to anything specific about the panels themselves.
JF-004	Socio-Economics, Recreation and Tourism	Local businesses	Business and economic effects: The impacts on established rural businesses, including equine operations and the wider local economy they support, have not been adequately considered.	The concerns raised are acknowledged, the Applicant maintains that the Scheme does not pose a threat to local rural businesses or the local equestrian economy. Equestrian facilities, including private stables and paddocks, studs, riding schools, and on public rights of way such as bridleways and byways have been considered as specific recreational receptors in the assessment in the ES Volume 1, Chapter 16: Socio Economics, Tourism and Recreation [APP-068]. The likely effects on these locations and receptors are specifically and individually assessed in ES Volume 3, Appendix 16-2: Tourism and Recreation Receptor Tables [APP-241]. The Applicant confirms that the majority of significant adverse effects can be mitigated, and confirms no significant adverse effect is anticipated at West

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				Park Farm, Corston at any phase of the Scheme. When assessing other equestrian-specific locations, the Applicant understands that some significant adverse effects to users of routes in Lime Down E, and to the equestrian business at Park Farm, Yatton Keynell cannot be mitigated further during construction and will therefore be considered in the planning balance when the DCO is determined. No significant residual effects are anticipated during the operational phase of the Scheme. The Applicant has committed to ensuring the operation or recreational use of equestrian facilities and PRowS is protected as much as practicable through the implementation of embedded and additional mitigation measures set out in the Outline CTMP [REP1-112] and Outline PRowPPMP [REP 1-104], secured respectively by Requirements 15 and 16 in Schedule 2 to the Draft DCO [REP1-007].

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				The Applicant considers that the Environmental Statement has fully assessed the impacts of the Scheme on all receptors. The Applicant is committed to ensuring impacts on equestrian facilities such as West Park Farm can be mitigated wherever practicable, and therefore is undertaking, and encourages further, engagement with relevant stakeholders through the DCO process. Following the written representations submitted at Deadline 1 and 1A relating to horses and equine businesses, the Applicant is considering the technical information provided in detail and will provide further commentary at Deadline 3.
JF-005	Site Selection and Alternatives	Alternatives	Site selection and alternatives: The Applicant has not demonstrated that this is the most appropriate location when assessed against reasonable alternatives. The site selection process, the use of the NSIP regime, and the question of alternatives.	Site selection is addressed 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] . An appraisal of alternative sites within a 20km radius of the Existing National Grid Melksham Substation has been undertaken, which concludes that

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				there are no more suitable locations within the 20km search area than the proposed location for the Scheme. In addition, further work on site selection has been completed as set out in the Technical Note on Site Selection Assessment [EN010168/EXAM/9.26]. This Technical Note confirms that the conclusions of the Site Selection Assessment Report [APP-185] remain unchanged. Although the Applicant believes a proportionate approach to site selection was undertaken, the Applicant considered whether any of PDAs 1-4 could have been enlarged to incorporate land that was introduced at the later stages of the site selection assessment. Furthermore, the Applicant also considered whether any of the PDAs could have been redrawn to remove constraints and then combined in order to create new PDAs or "clusters." This further analysis has resulted in three "clusters" of PDAs being considered. However, none of the clusters are considered to be reasonable

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				alternatives for the Scheme. In terms of the use of the NSIP regime, under the Planning Act 2008 the Scheme is classified as a NSIP due to its proposed generating capacity of more than 100 MW and therefore requires an application for a Development Consent Order (DCO). Although the decision on whether to grant a DCO is made by the Secretary of State, the Applicant has frequently engaged with Wiltshire Council on various technical elements.
JF-006	Scheme Description and DCO Process	Transparency	Governance and transparency: There are outstanding concerns regarding the accuracy of public claims and the transparency of aspects of the scheme, which I respectfully ask the Examining Authority to examine carefully.	The Applicant notes this comment.
JF-007	Scheme Description and DCO Process	Sentiment	I want to be clear about something at the outset. The toll of this process has been very real. My family and I live and work at in Corston, a thoroughbred stud which sits immediately alongside the proposed panel areas of Lime	The Applicant sincerely respects this personal testimony in regard to the difficulty navigating the Development Consent Order (DCO) process and recognises the comments made on the impacts it has had to family life for

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			Down D and opposite the substation. They have shared my time and attention with Stop Lime Down since before they began either of these. Missed matches, rushed conversations, hours in front of a screen instead of with them. I mention it not to elicit sympathy but because the term "NIMBY", used freely in the press and elsewhere about people in my position, fails to recognise what is being asked of communities like ours. We are being asked to absorb, without compensation and with almost no meaningful dialogue, a development that is fundamentally incompatible with the place we live in. For me this is not about a back yard. It is a question of what is right. Ultimately, this is not simply a question of whether Lime Down can be engineered or mitigated. It is whether it is the right development, in the right place, at the right scale. I do not believe that it is.	the respondent. The Applicant expressly rejects the use of the term "NIMBY" and acknowledges there will be effects experienced by those living in close proximity to the Scheme. The Applicant has sought to provide robust and transparent information about the Scheme throughout the pre-application consultation process undertaken, as recorded in the Consultation Report [APP-022] and its supporting appendices [APP-023 to APP-051]. This has included the opportunity for all affected persons to make contact with the Applicant team through free-to-use services. This has been done to ensure residents and business owners have had access to as much material as practicable at each stage of the DCO process, to be able to reduce anxiety or concerns from being unsure of what impacts the Scheme may have to them.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				Site selection is addressed 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] . An appraisal of alternative sites within a 20km radius of the Existing National Grid Melksham Substation has been undertaken, which concludes that there are no more suitable locations within the 20km search area than the proposed location for the Scheme.
JF-008	Scheme Description and DCO Process	Sentiment	This Written Representation focuses on IGP's response to my RR and areas where the evidence base in my view falls short, and where I respectfully ask the Examining Authority to look hard at what the Applicant has, and has not, demonstrated. The NSIP regime is, in my view, being used in a way that the Planning Act 2008 did not envisage. My concerns include:	The Solar PV Sites and Cable Route Corridor are located on agricultural land, and the Scheme has been meticulously designed to avoid residential dwellings.
JF-009	Scheme Description and DCO Process	Assessment	Assessment of impacts: The Applicant repeatedly concludes "no significant effects" across multiple topics including flooding, landscape, construction,	In relation to hydrology and flood risk, the conclusion of no significant residual effect is supported by Scheme-specific assessment in ES

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			decommissioning, socio economic impact, equine welfare and mental health. I do not consider these conclusions to be supported by robust, site-specific evidence.	Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [REP1-017] and the FRA & Drainage Strategy [REP1-037 to REP1-054]. That assessment considers the local flood risk baseline, watercourses, surface water pathways, climate change, construction compaction, sediment risk, drainage disruption and operational runoff from impermeable infrastructure. It distinguishes between panelled areas, which remain permeable and drain to ground, and hard infrastructure, which is subject to formal drainage design, attenuation and controlled discharge. The assessment does not rely on generic assumptions about solar development. It applies the Scheme-specific layout, local flood risk context and secured mitigation. The conclusion is therefore based on the submitted assessment and the DCO Requirements which secure the outline management plans.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				The assessment in ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068] has assessed the likely impacts on the economy within a 20 km Study Area surrounding the Scheme, and on individual tourism and recreation impacts within 2 km and 5 km Study Areas around the Scheme. These have identified some residual significant adverse effects to a small number of PRowWs, long-distance recreation routes and one equestrian facility. These will therefore have to be considered in the planning balance when the DCO is determined. Where significant effects are not anticipated, this is as a result of the proposed mitigation measures (traffic control measures, PRowW protections, skills and employment support) put in place to reduce impacts on these types of receptors, as tailored to their location-specific needs. These are secured through the relevant management places by the Requirements in

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				Schedule 2 of the Draft DCO [REP1-007]. The Applicant has not assessed impacts on equine welfare separately but has assessed impacts on equestrian businesses and equestrian recreation facilities in ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068], finding residual significant effects to one facility. The Applicant has assessed impacts on human health and wellbeing though the assessment in ES Volume 1, Chapter 18: Human Health [APP-070]. This assessment has been undertaken in compliance with public and professional industry guidance (Public Health England, and Institute for Environment and Sustainability Professionals) and though consultation with the Office for Health Improvement and Disparities and Wiltshire Council's Public Health team. This has ensured the

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				assessment has been undertaken in a robust and location-specific manner to ensure effects on local people and communities has been comprehensively assessed based on the design of this Scheme. The LVIA in ES Volume 1, Chapter 8 Landscape and Visual Impact Assessment (LVIA) [APP-060] takes into account the effects on landscape character and visual amenity in detail and recognises there are adverse visual effects on a number of residential receptors, footpaths and local roads as set out in Table 8-19 Significant Visual Effects: Private Receptors, Table 8-20 Significant Visual Effects: Public Receptors and Table 8-21 Significant Visual Effects: Transport Receptors in in ES Volume 1, Chapter 8: Landscape and Visual [APP-060]. The LVIA [APP-060] recognises that there would be temporary Moderate Adverse Significant effects on Landscape Character within the 1 km

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				Study Area as a result of the change in land use from arable farmland to solar infrastructure. However, the Scheme proposes substantial 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.
JF-010	Socio-Economics, Recreation and Tourism	Local businesses	Equine impacts: The impact on and the wider equestrian and rural economy. Horses have been treated as recreational receptors. No equine-specific assessment has been undertaken, despite the site being located within a highly active equestrian and breeding landscape. The effects of construction activity, moving tracker panels, operational noise and associated infrastructure on equine welfare and safety have not been properly assessed.	Please refer to the Applicant's response to reference ID 'JF-003' above, wherein the Applicant has detailed how impacts to equestrian facilities have been assessed.
JF-011	Socio-Economics, Recreation and Tourism	Local businesses	Business and economic effects: The impacts on established rural businesses, including equine operations and the wider local	Please refer to the Applicant's response to reference ID 'JF-004' above, wherein the Applicant has

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			economy they support, have not been adequately considered.	detailed how impacts to rural businesses have been assessed.
JF-012	Site Selection and Alternatives	Assessment	Site selection and alternatives: The Applicant has not demonstrated that this is the most appropriate location when assessed against reasonable alternatives. The site selection process, the use of the NSIP regime, and the question of alternatives.	Please refer to the Applicant's response to reference ID JF-005 above which addresses the use of NSIP regime. This point also summarises the site selection process and details the further work undertaken for site selection.
JF-013	Scheme Description and DCO Process	Transparency	Governance and transparency: There are outstanding concerns regarding the accuracy of public claims and the transparency of aspects of the scheme, which I respectfully ask the Examining Authority to examine carefully.	The Applicant notes this comment.
JF-014	Consultation and Engagement	Sentiment	I want to be clear about something at the outset. The toll of this process has been very real. My family and I live and work at in Corston, a thoroughbred stud which sits immediately alongside the proposed panel areas of Lime Down D and opposite the substation. They have shared my time and attention with Stop Lime	When designing the Scheme, the Applicant thought carefully about how it might affect the local community and how people feel. The Applicant understands that some might worry that the countryside could feel less peaceful or different. Some people may think that the Scheme is helpful, while others may think it causes problems. Because of this, some

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			Down since before they began either of these. Missed matches, rushed conversations, hours in front of a screen instead of with them. I mention it not to elicit sympathy but because the term "NIMBY", used freely in the press and elsewhere about people in my position, fails to recognise what is being asked of communities like ours. We are being asked to absorb, without compensation and with almost no meaningful dialogue, a development that is fundamentally incompatible with the place we live in. For me this is not about a back yard. It is a question of what is right. Ultimately, this is not simply a question of whether Lime Down can be engineered or mitigated. It is whether it is the right development, in the right place, at the right scale. I do not believe that it is.	people could feel upset, stressed or worried. The Applicant believes that these effects would, overall, not be significant. To help people during the building work, there will also be a community liaison group. This group will: 1. Listen to people's worries and questions; 2. Pass information between the builders and the community; 3. Help solve problems quickly; and 4. Guide people to mental health support if they need extra help. The group is there to make sure people are heard, informed and supported while the Scheme is being built and operated. If the Scheme goes ahead, there will be a binding legal condition that makes sure the group exists. This is in the Draft DCO

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				[REP1-007], as Requirement 4 in Schedule 2. There is more information in ES Volume 1, Chapter 18: Human Health [APP-070].
JF-015	Consultation and Engagement	Response to RRs	Fundamental framing failure IGP have not only failed to answer the questions I raised in my RR but they have systematically answered the wrong questions. They have absorbed my specific concerns into one generic response. This is a fundamental framing failure, not merely a formatting one. I emailed PINS on 15th April 2026 to clarify the criteria by which IGP can simply decide to reply individually to some RR's and not to others. I do not feel this has been adequately addressed prior to the Written Representation deadline and I do not consider it unreasonable to expect consistency. Residents directly adjacent to the red line haven't warranted a response (in keeping with IGP's lack of engagement) the absence of any criteria for them to do so, is quite	The Applicant refers to its response provided under reference ID CE-26 in Applicant's Response to Relevant Representations (Part 2) (Rev 2) [REP1-117] regarding its approach to responding to submissions. Each RR submitted by the general public, and any other non-statutory parties not responded to at Deadline A, has been systematically reviewed and a summary of the issues raised has been prepared. These summaries are presented alongside the corresponding unique reference ID, enabling a clear audit trail between the original representation and the Applicant's response. The Applicant therefore had regard to all RRs received and has provided a response to the issues raised. The Examination process, led by the

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			simply wrong. I mentioned at the OFH that our livelihoods are being treated as collateral damage. I feel dismissed, silenced and made to question if my participation carries any real weight. This is highlighted by my specific detailed RR remaining unanswered.	Examining Authority, will further consider all RRs, alongside the Applicant's responses and any subsequent submissions, in reaching a recommendation on the Scheme. The Applicant notes that the free-to-use Scheme communication channels remain open for anyone to contact the Applicant regarding questions about submissions and responses to comments.
JF-016	Socio-Economics, Recreation and Tourism	Equine Impact	IGP continue to assess our thoroughbred stud, as a recreational receptor. No land use compatibility, equine welfare or breeding assessment has been conducted. IGP's response to SE-27 and SE-28 treats equestrian operations exclusively as recreational receptors assessed under Chapter 16 (Socio economics, tourism and recreation). It continues to not engage with mine and others specific points that a thoroughbred breeding operation is a welfare and	ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068] considers equestrian facilities as recreational facilities, with the socio-economic assessment focussing on how the Scheme may affect the operation of, and access to, these facilities. The assessment considers for example, potential construction effects on equestrian facilities, including changes to views which may affect the desirability of facilities for users, potential disturbance and noise impacts on facility users and horses within paddocks, and the potential for

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			commercial business requiring a completely different assessment framework. This is a significant gap.	HGV and construction traffic on local roads to affect recreational use and access to the PRoW network for hacking.
JF-017	Socio-Economics, Recreation and Tourism	Equine Impact	The word "breeding" does not appear in any equine response, despite the number of stud farms adjoining the red line. Nothing in any of IGPs equine responses addresses broodmares, covering season, foaling, young stock or the vulnerability of breeding stock during pregnancy and early development.	The Applicant confirms that the assessment in ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068] has considered impacts on equestrian facilities primarily as recreational or recreation-dependent businesses. Whilst "breeding" has not been explicitly referenced, this has been understood as part of the function of equestrian facilities: including stud farms, liveries, riding schools, and private stables. Table 2-10 in ES Volume 3, Appendix 16-2: Tourism and Recreation Receptor Tables [APP-241] provides a description of which equestrian facilities were identified in the Study Area around the Scheme and indicates whether they were taken forward for full assessment.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				The Applicant considers that the Environmental Statement has fully assessed the impacts of the Scheme on all receptors. The Applicant is committed to ensuring impacts on equestrian facilities such as West Park Farm can be mitigated wherever practicable, and therefore is undertaking, and encourages further, engagement with relevant stakeholders through the DCO process. Following the written representations submitted at Deadline 1 and 1A relating to horses and equine businesses, the Applicant is considering the technical information provided in detail and will provide further commentary at Deadline 3.
JF-018	Socio-Economics, Recreation and Tourism	Equine Impact	IGP's own response to SE-27 acknowledges that Park Farm, Yatton Keynell cannot be mitigated during construction and will be considered in the planning balance (but then asserts no significant operational effects). The only reason this equine farm has been acknowledged is because it sits within the cable route therefore,	ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068] considers potential impacts across all phases of the Scheme. ES Volume 3, Appendix 16-2: Tourism and Recreation Receptor Tables [APP-241] provides a detailed assessment of tourism and recreation receptors

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			they have had to acknowledge Park Farm. No other equine property is acknowledged at all. This concession for Park Farm during construction, combined with the complete absence of operational phase analysis, is a significant inconsistency.	within the Study Areas for tourism and recreation effects. Table 2-10 [APP-241] provides a description of equestrian facilities identified by the Scheme and indicates whether they are to be taken forward for assessment. Table 3-20 [APP-241] provides the detailed assessment and outlines the likely effects on equestrian facilities. This includes Park Farm, which is identified on page 123 as experiencing a medium-term temporary moderate adverse effect during construction. The operational assessment for Park Farm is presented on page 126, peak replacement on page 129, and decommissioning on page 133, where no significant effects are identified.
JF-019	Glint and Glare Socio-Economics, Recreation and Tourism	Equine Impact	I noticed whilst spending hours navigating the unnecessarily complicated format of EN010168 I am absent from SE-29 (impact of proposal on horses) and O-06 (glint and glare safety including horse riders) despite my RR directly raising both these issues.	Glint and Glare impacts upon horses and horse riders has been considered at a high level within Section 8 of the Solar Photovoltaic Glint and Glare Assessment [APP-261] . This does not include specific receptors but rather considers the possible extent of impacts based on guidance

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				from the British Horse Society. The British Horse Society's guidance states that 'any reflection is unlikely to be a direct problem to horses, riders or carriage-drivers because of the angles and distances involved'.
JF-020	Glint and Glare	Equine Impact	Moving tracker panels My RR specifically highlighted the 4.5m moving tracker panels as a distinct welfare risk yet IGP's equine responses make no reference to tracker panels at all. The Glint and Glare response (O-06) addresses fixed tilt panels at 2.5m high will be used where required, but does not explain how or where this applies, nor does it address the behavioural impact on horses of continuously shifting visual stimuli, which is a separate issue from optical glare.	The Glint and Glare Assessment considers both fixed and tracking panel configurations, as both options are being taken forward at this stage and each present their own distinct effects. The Applicant has committed not to use fixed panels in a small area in order to mitigate effects upon railway receptors, as shown in Figure 37 (pg. 77) of the Solar Photovoltaic Glint and Glare Assessment [APP-261]. Tracking panels rotate slowly throughout the day in order to optimise yield by facing towards the sun. It is not expected that there would be any swift movements which could spook horses and the slow movement of panels will be almost imperceptible.
JF-021	Socio-Economics,	Equine Impact	Operational phase	Paragraph 14.1.2 of ES Volume 1, Chapter 14: Noise and Vibration

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
	Recreation and Tourism		During the operational phase, IGP states explicitly that "no significant residual effects are anticipated during the operational phase." This is asserted without any equine-specific evidence and directly contradicts my points about permanent noise, movement, visual disturbance and our proximity to the substation. The response offers no engagement with the specific infrastructure adjacent to my farm, nor with the science of equine habituation.	[REP1-021] clarifies that the scope of the noise assessment is limited to human receptors. The assessment of noise on horses is outside the scope of an Environmental Statement, although the potential impact this may have on local equine businesses is covered in ES Volume 1, Chapter 16: Socio Economics, Tourism and Recreation [APP-068]. Equestrian facilities, including private stables and paddocks, studs, riding schools have been considered as specific recreational receptors in the assessment in the ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]. The likely effects on these locations are specifically assessed in ES Volume 3, Appendix 16-2: Tourism and Recreation Receptor Tables [APP-241] which identifies no significant residual effects to their operation or recreational use as a result of noise impacts, subject to implementation of embedded and additional mitigation measures with

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				any mitigation requirements (such as noise screening and offsetting away from neighbouring paddocks) secured through the relevant management documents. The Applicant considers that the Environmental Statement has fully assessed the impacts of the Scheme on all receptors. The Applicant is committed to ensuring impacts on equestrian facilities can be mitigated wherever practicable, and therefore is undertaking, and encourages further, engagement with relevant stakeholders through the DCO process. Following the written representations submitted at Deadline 1 and 1A relating to horses and equine businesses, the Applicant is considering the technical information provided in detail and will provide further commentary at Deadline 3
JF-022	Other Environmental Matters	BESS Safety	BESS risks to horses IGP's BESS response (SS-14) addresses human receptor plume modelling but does not address equine specific vulnerability and	The Applicant acknowledges the point raised regarding the potential sensitivity of horses to airborne pollutants and the distinction between equine and human receptors. The

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			my point on the distinct and serious welfare risk given horses respiratory physiology and herd flight response.	BESS fire emissions assessment undertaken for the Scheme (ES Volume 3, Appendix 15-2 BESS Fire Emissions Modelling [EN010168/APP/6.3 (Revision 2)]) considers pollutant concentrations in ambient air at ground level, which is directly relevant to all receptors that inhale air, including animals. The assessment demonstrates that predicted concentrations of all assessed pollutants at nearby receptors are well below the relevant Acute Exposure Guidance Levels (AEGs). AEGs are specifically designed to be protective of the general population, including sensitive individuals, for short-term exposure scenarios and therefore provide a conservative benchmark for assessing potential health effects. It should be noted that a BESS fire represents a low-probability event, and the assessment has been undertaken using conservative assumptions to characterise a realistic worst-case scenario. Even under these assumptions, the modelling demonstrates that pollutant

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				concentrations reduce rapidly with distance from the source due to dispersion and dilution. While horses may have different respiratory physiology compared to humans, the assessment indicates that any exposure to airborne pollutants would be short-term and at concentrations that do not result in significant adverse effects. On this basis, the conclusions of ES Volume 3, Appendix 15-2: BESS Fire Emissions Modelling [APP-239] are considered applicable to all receptors exposed to ambient conditions in the vicinity of the Scheme, including equine receptors. The assessment does not identify a risk of significant adverse effects arising from airborne emissions in the event of a BESS fire.
JF-023	Socio-Economics, Recreation and Tourism	Local businesses	Insurance and business viability My RR explicitly raised the commercial untenability of insurance for high value bloodstock, staff and the loss of client confidence in an industrialised environment. IGP's	The concerns raised are acknowledged, the Applicant maintains that the Scheme does not pose a threat to local rural businesses or the local equestrian economy.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			response to SE-27 notes that workers "would be eligible for accessing skills and employment support measures." This is entirely non-responsive to the specific argument made, it treats the issue as one of individual employment rather than business destruction. For example local farriers and experienced equine staff should not be expected to retrain simply to accommodate Macquarie's destruction.	As noted within the response to SE-27 Equestrian facilities, including private stables and paddocks, studs, riding schools, and on public rights of way such as bridleways and byways have been considered as specific recreational receptors in the assessment in the ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]. The likely effects on these locations and receptors are specifically and individually assessed in ES Volume 3, Appendix 16-2: Tourism and Recreation Receptor Tables [APP-241]. The Applicant confirms that the majority of significant adverse effects can be mitigated, however understands that some significant adverse effects to users of routes in Lime Down E, and to the equestrian business at Park Farm, Yatton Keynell cannot be mitigated further during construction and will therefore be considered in the planning balance when the DCO is determined. No significant residual effects are anticipated during the operational phase of the Scheme.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				The Applicant has committed to ensuring the operation or recreational use of equestrian facilities and PROWs is protected as much as possible through the implementation of embedded and additional mitigation measures set out in the Outline CTMP [REP1-112] and Outline PRowPPMP [REP1-104] , secured respectively by Requirements 15 and 16 in Schedule 2 to the Draft Development Consent Order (DCO) [REP1-007] .
JF-024	Hydrology, Flood Risk and Drainage	Flood risk	Flooding The Gauze brook response (H-22) is generic and states hydraulic modelling concludes there would be no increase in flood risk downstream. It does not acknowledge Storm Bert, which clearly highlighted the extent of the flood risk, it does not address the sudden inundation of fields adjacent to our farm and does not engage with my specific point that neighbouring land, outside the red line boundary, bears the displaced consequences. The Environment Agency scoping concerns (H-06)	The Applicant does not agree that the Gauze Brook response is generic. Gauze Brook is specifically assessed in FRA Appendix 11-6: Lime Down D / BESS [REP1-047], including floodplain interaction, predicted flood depths and the location of the BESS and substations. Storm Bert is recognised as evidence of existing floodplain behaviour. The event does not demonstrate that the Scheme would increase flood risk. Photographs and observations from that event do not provide surveyed flood levels, measured depths, velocity data or hazard ratings. They

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			are acknowledged but dismissed with a reference to ongoing Statement of Common Ground discussions. We have had no contact from the Environment Agency.	show flooding within the known Gauze Brook floodplain, which has already been identified and assessed. The assessment does not show that the Scheme would displace floodwater onto neighbouring land outside the Order Limits. Solar PV panels within flood risk areas are raised and flood-compatible. The BESS and substations are located in Flood Zone 1. Runoff from impermeable infrastructure will be attenuated and controlled. The Environment Agency is a statutory consultee and engagement with the Environment Agency has taken place through the DCO process. The adequacy of the assessment does not depend on the Environment Agency contacting individual residents.
JF-025	The Applicant	Funding	Macquarie/stewardship The response to D-24 cites Macquarie's £65bn UK infrastructure investment and references the Cottom and West Burton consented (not built) projects. It does not engage	The Applicant notes the expression for further clarification of the respondent's concerns regarding Thames Water.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			substantively with the Thames Water Parallel beyond "concerns are noted"	The Applicant wishes to clarify that Macquarie's involvement in Thames Water has been repeatedly mischaracterised. Macquarie-managed funds were part owners of Thames Water for 11 years. In that time, the company invested £11 billion and Thames Water's assets almost doubled, from £6.5 billion to £12.9 billion. There were significant improvements in water quality (ranked amongst the sector's best), water leakage was cut by around 22%, the second-best improvement in the sector over this time, and pollution incidents were down by 75% between 2008 and 2012. This investment programme was delivered while achieving the third lowest customer bills for water and wastewater in England and Wales at the time of Macquarie's full exit, while from 2009 to 2012, the debt to assets ratio reduced by about 6%. Furthermore, the context here is very different. The development of a privately owned new solar farm is a

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				very different situation from an investment in a former publicly owned service company with existing operational assets that was privatised. In the case of the Scheme, Macquarie has provided the up-front equity capital to develop the Scheme and as such carry significant upfront development risk. Until the Development Consent Order is secured, the Scheme would not generate any income at all, with no guarantee of return unless the Scheme progresses successfully through development, planning, construction and operation. This creates a strong long-term commercial incentive for Macquarie to see the Scheme through to completion. Finally, the Applicant, and any future operator of the Scheme, is bound by the legally enforceable requirements of the Development Consent Order (DCO) as set out in the draft

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				Development Consent Order [REP1-007]. These legally binding requirements are attached to the Scheme and pass directly to any new operator throughout the lifetime of operation and decommissioning. Under the Planning Act 2008, failing to comply with a DCO Requirement is a criminal offence.
JF-026	General Remarks	Local businesses	[Redacted] is a working thoroughbred stud farm. We operate it alongside Dermot's international bloodstock business, which has been active for over twenty years and is responsible for Group 1 winners in every major racing country in both the Northern and Southern hemispheres. We invest in approximately 50 to 100 horses each year. Our farm accommodates a constantly changing population of high-value horses: pregnant broodmares, foals, yearlings, racehorses, and bloodstock boarded on behalf of overseas clients with horses regularly in transit to Hong Kong,	The Applicant notes this comment.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			Australia, the United States, and sales across Europe. To give an indication of what those values look like in practice, just last week Dermot attended the OBS sales in Florida with a client who spent \$3,530,000 on five two-year-old thoroughbreds; one alone made \$2,300,000. Any of these horses we would expect to board on our farm in the future.	
JF-027	Scheme Description and DCO Process	Local businesses	A core part of our business is "pinhooking" foals. These young horses remain with us for less than a year and are prepared for yearling sales. The work involves daily handling, including walking them in-hand around paddocks, particularly alongside the Gauze Brook. Thoroughbreds are highly sensitive animals. They are prey species, neurologically wired to respond to unfamiliar noise and movement. A foal that panics in-hand can injure itself, the handler, or both. A broodmare disturbed in late pregnancy, or in the weeks	Paragraph 14.1.2 of ES Volume 1, Chapter 14: Noise and Vibration [REP1-021] clarifies that the scope of the noise assessment is limited to human receptors. Nevertheless, with prior warning of noisy events during the construction phase, as committed to in Table 8 of the Outline CEMP [REP1-096], and low level continuous operational noise, no undue disturbance to horses is anticipated. This is a conclusion accepted by the Secretary of State in considering the Sunnica Energy Farm application, as outlined in paragraphs 4.182 and 4.183 of the decision letter (https://nsip-

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			after foaling, does not simply experience inconvenience. Outcomes are affected. A failed covering, a stressed mare, an injured foal, a client who loses confidence in the farm's environment: each of these carries a financial cost that cannot be recovered. None of this is theoretical. Our barns and stables sit in an elevated position directly overlooking proposed Area D. Our grazing and yearling-prep paddocks run alongside the Gauze Brook, immediately adjacent to the proposed panels. The proposed substation, which earlier in the process was described as a second BESS, is elevated and directly opposite our buildings.	documents.planninginspectorate.gov.uk/published-documents/EN010106-006023-Sunnica%20SoS%20Decision%20Letter%20signed%2012%20July%202024.pdf). Additionally, the potential impact this may have on local equine businesses is covered in ES Volume 1, Chapter 16: Socio Economics, Tourism and Recreation [APP-068]. Equestrian facilities, including private stables and paddocks, studs, riding schools have been considered as specific recreational receptors in the assessment in the ES Volume 1, Chapter 16: Socio Economics, Tourism and Recreation [APP-068]. The likely effects on these locations are specifically assessed in ES Volume 3, Appendix 16-2: Tourism and Recreation Receptor Tables [APP-241] which identifies no significant residual effects to their operation or recreational use as a result of noise impacts, subject to implementation of embedded and additional mitigation measures with any mitigation requirements (such as

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				noise screening and offsetting away from neighbouring paddocks) secured through the relevant management documents.
JF-028	Socio-Economics, Recreation and Tourism	Local businesses	Since acquiring the farm in 2018 we have invested substantially in facilities and infrastructure. We stopped two years ago. It would be irresponsible to continue investing under this level of uncertainty and exposure. This is an immediate, present, ongoing economic harm, not a hypothetical future one. Our contribution to the local economy is significant and easy to measure. We employ three full-time staff and use a range of subcontractors; only last week I noted thirteen on site at once. Our part-time and full-time staff totals eleven. Annual local spend includes approximately £15,000 on farriers, £40,000 on vets, £100,000 on international transporters, £10,000 on domestic transporters, and £40,000 on locally grown hay, straw and feed. Our farm accountant is five miles away.	The Applicant acknowledges this comment; however, the Applicant maintains that the Scheme does not pose a threat to local rural businesses or the local equestrian economy as outlined within ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068].

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			Tractors, trailers and quads are sourced locally. We have given more than a dozen school leavers their first job. The last international client to visit invested £5million into the UK racing industry on the back of that visit. This is the kind of activity that, once disrupted, does not simply relocate, it will disappear.	
JF-029	Noise and Vibration The Applicant	Surveys	In October 2023 (before any notification of Lime Down had been received), we discovered a monitoring device chained to our boundary fence. We believe it had been placed there to monitor sound. No permission had been sought. We requested its immediate removal. I mention it because it speaks to the wider pattern of how this scheme has been pursued.	The Applicant acknowledges the misplacement of this meter. Permission was sought and granted for all sound monitoring locations, however, in this instance the meter was accidentally attached to the wrong boundary fence as a result of human error.
JF-030	Socio-Economics, Recreation and Tourism Noise and Vibration	Equine Impact	Despite over 400 Relevant Representations specifically raising equine concerns, no equine-specific assessment has been produced. This is a highly active equestrian landscape yet the treatment of horses, and the	The British Horse Society produced updated guidance on solar farms in August 2025, which includes a section on Glint and Glare. The document states that "The Society has no evidence of 'glint and glare' from solar panels and no evidence of

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
	Construction and Decommissioning Human Health		businesses that depend on them, is in our view fundamentally inadequate. Specifically: • There is no equine-specific assessment methodology. • Static solar-panel guidance is being applied to large-scale tracking panels. • Movement, angle change and shifting reflections are not assessed as behavioural stimuli. • Construction and operational noise has not been assessed in terms of equine response. • Rural lanes and Public Rights of Way have been downgraded on the basis of low user numbers. • Equine businesses, including stud farms, are not being treated as sensitive receptors. • Welfare risk has effectively been transferred to riders, handlers and businesses.	horses reacting to it or of it being detrimental to the health and wellbeing of horses. Reports from sites with both solar panels and horses, including a solar array beside an arena used for riding horses, indicate no reflection and no reaction from or impact on horse or rider." It is therefore considered sufficient to consider impacts upon horses at a high level within the Solar Photovoltaic Glint and Glare Assessment [APP-261]. Equestrian facilities, including private stables and paddocks, studs, riding schools, and on public rights of way such as bridleways and byways have been considered as specific recreational receptors in the assessment in the ES Volume 1, Chapter 16: Socio Economics, Tourism and Recreation [APP-068]. The likely effects on these locations and receptors are specifically and individually assessed in ES Volume 3, Appendix 16 2: Tourism and Recreation Receptor Tables [APP-241]. The Applicant

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			Impacts have been categorised as "operationally accommodatable" without supporting evidence.	confirms that the majority of significant adverse effects can be mitigated, however understands that some significant adverse effects to users of routes in Lime Down E cannot be mitigated further during construction. No significant residual effects are anticipated during the operational phase of the Scheme. The Applicant has committed to ensuring the operation or recreational use of equestrian facilities and PROWs is protected as much as possible through the implementation of embedded and additional mitigation measures set out in the Outline CTMP [REP1-112] and Outline PROWPPMP [REP1-104] , secured respectively by Requirements 15 and 16 in Schedule 2 to the Draft Development Consent Order (DCO) [REP1-007] .
JF-031	Socio-Economics, Recreation and Tourism	Equine Impact	The wider equestrian economy in this area is not incidental. It supports farriers, vets, feed merchants, transport operators, agricultural contractors and a skilled local workforce. If the conditions that make this	The Applicant acknowledges this comment, and the sentiment of the wider equestrian economy in the area, however, the Applicant maintains that the Scheme does not pose a threat to local rural businesses or the local equestrian

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			landscape suitable for high-value equestrian activity are degraded, that economic activity does not simply move. It largely vanishes. The loss is measurable, local, and permanent. Our business, like others, has been treated as collateral damage. That is a hard thing to write, but it is the honest reflection of two years of trying to engage with IGP.	economy as outlined within ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation. Therefore, it follows that it is also considered that the wider equine support network would not experience a permanent loss of economic activity as a result of the Scheme. The Applicant confirms that the approach to equestrian and PROW impacts and highway safety are under discussion with Wiltshire Council's Countryside Access Team and Highways Team (as part of discussions with Wiltshire Council in general). Additional discussions specific to PROWs are being undertaken with the British Horse Society, and the Wiltshire Bridleway Association. Progress on each of these discussions is set out in the relevant Statements of Common Ground with each of these parties to be submitted at Deadline 2.
JF-032	Socio-Economics,	Equine Impact	Appendix 8-3-3 (private receptors summary sheet (EN010168-000621-6)) concludes (view	The methodology [REP1A-006] for undertaking the LVA [APP-060] uses a series of industry

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
	Recreation and Tourism		point 46), as medium sensitivity, a very low magnitude of change in operational year 1, year 15 and decommissioning and a minor significance of effect throughout. IGP have never visited or meaningfully tried to understand our business. How could they possibly claim these results? Trust in IGP has been eroded, with, in my opinion, professionalism lacking throughout.	standard assumptions which are set out within section 8.4 Assessment Assumptions and Limitations of the LVIA which set out that: '<i>Fieldwork has been undertaken from publicly accessible locations only</i>', and that '<i>Assessment of effects upon residential properties has been undertaken from the curtilage of residential properties where publicly accessible unless other arrangements are agreed with individual residents to gain access to their property. Professional judgement has been used to assess views from residential properties aided by the ZTV, aerial photography and LVIA figures.</i>' A detailed LVIA methodology that conforms to the landscape Institutes Guidelines for Landscape and Visual Impact Assessment (GLVIA3) is included at Es Volume 3, Appendix 8-1 LVIA Methodology [REP1A-006], which has been progressed and agreed with the Local Planning Authorities.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
JF-033	Site Selection and Alternatives	Alternatives	Lime Down does not, in my view, represent a strategically planned project. It is opportunism by Macquarie, enabled by a system that allows it. IGP has not demonstrated, as it is required to, that this is the most appropriate location when assessed against reasonable alternatives. There is a clear absence of a robust and transparent alternatives assessment, particularly in respect of lower-impact options.	Please refer to the Applicant's response to reference ID JF-005 above which summarises the site selection process and details the further work undertaken for site selection.
JF-034	Landscape and Visual	AONB	The proposed development would result in substantial harm to the setting of the Cotswolds National Landscape, where policy requires weight to be given to conserving landscape character and tranquillity under Section 85 of the Countryside and Rights of Way Act 2000.	The Scheme lies adjacent to the CNL; Site A, B and C are within the setting of the CNL. The proposed development has been set back from the CNL (formerly known as an Area of Outstanding Beauty) to protect land within its setting. This land will be utilised for positive enhancement of the CNL and 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;

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				The inclusion 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; and Hedgerow enhancements including the re-establishment of historic hedgerows within the setting of the CNL. The effects on the Cotswolds National Landscape and its Special Qualities are set out in a standalone assessment in ES Volume 3, 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. ES Volume 1, Chapter 8: Landscape and Visual Impact

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				[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).
JF-035	Site Selection and Alternatives	Assessment	In the absence of compelling evidence that this location is necessary and given that site selection appears to have been driven by commercial and grid-connection convenience rather than a plan-led, least-harm approach, the proposal does not, in my view, demonstrate that its adverse impacts are justified or proportionate.	ES Volume 1, Chapter 4: Alternatives and Design Evolution [APP-056] details the alternatives considered, including Minety Substation as an alternative point of connection to Melksham substation. The Applicant has undertaken extensive engagement with National Grid throughout the scoping and development of the Scheme to determine the appropriate point of connection. The Existing National Grid Melksham Substation was

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				identified as having available capacity for a utility scale energy project such as the Scheme. Whilst Minety substation does house 400kV infrastructure, the Applicant's discussions with National Grid confirmed there was no connection available at Minety for the Scheme. On that basis, Minety Substation is not a viable alternative and the Existing National Grid Melksham Substation remains the only viable connection point for the Scheme. In addition, Section 2.2 of ES Volume 3, Appendix 4-1: Site Selection Assessment Report [APP-185] states that the point of connection at the Existing National Grid Melksham Substation is the last major grid connection available in the area that can be delivered pre-2030 in line with the Government's Clean Power 2030 Action Plan targets and can be released quickly and efficiently by utility scale solar. It was therefore placed as the point of connection for the Scheme as the

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				Scheme can be constructed and commissioned by 2030. ES Volume 1, Chapter 4: Alternatives and Design Evolution [APP-056] and ES Volume 3, Appendix 4-1: Site Selection Assessment Report [APP-185] also detail the staged approach to site selection undertaken by the Applicant which includes the consideration of a range of planning, environmental and operational factors. Although grid connection is the first stage in identifying the area of search, it is not the only consideration when determining the proposed location for the Scheme. Likewise, the availability of large scale land holdings was a consideration, however, it was not the only consideration in the site selection process.
JF-036	Site Selection and Alternatives	Assessment	This matters because this is not anonymous land. Malmesbury is a highly desirable area to live, recognised again this year by The Sunday Times as the "Best place to live in the South West". I do not believe any other NSIP solar sits	Please refer to reference IDs SS-06 and SS-07 in the Applicant's Response to Relevant Representations Part 2 [REP1-117] which summarises the Applicant's approach to identifying and evaluating potential

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			within such a rural and residential setting, surrounded by such a density of homes, businesses and amenities. That is not a planning detail. It is the fundamental basis on which the appropriateness of this scheme should be judged.	sites for the Scheme. Based on this approach, it has been concluded that there are no more suitable and available locations within the search area than the proposed location for the Scheme.
JF-037	Site Selection and Alternatives	Assessment	Many of the benefits the Applicant claims, including elements of biodiversity net gain, may well deliver real results elsewhere. They are credible improvements on a degraded brownfield site. They are not credible on this kind of working rural and residential landscape, where the baseline is already a high-value, high-quality environment. The framework was designed for one situation and is being applied to another.	Please refer to reference ID CB-01 in the Applicant's Response to Relevant Representations Part 2 [REP1-117] which acknowledges that adverse effects of the Scheme are more likely to be felt locally than the wider-scale benefits of the Scheme, however, there are a wide range of benefits associated with the Scheme which have been developed within the context of the local area and will provide direct benefits to the local people.
JF-038	Scheme Description and DCO Process	Grid Connection	I ask the Examining Authority to consider what this scheme tells us about how the NSIP regime is now being used. The Planning Act 2008 was not, as I understand it, intended to function as a route by which a private developer identifies valuable available land may secure consent	Please refer to the Applicant's response to reference ID JF-005 above which addresses the use of NSIP regime. This point also summarises the site selection process and details the further work undertaken for site selection. In regard to grid connection, as detailed in ES Volume 1, Chapter 4:

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			for nationally significant infrastructure regardless of whether it is the right place for it. Strategic need and least harm placement should come before planning, not after. Grid connection allocations for Gate 2 offers have not even begun, because the engineering design work has not yet been done. Yet schemes are being progressed at speed in advance of that strategic groundwork. That is the wrong way round.	Alternatives and Design Evolution [APP-056] and ES Volume 3, Appendix 4-1: Site Selection Assessment Report [APP-185] the Applicant has undertaken extensive engagement with National Grid to identify an appropriate point of connection. The Existing National Grid Melksham substation was identified as it had capacity to deliver a Scheme by 2030, of which the Scheme can be delivered by.
JF-039	Scheme Description and DCO Process	Planning Process	National policy, as it stands, does not adequately protect those unfortunate enough to live alongside these sites. There is no compensation framework, no enforceable duty on developers to consider the residential effect on neighbouring families, no equivalent of the protections available on other forms of major infrastructure. The system effectively treats us as collateral damage, and it is being exploited on that basis.	The Applicant notes this comment. The effects on residential properties and local communities are assessed in ES Volume 1, Chapter 8: Landscape and Visual [APP-060], Chapter 13: Transport and Access [REP1-019], Chapter 14: Noise and Vibration [REP1-021], Chapter 15: Air Quality [REP1-023], Chapter 16: Socioeconomics, Tourism and Recreation [APP-068], and Chapter 18: Human Health [APP-070]. These chapters identify both beneficial and adverse effects as a

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				result of the Scheme, proposing measures to mitigate any adverse effects. Mitigation measures are also contained within various outline management plans which are secured via Schedule 2 of the Draft Development Consent Order [REP1-007]. The Planning Statement [REP1-087] considers the adverse and beneficial effects of the Scheme in the application of the planning balance and concludes that the benefits of the Scheme outweigh the residual adverse impacts identified. The benefits of the Scheme are set out in Section 5.3 of the Planning Statement [REP1-087] and include the delivery of large amounts of affordable, secure, and low carbon electricity which will help the UK to achieve net zero by 2050, ecological and landscape enhancements, biodiversity net gain, permissive paths, employment generation, economic benefits and skills training.
JF-040	Compulsory Acquisition	Cable Route	The unprecedented length of cable route (22km) disrupting so many	The Applicant confirms that agreements with landowners are

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			landowners adds a further dimension. Many of those landowners feel intimidated by the structure and tone of Heads of Terms. These claim to be voluntary yet threaten Compulsory Acquisition and include time-limited incentive payments. The Applicant later admitted that a controversial silencing clause "should not have been included". The scheme depends on only nine participating landowners. I understand that some have since had reservations about their involvement but may be constrained by confidentiality and non-disclosure clauses. In those circumstances, the existence of signed agreements should not be treated as straightforward evidence of free, continuing support for the scheme. The original landowners option to lease premises agreement was for 30 years with the option to extend to 40 years in 5 year increments.	confidential, consistent with standard practice for large-scale infrastructure projects. On that basis, requests from individuals associated with Stop Lime Down to inspect confidential agreements have not been acceded to. It is also noted that certain option landowners have reportedly been subject to significant legal and personal pressure in relation to the disclosure of confidential information. This has occurred notwithstanding the Applicant's ongoing provision of information regarding the Scheme throughout the pre-application and consultation process, with full details ultimately entering the public domain upon submission of the Development Consent Order application on 19 September 2025. Assurances regarding ongoing and concluded negotiations to date are provided in the Land and Rights Negotiations Tracker [REP1-246], which is regularly updated in Examination and demonstrates the Applicants effort to reach voluntary

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				agreements in order to deliver the Scheme. As set out on page 23 & 24 of the Written Summary of the Applicant's Oral Submissions and Responses at Issue Specific Hearing 1 and Responses to Action Points [REP1A-012] the Post Hearing Note states: The terms of the Option Agreements are confidential and the Applicant cannot provide details without the landowner's consent. However, as an example, the Applicant has the landowner's consent to confirm that the Option Agreement dated 21 February 2023 in respect of Site E is for a maximum term of 40 years and therefore any extension to 60 years would be by agreement. In response to the Examining Authority's queries relating to the planning balance, the Applicant notes that Requirement 20 provides a maximum time period during which the Scheme can operate. There is no obligation on the Applicant to operate the generating station for a prescribed or minimum amount of time and this is consistent with the approach taken in made solar DCOs to date. For the purposes of

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				assessment, the Applicant considers that assessing a 60-year operational period represents the reasonable worst case as it takes into account the GHG emissions during the maximum operational period which includes emissions associated with replacement activities.
JF-041	The Applicant	Funding	I would respectfully ask the Examining Authority to consider some matters that go to the integrity of the process. The Applicant's public statements. Lime Down's own website FAQ states, in answer to the question of whether the scheme is supported by government subsidies: "Lime Down Solar Park will not require any public money, subsidy or funding." That is, in my view, misleading. If wholesale power prices fall, or UK government bond yields move materially, large-scale solar typically requires public subsidy support to remain viable. An unqualified statement of that kind, made in any other regulated context, would carry serious legal	The respondent's comments regarding UK power pricing are relevant to all forms of low-carbon energy generation if they secure a Contract for Difference (CfD). Without consent, the Scheme is not eligible for a CfD, nor is it a required route into the energy market should consent be granted. The Scheme is fully funded via private means and has not been subsidised in any way, as detailed within section 2.3 of the Funding Statement [APP-019]. Furthermore, the Applicant clarifies that characterising CfD's as a "subsidy" is inaccurate, as they act as a two-way price stabilisation mechanism rather than a one-way guaranteed payment. These help guarantee predictable revenue floors

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			consequences. It is being made here in connection with a development of national significance, and it should be tested. The structure of legal representation in solar NSIPs also deserves consideration. Pinsent Masons appears to act for every solar NSIP developer of significance in the UK, and to have written substantial guidance in this area, including, I understand, training material provided to the Planning Inspectorate ahead of Cleve Hill seven years ago. Even if every individual involved acts entirely properly, the perception of overlap between IGP's legal advisors and those who have shaped the process should not be dismissed.	and wholesale electricity prices for consumers, which ultimately benefit long-term electricity costs. Strike prices determine whether a generator who has secured a CfD pay money back during high price periods, which can, for example, return substantial sums from operators to suppliers and ultimately the consumer. The Applicant's legal representatives, as with any legal representative, are subject to strict obligations regarding the disclosure and management of conflicts of interest (perceived or otherwise). While Pinsent Masons LLP act for a range of other Solar NSIP developers, they do not act for the Planning Inspectorate, which has its own legal advisors. Pinsent Masons LLP frequently provides training, webinars and participates in panel discussions on the DCO process for a wide range of audiences. In respect of Cleve Hill Solar, Pinsent Masons LLP provided training on the DCO process to the local planning authority (as part of a

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				planning performance agreement) so that the local planning authority could understand its role. Pinsent Masons LLP is an active member of the National Infrastructure Planning Association (NIPA) and often responds to Government consultations on the DCO process, legislative changes, policy and guidance.
JF-042	The Applicant	Funding	The ownership and governance of the developer itself. Island Green Power's ultimate owner is Macquarie, an Australian investment bank whose approach to extracting returns from UK regulated assets has, in other contexts, drawn comparisons to Thames Water. IGP's Chairman is Bertie Ahern; its directors include Denis O'Brien both of whom are public figures whose track records have been the subject of significant public concern. We were able to stop IGP's attempted sponsorship of Tetbury Rugby Club through Gareth Philips (Pinsent Mason).	The Applicant has responded to ownership structure previously as the respondent has noted. Further to this, while the Applicant notes the assertion that previous boards members have been the subject of public concern is unsubstantiated, those board members mentioned by the respondent are no longer part of IGP, following the full takeover of the company by Macquarie in 2025. Please see earlier response to reference ID JF-026 regarding the mischaracterisation of Macquarie's involvement with Thames Water.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			In December 2025 an MP wrote directly to Macquarie, warning investors that future policy changes could remove subsidy support for industrial-scale solar; that political risk now sits on top of the financial one and is relevant to the reliability of what is being promised here. Macquarie itself maintains a well-established ESG governance framework including its Environmental and Social Risk, Green Investment, Human Rights and Modern Slavery policies, committing the group to identifying high-risk supply chains and suppliers, and to balancing community concerns and environmental impact against the purpose of any given investment, with oversight from its Board Governance and Risk Committee. IGP's continuing inability to confirm where the solar panels and battery storage equipment for Lime Down will be sourced from raises a clear question as to whether the project,	

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			as currently proposed, can be delivered within Macquarie's own published standards. Biodiversity and cultural heritage are, I suspect, further areas where the same question arises. There is a further matter of how public support for this scheme has been represented. The Planning Inspectorate has confirmed that Lesley Bennett, a former Mayor of Malmesbury, has submitted two Relevant Representations in support of Lime Down. (RR-2768 and RR-2769). Together, these two submissions account for approximately 3.6% of all representations supporting the scheme and feels very dishonest. The same individual has also been the principal supportive voice featured in BBC coverage of this application. She has filmed coverage at an unrelated 1MW community solar development, not in any way comparable to Lime Down. Ms Bennett, it appears worked for Wessex Water for approximately twenty years prior to	

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			her time as Mayor. When asked publicly about Macquarie's involvement in both Lime Down and Thames Water, she has stated that she has no view. Macquarie's reputation for extracting returns from UK regulated assets is now well documented, and the parallels between Thames Water and the financial structure of large-scale solar are not, in my view, peripheral to a fair understanding of this application.	
JF-043	The Applicant Scheme Description and DCO Process	Planning process	I would respectfully ask the Examining Authority to consider: • Whether two Relevant Representations submitted by the same individual under slightly different forms of her name should be counted as one voice or two when the weight of public response is being assessed. • Whether broadcast media coverage that presents footage from an unrelated 1MW community	This is a matter for the Examining Authority to respond.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			installation alongside commentary in support of a 500MW NSIP scheme can fairly be described as informing the public on a like for like basis. Whether, in a planning process where opposition has been registered by nearly 5,000 representations and Wiltshire Council has unanimously objected, the asymmetry of media representation should be reflected in how the weight of public response is understood.	
JF-044	Climate Change and Energy Need	Efficiency	Most important, to anyone trying to understand what the Applicant's promises actually mean in practice is Cleve Hill solar park in Kent. I would urge the Examining Authority to look carefully at how that scheme operates today against what was said about it at consultation. The claims do not align with the reality. Cleve Hill is the only operating, real-world solar NSIP comparator we have, and it tells a	The Applicant acknowledges that Cleve Hill Solar Park was the first solar project to be consented through the NSIP regime. The Applicant agrees that at 500 MW of export capacity, the Scheme has secured a larger connection to the transmission network than Cleve Hill which secured around 350 MW of solar generation. However, both are consistent in terms of scale with an NSIP scheme formally defined as over 50MW, and now 100MW. The Applicant notes its own secured

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			different story to the one being told here. https://www.facebook.com/share/v/19Pr1ftnJL/?mibextid=wwXlfr I would also flag that we have submitted Freedom of Information requests, including in relation to the grid connection, where we have been unable to obtain answers. Transparency on these points is, in my view, essential to fair examination. Cleve Hill Solar Park in Kent is the first operational solar development to be consented through the Nationally Significant Infrastructure Project (NSIP) regime and is therefore the closest available comparator to Lime Down. However, it is significantly smaller in scale than the proposed Lime Down scheme, representing only a fraction of the land area and infrastructure proposed here. Consultation material claimed 90,000 homes could be powered but in reality, the electricity generated is exported to the national grid and contracted	Development Consent Orders at Cottam (600MW) and West Burton (480MW) alongside a number of other NSIP schemes currently being proposed or consented across the UK, which range up to 800 MW. Each development is consented on its own merits and subject to controls to manage their effects. The Applicant notes the respondent's appended returns from FOI requests and wishes to clarify that details of the grid connection for the Scheme, including its connection date, secured agreement and timelines are contained within the Grid Connection Statement [APP-270]. Furthermore, noting the FOI regarding Connections Reform does not disclose the gate position of the scheme in the response, the Applicant confirmed at Issue Specific Hearing 1 that it was informed by the National Energy System Operator (NESO) in December 2025 that the solar component of the Scheme had been re-prioritised as a 'Gate 2

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			through corporate power purchase agreements, including with commercial entities such as Tesco and Shell, rather than being directly supplied to local households.	Phase 1' connection meaning that it has been included within the first phase of NESO's re-prioritised list.
JF-045	Scheme Description and DCO Process	EIA Methodology	"No Significant Effects" – Questions for the Examining Authority Across an extraordinary range of topics, the Applicant has reached the conclusion of "no significant effects": flooding and hydrology, landscape and visual, construction noise, decommissioning, socio-economic impact, equine welfare. I respectfully ask the Examining Authority to consider what site-specific, real-world evidence supports those conclusions, as opposed to generalised assumptions about solar development.	For hydrology and flood risk, the conclusion of no significant effects is based on Scheme-specific assessment in ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [REP1-017] and the FRA & Drainage Strategy [REP1-037 to REP1-054]. That assessment considers the proposed layout, local flood risk baseline, topography, watercourses, drainage pathways, climate change, surface water runoff, construction compaction and decommissioning effects. It is supported by national policy, relevant drainage guidance and published research on solar runoff response. The conclusion reflects the retained permeability of the panelled areas,

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				the controlled drainage for impermeable infrastructure, and the secured mitigation for soil condition, vegetation and flow connectivity. It is not a generalised assumption that all solar development has no effect. The potential effects of the Scheme on tourism and recreation are assessed in ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068], supported by ES Volume 3, Appendix 16-2: Tourism and Recreation Receptor Tables [APP-241]. The assessment scope includes socio-economic impacts arising during all phases of the Scheme, including construction, operation and maintenance, and decommissioning. The assessment methodology is set out in Section 16.6, with the baseline conditions described in Section 16.7. The Applicant has utilised the most up-to-date available information to inform the baseline, including Census

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				data and information published by the Office for National Statistics. The identification of key impacts has been informed through modelling of anticipated workforce requirements for the construction, operation and maintenance of the Scheme, undertaken by an accredited EPC contractor and specialist high-voltage cable installation contractor. The modelling represents a reasonable worst-case scenario for the approximately two-year construction programme and has also informed the assessment of peak replacement and decommissioning activities. This information has been used to determine potential impacts on socio-economic receptors, including agricultural and tourism employment and economic performance. Impacts on tourism and recreation receptors have been identified through professional judgement, taking account of findings from associated ES topic chapters, including transport, landscape and

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				visual, and cultural heritage assessments. These findings have informed the assessment of likely effects on the tourism and visitor economy. The methodology for determining impact magnitude is set out in Section 16.6 of ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation. ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation considers potential effects on the construction and engineering sectors, agricultural activity, tourism-related businesses, and wider local economic conditions during construction, operation and decommissioning. Supporting evidence is also provided within ES Volume 3, Appendix 16-3: Socio-Economics, Tourism and Recreation – Summary of Non-Significant Effects [APP-239]. The LVIA in ES Chapter 8: Landscape and Visual Impact

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				[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 LVIA recognises that there are Significant Adverse 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

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				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 Appendix 8-6. 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.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				The Applicant acknowledges that the experience for users of existing 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 PRow 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 Landscape and Ecological Management Plan [APP-283] by Requirement 7 of Schedule 2 to the Draft DCO [REP1-007].

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				ES Volume 1, Chapter 8 Landscape and Visual Impact Assessment [APP-060] has robustly assessed the effects of the Scheme including the effects on Public Rights of Way and local roads. The LVIA recognises that there are some footpaths where there will be long term Significant adverse effects. These are set out in Table 8-30 Significant Long Term Visual Effects of the LVIA in ES Volume 1, Chapter 8 Landscape and Visual Impact Assessment [APP-060]. All these receptors are PRow with the majority being footpaths which diagonally cross fields where solar infrastructure is proposed and where mitigation such as hedgerow screening would be inappropriate to the legacy landscape.
JF-046	Human Health	Health impacts	The Applicant points to its mental health assessment in ES Chapter 18 and to a commitment to signpost residents to local services. More than two years into this process, I am not aware of a single member of the affected	The Applicant has sought to provide robust and transparent information about the Scheme throughout the pre-application consultation process undertaken, as recorded in the Consultation Report [APP-

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			community having been contacted by IGP, by Wiltshire Council's Public Health Team, or by any local support team mobilised in response. The commitment is on paper. The "no significant effect" conclusion is not felt on the ground.	022] and its supporting appendices [APP-023 to APP-051]. This has included the opportunity for all affected persons to make contact with the Applicant team through free-to-use services. This has been done to ensure residents and business owners have had access to as much material as practicable at each stage of the DCO process, to be able to reduce anxiety or concerns from being unsure of what impacts the Scheme may have to them. As set out in Table 18-2 in ES Volume 1, Chapter 18: Human Health [APP-070], during the pre-application and DCO process the commitment made (as discussed with Wiltshire Council's Public Health team) was and remains to signpost and redirect members of the public who are reaching out to access mental health support to those directly requesting it. This was considered the most appropriate solution as no member of the Applicant or consultant team is a

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				mental health care professional and so the Applicant's team is in no position to outwardly offer any medical advice to stakeholders. Should the DCO be consented, the Applicant has committed to mitigate concerns ahead of and during the construction phase through establishing a Community Liaison Group (secured by Requirement 4 of Schedule 2 to the Draft DCO [REP1-007]) to act as a human intermediary between residents and the project team to ensure concerns are heard and responded to directly. Alongside the mitigation measures to limit the physical impacts of the Scheme on communities, the Applicant is confident many concerns held will be addressed and avoided.
JF-047	Hydrology, Flood Risk and Drainage	Flood risk	Flooding and hydrology: what site-specific modelling has been done at this scale and panel density, taking account of the recent flood history on the Gauze Brook and the railway cutting? What enforceable controls exist to ensure discharge to watercourses	Site-specific hydraulic modelling has been undertaken or refined where material floodplain interaction occurs, including Gauze Brook at Lime Down D. The local flood history and the position of the railway cutting have been considered as part of the flood risk and drainage assessment.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			does not increase during heavy rainfall events?	The Scheme does not rely on uncontrolled discharge to watercourses or towards the railway. Runoff from impermeable infrastructure will be attenuated and controlled through the FRA & Drainage Strategy [REP1-037 to REP1-054]. The panelled areas are not modelled as connected impermeable catchments because that is not the relevant mechanism. Solar PV panels drain to ground and do not form a sealed drainage system. The relevant controls are vegetation cover, soil compaction, surface roughness, slope and hydraulic connectivity. These are secured through the Outline CEMP [REP1-096], Outline OEMP [REP1-098], Outline Soil Resources Management Plan [APP-280] and DCO Requirements. These are the enforceable controls that ensure discharge to watercourses does not materially increase during heavy rainfall events.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
JF-048	Hydrology, Flood Risk and Drainage	Water resources	Public water supply: Wessex Water draws drinking water from the aquifer beneath the Scheme, yet has, to my knowledge, neither engaged with the examination nor submitted any reports. How can the Examining Authority be satisfied that the aquifer is adequately protected in the absence of the statutory undertaker responsible for it?	Risks to sensitive groundwater resources are considered in ES Volume 1, Chapter 19 Ground Conditions [REP1-027] and in the associated Appendices [REP1-065 to REP1-079] . Mitigation to ensure protection of groundwater is presented in the Outline CEMP [REP1-096] , which also secures additional measures such as Foundation Works Risk Assessments, to ensure that no adverse impacts to potable drinking water resources are realised. Further to this, ground investigation will be undertaken prior to the commencement of the construction phase to determine the depth to the relevant Principal Aquifer across the areas where foundations or trenchless cable installation is required and where there is the potential for interaction of foundations of excavations with the water bearing strata, specific risk assessment will be undertaken and if necessary, additional mitigation will be deployed

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				to ensure the protection of sensitive groundwater. From a hydrology and water resources perspective, protection of surface water and groundwater is addressed in ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [REP1-017], the WFD Assessment [REP1-094], the Outline CEMP [REP1-096] and the FRA & Drainage Strategy [REP1-037 to REP1-054]. These documents identify potential pathways to surface water and groundwater receptors and secure pollution prevention, drainage, construction and incident control measures. The Examining Authority can rely on the submitted assessment and secured mitigation. The absence of a separate representation from Wessex Water does not mean that the aquifer has not been assessed or protected.
JF-049	Landscape and Visual	Visual impacts	Landscape and visual: on what evidence is it concluded that	ES Volume 1, Chapter 8 Landscape and Visual Impact Assessment

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			infrastructure including panels up to 4.5m high will not result in significant long-term harm to landscape character? How much weight is being placed on mitigation planting that takes at least 15 years to establish, when the harm is immediate?	[APP-060] recognises that there are Significant Adverse 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. 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.
JF-050	Noise and Vibration	Construction noise	Construction noise: how is it credible to conclude no significant construction noise effect when hundreds of thousands of piles will be installed? What real-world comparator project supports that conclusion?	Average construction noise levels, as presented in Table 14-18 of ES Volume 1, Chapter 14: Noise and Vibration [REP1-021] , would typically be between 50 and 60 dB LAeq at residential properties.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				These levels are indicative of regular conversation. Additionally, solar PV piling uses small mini-piling rigs which are quieter than the worst-case assumption in ES Volume 1, Chapter 14: Noise and Vibration [REP1-021] and the duration of noise events from such activity would be short. As described in the Outline Construction Environmental Management Plan [REP1-096], prior warning will be given to local residents of any noisy works and a noise monitoring programme agreed with Wiltshire Council will be carried out during construction. The preparation, approval and implementation of the Construction Environmental Management Plan, substantially in accordance with the Outline CEMP [REP1-096], is secured through Requirement 13 in Schedule 2 of the Draft Development Consent Order [REP1-007], ensuring that

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				construction noise and vibration are appropriately controlled. This is a standard and robust approach that has been applied in many consented solar farm DCOs.
JF-051	Soils and Agriculture	Land restoration	Decommissioning: how can land hosting substations, BESS infrastructure and deep piling realistically be returned to its original agricultural condition, and what evidence supports the claim that it can?	No agricultural land will be lost. The primary agricultural use will cease, however land beneath the solar panels will remain in-situ and largely undisturbed. ES Volume 1, Chapter 3: The Scheme [APP-055] details how the panel mounting structures will be installed with piles driven into the ground, which will not require excavation or intrusive disturbance to the land and soil. The Outline Decommissioning Strategy [REP1-100] notes that on decommissioning, foundations and below-ground infrastructure will be cut to 1.2m depth before a soil profile is reinstated. The depth of 1.2m is the standard depth considered for an agricultural soil profile, and would enable grading to be determined in accordance with the established

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				guidelines for grading agricultural land, as re-issued by Defra and the Welsh Government in a joint publication in 2025. The Decommissioning Strategy is secured by Requirement 20 in Schedule 2 of the Draft DCO [REP1-007] and must be approved by the relevant local planning authority and must be in substantial accordance with the Outline Decommissioning Strategy.
JF-052	Construction and Decommissioning	Decommissioning Bond	Delivery and enforcement: what mechanisms genuinely guarantee delivery, maintenance, and compliance over a 60-year operating period, across changes of ownership, which are common in this sector? What enforcement realistically occurs if mitigation fails?	The Applicant confirms that the Development Consent Order (DCO) incorporates the enforceable mechanisms to regulate Scheme delivery, maintenance and compliance for the lifetime of the scheme including its decommissioning. Any breach of development consent order or failure to comply with Requirements would result in enforcement action. Once granted, the DCO becomes a statutory instrument, and its legally binding Requirements are attached to the Scheme as set out in the Draft Development Consent Order [REP1-007] , passing all secured responsibilities directly to any future operator. Therefore,

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				responsible stewardship is legally and financially secured throughout the lifetime of the Scheme via the legally binding mechanisms of the DCO.
JF-053	Climate Change and Energy Need The Applicant	Efficiency	BESS connection: will the Lime Down BESS actually be connected to the solar? Solar NSIP developers have admitted that the BESS is often not actually connected to the solar, citing that the solar would not produce enough electricity to make it worthwhile. If the BESS is in practice for importing from the grid, this raises the question of whether the solar NSIP route is being used to secure consent for what is, in effect, a grid-arbitrage battery installation.	The 400 kV substation will collate all electricity produced from the Solar PV Sites along with the electricity produced and stored at the BESS site on Lime Down D as stated in Section 3.3 of the Grid Connection Statement [APP-270]. The electricity will then be converted using high voltage transformers to a single 400 kV supply that can be exported to the existing Melksham 400kV National Grid substation. In addition, Section 3.5 of Environmental Statement (ES) Volume 1, Chapter 3: The Scheme [APP-055] confirms that the BESS will be designed to provide peak generation and grid balancing services to the electricity grid. The BESS allows excess electricity generated from the Solar PV Panels or excess energy in the grid to be stored in the batteries and exported at strategic times of the day to

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				provide flexibility and enhance grid reliability.
JF-054	Other Environmental Matters	BESS safety	BESS safety: given that global BESS capacity has been rolled out faster than the regulatory framework has matured, and given the long latency of some thermal-runaway and health concerns, what site-specific safety case has been made for residents, livestock and equine businesses adjacent to the proposed installation?	The Applicant has followed National Fire Chiefs Council (NFCC) guidance and commissioned a BESS fire emissions assessment (as detailed in ES Volume 3, Appendix 15-2: BESS Fire Emissions Modelling [EN010168/APP/6.3 (Revision 2)] to model toxic gas emissions and visibility impacts from a BESS fire on all sensitive receptors within a 1km radius of the BESS area. The fire emissions modelled in the report were based upon recent UK Health Security Agency (UKHSA) requests for DCO BESS projects which explore both immediate air quality impacts together with annual UK air quality requirements, the selected gases are representative of emissions recorded from a range of LFP battery systems integrated in current BESS designs. The UKHSA is a statutory consultee for the Scheme and has confirmed in their relevant representation [RR-4798] that <i>"Following our review of the submitted documentation the</i>

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				<i>UKSHA are satisfied that the proposed development should not result in any significant adverse impact on public health".</i> The spacing distances of the illustrative BESS site design are based upon Large Scale Fire Testing (LSFT) where no fire propagation occurred; therefore, this is a credible worst-case scenario. ES Volume 3, Appendix 15-2: BESS Fire Emissions Modelling [APP-239] concludes that there would be no significant air quality effects as a result of a BESS fire incident and visibility issues were not predicted. To validate the final BESS site design, the Applicant has also committed to commissioning an additional Plume Analysis Study at the detailed design stage as stipulated in Section 5.5.9 of the Outline BSMP [REP1-110] and secured through the DCO: "<i>..at the detailed design stage a BESS system and site specific Plume</i>

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				<i>Analysis study will be conducted to assess the environmental impact of a site incident to sensitive receptors within a 1 km radius. Toxic gas emissions to sensitive receptors must be below relevant public health exposure limit guidelines when the battery system of a BESS is fully consumed (burnt out), production of Particulate Matter (PM) and a visibility impact assessment on any transport links within a 1 km radius of the BESS area will also be included. The ERP produced at the detailed design stage (template outlined in Section 5.4.4) will incorporate all necessary emergency response procedures and actions based upon thermal runaway test data supplied by the BESS system provider."</i> An Outline BSMP [REP1-110] has been prepared for the Scheme using guidance from Dorset and Wiltshire Fire and Rescue Service and incorporating recommendations of the National Fire Chiefs Council. The safety objectives for the design of the

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				BESS site are listed in Section 2.4 of the Outline BSMP [REP1-110]. The Outline BSMP [REP1-110] has been amended at Deadline 1 to fully accommodate the latest BESS safety requirements contained in NFPA 855 (2026) ensuring that any credible risks associated with battery storage are either prevented or fully mitigated if a BESS failure occurs. As now mandated under NFPA 855 (2026) the Applicant will only be able to select a BESS system that has undertaken Large Scale Fire Testing (LSFT). At the detailed design stage, the selected BESS LSFT data will be leveraged to fully inform inputs for risk assessment tools which will be utilised together with detailed consequence modelling to provide a comprehensive site operations and emergency response safety audit, this is stipulated in the Outline BSMP [REP1-110] pre-construction requirements (Section 6). Section 2.4.2 of the Outline BSMP [REP1-110] stipulates: "Final BESS

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				design and site layout will have been validated through mandatory Large Scale Fire Testing (LSFT) and rigorous consequence modelling to minimise the requirement for any D&WFRS intervention in a thermal runaway incident. LSFT must establish minimum equipment spacing distances that demonstrate there is no fire propagation to adjacent BESS enclosures or ESS equipment. D&WFRS intervention in worst case scenarios would typically be limited to boundary cooling of adjacent BESS and Energy Storage System (ESS) units to prevent the fire from spreading. This strategy will be finalised with D&WFRS and be clearly communicated in the Emergency Response Plan (ERP): 1. To ensure that fire, smoke, and any release of toxic gases does not significantly impact site operatives, first responders, and the local community; and

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				2. To ensure that firewater run-off is contained and tested before release or, if necessary, removed by tanker and treated offsite." The Applicant is currently drafting a Statement of Common Ground (SOCG) with the Environment Agency (EA) on Scheme environmental protection issues including the BESS area drainage strategy. The Applicant's Outline BSMP [REP1-110] Section 5.5 documents agreed drainage strategy for the BESS area. The Applicant confirms that firefighting water containment for the BESS has been designed on the basis of credible incident scenarios, including the potential for multiple units to be involved, and is not limited to routine or minor events. The approach set out in the Outline BSMP [REP1-110] and the standalone Firewater Containment

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				and Drainage Strategy – Lime Down BESS [REP1-124] is to contain and isolate firefighting water within the BESS Area, rather than allow discharge to the environment. This is achieved through a sealed and isolatable drainage system, capable of retaining firefighting water and rainfall during an incident. The agreed strategy document 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. 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 Battery

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				Safety Management Plan has been submitted to and approved by the relevant planning authority. The approved plan must be substantially in accordance with the Outline BSMP [REP1-110] . The Draft DCO [REP1-007] also requires the relevant planning authority to consult with Dorset and Wiltshire Fire and Rescue Service and the Environment Agency before determining the application, and that the Battery Safety Management Plan must be implemented as approved.
JF-055	Socio-Economics, Recreation and Tourism	Local businesses	Socio-economic impact: what evidence underpins the Applicant's job and economic figures, and how have indirect and local-business impacts, such as ours, been counted, rather than dismissed? It is a gross underestimation to claim that just 20 agricultural jobs will be lost. There are 12 tenant farmers and their families alone, losing their livelihoods.	ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068] provides sources of information and references (Section 16.14) to its baseline information (Section 16.7). For Economic Activity, Employment and Income, following sources of information were utilised: • ONS (2025) Annual Population Survey: 12 months to December 2024

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				– Economic Activity Rate aged 16-64. • ONS (2025). Annual Population Survey: 12 months to December 2024 – Unemployment Rate aged 16 – 64. • Employment rate - ONS (2025). Annual Population Survey: 12 months to December 2024 – Employment Rate aged 16-64. • Business section workforce - ONS (2024). 2023 Business Register and Employment Survey – Employment • ONS (2025). Regional Gross Value Added (Balanced) by Industry: Local Authorities by ITL1 Region – Current Prices (2023) • ONS (2025). December 2024 Workforce Jobs by Industry (SIC 2007) • ONS (2025). United Kingdom Input-Output Analytical Tables: Industry

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				by Industry, 2023: Type I multipliers Based on an understanding from landowners involved in the Scheme, there are nine tenancies likely to be directly affected in the long-term by the Scheme. The Applicant has estimated 1.5 full-time jobs on each tenancy could be lost, with a further 1.5x multiplier applied for downstream or supply chain impacts. This therefore results in an estimated loss of 20 full-time equivalent agricultural jobs. Impacts on adjacent, or temporarily affected agricultural business have not been considered to result in direct job losses. Impacts to local business dependent on visitors have been included as part of tourism and recreation-dependent job losses, estimated to be up to a maximum peak of 50 FTE jobs during construction, and a long-term 11 FTE jobs lost during the Scheme's operation.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
JF-056	Scheme Description and DCO Process	Planning Process	Process transparency: on what authority were national press initially refused access to the Open Floor Hearing? On what authority were so many redactions made from the Relevant Representations, especially in relation to Macquarie and Thames Water? What is the position on Stop Lime Down's use of short clips from the Open Floor Hearing footage for our ongoing campaign?	This is a matter that the Planning Inspectorate will be better placed to assist with if the question can be directed to them.
JF-057	Scheme Description and DCO Process Soils and Agriculture Site Selection and Alternatives	Alternatives	This is not a question of whether something can be engineered, modelled or mitigated. It is a question of whether it should be built here, at this scale, in this place. Lime Down does not, in my honest view, pass that test. There is broad public support for solar energy in the right places: rooftops, warehouses, brownfield. There is far less awareness of the scale, the inefficiencies, and the long-term implications of developments such as this. Public opinion on large-scale solar on farmland has shifted significantly in	Please refer to reference IDs SS-06 and SS-07 in the Applicant's Response to Relevant Representations Part 2 [REP1-117] which summarises the Applicant's approach to identifying and evaluating potential sites for the Scheme. Based on this approach, it has been concluded that there are no more suitable and available locations within the search area than the proposed location for the Scheme.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			recent years, and that shift deserves to be acknowledged in decision-making.	
JF-058	Scheme Description and DCO Process	General remarks	I would ask, finally, that you reflect on independence, accountability and the long-term consequences of this decision. There must be accountability, not just today, but to the generations who will live with the result.	The Applicant notes this comment.
JF-059	Scheme Description and DCO Process	General remarks	Respondent included a Summary of Evidence & Equine Reports submitted in their Written Representation [REP1-214].	The Applicant notes this comment.
Jill Johnston REP1-217				
JJ-001	Scheme Description and DCO Process	General remarks	I am writing with regard to the impact of the proposed Lime Down solar project on the local landscape. I have a background in carrying out environmental impact assessments on infrastructure projects , particularly roads, waste water treatment works and large manufacturing facilities.	The Applicant notes this comment.
JJ-002	Scheme Description and DCO Process	Scheme Description	The Lime Down project, as proposed, would have a huge permanent impact on the locality in	The assessment reported in the Environmental Statement (ES) [APP-053 to APP-265 and updated

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			which it is situated and materially change the landscape. The scheme is put forward as a temporary development, however the operating lifespan of this scheme is 60 years and is a timeframe that should be considered more as permanent in planning terms. Other energy infrastructure schemes which have a shorter operating lifespan are considered and have to be applied for as permanent development . Crucial elements of the Lime Down scheme, such as the cable, substations and BESS are not proposed to be removed and are therefore permanent features; indeed without them the development cannot operate. There would also be permanent alterations to the road network , changing the nature of the small historic lanes to allow for access for the large vehicles required during construction in particular.	by REP1-015 to REP1-084] considers the likely significant effects of the Scheme as a result of the 60-year operational phase. Effects associated with the long term, but temporary, operational phase have therefore been assessed. These effects are fully reported in the ES and are a matter for the Secretary of State to weigh in the planning balance against the need for the Scheme and its wider benefits. As set out within Section 2 of the Outline Decommissioning Strategy (Rev 2) [REP1-100], when the operation and maintenance phase ends, the Solar PV Sites would be decommissioned and the land returned to its original use and condition as far as practicable and returned to the landowner. All Solar PV Panels, mounting structures, cabling, inverters, transformers, switchgear, BESS Area, substations and access tracks would be removed from within the

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				Solar PV Sites and recycled or disposed of in accordance with good practice and market conditions at that time. Complete removal of piled foundations will be avoided if practicable so as not to create potential pathways to underlying groundwater resources or create structural deficiencies in the surrounding soils. Foundations and other below ground infrastructure will be cut to 1.2 m below the surface to enable future ploughing and capped with a reinforced concrete cap. Should piled foundations be completely removed, the methodology will take into account the type of pile used and the properties of the surrounding soils, and the resultant void will be immediately backfilled with an appropriate material such as bentonite slurry. The depth of 1.2m is the standard depth considered for an agricultural soil profile, and would enable grading to be determined in accordance with the established

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				guidelines for grading agricultural land, as re-issued by Defra and the Welsh Government in a joint publication in 2025. The Decommissioning Strategy is secured by Requirement 20 in Schedule 2 of the Draft DCO [REP1-007] and must be approved by the relevant local planning authority and must be in substantial accordance with the Outline Decommissioning Strategy. As set out within Section 2 of the Outline Decommissioning Strategy (Rev 2) [REP1-100], The mode of the Interconnecting Cables and Grid Connection Cables decommissioning would be dependent upon government policy and good practice at that time. Currently, the most environmentally acceptable option is considered to be leaving the cables in situ, as this avoids disturbance to overlying land and habitats and to neighbouring communities. Alternatively, the cables can be removed by opening up the ground at regular intervals and pulling the cable

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				through to the extraction point, leaving the ducting and jointing bays in place, avoiding the need to open up the entire length of the Grid Connection Cables. The proposals only include minor widening which will be undertaken in a sensitive manner. The Applicant will agree to sensitive construction details, such as conservation kerbs which are specialized concrete edging units designed to provide structural support while complementing environmentally sensitive or historically significant areas. This will be secured through the technical approval process and the Final CTMPs. The preparation, approval and implementation of the final CTMPs, substantially in accordance with the Outline CTMP [REP1-112], are secured through Requirement 15 of Schedule 2 of the Draft Development Consent Order [REP1-007], ensuring construction traffic impacts are appropriately

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				managed throughout the construction phase of the Scheme. The LVIA in ES 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 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). 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.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				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 Appendix 8-6. 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

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				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.
JJ-003	Landscape and Visual	AONB	The area put forward for the Lime Down scheme lies, for the most part, immediately adjacent to the important Cotswold National Landscape . A landscape that is recognised as being of national importance but is also known across the world as a very special and significant landscape for its unspoilt nature and attractive settlements that complement the rural landscape. Indeed much of the area of the scheme is in an area that was considered for inclusion within the boundary of the original AONB, it being of equal merit (ref: Designation History Series Cotswolds AONB, Ray Woolmore, 2004). The significant adverse impact to such a landscape of national and	The Scheme lies adjacent to the CNL; Site A, B and C are within the setting of the CNL. The proposed development has been set back from the CNL (formerly known as an Area of Outstanding Beauty) to protect land within its setting. This land will be utilised for positive enhancement of the CNL and includes: 1. 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; 2. The inclusion of wildflower meadow verges on the edge of set aside land in A11,

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			international importance should be a key consideration in determining whether the project should be given approval or not. Land that is adjacent to the designated National Landscape should also have a strong degree of protection from development as it provides a buffer and can enhance the experience of the designated area.	A12 and C10 to provide attractive buffers in views from public roads; and 3. Hedgerow enhancements including the re-establishment of historic hedgerows within the setting of the CNL. 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. ES Volume 1, Chapter 8: Landscape and Visual Impact [APP-060] takes

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				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).
JJ-004	Landscape and Visual	Rural landscape	The placing in fields of monstrous 4.5 metre high solar panels within an undulating agricultural landscape, and where existing field boundaries are 2-2.5 metres in height ,will be near on impossible to mitigate in any satisfactory manner. The row upon row of uniform panels would be visible from a wide area and including from many heritage assets too, of which they are rural in context and setting. These include conservation areas, listed buildings and ancient monuments. The Lime Down	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 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

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			development would allow a distinctly industrial element to be placed, for 60 years, within the fabric of a rural and agricultural land and significantly change it. The area has been rural and agricultural in nature for two thousand years, asking it to host a huge change through the solar development for a very minor addition to the energy supply, albeit intermittent in nature too, seems too much of a compromise.	once operational (e.g. at year 1 and year 15). The dispersed nature of the Scheme which comprises a series of independent Sites set across an extensive agricultural landscape, with large areas of land between each of the Sites assists with assimilation of the Scheme into the landscape. Each Site is set apart by their associated features such as robust hedgerows, woodland and tree cover, intervening settlements and the road and rail infrastructure and the changing topography. The discrete areas of land in the Scheme are placed so far apart that the Scheme would not be perceived in its entirety and the solar panels are distributed 'in and amongst' the landscape features to assimilate them into the landscape. The 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 designated heritage assets such as

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				conservation areas, listed buildings and ancient monuments, 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).
JJ-005	Landscape and Visual	Mitigation	The mitigation to the impact on the landscape that is proposed would take many years to screen the development . The Environmental Statement considers that 15 years on from operation there may be some screening but that all depends on how well the vegetation is established . Many planting schemes often have failures of plants so there are likely to be gaps in the screening. Given the wide area covered by the Lime Down scheme and the huge amount of maintenance required for the mitigation measures to establish failure of some is very likely.	In landscape and visual impact assessments, a 15-year timeframe is commonly used to define the "mature" stage of planting mitigation, where proposed trees and shrubs have grown sufficiently to provide screening of the development. While initial effects may be adverse, this period allows for established green infrastructure to integrate the site into the surrounding landscape. Mitigation and enhancement measures are detailed in the Outline LEMP [APP-283] and the Outline 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 Landscape and Ecological

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				Management Plan, substantially in accordance with the Outline LEMP [APP-283] , is secured through Requirement 7 in Schedule 2 of the Draft Development Consent Order [REP1-007] .
JJ-006	Landscape and Visual	Mitigation	The photo montages that have been produced for the Environmental Statement provide very little realistic indication of what the scheme may look like in the context of the landscape, therefore it is very difficult to envisage the impact over the construction, early operation and later operational phases . Trying to hide the solar development and associated infrastructure behind trees and hedges cannot ever be considered adequate mitigation or, as the Environmental Statement asks us to believe, be, at the minimum, a neutral change or even positive impact on the landscape. The size and presence of trees and hedges on land outside of the development envelope cannot be controlled and	ES Volume 1, Chapter 8: Landscape and Visual Impact [APP-060] includes a total of 67 viewpoints covering the Study Areas for the Sites and the Cable Route Corridor. Viewpoint locations are set out within Table 8-9 of the LVIA. Viewpoint locations are shown on ES Volume 2, Figure 8-10 Viewpoints [APP-099] . These viewpoints comprise initial viewpoints selected for the purpose of the assessment and likely to be affected by the Scheme and then additional viewpoints provided as part of the Section 42 Consultation. The locations of the viewpoints have been subject to consultation with the relevant consultees and planning authorities under Section 42 Consultation, where

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			should not be replied upon for screening.	a total of 10 additional viewpoints have been included and photography undertaken, these are identified as Viewpoint Numbers CNL A-G and WC1-3. Viewpoint photography and photomontages are included within Figure Series ES Volume 2, Figure 8-14 Baseline Photography and Photomontages [APP-103 to APP-105]. Locations of the required photomontages and Accurate Visual Representation (AVR) were agreed with the Landscape Officer representatives from Wiltshire Council (WC) and the Cotswold National Landscape Board (CNLB). A total of 32 AVR level 3 montages have been produced using summer and winter photography as illustrated in ES Volume 2, Figure 8-14 Baseline Photography and Photomontages [REP1-033 to REP1-035] and as set out within Table 8-10 of ES Volume 1, Chapter 8: Landscape and Visual Impact [APP-060] . These include the 10 additional Viewpoints which were

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				agreed with the Landscape Officer representatives for WC and CNLB. The Photography and Photomontage Methodology is included within ES Volume 3, Appendix 8-1 Landscape and Visual Impact Assessment Methodology [REP1A-006]. The photography and visualisation team consists of Lanpro and MSEnvision who are leading photography and visualisation specialists operating across the UK. Lanpro have worked closely with Mike Spence of MSEnvision who has led the photography and 3D modelling process. Mike Spence was a key technical author of the Landscape Institute's TGN 06/19 on visualisation of development proposals. He has worked alongside The National Trust, Historic England, English Heritage, RBG Kew, Historic Royal Palaces, Friends of the Earth, as well as NatureScot (formerly Scottish Natural Heritage) for whom he is currently working on updates to their windfarm visualisation guidance. Lanpro's team

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				have delivered numerous Solar and Battery Energy Storage Site (BESS) schemes over the past 10 years using the proposed methodology which have been tested successfully through the DCO process. Visualisations have been produced in accordance with the Landscape Institute TGN 06/19 and the developing understanding of visualisation work. The resultant visualisations are highly accurate. For the Lime Down Solar Park project, MSEnvision (MSE) constructed a full 3D model of the Scheme using the layout data supplied by Lanpro, OS MasterMap for geo-referencing and Environment Agency LIDAR DTM (2m). 3D point data was used for checking horizontal and vertical alignment. Images of the 3D model utilised within the visualisations can be seen within the Photography and Photomontage Methodology included within ES Volume 3, Appendix 8-1 Landscape and Visual Impact Assessment Methodology [REP1A-006].

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
JJ-007	Socio-Economics, Recreation and Tourism Landscape and Visual	PRoWs	The severity of the impact to local residents and those travelling through the landscape, either by driving, walking, cycling or riding would experience a material change from an area of glorious open views to a very enclosed and dense imposing feel to the landscape. Many of the existing footpaths and bridleways in the area follow historic routes. The removal or diversion of these will negatively affect the connectivity of the landscape and settlements. Permissive footpaths proposed at mitigation will not be a like for like substitute and permission over the land can always be withdrawn.	The potential impact of the Scheme on non-motorised users (NMU) is assessed in ES Volume 1, Chapter 13: Transport and Access [REP1-019] which concludes that there would be no significant impact on NMU as a result of the Scheme. Highway widths of construction routes have been assessed and provide sufficient opportunities and width for HGV traffic to comfortably pass cyclists and equestrians. An Outline CTMP [REP1-112] and Outline PRoWPPMP [REP 1-104] support the DCO Application and include outline measures to ensure impacts to NMU along highways and PRoW are minimised as far as practicable. It is anticipated that PRoW which cross the Order Limits will generally remain open during the construction phase of the Scheme. There may be some slight perceptible delay to NMU movement if a construction vehicle is crossing a PRoW within the Order Limits. An Outline PRoWPPMP [REP1-104] forms an

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				embedded mitigation and will provide measures to ensure the effects of the construction phase on PRow users is minimised. The Outline PRowPPMP [REP1-104] contains specific measures for the temporary diversion of footpath WT GRIT 20 and bridleway WT MALW 54, where access to Cable Route Corridor works east of Grittleton, and HGV access to Lime Down E are taken respectively. These diversions are proposed to ensure unreasonable effects to PRow users are not experienced during construction, replacement and decommissioning. The LVIA in ES Volume 1, Chapter 8 Landscape and Visual Impact Assessment [APP-060] has robustly assessed the effects of the Scheme including the effects on Public Rights of Way and local roads. The LVIA recognises that there are some footpaths where there will be

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				long term Significant adverse effects. These are set out in Table 8-30 Significant Long Term Visual Effects of the LVIA in ES Volume 1, Chapter 8 Landscape and Visual Impact Assessment [APP-060] . All these receptors are PRow with the majority being footpaths which diagonally cross fields where solar infrastructure is proposed and where mitigation such as hedgerow screening would be inappropriate to the legacy landscape.
JJ-008	Other Environmental Matters – Materials and Waste Climate Change and Energy Need Construction and Decommissioning	Supply chain	The Lime Down Solar scheme is asking the locality to host a monster in their landscape and which is one of the least efficient methods of generating electricity and most land use intensive. It is extremely unlikely to positively contribute towards the Net Zero goals. It may be labelled as a clean energy source but that is only after requiring coal fired power stations in China, diesel powered vehicles and ships to mine, manufacture and transport the components required to construct the development. Throughout the lifetime of the scheme this	Chapters 2 and 3 of the Applicant's Statement of Need [REP1-085] sets out the need for UK decarbonisation to progress with urgency; the role of solar within government's plans (specifically Sections 2.6 and 2.9) and the policy support for large-scale solar development in the UK (Chapter 3). Key elements of that policy support include that large-scale solar is an important part of the solution to decarbonising the electricity sector, and "a secure, reliable, affordable net zero consistent system in 2050 is likely to be composed predominantly

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			is repeated again as the batteries and the panels will need replacing a number of times. All this to generate electricity intermittently.	of wind and solar." (NPS EN-1 (2023) Paragraph 3.3.20) Secondly, large-scale schemes are needed to meet the Government's energy objectives because they connect to high voltage transmission lines, enabling efficient transfer of power between geographies and the pooling of supply and demand. Further, as set out at Paragraphs 2.10.13 and 2.10.14 of NPS EN-3 (2023), "Solar farms are one of the most established renewable electricity technologies in the UK and the cheapest form of electricity generation" (Paragraph 2.10.13) and "Solar farms can be built quickly and, coupled with consistent reductions in the cost of materials and improvements in the efficiency of panels, large-scale solar is now viable in some cases to deploy subsidy-free". There is a demonstrated need for large-scale solar schemes to come forward with urgency in Great Britain, and the Scheme is being proposed to support

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				delivering to the Government's plan to address the climate crisis. An assessment of landscape and visual effects of the Scheme is presented in ES Volume 1, Chapter 8: Landscape and Visual [APP-060]. To mitigate against any identified landscape and visual effects, measures have been proposed and minimum offsets from existing landscape features have been incorporated into the Scheme design. The climate change assessment has considered a conservative approach of materials coming from China and embodied carbon from global emissions in products. With these assumptions in place, the scheme can still show to have a net positive effect on emissions in comparison with baseline future year UK grid emissions. Replacement panels and battery emissions are also considered within

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				the Greenhouse Gas emissions assessment. As a conservative approach, the emissions for these have been assumed to be the same as the baseline year, though in reality, as global initiatives are put forward and technology improves to reach Net Zero, they are likely to be much lower in future.
JJ-009	Construction and Decommissioning	Decommissioning	It is not known in reality that the land would be returned to agricultural use, no other projects are at the end of life in order to have a comparison for the feasibility of restoration that is promised. There is also a strong chance that the land may be contaminated from being covered in solar panels and that it may not be suitable for growing crops or fodder for animals. It is highly likely that the area covered by the scheme would, in future, be considered as brownfield and therefore ripe for development.	The Outline CEMP [REP1-096] describes the measures that will be taken to ensure protection of soil and groundwater during the construction of the scheme. The construction phase will be preceded by a ground investigation to identify and where required, propose additional mitigation, in relation to the protection of soil and groundwater. The Outline OEMP [REP1-098] describes the measures that will be taken during the operation of the solar park to ensure that soil and groundwater is not contaminated by activities undertaken in maintenance of equipment within the scheme.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				Measures to avoid and minimise effects on soils and agricultural land are embedded within the Scheme design and secured through Schedule 2, Requirement 17 of the Draft DCO [REP1-007], which includes the preparation and implementation of a Soil Resources Management Plan (SRMP). A detailed SRMP will be prepared post consent and will be required to be in substantial accordance with the Outline Soil Resource Management Plan [APP-280]. The detailed SRMP will establish soil conditions at the time of decommissioning and 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 Soil Resource Management Plan [APP-280] does not prescribe detailed remediation measures at this stage. Further detail on decommissioning activities will be provided within the detailed

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				Decommissioning Environmental Management Plan (DEMP). There are no significant permanent effects on agricultural land, as all land will be returned to its original use and condition as far as practicable following decommissioning, as set out in paragraphs 2.1.3 to 2.1.5 of the Outline Decommissioning Strategy [REP1-100], which is secured by Schedule 2, Requirement 20 of the Draft Development Development Consent Order (DCO) [REP1-007]. The Outline Decommissioning Strategy [REP1-100] identifies how commitments made in the ES will be translated into actions on site during decommissioning works. A detailed Decommissioning Strategy will be prepared for the decommissioning phase.
JJ-010	Scheme Description and DCO Process Site Selection and Alternatives	General remarks	The landscape would be permanently changed from its original nature and never returned to any semblance of its former character. We should not be destroying the landscape and environment in this way for such	The LVIA in ES 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 an

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
	Landscape and Visual		little to no gain to anyone except the developer.	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). 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. The LVIA recognises that there are Significant Adverse 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

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				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 Appendix 8-6. 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

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				creation of new/reestablishment of historic ponds. The Significant Beneficial Moderate effects on Landscape Fabric at Year 15 are set out in Table 8-16 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 • Groundcover 702.8 ha. Mitigation and enhancement measures are detailed in the Outline LEMP [APP-283] and the Outline EPMS [REP1-106], which set out habitat creation, species protection

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				measures, buffer zones and long-term ecological management.
Vivienne Jane Clarke REP1-243 and REP1-244				
VJC-001	Scheme Description and DCO Process	Introduction	I wish to comment on the responses the Applicants supplied in its document EXAM9.3 which purported to respond to the Relevant Representations I submitted. I also wish to make a number of comments on the Applicants' approach to public consultation and, from knowledge of the area, to ask the Examining Authority to ask a number of questions. Whilst I understand that it is accepted that due to the large number of responses the Applicant could properly group answers to points raised in Relevant Representations together in order to avoid unnecessary duplication I do not consider that all the points raised in my Relevant Representation have been adequately dealt with and in some cases not dealt with at all. The format used by the Applicants makes it very difficult to assess –	The Applicant refers to its response provided under reference ID CE-26 in Applicant's Response to Relevant Representations (Part 2) (Rev 2) [REP1-117] regarding its approach to responding to submissions. Each RR submitted by the general public, and any other non-statutory parties not responded to at Deadline A, has been systematically reviewed and a summary of the issues raised has been prepared. These summaries are presented alongside the corresponding unique reference ID, enabling a clear audit trail between the original representation and the Applicant's response. The Applicant therefore had regard to all RRs received and has provided a response to the issues raised. The Examination process, led by the Examining Authority, will further consider all RRs, alongside the Applicant's responses and

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			there are 61 references to RR4875 scattered over a document which is 1082 pages long. I will comment only on a few of the responses, or failures to respond. This is not exhaustive but illustrative. There are some where I particularly hope that the Examiners will challenge the Applicants and its experts (who seem to be the experts used on every scheme promoted by IGP with no particular local knowledge) on a wide range of matters and not to accept their assessments of damage and proposed mitigation without the most careful analysis of the accuracy of the bases for the assertions and conclusions in relation to the harms this Scheme would cause. In particular I would ask the Examiners to examine very carefully the Applicants' overall approach and the effectiveness of their proposed mitigation and whether the protections in relation to mitigation and decommissioning, even if included in a DCO, are sufficient when the party benefiting	any subsequent submissions, in reaching a recommendation on the Scheme. The Applicant notes that the free-to-use Scheme communication channels remain open for anyone to contact the Applicant regarding questions about submissions and responses to comments.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			from the DCO is a Single Purpose Vehicle the shares in which are currently ultimately owned by a Macquarie Bank fund and likely to be sold off, quite possibly before being built.	
VJC-002	Site Selection and Alternatives	Land agreements	ALTERNATIVES I can find no trace of a response to points made in my Relevant Representations in which I questioned whether the Applicants had the right to all the land within the redline area of the scheme until 2089. This is something which has been requested by me and others in meetings and correspondence from the moment that the outline of this Scheme was made public at the non-statutory consultation in March 2024. The landowners have been prevented by the Applicants from giving any information or comment about what they have agreed to by contractual terms imposed by the Applicants. Could the Examiners please require the Applicants to disclose what agreements they originally signed with the various landowners and any further	The Applicant confirms that agreements with landowners are confidential, consistent with standard practice for large-scale infrastructure projects and broader property transactions. On that basis, requests from individuals associated with Stop Lime Down to inspect confidential agreements have not been acceded to. The Applicant has provided an example of the duration of an option agreement page 23 and 24 in its Written Summary of Oral Submissions at Issue Specific Hearing 1 [REP1A-012] .

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			agreements they now have giving rights over the pink land, specifically the duration of such rights.	
VJC-003	Site Selection and Alternatives	Land agreements	The Applicants insist that arrangements with landowners are confidential. The imposition of NDAs and other terms in the contracts have prevented landowners from providing this information (even those who would otherwise have wanted to) but there is a belief that what the Applicants obtained from the landowners at the outset (presumably on the basis of what they told the landowners would be required when persuading them to grant options) did not include the right to use the land within the Scheme for the 60 years – plus construction and decommissioning so more like 65 years – that they have said or implied they have obtained voluntarily and which they need unless they are to seek Compulsory Acquisition of the pink land or only operate for a period shorter than the 60 years sought. I would urge the Examiners not to	The Applicant repeats that agreements with landowners are confidential, as is standard practice in large scale infrastructure schemes. Assurances regarding ongoing and concluded negotiations to date are provided in the Land and Rights Negotiations Tracker [REP1-246] , which is regularly updated in Examination and demonstrates the Applicant's effort to reach voluntary agreements in order to deliver the Scheme. As set out on page 23 & 24 of the Written Summary of the Applicant's Oral Submissions and Responses at Issue Specific Hearing 1 and Responses to Action Points [REP1A-012] the Post Hearing Note states: <i>The terms of the Option Agreements are confidential and the Applicant cannot provide details without the landowner's consent. However, as an example, the Applicant has the</i>

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			underestimate the fear that the some of the landowners and some of the tenants of the landowners are operating under. They have effectively been "gagged" either by the contracts or by fear of upsetting a powerful landlord.	<i>landowner's consent to confirm that the Option Agreement dated 21 February 2023 in respect of Site E is for a maximum term of 40 years and therefore any extension to 60 years would be by agreement.</i> In response to the Examining Authority's queries relating to the planning balance, the Applicant notes that Requirement 20 provides a maximum time period during which the Scheme can operate. There is no obligation on the Applicant to operate the generating station for a prescribed or minimum amount of time and this is consistent with the approach taken in made solar DCOs to date. For the purposes of assessment, the Applicant considers that assessing a 60-year operational period represents the reasonable worst case as it takes into account the GHG emissions during the maximum operational period which includes emissions

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				associated with replacement activities.
VJC-004	Site Selection and Alternatives	Land Agreements	The Applicants have said the voluntary provision of land was a major reason for selecting this area for a solar scheme so even if the landowners have more recently granted longer options it will be relevant. It is the duration of what was agreed at the outset and what they have now agreed, not the commercial terms, which are important. That information cannot be, or should not be, confidential. The Applicants should not be allowed to hide behind confidentiality agreements which they themselves imposed. How can you properly examine the Scheme if you not know the facts? Any NDA should have carve outs to allow disclosure if required by law. Surely the Examiners have the legal right to the facts when this is so fundamental to the viability of the Scheme and (1) the true position of the Applicants in relation to the original site selection and what the land owners were told the Scheme	ES Volume 1, Chapter 4: Alternatives and Design Evolution [APP-056] and ES Volume 3, Appendix 4-1: Site Selection Assessment Report [APP-185] detail the staged approach to site selection undertaken by the Applicant. This includes consideration of a range of planning, environmental and operational factors. Although the availability of large-scale land holdings was a consideration, it was not the only consideration in the site selection process. In terms of lease agreements, and project term of up to 60 years, please refer to Page 23 and 24 of the Written Summary of the Applicant's Oral Submissions and Responses at Issue Specific Hearing 1 and Responses to Action Points [REP1A-012] which addresses this point. Furthermore, where the Applicant has entered into option agreements with

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			would be and (2) the Applicants' ability to operate the Scheme for up to 60 years plus commissioning and decommissioning ,as sought in the DCO. The term of usage of land would presumably have been a key consideration for landowners understanding what was proposed when entering into option agreements with the Applicants. In addition to its importance in the context of site selection, as I understand it many of the figures relied on by the Applicants to demonstrate overall benefit of the Scheme rely on the operation being for 60 years.	landowners, this has been supported throughout by independent legal and professional advice, ensuring all parties are properly informed of the full implications of the process and the proposals. The Applicant maintains that consultation with all landowners from the outset has been carried out in full accordance with the statutory requirements of the Planning Act 2008. Additionally, the Applicant confirms that landowner negotiations, and any subsequent agreements, are confidential between the parties, as is standard practice in legal negotiations of this kind, including property transactions for example.
VJC-005	Hydrology, Flood Risk and Drainage Ground Conditions	Flood risk	FLOOD The response to my concern about risk of increased flood off site by increased run off and compaction of soil is unsatisfactory. There is no scheme which has been built of this size or using the proposed	The Applicant acknowledges the existing flooding issues identified at Corston, Easton Grey, Norton, Foxley, Malmesbury, the Somerfords and other downstream communities. Those existing catchment flood mechanisms are part of the baseline,

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			tracking panels in the UK, let alone on the type of soil and geology which exists in the areas of the 5 Lime Down sites. There are well known (at least to those who live in the area) flood issues in Corston, Easton Grey, Norton, Foxley, Malmesbury, the Somerfords and others. Ancient bridges such as the one in Easton Grey are vulnerable to flash flooding when there is very heavy rainfall leading to increased run off or after lengthy but moderate rainfall leading to runoff from saturated land. See photo of Easton Grey bridge in November 2024 – Storm Bert. If the water level gets above the arches (as it did nearly but not quite in 2024) the bridge would act as a dam and flood the village. There are similar ancient bridges with limited height arches down the Upper Avon and Gauzebrook. In Easton Grey, and I assume other villages and hamlets downstream, there are cesspits and sewage treatment plants at river level as many properties are not on the mains	but they do not mean that the Scheme would increase flood risk. The submitted assessment considers the local soils, geology, watercourses, floodplain interaction and surface water pathways in ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [REP1-017] and the FRA & Drainage Strategy [REP1-037to REP1-054]. The use of tracker panels does not make the panelled areas impermeable. Rainfall will continue to drain to vegetated ground beneath and between panel rows. The key risk pathway is construction-phase soil compaction, which is controlled through the Outline CEMP [REP1-096] and Outline Soil Resources Management Plan [APP-280]. The Scheme would not divert uncontrolled runoff to ancient bridges, downstream properties, cesspits or private sewage treatment plants. Runoff from impermeable infrastructure will be attenuated and controlled. Pollution prevention, sediment control and watercourse

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			sewage. Overwhelming these sewage treatment plants risks polluting the rivers which would be a criminal offence.	protection measures are secured through the outline management plans. The Applicant therefore does not agree that the Scheme would materially increase flood risk or water pollution risk downstream.
VJC-006	Hydrology, Flood Risk and Drainage	Flood risk	To assist the Examiners in assessing the kind of statements made to my concerns about flood, words which are used by the Applicants in response to the concerns of many others, I have set out below the Applicants' response to part of my query on flood issues (my highlighting). It appears to me to include words deliberately intended to downplay or avoid responding properly to what is a serious concern not just of mine but of hundreds of people who live locally and sent in Relevant Representations and to use words which mask or underplay the flood risks which the Scheme would cause to a large number of people, businesses and properties outside the redline area. There is also a risk to the mainline	The Applicant does not accept that the wording previously provided was intended to downplay flood risk. It reflects the technical distinction between solar PV panel areas, which remain permeable and drain to ground, and associated impermeable infrastructure, which requires formal drainage control. The assessment considers flood risk both within and outside the Order Limits. It does not assess only the protection of Scheme assets. The FRA & Drainage Strategy [REP1-037 to REP1-054] considers whether the Scheme would increase runoff rates, flood extents, flood depths or flood risk to downstream receptors. Where material interaction with floodplain

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			railway which runs through a deep cutting which is to be surrounded by panels in Area D. The BESS and 400kV transformer which, even on the Applicants' assessment will be on impermeable bases are right by the railway. "Regarding specific concerns that panels will increase flooding, the submitted assessment presented in ES Volume 3, Appendix 11-1 ES Volume 3, Appendix 11-1: Flood Risk Assessment and Drainage Strategy - Lime Down Covering Report [APP-210] reflects established hydrological evidence that the addition of solar panels over a vegetated field does not materially increase runoff volumes, peak discharges or response times, and that changes in hydrologic response are primarily associated with alterations to ground cover beneath the panels rather than the panels themselves. Panelled areas are therefore designed so rainfall continues to drain to ground, with no creation of	occurs, including at Gauze Brook, site-specific modelling has been undertaken or refined. In relation to the railway cutting, the Scheme does not propose uncontrolled discharge towards the railway. The BESS and substation infrastructure is located in Flood Zone 1 where practicable and will be served by controlled drainage. Runoff from impermeable areas will be attenuated and managed through the drainage strategy.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			extensive impermeable surfaces and with controls in place to avoid any increase in discharge to watercourses. Measures to manage surface water runoff and drainage are set out in the outline drainage and construction management plans (ES Volume 3, Appendix 11-1 to 11-9: Flood Risk Assessment and Drainage Strategy [REP1-037 to REP1-054] and Outline CEMP [REP1-096]) accompanying the Application. Where drainage measures are necessary, these include permeable surfacing, infiltration features, swales and attenuation storage to manage surface water and maintain greenfield runoff behaviour, as applicable. Consistent with NPS EN-3 paragraph 2.10.84, these controls distinguish between solar PV panel areas, which drain to the existing ground and do not generally give rise to significant drainage effects, and associated infrastructure where runoff controls are required. The preparation,	

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			approval and implementation of the detailed drainage and construction management plans, substantially in accordance with the outline plans, are secured through Schedule 2 of the Draft DCO [REP1-007]. This secures delivery and maintenance of the drainage strategy for Scheme infrastructure, together with soil and water management controls during construction, ensuring there is no material increase in off-site flood risk over the lifetime of the Scheme. Accordingly, the Applicant considers that flood risk in relation to the Scheme has been robustly and appropriately considered." "Measures to manage surface water runoff and drainage are set out in the outline drainage and construction management plans accompanying the Application (ES Volume 3, Appendix 11-1 to 11-9: Flood Risk Assessment and Drainage Strategy [REP1-037 to REP1-054]). Consistent with NPS EN-3 paragraph 2.10.84, these controls distinguish between solar PV panel	

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			areas, which drain to the existing ground and do not generally give rise to significant drainage effects, and associated infrastructure where runoff controls are required."	
VJC-007	Hydrology, Flood Risk and Drainage	Flood risk	Could the Examiners please seek details from the Applicants of: 1. The "established hydrological evidence" that solar panels, specifically the types of panels they propose using, do not materially increase run off volumes, peak discharges or response times.	The Applicant's reference to "established hydrological evidence" is not a claim that solar panels have no interaction with rainfall. The evidence shows that solar panels can redistribute rainfall locally, particularly at panel edges and drip-lines. The relevant question is whether that local redistribution becomes additional connected runoff leaving the field, increases peak flows, or shortens response times downstream. The published evidence does not support treating solar panel arrays as conventional impermeable hardstanding. Cook and McCuen (2013) found that, where grass cover is maintained beneath solar panels, changes in runoff volume and peak discharge are negligible. The same study shows that increased runoff risk

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				is associated with degraded ground cover, such as bare or compacted soil. Yavari et al. (2022) similarly identifies solar runoff effects as site-specific and dependent on ground cover, soil compaction and management. Elamri et al. (2018), Gullotta et al. (2023), Wang and Gao (2023) and Baiamonte et al. (2023) also identify vegetation cover, bare ground at drip-lines, soil condition, surface roughness, slope and hydraulic connectivity as the key controls. The Scheme design envelope allows for solar PV panels to be either fixed or tracking. Neither option changes the flood risk conclusion. In both cases, the panels are elevated above ground, are not sealed into a drainage network, and do not create a continuous impermeable surface. Rainfall will continue to drain to the ground beneath and between panel rows. A fixed panel arrangement would have a more consistent drip-line position. A tracking arrangement

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				may move the drip-line position over time. In either case, the relevant risk pathway is the condition of the ground receiving rainfall, not the panel itself acting as hardstanding. At Lime Down, those risk factors are controlled through embedded mitigation, including permanent ground cover, soil protection, wet weather working controls, compaction remediation, permeable tracks and maintenance of existing overland flow routes. These measures are secured through the Outline CEMP [REP1-096], Outline OEMP [Rep1-098] and Outline Soil Resources Management Plan [APP-280]. Runoff from genuinely impermeable infrastructure is assessed separately and controlled through the FRA & Drainage Strategy [REP1-037 to REP1-054]. On that basis, neither fixed nor tracking panels would materially increase runoff volumes, peak discharges or response times leaving the site.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
VJC-008	Hydrology, Flood Risk and Drainage	Flood risk	2. What other matters cause changes in hydrologic response which they claim are "primarily" (and presumably therefore not wholly) associated with ground cover rather than panels themselves.	The Applicant's position is that changes in hydrological response are driven primarily by the condition of the receiving ground and the creation of connected flow routes, rather than by the presence of solar panels alone. The relevant factors include vegetation cover, soil compaction, soil structure, infiltration capacity, bare ground at panel drip-lines, surface roughness, slope, field drainage connectivity, construction disturbance, and any new impermeable infrastructure. Published solar hydrology research, including Cook and McCuen (2013), Yavari et al. (2022), Elamri et al. (2018), Gullotta et al. (2023), Wang and Gao (2023) and Baiamonte et al. (2023), supports this distinction. Those studies identify that panels can redistribute rainfall locally, but increased runoff risk occurs where the receiving ground is bare,

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				compacted, poorly vegetated, smooth, steep, or hydraulically connected to a ditch or watercourse. The Scheme design envelope allows for either fixed or tracking panels. Neither option changes the assessment conclusion. In both cases, the panels are elevated above ground, are not sealed into a drainage system, and do not form continuous impermeable hardstanding. The key controls are therefore the management of soil and vegetation beneath and between the panels, and the control of any genuinely impermeable infrastructure. Those matters are secured through the Outline CEMP [REP1-096], Outline OEMP [REP1-098], Outline Soil Resources Management Plan [APP-280] and the FRA & Drainage Strategy [REP1-037 to REP1-054].

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
VJC-009	Hydrology, Flood Risk and Drainage	Flood risk	3. What the Applicants consider to be "significant" drainage effects.	A "significant" drainage effect means a material change in runoff rate, runoff volume, flood extent, flood depth, flood hazard, drainage pathway or watercourse condition that would increase flood risk on or off site. Local redistribution of rainfall beneath or adjacent to solar panels is not, by itself, a significant drainage effect. The relevant question is whether that redistribution becomes additional becomes runoff leaving the field or entering a ditch, drain or watercourse. The published evidence indicates that this depends on ground condition, vegetation cover, compaction, surface roughness, slope and hydraulic connectivity. At Lime Down, those risk factors are controlled. Permanent ground cover, soil protection, wet weather working controls, remediation of compaction, permeable tracks and maintenance of existing overland flow routes are secured through the Outline CEMP

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				[REP1-096], Outline OEMP [REP1-098] and Outline Soil Resources Management Plan [APP-280]. Genuinely impermeable areas, including substations, BESS infrastructure and hardstanding, are separately assessed and controlled through the Flood Risk Assessment and Drainage Strategy [REP1-037 to REP1-054]. On that basis, the Scheme would not give rise to a significant drainage effect.
VJC-010	Hydrology, Flood Risk and Drainage	Flood risk	4. The underlying evidence, and the basis on which it was analysed, to reach the conclusion that the flood risk outside the Scheme area (not just for the Scheme infrastructure) has been “robustly and appropriately considered”.	Yes. The Applicant's findings are supported by Scheme-specific assessment, proportionate modelling and published evidence. The Flood Risk Assessment and Drainage Strategy [REP1-037 to REP1-054] includes site-specific assessment for each Solar PV Site and the Cable Route Corridor. Site-specific hydraulic modelling has been undertaken or refined where material floodplain interaction occurs, including Gauze Brook at Lime Down D and Gabriel's Well at Lime Down E2. For smaller

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				ordinary watercourses and land drainage features, proportionate local methods, including Manning's/open-channel calculations, have been used to understand local flood interaction and inform layout. These are not downstream hydrographs and should not be read as predicted flood flows at settlements. For solar PV panel areas, the assessment is supported by national policy and published solar hydrology research. NPS EN-3 paragraph 2.10.84 recognises that solar PV panels drain to the existing ground. The literature, including Cook and McCuen (2013), Yavari et al. (2022), Elamri et al. (2018), Gullotta et al. (2023), Wang and Gao (2023) and Baiamonte et al. (2023), shows that runoff response is governed by vegetation cover, compaction, bare ground, surface roughness, slope and hydraulic connectivity. Those variables are controlled through the submitted management plans and DCO Requirements.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
VJC-011	Hydrology, Flood Risk and Drainage	Flood risk	5. Whether the Applicants' findings are supported by appropriate research and modelling of the actual area.	Please refer to comment Reference ID VJC-010.
VJC-012	Hydrology, Flood Risk and Drainage	Flood risk	6. How much water in heavy rain falling onto the concrete bases of the transformers, huge BESS area and other non-porous infrastructure will be diverted into watercourses or towards the mainline railway cutting where currently the land absorbs rainfall.	Rainfall falling onto concrete bases, BESS infrastructure, substations and other impermeable infrastructure will not be diverted uncontrolled to watercourses or towards the railway cutting. Those areas are treated separately from panelled fields in the Flood Risk Assessment and Drainage Strategy [REP1-037 to REP1-054] because they are genuinely impermeable or engineered infrastructure. Runoff will be collected, attenuated and discharged at controlled rates. The BESS drainage system will include isolation and containment measures. The substation drainage strategy is source-control led, with bunding and local isolation for potentially polluting plant where required.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				This is different from the solar PV panel areas, which are elevated above ground and drain to vegetated ground beneath and between rows. The Scheme does not rely on the railway cutting, adjacent land or local watercourses receiving uncontrolled runoff from impermeable infrastructure.
VJC-013	Hydrology, Flood Risk and Drainage	Flood risk	7. What is meant by "generally" and "significant" in the highlighted parts of the second extract from the Applicant's response?	"Generally" reflects the wording and policy position in NPS EN-3 paragraph 2.10.84, which recognises that solar PV panels drain to the existing ground and that the drainage impact will not, in general, be significant. It does not mean that drainage has been ignored. It means that solar PV panel areas are different from hardstanding, roofs, roads, BESS infrastructure and substation compounds. Panelled areas remain permeable and drain to ground. Genuinely impermeable infrastructure is assessed separately

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				and controlled through formal drainage design. "Significant" means a material drainage or flood risk effect, such as an increase in runoff rate, runoff volume, flood extent, flood depth, flood hazard, watercourse impact or off-site flood risk. The Applicant's assessment concludes that, with secured soil, vegetation and drainage controls, the Scheme would not give rise to a significant drainage effect or materially increase flood risk elsewhere.
VJC-014	Hydrology, Flood Risk and Drainage	Flood risk	8. Who, if anyone, is responsible for the costs of remedying the damage caused by floods and the increased flood risk if the mitigation and avoidance measures the Applicant confidently says turn out not to work? Is this just a harm that the community and the council tax payers of Wiltshire has to bear literally and financially?	The Applicant does not accept the premise that the Scheme would increase flood risk or transfer flood damage costs to the local community. As with many areas of the UK, communities and land adjacent to watercourses are already subject to flooding. That flooding will continue to occur whether or not the Scheme is developed. Flood risk is also likely to increase over time as a result of climate change, including more

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				intense rainfall events and wetter winter conditions. The purpose of the Scheme's flood risk assessment is therefore not to show that existing flooding will be removed. It is to assess whether the Scheme would materially worsen flood risk. The submitted ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [REP1-017] and FRA & Drainage Strategy [REP1-037 to REP1-054] demonstrate that the Scheme would remain safe for its lifetime and would not materially increase flood risk elsewhere. That conclusion is based on the Scheme design, the retention of permeable panelled areas, controlled drainage for impermeable infrastructure, climate change allowances, and secured construction and operational management measures. The mitigation is not voluntary or optional. The relevant drainage, soil, pollution prevention and construction controls are secured through the DCO Requirements, including

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				the Outline CEMP [REP1-096], Outline OEMP [REP1-098], Outline Soil Resources Management Plan [APP-280] and detailed drainage design. The detailed plans must be approved and implemented before the relevant works can proceed. In the event that works were not carried out in accordance with the approved controls, that would be a compliance and enforcement matter under the DCO and other relevant legal regimes. The assessment does not assume flood damage would occur as a result of the Scheme and then leave that cost to local residents or Wiltshire Council.
VJC-015	Landscape and Visual	Mitigation	MITIGATION The Applicants' responses to most of my representations refer to the mitigation steps they will be taking to avoid or reduce harm. In the context of landscape this includes lots of planting of hedges and trees to replace those which will be grubbed up as part of the	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

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			construction process. Apart from the impact on ecology of removing ancient hedges and replacing with saplings there are real issues about the viability of this mitigation which impacts ecology, landscape and traffic. Could the Examiners please investigate how the Applicants intend to ensure that young saplings and hedges which need regular watering in the summer months to survive are going to be tended and by whom and how any assurances can be made binding.	to facilitate access to particular fields/parts of the Solar PV Sites including providing access for Abnormal 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 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 11.45 ha

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				- Enhanced Riparian Native Planting 7.78 ha - Hedgerow Reinforcement & Reinforced Roadside Vegetation 54.92 km - Proposed Hedgerows 16.23 km - Proposed Ponds and Wader Scrapes 14 - Groundcover 702.8 ha. Mitigation and enhancement measures are detailed in the Outline LEMP [APP-283] and the Outline 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 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 Development Consent Order [REP1-007].

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
VJC-016	Arboriculture, Transport and Access	Water resources	Where is the water going to come from? If by tanker, where are the figures for this in the Applicants' traffic and other chapters?	The Scheme is not a residential development and does not create a material operational water demand comparable to housing or domestic water use. The existing baseline is agricultural land. That land already receives rainfall and supports crop growth, with water used through evapotranspiration and, where undertaken, seasonal agricultural operations including irrigation during drier periods. The proposed solar use would not introduce a continuous household-type potable water demand. Operational water demand would be limited and intermittent, principally associated with maintenance activities such as occasional panel washing where required. Panel washing, if required, would be periodic rather than continuous and would be undertaken using authorised water supplies. It would not rely on uncontrolled abstraction

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				from local watercourses or groundwater. Any operational maintenance activity with potential to affect drainage or water quality would be managed through the Outline OEMP [REP1-098]. Any construction-phase water requirement would also be temporary and would be sourced through authorised means, such as mains supply or tanker delivery where required. Any abstraction or discharge would require the relevant approvals and would be managed through the Outline CEMP [REP1-096].
VJC-017	Landscape and Visual	Mitigation	How if the saplings and hedges die, as already seems to be anticipated in the OLEMP, the statements as to effects of this type of planting mitigation can be accepted?	For the purposes of the landscape and visual assessments in relation to planting and visual screening, a uniformed growth rate of 0.4m per year is assumed, leading to a minimum height of 7.5m in 15 years. This approach is considered reasonable for assessment purposes, provided that it is supported by an appropriate planting specification and suitable

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				long-term management plan. In practice, growth rates are species-dependent and will also vary according to local conditions such as soil conditions and growth competition. For example, faster growing pioneer species such as alder, willow, or birch can achieve or exceed 0.4 metres per year under favourable conditions, whereas slower-growing native species such as oak, field maple or holly may establish more gradually. The uniform rate therefore represents an average rather than a site-specific prediction. The Outline LEMP [APP-283] defines species composition, planting densities, stock sizes, and management regimes suitable to the range of site conditions. Monitoring and replacement planting is secured to address underperforming areas or slower-growing species; and subject to these provisions being secured through the DCO Requirements and detailed LEMP.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
VJC-018	Scheme Description and DCO Process	DCO commitments	Who is expected to enforce commitments in the DCO if not complied with (as appears to have happened at Cleve Hill, the only large solar NSIP built so far).	Requirements within the Draft DCO [REP1-007] are discharged by Wiltshire Council as the "relevant planning authority" under the process set out in Schedule 16. This process gives control and oversight over how detailed management plans are prepared and matters of detailed design. It would be open to Wiltshire Council to refuse to discharge a Requirement where it considers new or materially different environmental effects would occur. Wiltshire Council also has a range of monitoring powers under management plans, and the Applicant is in discussions with Wiltshire Council regarding a consistent approach to monitoring across all of the Scheme components. It is also a criminal offence under section 161 of the Planning Act 2008 to breach the terms of a DCO, which would include powers for Wiltshire Council to seek injunctive relief to prevent further implementation of the DCO.
VJC-019	Socio-Economics,	Tourism and businesses	SOCIO-ECONOMIC The response to challenges about the figures put	The potential effects of the Scheme on tourism and recreation are

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
	Recreation and Tourism		in the Applicant's EIS have been effectively ignored with a "We know better than you" approach which prevails in so many areas of this and other documents produced by the Applicants and their consultants. "The assessment therefore concludes that the Scheme would not result in significant adverse effects on local businesses or the wider local economy, and that socioeconomic benefits, including job creation and local supply-chain opportunities, are expected during the construction phase, with more modest economic and skills and supply chain opportunities during the operational phase." The Applicants' failure to recognise the risk to tourism, equine establishments, farmers (including tenant farmers of the owners of the pink land), AirBnBs etc whose business comes from people wanting a rural escape is shocking. The reason people come here is for the landscape and tranquility which the Scheme would destroy.	robustly assessed in ES Volume 1, Chapter 16: Socio Economics, Tourism and Recreation [APP-068], supported by ES Volume 3, Appendix 16-2: Tourism and Recreation Receptor Tables [APP-241]. The assessment scope includes impacts on tourism and recreation all phases of the lifetime of the Scheme (construction, operation and maintenance, and decommissioning phases). The methodology for the assessment is set out in Section 16.6 of ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-241]. The chapter of the ES therefore identifies and assess the impact on key local tourism and recreational facilities including: Key tourist and visitor attractions of local, regional and national importance likely to be impacted by the Scheme; Locally and regionally important parks and nature

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				reserves; PRoW and long-distance walking and cycling routes; Navigable waterways and waterbodies used for recreation; Recreation aviation centres; Recreational hubs for organised sports and youth sports and play likely to be impacted by the Scheme; and Equestrian businesses and facilities likely to be impacted by the Scheme. The baseline is outlined within Section 16.7 which gives consideration tourism economy, Tourism and Visitor Accommodation, Visitor Attractions, Public Rights of Way and Recreational Routes, Recreation Venues and Facilities for example. The assessment has been informed by available information through available sources of information such as Visit Britain; Visit England, Visit Wiltshire and Cotswolds Tourism. The assessment of likely impacts and effects is set out in section 16.10. The assessment identifies a

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				worst-case scenario in which a temporary loss of up to 50 tourism-related jobs and £1.76 million in annual spending could occur locally during construction, and a long-term loss of up to 11 tourism-related jobs/ £395,000 in visitor spending per annum could occur during the operational phase of the Scheme. # This represents a precautionary estimate based on conservative assumptions. The assessment concludes that, while some localised effects on tourism receptors are anticipated to occur, significant adverse effects on the wider tourism economy are not anticipated. Additional mitigation measures (which were not quantified for inclusion in the assessment of potential losses to employment) secured in the Outline SSCEP [REP1-108] seek to reduce tourism employment losses through focussing on local recruitment, promoting local suppliers where practicable, and through providing

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				retraining opportunities for workers in tourism-dependent industries. This is secured through Requirement 18 of Schedule 2 to the Draft DCO [REP1-007]. To support the appeal of the area for visitors, the Scheme includes the provision of new non-vehicular permissive paths (Work No. 10), as shown on the Works Plan [REP1-005]. These additional routes are specifically designed to improve connectivity to the wider Public Rights of Way (PRoW) network and encourage recreational activity in the vicinity. Accordingly, the Applicant considers that flood risk in relation to the Scheme has been robustly and appropriately considered. An assessment of landscape and visual effects is presented in ES Volume 1, Chapter 8: Landscape and Visual [APP-060]. The Landscape and Visual Impact Assessment (LVIA) assesses effects

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				on identified landscape and visual receptors, including residential properties, users of public rights of way and roads, and identifies where significant effects may occur. The LVIA found no significant long term visual effects to residential properties as a consequence of the Scheme. The visual effects of the Scheme are summarised in ES Volume 3, Appendix 8 3-3: Summary of Visual Effects [APP 192]. Temporary Major/Moderate and Moderate Adverse effects on visual receptors have been recorded across the Scheme during construction and at Year 1. However, for the majority of these receptors, the effects reduce to non significant levels as a result of the embedded mitigation measures which are set out in Section 8.9 of ES Volume 1, Chapter 8: Landscape and Visual [APP 060] and include landscape buffers, retention of existing hedgerows and woodland, and new planting to provide screening and integration over time.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				The assessment also identifies that there would be some long-term significant effects on the visual amenity of users of some localised footpaths, as a result of the Scheme. This predominantly relates to locations where footpaths diagonally cross fields and mitigation planting would be inappropriate to landscape character and the legacy landscape. Those receptors which would experience Significant Long Term Visual Effects are listed in Table 8-30 of the LVIA within ES Volume 1, Chapter 8: Landscape and Visual [APP-060]. Mitigation measures to address landscape and visual effects are set out in ES Volume 1, Chapter 8: Landscape and Visual [APP-060], ES Volume 2, Figure 3-4-1 to 3-4-5.2 Landscape and Ecology Mitigation Plan [REP1-029 to REP1-032] and secured within the Outline LEMP [APP-283] and the Outline EPMS [REP1-106]. These

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				documents include proposals for new and enhanced planting, retention of existing hedgerows and woodland, and landscape integration measures to reduce visual effects over time. The preparation, approval and implementation of detailed landscape and ecological management plans, substantially in accordance with the Outline LEMP [APP-283] and Outline EPMS [REP1-106], are secured through requirements in Schedule 2 of the Draft Development Consent Order (DCO) [REP1-007], ensuring that the identified mitigation measures are delivered and maintained throughout the lifetime of the Scheme.
VJC-020	Socio-Economics, Recreation and Tourism	Supply chain	No explanation is given about the modest economic skills and supply chain opportunities. The bulk of the materials for this Scheme are likely to come from China and I do not understand how the local supply chain will benefit. On the contrary the increase in traffic	The Applicant maintains that while the primary hardware for the Scheme may be sourced through a transparent and ethical global supply chain, local businesses will have direct and indirect opportunities in construction services, and logistics, as well as spending locally from the workforce. The Applicant can confirm

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			during construction will hinder local businesses.	that Island Green Power (IGP) is a member of Solar Energy UK and is committed to following national guidelines and best practice standards for the development of their schemes, including Lime Down Solar Park. Specifically, the Applicant is a signatory of the Solar Energy UK Supply Chain Commitment, which ensures ethical sourcing through the Solar Stewardship Initiative (SSI). 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 Schedule 2 to the Draft DCO [REP1-007].
VJC-021	Socio-Economics,	PRoWs	I can see no real analysis of how many tourists who currently visit	On the 12th March 2025 it was agreed in a scoping meeting with WC

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
	Recreation and Tourism, Transport and Access		this area, on foot, cycle or by car are calculated. There seems to be no analysis or why they would not be put off by the complete change in landscape from long peaceful quiet views with open footpaths to an entirely different sound and visual landscape.	that PRow surveys were not required, due to likely low numbers of PRow users and the proposed mitigation during the construction period. The potential impact of the Scheme on non-motorised users (NMU) is assessed in ES Volume 1, Chapter 13: Transport and Access [REP1-019] which concludes that there would be no significant impact on NMU as a result of the Scheme. Highway widths of construction routes have been assessed and provide sufficient opportunities and width for HGV traffic to comfortably pass cyclists and equestrians. An Outline CTMP [REP1-112] and the Outline PRowWPPMP [REP1-104] support the DCO Application and include outline measures to ensure impacts to NMU along highways and PRow are minimised as far as practicable. It is anticipated that PRow which cross the Order Limits will generally remain open during the construction phase of the Scheme. There may be some slight perceptible delay to NMU

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				movement if a construction vehicle is crossing a PRoW within the Order Limits. An Outline PRoWPPMP [REP1-104] forms an embedded mitigation and will provide measures to ensure the effects of the construction phase on PRoW users is minimised. The Outline PRoWPPMP [REP1-104] contains specific measures for the temporary diversion of footpath WT GRIT 20 and bridleway WT MALW 54, where access to Cable Route Corridor works east of Grittleton, and HGV access to Lime Down E are taken respectively. These diversions are proposed to ensure unreasonable effects to PROW users are not experienced during construction, replacement and decommissioning.
VJC-022	Socio-Economics, Recreation and Tourism	Recreation	The effect on Malmesbury, for example, has been ignored despite being heavily reliant on visitors to the area. The effect on Sherston has also been ignored despite having at least 2	Please refer to Tables 5.3 and 5.12 within the Applicant Response to Relevant Representation (Part 1) [PDA-009] where the Applicant has responded to comments raised by both Malmesbury and Sherston. The

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			businesses who are reliant on cyclists and walkers and tourists plus a pub. The Vine Tree pub at Norton, currently reached by many on a public footpath, would be surrounded by panels as would the footpath. That is inevitably going to impact that pub's business. There is a country house hotel in Easton Grey who clients often walk the footpaths which will be impacted. The loss of income and potential job losses are simply not factored in. It is not credible to suggest that at least some cyclists, walkers and tourists will choose to go to a different area to enjoy the landscape and peace they currently have in the Lime Down area or choose not to return once they have seen what has been done to the landscape. There are many other small businesses which will be impacted, quite apart from tenant farmers and farmers down the cable route.	Applicant confirms that the assessment 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] does include assessment of impacts to tourism, visitor and recreation receptors including in Malmesbury and Sherston. Impacts to industry sectors have been assessed, but impacts on individual businesses have not. The Applicant has sought to minimise impacts upon neighbouring properties and amenity through the mitigation measures secured by requirements in Schedule 2 to the Draft DCO [REP1-007]. This has included ensuring the Scheme design is buffered and screened considerably from residential and community buildings to minimise visual impacts, secured through the Outline LEMP [APP-283] by Requirement 7 [REP1-007]. Further measures to control

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				HGV movements to mitigate impacts to visitors and business operators accessing business premises are secured through the Outline CTMP [REP1-112] by Requirement 15 [REP1-007] . Measures to limit visual and safety impacts to PRow users are secured through the Outline PROWPPMP [REP1-104] by Requirement 16 [REP1-007] and additionally secure provision for permissive routes to improve access to the PRow network around Sherston, Norton, and the Lime Down Solar PV Sites during the operational lifetime of the Scheme.
VJC-023	Socio-Economics, Recreation and Tourism Transport and Access Noise and Vibration	Equine Impacts	No proper assessment on the impact on horses have been made. Horses and riding round here are not just recreational – horses account for the business of studs, event yards, livery yards, farriers, vets, feed merchants and so much more. Horses and HGVs and noise do not mix.	The Applicant notes this comment and refers to the Applicant's response to January Farrington in the Written Summary of the Oral Submissions at the Open Floor Hearing 1 and the Applicant's Responses [REP1A-013] . Although a specific equine assessment has not been undertaken, the EIA has sought to identify and minimise potential effects on sensitive receptors across a range

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				of technical topics, with embedded mitigation and management measures incorporated where appropriate. Equestrian facilities, including private stables and paddocks, studs, riding schools, and on public rights of way such as bridleways and byways have been considered as specific recreational receptors in the assessment in the ES Volume 1, Chapter 16: Socio Economics, Tourism and Recreation [APP-068]. The likely effects on these locations and receptors are specifically and individually assessed in ES Volume 3, Appendix 16-2: Tourism and Recreation Receptor Tables [APP-241]. The likely effects on these locations and receptors are specifically and individually assessed in ES Volume 3, Appendix 16 2: Tourism and Recreation Receptor Tables [APP-241]. The Scheme's approach has assessed the likely direct impact of

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				construction on equestrian facilities, and accessibility and amenity impacts on those facilities and surrounding rights of way used for hacking. The Applicant confirms that the majority of significant adverse effects can be mitigated, however understands that some significant adverse effects to users of routes in Lime Down E cannot be mitigated further during construction. No significant residual effects are anticipated during the operational phase of the Scheme. The Applicant has committed to ensuring the operation or recreational use of equestrian facilities and PROWs is protected as much as possible through the implementation of embedded and additional mitigation measures set out in the Outline CTMP [REP1-112] and Outline PROWPPMP [REP1-104], secured respectively by Requirements 15 and 16 in Schedule 2 to the Draft Development Consent Order (DCO) [REP1-007].

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				The Applicant confirms that the Scheme design includes provision of approximately 12.6 km of permissive paths for pedestrians, and for pedestrians, cyclists and equestrian users, to improve connectivity across the Sites and the wider public rights of way network. These are secured through the Outline LEMP [APP-283] and Outline PROWPPMP [REP1-104] Requirements 7 and 16 of Schedule 2 to the Draft Development Consent Order (DCO) [REP1-007]. The Applicant confirms that the approach to equestrian and PROW impacts is under discussion with Wiltshire Council's Countryside Access Team (as part of discussions with Wiltshire Council in general), the British Horse Society, and the Wiltshire Bridleway Association. Progress on each of these discussions is set out in the relevant Statements of Common Ground. The Applicant recognises that animals, including horses, can be

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				sensitive to dust and construction activity. Management measures within the Outline CEMP [REP1-096] and the Outline CTMP [REP1-112] include measures such as dust suppression, site management controls, routing and scheduling of construction traffic, and management of plant and machinery which are specifically designed to minimise dust at source and reduce the potential for construction related emissions to affect nearby receptors, including equestrian properties. Glint and glare effects upon bridleway users have been assessed in Section 8 of ES Volume 3, Appendix 20-4: Solar Photovoltaic Glint and Glare Study [APP-261]. No significant effects are predicted as the sensitivity of receptors is considered to be low. There is no evidence that horses are significantly affected by solar reflections. Construction noise effects would be controlled through the implementation

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				of the Outline CEMP [REP1-096], secured through Requirement 13 of Schedule 2 to the Draft DCO [REP1-007]. In particular, Sections 2.5 and 3.9 of the Outline CEMP [REP1-096] set out a range of embedded mitigation measures, including adherence to best practicable means in accordance with BS 5228, restrictions on core construction working hours, management of out-of-hours working through Section 61 agreements where required, use of temporary acoustic fencing around HDD compounds where necessary, and implementation of additional site specific mitigation measures where activities have the potential to affect nearby noise-sensitive receptors. Additional mitigation measures include the careful siting and orientation of temporary construction compounds and plant, use of quieter plant where practicable, and offsetting noisy construction activities away from neighbouring paddocks and sensitive receptors where reasonably practicable. The Outline

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				CEMP [REP1-096] also includes measures relating to lighting control and traffic management to minimise disturbance during construction. With regards to horses, as there is currently no established regulatory guidance for assessing noise induced behavioural change in livestock or horses, the approach where noise for humans and horses are considered in terms of a receptor are addressed as potential amenity impacts on equestrian facilities, including private stables, paddocks, stud farms and riding schools, which have been assessed in ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068] and its supporting ES Volume 3, Appendix 16-2: Tourism and Recreation Receptor Tables [APP-241]. The chapter concludes there would be no significant residual effects to their operation or recreational use as a result of noise impacts, subject to implementation of embedded and additional mitigation measures

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				with any mitigation requirements (such as noise screening and visual screening between onsite infrastructure and neighbouring paddocks). The approach where noise for humans and horses are considered in terms of a receptor are addressed as potential amenity impacts on equestrian facilities, including private stables, paddocks, stud farms and riding schools aligns with an accepted methodology based on expert advice in other DCO's, including Sunnica Energy Farm, where the Secretary of State (SoS) agreed with the methodology that an animal's processing of decibel levels is sufficiently similar to a humans' that the established human-noise threshold is a fair benchmark for noise impacts to be considered. The Scheme's approach has assessed the likely direct impact of construction on equestrian facilities, and accessibility and amenity impacts

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				on those facilities and surrounding rights of way used for hacking. Furthermore, the Applicant, notes a summary from the British Horse Society from August 2025 which contains a section on glint and glare: "The society has no evidence of 'glint and glare' from solar panels and no evidence of horses reacting to it or of it being detrimental to the health and wellbeing of horses. Reports from sites with both solar panels and horses, including a solar array beside an arena used for riding horses, indicate no reflection and no reaction from or impact on horse or rider." The view put forward by the British Horse Society is that, whilst horses may initially react to new solar infrastructure, this is no different from how they might respond to any unfamiliar change in their environment, and is something they generally adapt to quickly. Any reaction is therefore attributed to a change in surroundings, rather than

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				to anything specific about the panels themselves.
VJC-024	Socio-Economics, Recreation and Tourism	Local businesses	Could the Examiners please get the Applicants to explain what benefits are expected to accrue to the residents and businesses in this area (other than the payments to be made to the owners of the pink land) in the construction period and how they came to the conclusion that the Scheme would not result in significant adverse effects on local businesses or the wider local economy.	The Applicant acknowledges that any adverse effects from the Scheme are more likely to be felt locally than the largely wider scale benefits of the Scheme. The Scheme is anticipated to help meet the UK's net zero requirements for energy production, which is considered a critical national priority and set out in National Policy Statements for Energy NPS EN-1 (section 4.2) and EN-3. This therefore will benefit the national population rather than just the local population. The benefits of the Scheme are set out in Section 5.3 of the Planning Statement [REP1-087] and include the delivery of large amounts of cheap, secure, and low carbon electricity which will help the UK to achieve net zero by 2050, ecological and landscape enhancements, biodiversity net gain, permissive paths, employment generation, economic benefits and skills training.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				The Scheme is also anticipated to to benefit the population within approximately 20 km of the Scheme, through providing employment and income especially during construction and peak replacement activities, and providing skills and training opportunities. Where the Scheme is anticipated to benefit local people more specifically, this is done through providing onsite permissive paths to increase access to the countryside, providing improved landscape planting through reinforcing existing hedgerows and planting of new trees, providing biodiversity net gains through habitat improvements. That notwithstanding, the Applicant is committed to providing a Community Benefit Fund to allow for community-driven benefits that are not necessarily associated with the Scheme itself. The purpose is to establish a means to recognise local community needs that the

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				Applicant wants to be able to contribute towards in recognition of the local impact of the Scheme. The Community Benefit Fund is separate from the DCO process, and so is not bound to the same timescales or information requirements as submitted information. Furthermore, community benefits are legally immaterial to planning decisions and cannot be considered when deciding whether to grant planning consent. The Applicant acknowledges this and so has sought to provide the Community Benefit Fund voluntarily even though it won't add favourable weight in the planning balance.
VJC-025	Socio-Economics, Recreation and Tourism	Employment	What are the economic skills and supply chain opportunities during the operational phase?	The ongoing workforce associated with the operation and maintenance of the Scheme throughout the Scheme's operation and maintenance phase is likely to be limited to replacement and maintenance workers, and landscaping teams. Jobs will include electrical engineers,

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				performance managers and landscape and monitoring managers. Site monitoring and security is anticipated to be operated remotely. The Draft DCO [REP1-007] also applies for the provision of a peak replacement scenario within which all onsite Solar PV Panels and BESS batteries could be replaced in a 12-month period. During this period, an estimated gross 125 FTE employees per annum would be required, with the estimated onsite replacement workforce expected to peak at approximately 360 workers.
VJC-026	Consultation and Engagement	Consultation materials	TRANSPARENCY OF CONSULTATION The paper based materials which the Applicants supplied during the statutory consultation were misleading. The images of the BESS and solar panels in the Project Information Booklet and at the consultation meetings bore no resemblance to the reality of what is planned. The image of the BESS was computer generated	The Applicant acknowledges this comment but remains confident in the level of consultation undertaken and the information presented. The Applicant notes Adequacy of Consultation Responses [AoC-001 to AoC-012] where consultees provide their feedback on the adequacy of consultation. These responses are taken into consideration by the Planning

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			and does not give a true impression of what the Applicants actually propose. Similarly the image of the 400kV transformer is CGI and unlike what is proposed. Finally, the only images of PV panels in the booklet are not 4.5m tracking or 3.5 m fixed panels. It takes a sharp eye to realise that these are not the panels proposed. Photos of the relevant pages from the Project Information Booklet are at the end of this note. Perhaps unsurprisingly no image of the proposed 4.5m tracking panels were included in the project booklet. It is not acceptable to say that information was provided in the PEIR – what normal person looks further than the leaflet delivered? Despite writing to the Applicant requesting an image of a BESS of similar size to the one proposed this has not been provided. The image of the BESS and the photo of solar panels would not lead someone to have any idea of what the Applicant actually intended to build	Inspectorate when deciding to accept an application for development consent. The Applicant is confident that appropriate and proportionate consultation with the community has been carried out. In summary, the Applicant published a range of consultation materials including a Consultation Leaflet and Project Information Booklet summarising the proposals, and PEIR Non-Technical Summary (NTS) providing an overview of the information and findings set out in the PEIR. The Document Navigation Booklet was made available to guide readers through the full suite of consultation documents. Reference copies of technical documents (PEIR, NTS of the PEIR, maps and plans) were available to view free of charge at Community Access Points (CAPs) for inspection in printed and electronic format. These documents were also available to view at the 10 information events held by the Applicant, where the proposals could

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			nor the numbers or scale. Generally it has been very difficult for members of the public to obtain information to enable them to understand the real scale and impact of the project from within the mass of material submitted. Particularly to visualise the size of the panels in the landscape.	be discussed with the Applicant's project team. Members of the public were, and still are, able to ask questions about the proposals using the free-to-use Scheme communication channels.
VJC-027	Consultation and Engagement	Consultation materials	After the application was filed I asked for copies of the visualisation documents at APP 103-105 (because the notes say they have to be printed on a particular size of paper in order to be viewed properly). The instructions as to viewing and printing is set out below Technical Information Refer to accompanying Technical Methodology: ES Volume 3, Appendix 8-1: LVIA Methodology [EN010168/APP/6.3] Printing Note This viewpoint visualisation is spread across a single sheet 841mm wide and 297mm high. To give the correct viewing distance the sheet should be printed at a scale of 1:1 on large format paper	The Applicant remains confident in its response to RR-4875 regarding accessing Application Documents and the presentation of associated infrastructure in the community consultation. The Applicant's response can be found under Reference ID CE-22 in the Applicant's Response to Relevant Representations (Part 2) (Rev 2) [REP1-117]. The Applicant notes that they remain open to providing specific documents in hard copy format on request, with an appropriate charge applied in certain instances.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			and cut to size. Do not print at A3. This photograph and visualisation is a cylindrical projection panorama. Hold this sheet at a comfortable arm's length from your eyes and curve the image through 90° and turn head to view. Alternatively, the visualisation can be laid flat and viewed by scanning left or right parallel to the sheet maintaining a 50cm viewing distance between your eye and the page. This visualisation is a tool for assessment and is best used for comparison in the field from the viewpoint location shown. It cannot be considered a substitute for visiting the viewpoint location. I was told I (an individual trying to understand the visualisations of what the Applicants propose) would have to pay £3150 plus VAT plus a handling fee of £472.50 and a courier fee of £200 to receive these. I can find no reply to my comments about this in the Applicants' response. It appears that the photomontages were intended to be – or in practice are	

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			– not usable by any member of the public or many statutory consultees trying to understand the extent of the scheme. While I am aware that the consultation has been approved, in the sense that that Applicants have been permitted to submit their Application, it is noteworthy just how many people expressed concern about the consultation process in their Relevant Representations. The Applicants' reply included the following "The Applicant considers the materials provided were adequate and informative, and presented information using standard mapping conventions." No one looking at the image of the BESS would have known what is planned and nowhere is there an image of the PV panels proposed (so much larger than the "normal" panels seen in nearby solar developments) nor or an indication of the numbers – 600,000 plus – to be used in the landscape. Despite the local community's best efforts to get people to understand what is	

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			proposed there are still many people who have no concept of what Lime Down really consists of. Could the Examiners ask the Applicants why they chose not to produce images which properly reflected the proposed BESS, panels and 400kV transformer in their consultation materials.	
VJC-028	Consultation and Engagement	Adequacy	CONCLUSION These are non-exhaustive examples of my concerns about my Relevant Representations not being properly addressed despite the huge resources of the Applicants and my concerns at the apparently deliberate attempt to mask the enormity of the impact of the Scheme from ordinary members of the public. The Examiners are asked not to accept the materials submitted by the Applicants and their consultants at face value and to have at least equal regard to the materials submitted by or on behalf of those who live in and love and know this area including those from SLD.	The Applicant refers to its response provided under reference ID CE-026 in Applicant's Response to Relevant Representations (Part 2) (Rev 2) [REP1-117] regarding its approach to responding to submissions. Each RR submitted by the general public, and any other non-statutory parties not responded to at Deadline A, has been systematically reviewed and a summary of the issues raised has been prepared. These summaries are presented alongside the corresponding unique reference ID, enabling a clear audit trail between the original representation and the Applicant's response.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				The Applicant therefore had regard to all RRs received and has provided a response to the issues raised. The Examination process, led by the Examining Authority, will further consider all RRs, alongside the Applicant's responses and any subsequent submissions, in reaching a recommendation on the Scheme. The Applicant notes that the free-to-use Scheme communication channels remain open for anyone to contact the Applicant regarding questions about submissions and responses to comments. The Applicant also notes Adequacy of Consultation Responses [AoC-001 to AoC-012] where consultees provided their feedback on the adequacy of the consultation.
Paul Bird REP1-232				

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
PB-001	Scheme Description and DCO Process	General remarks	Submitted by Paul Bird, Campaign Director, Harvesting the Sun Twice This representation does not oppose the principle of solar energy generation at Lime Down. It advances a specific, evidence-based argument: that the applicant has proposed a suboptimal solar configuration for the quality of land involved, and that the Examining Authority should satisfy itself that Vertical Bifacial PV (VBPV) was properly evaluated as an alternative before consent is granted. The configuration argument. The proposed Lime Down Solar Park uses conventional fixed-tilt, south-facing panels (TBPV). An alternative configuration — Vertical Bifacial PV — mounts identical bifacial panels vertically in an east-west orientation. Both use the same panel technology. The difference is orientation only, but the consequences for land use, grid economics, and reversibility are profound. BMV land.	VBPV solar orientations are a relatively new concept reported to be suitable for high latitude applications. VBPV is unproven at scale globally - the largest VBPV scheme in operation has a capacity of order of magnitude 1,000 times smaller than the Scheme. The Applicant continually reviews and assesses emerging technologies and orientations and has concluded that (a) VBPV performance at scale in the UK is unproven and considerable caution should be taken in transferring the results of a single small-scale trial to a nationally significant infrastructure scale; and (b) that developing a VBPV at the scale required to match the grid connection capacity is not achievable in the timeframes proposed for the development of the Scheme. Therefore, VBPV was therefore not assessed as an alternative layout to the Scheme in line with NPS EN-1 (2023) Paragraph 4.3.23).

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			Wiltshire Council has formally objected on the grounds that 30% of the site is Best and Most Versatile (BMV) agricultural land, and that no evidence has been provided that alternative sites were considered. This representation adds a further point: even where BMV land is used, TBPV makes the impact significantly worse than necessary. Under VBPV, 70–85% of agricultural productivity is retained throughout the operational life of the asset. Full-width machinery can operate between panel rows. The BMV objection is not merely mitigated — it is substantially resolved. Energy and grid performance. VBPV delivers 8–12% more energy annually than south-facing fixed-tilt monofacial PV (University of York; Badran & Dhimish, 2024). Its east-west orientation produces a dual morning/evening generation profile aligned with grid demand peaks, reducing the	Section 4.9 of ES Volume 1, Chapter 4: Alternatives and Design Evolution [APP-056] outlines the alternative solar infrastructure technologies considered at the preliminary stage, against environmental constraints and the objectives of the Scheme. Both east-west single axis tracking Solar PV Panels (Option A) and south facing fixed Solar PV Panels (Option B) have been included within the parameters that have been assessed in the ES. East-west fixed Solar PV Panels were discounted by the Applicant at an early stage as they are not suitable for the Scheme due to their lower energy generation yield and increase the amount of land required to deliver a 500MW scheme. The BESS has been proposed as associated development to support the operation of the Scheme. Section 4.6 of the Statement of Need [REP1-085] explains that the balance between supply and demand on the

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			Battery Energy Storage System (BESS) requirement by approximately 52% compared to an equivalent TBPV installation. The 1GWh BESS proposed for Lime Down should be assessed against a VBPV scenario. Leave no trace. Planning conditions should require baseline microplastic soil assessment at commissioning, annual drip-line monitoring, and a soil condition report at decommissioning. No published UK study of drip-line soil microplastic accumulation beneath solar farms currently exists; this monitoring gap is a material evidence absence. Requests of the Examining Authority. The representation asks the Examining Authority to require the applicant to demonstrate that VBPV was properly evaluated for the BMV land within the site; that the Environmental Statement addresses long-term agricultural productivity impact by configuration; that soil condition	GB electricity system is changing and is expected to continue to change as both supply and consumption change and grow. It is therefore not a given, as this representation states, that grid demand peaks will always occur at times when VBPV technology generation is highest. The inclusion of BESS as part of the Scheme will allow energy to be stored at times that it is not needed, and released at times when it is needed more. The BESS has been proposed at a scale which is appropriate for the Scheme while respecting local environmental considerations. In terms of the use of agricultural land and the consideration of alternative sites, please refer to response ID SS-06 and SS-07 in the Applicant's Response to Relevant Representations (Part 2) [REP1-117] which addresses this point. In summary, the Applicant has undertaken an appraisal of alternative sites which concludes that there are no more suitable or available

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			monitoring conditions are imposed; and that BESS sizing is justified against a VBPV alternative scenario.	locations within 20km of the grid connection at the Existing National Grid Melksham Substation than the proposed location for the Scheme. A sequential approach has been adopted in regard to agricultural land, with lower grade agricultural land considered first before the search area was expanded to higher grades of agricultural land. The hydrology assessment has assessed the Scheme applied for. The suggested alternative panel configuration does not identify a deficiency in the submitted flood risk assessment. From a flood risk perspective, the key question is whether the proposed Scheme would materially increase runoff or flood risk. That has been assessed in ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [REP1-017] and the FRA & Drainage Strategy [REP1-037 to REP1-054]. The proposed panelled areas remain permeable

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				and drain to ground. They are not treated as impermeable hardstanding because they are elevated structures and are not connected to a formal drainage network. Whether panels are fixed, tracking or vertically mounted, the hydrological control remains the same: ground cover, soil condition, compaction, surface roughness and flow connectivity. At Lime Down, those controls are secured through the Outline CEMP [REP1-096], Outline OEMP [REP1-098] and Outline Soil Resources Management Plan [APP-280]. Runoff from impermeable infrastructure is assessed separately and controlled. The Scheme would remain safe for its lifetime and would not materially increase flood risk elsewhere. A detailed Soil Resource Management Plan (SRMP) will be prepared post consent and will be required to be in substantial

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				accordance with the Outline Soil Resource Management Plan [APP-280]. The detailed SRMP will establish soil conditions at the time of decommissioning and set out how any requirement for remedial works will be identified. As best practice measures may evolve over the lifetime of the Scheme, the SRMP does not prescribe detailed remediation measures at this stage. Further detail on decommissioning activities will be provided within the detailed Decommissioning Environmental Management Plan (DEMP). Ground investigation will be undertaken across the study area prior to the commencement of the construction phase, as secured via the Outline CEMP [REP1-096]. As part of this exercise, geo-environmental analysis of soil and groundwater will be undertaken, based on the Conceptual Site Model developed as part of ES Volume 1, Chapter 19: Ground Conditions

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				[REP1-027] and any potential contaminants associated with the proposed site activity in order to ensure that baseline ground conditions are understood.
PB-002	Site Selection and Alternatives	Assessment	CLAIM 1: The Lime Down site was selected following a comprehensive and transparent assessment of alternatives. Source: IGP Application / Lime Down Solar website Reality: Evidence submitted to the Planning Inspectorate shows that site selection at Lime Down was significantly driven by commercial land agreements with a small number of large landowners, not by a systematic assessment of least-impact locations. - The Site Selection Assessment Report adopted an illogical and inconsistent approach to environmental constraints: sites were not compared against the same criteria, meaning the comparison is unreliable - IGP's own documents acknowledge the process was	ES Volume 1, Chapter 4: Alternatives and Design Evolution [APP-056] and ES Volume 3, Appendix 4-1: Site Selection Assessment Report [APP-185] detail the staged approach to site selection undertaken by the Applicant. This includes consideration of a range of planning, environmental and operational factors. Although the availability of large-scale land holdings was a consideration, it was not the only consideration in the site selection process as suggested by the respondent. The Applicant does not consider it proportionate to assess all sites in various combinations, or to redraw previously discounted PDAs. It is considered that this goes beyond the

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			driven by land agents identifying 'potentially willing landowners with large areas of land. This was commercial availability, not environmental suitability - Closer, less sensitive combinations of land parcels near Melksham were not meaningfully tested, despite potentially offering shorter cable routes and lower landscape harm - The resulting 22km cable route is itself evidence that this is not the most suitable available location; a shorter route to the grid would indicate a better-sited scheme and not affect villages such as Castle Coombe. - 4,958 Relevant Representations, 99% opposing, were submitted; the highest number ever recorded for any solar NSIP in England, exceeding Gatwick Airport	policy requirements for the consideration of alternatives. However, the Applicant has further considered whether any of the PDAs could have been redrawn to remove constraints and then combined in order to create new PDAs or "clusters." This is set out in the Technical note on Site Selection Assessment [EN010168/EXAM/9.26]. This further analysis has resulted in three "clusters" of PDAs being considered. However, none of the clusters are considered to be reasonable alternatives for the Scheme. Therefore the conclusions of the Site Selection Assessment Report [APP-185] remain unchanged. The design evolution of the Cable Route Corridor and consideration of alternatives is detailed within ES Volume 1, Chapter 4: Alternatives and Design Evolution [APP-056]. Several factors were considered and the corridor was designed to take a

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				direct route whilst following existing features, such as roads, and avoiding sensitive receptors as far as practicable, such as habitat designations, residential and commercial properties, heritage assets, and a large number of land interests, including private residences and gardens. The Applicant welcomes the submissions received during the Relevant Representation period and has reviewed and provided responses to all submissions in Applicant's Response to Relevant Representations (Part 1) [PDA-009] and Applicant's Response to Relevant Representations (Part 2) (Rev 2) [REP1-117]. Throughout the development process, the Applicant has considered all feedback received. The Consultation Report [APP-022] and its Appendices [APP-023 to APP-051] provide a detailed

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				account of how consultation feedback, including prescribed consultees and public comments, have been considered and, where appropriate, how it has influenced the evolution of the Scheme.
PB-003	Cumulative and In-Combination Impacts	Assessment	CLAIM 2: Wiltshire is not disproportionately affected by solar development Source: Solar Power Portal 'Wiltshire ideally situated for solar power' Reality: Wiltshire already hosts multiple large solar installations. Lime Down at 500MW would be one of the largest NSIP solar developments in England and would make Wiltshire one of the most solar-industrialised counties in the country. • Existing major sites in the county include Lyneham, Wroughton and Snarlton • Two additional large sites are already approved: Leigh Delamere (50MW) and Red Barn	Consideration of combined effects is an important part of the application. The Applicant has responded to comments relating to cumulative effects in detail on page 806-807 and page 870-871 of the Applicant's Response to Relevant Representations [PDA-009], where it is explained that full and extensive engagement, consideration, assessment and reporting of intra- and inter-project cumulative effects has been undertaken with the conclusions set out within ES Volume 1, Chapter 21 Cumulative and In-Combination Effects [APP-073]. The Applicant reaffirms that ES Chapter 21 Cumulative and In-Combination Effects [APP-073] fully considers each of the existing and proposed solar and BESS schemes

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			• Lime Down's five individual solar sites would each independently qualify as Nationally Significant Infrastructure Projects in their own right • The combined development footprint - panels, cable route, substations and associated infrastructure, covers approximately 50 square kilometres of North Wiltshire countryside • No equivalent concentration of NSIP-scale solar exists in any other county in England	shown on ES Figure 21-1 [APP-178] and Figure 21-2 [APP-179]. Cumulative effects have therefore been assessed in accordance with the EIA Regulations and relevant guidance as listed within ES Volume 1, Chapter 21 Cumulative and In-Combination Effects [APP-073].
PB-004	Scheme Description and DCO Process	Planning process	CLAIM 3: Every solar project undergoes an impartial planning process Source: The Political Quarterly Reality: Nationally Significant Infrastructure Projects are determined by the Secretary of State, who can and does override Planning Inspectors' recommendations. Lime Down has generated the most locally opposed response ever recorded in English planning history.	The weight given to the recommendations of the Planning Inspector and any decision made by the Secretary of State is a matter for the Secretary of State to consider.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			• In 2024, Ed Miliband approved the Sunnica Solar NSIP against the Planning Inspector's recommendation to refuse, demonstrating that ministerial priorities can override expert assessment • Wiltshire Council voted 85 – 0 against Lime Down, the clearest possible democratic expression of local opposition; under NSIP rules, it carries no binding weight • 4,958 Relevant Representations were submitted, 99% objecting, exceeding the previous record for any NSIP, including Gatwick Airport's expansion • No statutory consultee offered clear support for the scheme; objections were raised by National Grid, Historic England, Natural England and the Environment Agency • The Planning and Infrastructure Bill proposes further acceleration of developer led outcomes and reduced local oversight	

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
PB-005	Soils and Agriculture	Land use	B. LAND, FARMING & FOOD SECURITY CLAIM 4: Solar farms use low-value land. Source: Solar Power Portal Reality: Government policy directs that Best and Most Versatile (BMV) agricultural land should be avoided where possible. At Lime Down, the applicant itself acknowledges that approximately 240 hectares, around 33% of the solar PV area is BMV, which it describes as 'significant.' • Natural England has stated that the BMV land assessment methodology is still under discussion, raising questions about whether the true BMV proportion is higher than claimed • The Sunnica Solar NSIP (approved 2024) was subsequently found to include approximately 50% BMV land, far exceeding the developer's initial figure of 4%, demonstrating that applicant	Please refer to response ID SS-06 and SS-07 in the Applicant's Response to Relevant Representations (Part 2) [REP1-117] which addresses the use of agricultural land and consideration of alternatives. In summary, the Applicant has undertaken an appraisal of alternative sites which concludes that there are no more suitable or available locations within 20km of the grid connection at the Existing National Grid Melksham Substation than the proposed location for the Scheme. A sequential approach has been adopted in regard to agricultural land, with lower grade agricultural land considered first before the search area was expanded to higher grades of agricultural land. In terms of the Cable Route Corridor, ES Volume 1, Chapter 4: Alternatives and Design Evolution [APP-056] details the design evolution and the alternatives that have been considered. Several factors were considered and the

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			BMV assessments cannot be taken at face value • The cable route corridor passes through land that is approximately 75% BMV in some sections • NPS EN-3 (2025) states applicants 'should avoid the use of Best and Most Versatile agricultural land where possible' compliance with this cannot yet be demonstrated • The NFU has warned that removal of planning protections for BMV land will 'create further instability for those facing compulsory purchase of their land'	corridor was designed to take a direct route whilst following existing features, such as roads, and avoiding sensitive receptors as far as practicable, such as habitat designations, residential and commercial properties, heritage assets, and a large number of land interests, including private residences and gardens. The methodology employed for the Agricultural Land Classification survey work undertaken is set out in ES Volume 3, Appendix 17-1: Agricultural Land Classification and Soil Resources Survey Report [REP1-063]. The methodology was agreed in consultation with Natural England and the final observation densities achieved have subsequently been confirmed as acceptable. There were several disputes regarding the quality of the ALC studies at Sunnica, including the reliability of the data, and

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				also whether the presence of irrigation should be accounted for or not. In droughty soils, the ALC guidance at the time noted that land could be upgraded by one grade if a reliable irrigation system was in place. The ALC report discounted irrigation; much of the upgrade to BMV referred to in this comment was due to irrigation being accounted for. Irrigation on droughty, sandy soils is not an issue relevant to Lime Down. The survey methodology and full schedule of soil profile data are provided at ES Volume 3, Appendix 17-1: Agricultural Land Classification and Soil Resources Survey Report [REP1-063] and are supported by photographs of each soil type and laboratory analysis results.
PB-006	Soils and Agriculture	Food security	CLAIM 5: Utility scale solar does not affect food security. Source: Solar Energy UK Reality: At Lime Down, approximately 2,200 acres would be removed from food production	The total area of the Solar PV Sites noted in ES Volume 1, Chapter 3: The Scheme [APP-055] is 748 hectares, which equates to 1,848 acres, not 2,200.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			for up to 60 years, a generational change in land use, not the temporary one described by the applicant. Twelve tenant farmers face displacement. • The UK imported £64.1 billion of food in 2024 but exported only £24.6 billion, a large and growing deficit (DEFRA UK Trade in Food 2024) • Only 62% of all food consumed in the UK was domestically produced in 2023 (UK Food Security Report 2024) • A 60-year operational life is functionally permanent: no scheme of this scale has ever been decommissioned and there is no reliable evidence that land can be fully restored afterwards • The scheme is enabled by nine landowners, many of whom do not farm the land themselves, displacing twelve tenant farmers • Proposed 'soil improvement' under panels is based on studies of ten years or fewer; no credible evidence supports the	The UKRI's Roadmap for Resilience: A UK Food Plan for 2050, addresses future food security and self-sufficiency, which it notes would be achievable "but only with coordinated policy on production, diets and land use." The three core principles for the UK to become self-sufficient are: resilient agricultural production, which includes reducing livestock numbers and supporting farm diversification; integrated land use to sequester carbon and reduce agricultural emissions; and changing dietary choices, namely consuming less meat. The Applicant does not consider that cessation of arable production on a majority moderate to low quality agricultural land in Subgrade 3b and Grade 4 would significantly affect the UK's ability to become self-sufficient in food production. Finally, DEFRA's recently published "Land Use Framework- March 2026" sets out how there is enough land to

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			improvements claimed over 60-year timescales	deliver objectives for nature restoration and development without reducing domestic food production or compromising on the framework's objectives. Within this it is detailed within the Category D objective- Renewables, that 1% of England would be needed for solar & wind targets to 2035, and a further 1% for 2050 targets, with some of this land still able to continue to be used for food production, and that land for Renewables overlaps into Category C – Land use change toward climate change and nature benefits.
PB-007	Soils and Agriculture Ecology and Biodiversity Ground Conditions	Dual land use	CLAIM 6: Dual-use farming and sheep grazing under solar panels provides genuine agricultural benefit Source: Lightsource bp (Australian study) Reality: At Lime Down, the 4.5-metre tracking panels are substantially taller than standard solar installations and create conditions incompatible with meaningful agricultural activity. 'Dual use' is a marketing term, not	The Applicant notes that the design of the Solar PV Sites is compatible with some farming practices, such as sheep grazing, which could provide an opportunity to limit the effects on agricultural production during the Scheme's operation. As detailed in ES Volume 1, Chapter 3: The Scheme [APP-055], Section 3.5, whilst grazing of livestock (sheep) beneath the solar panels may be possible, the Applicant has not relied on sheep grazing beneath the panels

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			an independently verified outcome. • Up to 700,000 panels at 4.5 metres high, with tracking motors, cabling and inverter compounds create direct injury risks for livestock • Shading under panels can reduce herbage yield by up to 56%, even where stocking rates are managed to compensate (US agrivoltaic research) • Livestock grazing under panels damages the ground vegetation, which must remain intact to absorb water runoff and prevent soil erosion, a direct conflict of land uses • The Australian study cited was conducted at a conventional fixed-tilt farm; its findings do not apply to the 4.5m tracking panels proposed at Lime Down • Microplastic shedding from panel degradation is an emerging and unquantified risk for livestock and soils; no assessment has been carried out	for mitigation in any part of the assessment, and does not state grazing to be a "genuine agricultural benefit", only that it would represent some continued agricultural use, should the land be grazed. Furthermore, the Applicant does not rely on livestock grazing as the sole mechanism for managing runoff or flood risk. The hydrology position is based on the retention of permeable ground, management of construction-phase compaction, maintenance of vegetation cover and formal drainage controls for impermeable infrastructure. The point raised about vegetation damage from grazing is relevant only if grazing were unmanaged and resulted in bare, compacted or degraded ground. That is not the basis of the Scheme. Operational land management will need to maintain ground cover and soil condition beneath and between panels. This is secured through

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				the Outline OEMP [REP1-098], Outline CEMP [REP1-096] and Outline SRMP [APP-280]. Published solar hydrology research identifies that runoff risk is controlled by vegetation cover, compaction, surface roughness and hydraulic connectivity. Those risks are embedded within the Scheme's management approach. The Scheme would not materially increase runoff or flood risk as a result of the proposed operational land management approach. Microplastics have been shown to be introduced to greenfield agricultural land via standard fertiliser application operations, with one study (published by the James Hutton Institute in May 2025) showing microplastic abundance to increase by up to 1,445% following application of sewage sludge. Removing the agricultural land within the Solar PV Sites from arable production will negate the requirement for annual

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				application of fertilisers, and remove that potential pathway of microplastic contamination. No studies on microplastic shedding from solar panels specifically have been reviewed as part of the assessment of effects on soils, however it should be acknowledged that there are existing pathways for microplastics to enter the soil; any shed from solar panels would not necessarily represent the introduction of new contamination, rather a different source.
PB-008	Ecology and Biodiversity	Wildlife impact	CLAIM 7: Solar farms are good for wildlife Source: Solar Energy UK Reality: At Lime Down, Wiltshire Council and Natural England identified significant gaps in the ecological survey data, meaning the impacts on numerous protected species have not been properly assessed. Large fenced industrial sites inevitably fragment habitats. • Survey data is absent for brown hare, hedgehog, polecat, dormice,	Habitats present within the Solar PV Sites have been assessed for their potential to support protected / notable species, including brown hare, hedgehog, polecat, dormice, harvest mice, reptiles, invertebrates, otters, water voles and white-clawed crayfish. Detailed water vole and otter surveys have been conducted at the Solar PV Sites as detailed in ES Volume 2, Appendix 9.6: Otter and Water Vole Survey Report [APP-203] Where habitat suitability assessments identified potential for

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			harvest mice, reptiles, invertebrates, otters, water voles and white-clawed crayfish across the site • 17 hectares of the cable route corridor were entirely unsurveyed due to access issues; no bat surveys were conducted despite the site's proximity to bat Special Areas of Conservation • The applicant's own Environmental Statement admits that approximately 71% of skylark and yellow wagtail nesting habitat within the panel areas would be destroyed • Approximately 10 kilometres of new security fencing would fragment wildlife corridors, affecting movement of mammals and ground-nesting birds across the site • In July 2025, a BBC report documented deer being trapped inside a UK solar farm, illustrating real-world welfare risks from large fenced installations	protected / notable species, their presence has been assumed, in line with the precautionary principle. On this basis, it was determined that species-specific surveys were not necessary, as a reasonable worst-case scenario has been applied. An assessment of potential impacts of the Scheme for each of the aforementioned species has been presented within ES Volume 1, Chapter 9: Ecology and Biodiversity [REP1-015]. The Applicant acknowledges that some areas within the Cable Route Corridor had not been subject to ecological survey at the point of finalising ES Volume 1, Chapter 9: Ecology and Biodiversity [REP1-015] Since the preparation of the Chapter 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

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				consistent with that reported in the ES Volume 1, Chapter 9: Ecology and Biodiversity [REP1-015] 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 (Rev 2) [REP1-076] 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. Comprehensive bat surveys have been undertaken as detailed in ES Volume 2, Appendix 9.3: Bat Survey Report [APP-200]. The assessment in ES Volume 1, Chapter 9: Ecology and Biodiversity [REP1-015] also identifies skylarks as a key species of conservation interest within the Scheme area. It concludes that approximately 71.5% of the

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				quantified number of territories belonging to the current skylark population will be displaced from the Solar PV Sites. This is expected to give rise to an adverse residual effect at a Local level which is transparently reported. Skylark-specific mitigation and habitat enhancement measures are incorporated into the Scheme design to reduce effects as far as practicable. These include the provision of suitably large, open set-aside and grassland habitats designed to provide appropriate breeding and foraging conditions. These measures are illustrated in ES Volume 2, Figure 3-4: Landscape and Ecological Mitigation Plan [REP1-029] and detailed in the Outline LEMP [APP-283]. The Scheme design incorporates fencing around the Solar PV Arrays that is permeable to wildlife, with the exception of deer. This means all wildlife (excluding deer only) will be able to freely access habitats within

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				the Solar PV Sites without the need for wildlife gates. In addition, wide buffers are retained around the peripheries of the Solar PV Sites to allow wildlife, including deer, to move between favoured habitats. These measures are described in ES Chapter 9 and detailed in the Outline EPMS [REP1-106] . Fencing will be subject to regular inspection and maintenance to ensure continued permeability to wildlife and effective functioning over the lifetime of the Scheme, with measures for ongoing ecological management and maintenance set out in the Outline LEMP [APP-283] .
PB-009	Ecology and Biodiversity	Biodiversity Net Gain	CLAIM 8: Lime Down will enhance wildlife habitats and achieve biodiversity net gains. Source: Lime Down Solar website Reality: The biodiversity net gain figures submitted for Lime Down are modelled on paper, not measured in reality. The calculations contain errors, were submitted in a format that	The Applicant notes this comment and a copy of the Statutory BNG Metric [PDA-008] in excel form was submitted at Procedural Deadline A. A full justification for the single habitat trading rule not being met is provided in paragraphs 1.11.10 - 1.11.16 of the BNG Assessment Report [REP1-091] . This relates to the loss

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			cannot be independently verified and include double counting. • The BNG calculations were not submitted in the required unlocked format, making independent verification impossible • IGP's own submission acknowledges that the BNG trading rules, which set minimum requirements to compensate for specific habitat losses, have not been satisfied • Habitats created as mitigation for destroyed habitat have been counted a second time as biodiversity gain inflating the claimed net benefit • Wildflower meadows, the primary claimed habitat creation, require nutrient-poor soils, which at Lime Down means deliberately downgrading productive agricultural land that currently supports a wide range of species • No independent long-term evidence exists for biodiversity	of habitats within the 'Cropland' broad habitat type, and is considered an artefact of the Statutory Metric, given that these habitats will in reality be retained and enhanced through the Scheme. Therefore, taking into account professional judgement, the BNG assessment is considered to be fully compliant with all trading rules. The Applicant confirms that habitat created as part of compensation or mitigation measures can indeed contribute to BNG values and this is accordance with guidance provide by DEFRA on this matter (for instance DEFRA article 'What you can count towards a development's biodiversity net gain' (May 2023) found at https://www.gov.uk/guidance/what-you-can-count-towards-a-developmentsbiodiversity-net-gain-bng. The Applicant acknowledges that cessation of agricultural inputs is proposed at land within the Solar PV

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			improvement under solar farms of this scale over 60 years in the UK	Sites, in order to maximise the biodiversity outcomes. The Applicant agrees that there are no examples of solar farms in the UK which have been in existence for close to 60 years. However, A comprehensive package of habitat creation and enhancement measures are shown 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]. These measures have been carefully designed based on the extensive knowledge of ecological conditions at the Order Limits collected through comprehensive desk studies and field surveys, as well as extensive professional experience of ecological enhancement measures which are both feasible and appropriate for the Scheme and its locality.
PB-010	Hydrology, Flood Risk and Drainage	Flood Risk	CLAIM 9: Solar Farms do not increase flood risk. Source: Solar Energy UK	The Applicant acknowledges recent flood events in the Bristol Avon catchment and the existing flood sensitivity of local watercourses.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			Reality: Lime Down sits in an area already experiencing severe and increasing flood events. Storm Bert (November 2024) flooded Chippenham and Bradford-on-Avon; Storm Claudia (November 2025) flooded Malmesbury for the second time in twelve months. The Environment Agency was not satisfied with the applicant's flood assessment. • The Environment Agency's scoping response identified factual inaccuracies and inconsistencies in the flood risk assessment, stating it was 'not satisfied' with the site description or its conclusions • Significant areas of Lime Down D and E already fall within Flood Zones 2 and 3 • The 4.5-metre tracking panels are larger than standard solar; rainfall falling from 2.5 metres height has over six times the kinetic energy of water from standard panel height, increasing runoff and soil erosion risk	Existing flooding is part of the baseline. The relevant question is whether the Scheme would materially worsen that risk. The majority of the Scheme is located in Flood Zone 1. Limited interaction with Flood Zones 2 and 3 occurs primarily at Lime Down D and Lime Down E2 and has been assessed in the relevant site-specific FRAs. The BESS and substations are located in Flood Zone 1 where practicable. The suggestion that larger fixed or tracking panels should be treated as impermeable hardstanding is not supported by national policy, published guidance or the available research. NPS EN-3 paragraph 2.10.84 recognises that solar PV panels drain to the existing ground. Norfolk County Council LLFA guidance treats panel areas as not impermeable. The Essex Design Guide describes solar farms as relatively low risk in surface water terms where mitigation is provided. Doncaster Council's solar drainage

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			• The applicant's flood assessment used rainfall data from Yeovilton, 68km away, despite 11 closer Met Office stations all recording higher rainfall and resulting in a 14% underestimation of climate-adjusted rainfall effects • Bradford-on-Avon's flood defence scheme was cancelled in July 2025 despite Storm Bert devastation, leaving downstream communities without protection if the scheme increases runoff	advice requires consideration of soil, slope, vegetation and SuDS, but does not require panel fields to be treated as impermeable catchments. Published studies including Cook and McCuen (2013), Yavari et al. (2022), Elamri et al. (2018), Gullotta et al. (2023), Wang and Gao (2023) and Baiamonte et al. (2023) show that panels can redistribute rainfall locally, but that increased runoff risk depends on bare ground, compaction, reduced roughness, slope and hydraulic connectivity. At Lime Down, those risk factors are controlled through permanent ground cover, soil protection, wet weather working controls, compaction remediation, permeable tracks and retained overland flow routes. These measures are secured through the Outline CEMP [REP1-096], Outline OEMP [REP1-098] and Outline SRMP [APP-280]. Climate change allowances have been applied in the flood risk and

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				drainage assessment. The status of downstream flood defence schemes does not change the conclusion that the Scheme would not materially increase flood risk elsewhere.
PB-011	Cultural Heritage	Assessment	CLAIM 10: Lime Down's heritage impacts have been properly identified and assessed. Source: IGP Application Reality: Historic England identified a material error in the heritage assessment: Bradfield Manor was described throughout as Grade II* listed, when it is in fact Grade I. This is the highest heritage designation in England. The implications of this error for the assessment remain unaddressed. • Bradfield Manor (Grade I, NHLE 1198808) is located adjacent to the proposed BESS facility. It's designation was misstated throughout the application, undermining confidence in the heritage assessment as a whole	Bradfield Manor Farmhouse is described as Grade I listed within ES Volume 1, Chapter 12 Cultural Heritage [APP-064], and the supporting appendices in ES Volume 3, Appendices 12-1 to 12-7 [APP-219 to APP-231]. 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 terms). The Applicant submitted a technical note at Deadline 1 [REP1-121 TO REP1-123], which included the visualisations as requested by WC and Historic England, which support the results of the assessment of harm on Bradfield Manor Farmhouse.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			• Historic England formally identified unresolved harm and serious documentation gaps in its Relevant Representation to the Planning Inspectorate • The Fosse Way Roman Road, a Scheduled Ancient Monument and iconic heritage route, runs through the scheme for approximately 4.5km; the significance of the character change to this historic landscape has been underestimated • Site visits to assess heritage and visual impacts were conducted in October, April and July, when vegetation was in leaf and screening was at its maximum, not in winter when worst-case impacts would be visible • Corsham Court (Grade II*) has been scoped out of the heritage assessment despite the cable route passing within 250 metres of this designated asset	Site visits were undertaken with Historic England on the 28th March 2025 and the Wiltshire County Council Conservation Officer on the 11th April 2025, which included visiting land adjacent to Grade I Listed Bradfield Manor. A second site visit with Historic England was undertaken in the grounds of Bradfield Manor on the 22nd May 2025 (see table 12-2 in ES Volume 1, Chapter 12: Cultural Heritage [APP-064]). Feedback provided during the site visits was used to inform the Scheme design and assessment provided in ES Volume 1, Chapter 12: Cultural Heritage [APP-064]. The potential effects of the Scheme on the Roman Roads (i.e. the Fosse Way), as well as other Roman archaeological assets are fully assessed in ES Volume 1, Chapter 12: Cultural Heritage [APP-064], supported by detailed technical appendices in ES Volume 3, Appendices 12-1 to 12-7 [APP-219]

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				to APP-231]. Where an adverse effect has been identified to Roman archaeological assets appropriate mitigation is proposed. See Section 12.9 of ES Volume 1, Chapter 12: Cultural Heritage [APP-064] for embedded mitigation and Section 12.11 for additional mitigation. An overarching archaeological mitigation strategy is provided in ES Volume 3, Appendix 12-6: Archaeological Mitigation Strategy [APP-230]. Since the design presented at PEIR stage, Field C26, the westernmost part of Field C25, and the majority of Field C13 have been entirely removed from the Order Limits. Solar PV Panels have also been removed entirely from within Fields B1-B5, C24-C25, and C13. A number of fields abutting the Fosse Way within which Solar PV Panels will be erected have had offsets established with their boundaries with Fosse Way, including Fields B6, C10-C12, and C22-C23. ES Volume 3, Appendix 12-1: Heritage Statement [APP-

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				219] identified that the overall setting and significance of the Fosse Way will remain intact, and the asset will retain its legibility as a roadway within a largely agrarian landscape. Consequently no significant effects were identified to the asset. A small section of the north eastern boundary of the Grade II* Listed Corsham Court extends within the 250m buffer of the cable route corridor. The asset was scoped out of detailed assessment as there was no potential for impacts as a result of the installation of cabling in the cable route corridor. As stated above a through scoping exercise was undertaken for heritage assets and assets scoped out of assessment were agreed with Historic England and Wiltshire Council.
PB-012	Other environmental matters	Battery safety	D. SAFETY CLAIM 11: Grid-scale batteries are completely safe and Lime Down BESS will be safely managed. Source: Lime Down Solar	Please refer to Applicant's Detailed Response to Stop Lime Down Deadline 1 Submission on BESS Fire Emissions, submitted at Deadline 2 in

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			Reality: Grid-scale lithium-ion battery storage carries well-documented risks of thermal runaway, fire, explosion and toxic gas release. The proposed Lime Down BESS 1GWh, one of the largest in England, would be sited above a principal drinking water aquifer, next to a mainline railway, and close to Grade I listed Bradfield Manor. • The Moss Landing facility in California (January 2025) caught fire and required evacuation over a 4-mile radius; post-fire concentrations of nickel, cobalt and manganese in nearby wetlands rose by up to an order of magnitude (Nature, 2025) • The National Fire Chiefs Council states BESS pose 'a significant fire risk due to thermal runaway, resulting in rapid production of large volumes of toxic and explosive vapours leading to explosion and fire • A 2025 Commons debate confirmed 'there are no laws	relation to the point concerning the 1km study area. In relation to water resources, the Applicant has prepared standalone Firewater Containment and Drainage Strategies [REP1-124 and REP1-125]. These address how potentially contaminated firewater, suppression water or incident runoff would be isolated, contained, tested and removed for appropriate disposal. The BESS drainage system will be capable of isolation and containment during an incident. This means contaminated runoff would not be allowed to discharge uncontrolled to ground, watercourses or the underlying aquifer. The approach is supported by the Outline BSMP [REP1-110], Outline CEMP [REP1-096] and wider groundwater protection measures in the Application.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			specifically governing the safety of battery energy storage sites' the UK lacks statutory lifecycle regulation • The entire Lime Down site sits within a Groundwater Source Protection Zone; firefighting water contaminated with battery chemicals poses a direct risk to drinking water supplies for Chippenham and Bath • The applicant's own plume assessment was restricted to a 1km radius, the Moss Landing evacuation radius was 4 miles (6.4km); no credible worst-case scenario for a facility of this size has been modelled	The Applicant has followed National Fire Chiefs Council (NFCC) guidance and commissioned a BESS fire emissions assessment (as detailed in ES Volume 3, Appendix 15-2: BESS Fire Emissions Modelling [EN010168/APP/6.3 (Rev 2)]) to model toxic gas emissions and visibility impacts from a BESS fire on all sensitive receptors within a 1km radius of the BESS area. The fire emissions modelled in the report were based upon recent UK Health Security Agency (UKHSA) requests for DCO BESS projects which explore both immediate air quality impacts together with annual UK air quality requirements, the selected gases are representative of emissions recorded from a range of LFP battery systems integrated in current BESS designs. The UKHSA is a statutory consultee for the Scheme and confirmed in their relevant representation [RR-4798] that <i>“Following our review of the submitted documentation the UKSHA are satisfied that the proposed development should not</i>

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				<i>result in any significant adverse impact on public health".</i> The spacing distances of the illustrative BESS site design are based upon Large Scale Fire Testing (LSFT) where no fire propagation occurred; therefore, this is a credible worst-case scenario. ES Volume 3, Appendix 15-2: BESS Fire Emissions Modelling [APP-239] concludes that there would be no significant air quality effects as a result of a BESS fire incident and visibility issues were not predicted. The Applicant emphasises that even a worst-case scenario such as the Moss Landing Fire did not require mass evacuations, and the preliminary precautionary evacuation of 1200 people living in the closest proximity to the Moss Landing Site was not triggered by air monitoring alerts. Emissions in these areas initially evacuated never exceeded public health thresholds. The Applicant points out that the referenced Moss Landing fire

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				involved old generation legacy systems that were not compliant with NFPA 855 and integrated NMC pouch cell, air-cooled battery systems; these type of systems will not be considered for the Scheme. Section 4.1.30 of the Outline BSMP [REP1-110] stipulates the selected BESS design will integrate: "<i>Battery liquid cooling systems with automated fail-safe operation (air cooling systems will not be considered for the Scheme).</i>" It is not credible to consider that the range and impact of the Moss Landing smoke plume generated from more than 55,000 battery modules (which also burnt through a significant portion of the gas plant roof), is in anyway comparable to the impacts of a smoke plume generated from a fire within single non-combustible enclosure BESS designs typically containing 40-60 battery modules.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				As witnessed in numerous BESS LSFT (2024-2026), the peak of fire propagation of battery systems results in maximum flame heights of 4-5 metres out of the roof of the BESS. Typically, these flames are channelled through roof level deflagration vents resulting in peak flaming of 8-9 metres above ground level. To validate the final BESS site design, the Applicant has also committed to commissioning an additional Plume Analysis Study at the detailed design stage as stipulated in Section 5.5.9 of the Outline BSMP [REP1-007] and secured through the DCO: <i>"..at the detailed design stage a BESS system and site specific Plume Analysis study will be conducted to assess the environmental impact of a site incident to sensitive receptors within a 1 km radius. Toxic gas emissions to sensitive receptors must be below relevant public health exposure limit guidelines when the battery system of</i>

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				<i>a BESS is fully consumed (burnt out), production of Particulate Matter (PM) and a visibility impact assessment on any transport links within a 1 km radius of the BESS area will also be included. The ERP produced at the detailed design stage (template outlined in Section 5.4.4) will incorporate all necessary emergency response procedures and actions based upon thermal runaway test data supplied by the BESS system provider."</i> An Outline BSMP [REP1-110] has been prepared for the Scheme using guidance from Dorset and Wiltshire Fire and Rescue Service and incorporating recommendations of the National Fire Chiefs Council. The safety objectives for the design of the BESS site are listed in Section 2.4 of the Outline BSMP [REP1-110]. The Outline BSMP [REP1-110] has been amended at Deadline 1 to fully accommodate the latest BESS safety requirements contained in NFPA 855 (2026) ensuring that any credible

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				risks associated with battery storage are either prevented or fully mitigated if a BESS failure occurs. As now mandated under NFPA 855 (2026) the Applicant will only be able to select a BESS system that has undertaken Large Scale Fire Testing (LSFT). At the detailed design stage, the selected BESS LSFT data will be leveraged to fully inform inputs for risk assessment tools which will be utilised together with detailed consequence modelling to provide a comprehensive site operations and emergency response safety audit, this is stipulated in the OBSMP pre-construction requirements (Section 6). 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

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				must establish minimum equipment spacing distances that demonstrate there is no fire propagation to adjacent BESS enclosures or ESS equipment. D&WFRS intervention in worst case scenarios would typically be limited to boundary cooling of adjacent BESS and Energy Storage System (ESS) units to prevent the fire from spreading. This strategy will be finalised with D&WFRS and be clearly communicated in the Emergency Response Plan (ERP); • To ensure that fire, smoke, and any release of toxic gases does not significantly impact site operatives, first responders, and the local community; and • To ensure that firewater run-off is contained and tested before release or, if necessary, removed by tanker and treated offsite." The Applicant is currently drafting a Statement of Common Ground

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				(SOCG) with the Environment Agency (EA) on Scheme environmental protection issues including the BESS area drainage strategy. The Applicant's Outline BSMP [REP1-110] Section 5.5 documents agreed drainage strategy for the BESS area. The Applicant confirms that firefighting water containment for the BESS has been designed on the basis of credible incident scenarios, including the potential for multiple units to be involved, and is not limited to routine or minor events. The approach set out in the Outline BSMP [REP1-110] and the standalone Firewater Containment and Drainage Strategy – Lime Down BESS [REP1-124] is to contain and isolate firefighting water within the BESS Area, rather than allow discharge to the environment. This is achieved through a sealed and isolatable drainage system, capable

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				of retaining firefighting water and rainfall during an incident. The agreed strategy document 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. 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 Battery Safety Management Plan has been submitted to and approved by the relevant planning authority. The approved plan must be substantially in accordance with the Outline BSMP [REP1-110]. The Draft DCO [REP1-

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				007] also requires the relevant planning authority to consult with Dorset and Wiltshire Fire and Rescue Service and the Environment Agency before determining the application, and that the Battery Safety Management Plan must be implemented as approved
PB-013	Socio-Economics, Recreation and Tourism Community Benefit Soils and Agriculture Decommissioning	Local community impact	E. COMMUNITY & LOCAL IMPACT CLAIM 12: Impacts on local communities are limited and outweighed by national benefits. Source: IGP / Industry Reality: Lime Down has generated 4,958 Relevant Representations, 99% objecting, the highest number ever recorded for any NSIP application in England. Despite over 400 of these raising equine welfare concerns, the applicant has not conducted a single equine-specific impact assessment. • The bloodstock and equine sector is a defining feature of the North Wiltshire rural economy; no equine specific assessment has been carried out despite more than	Equestrian facilities, including private stables and paddocks, studs, riding schools, and on public rights of way such as bridleways and byways have been considered as specific recreational receptors in the assessment in the ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068] . The Applicant confirms that the majority of significant adverse effects can be mitigated. The assessment has identified some location-specific significant adverse effects to users of routes in Lime Down E (bridleway MALW54, and unsurfaced road parallel to and crossing the railway), and to the equestrian business at Park Farm,

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			400 Relevant Representations explicitly raising equine concerns • The applicant has itself admitted that construction will cause unmitigable significant adverse effects on at least one equestrian business yet has not applied the same assessment to other equine and bloodstock businesses in the area • Wiltshire Council's own climate analysis indicates Lime Down would not reach carbon break-even until approximately 2076, meaning it increases net carbon emissions for over 50 years before delivering any climate benefit • The scheme displaces twelve tenant farmers, those least able to absorb the disruption, for the benefit of nine landowners, many of whom do not farm the land themselves • There is no provision for secured decommissioning bonds; the community has no guarantee the land will be restored, particularly given the likelihood of asset	Yatton Keynell due to direct construction impacts. These matters will therefore be considered in the planning balance when the DCO is determined. While impacts on equestrian businesses are not anticipated to be significant (with the exception of Park Farm during construction), the Applicant confirms that where employment may be affected as a result of the Scheme, affected workers would be eligible for accessing skills and employment support measures as secured through the Outline SSCEP [REP1-108] by Requirement 18 of Schedule 2 to the Draft DCO [REP1-007], subject to the final SSCEP being agreed by Wiltshire Council and any other stakeholders. The Applicant is committed to undertaking and encouraging further engagement with relevant equestrian stakeholders through the DCO process. The Applicant is also undertaking further technical advice specific to equine care that will be forthcoming during the examination process.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			transfer or resale over a 60-year period	The findings of Wiltshire Council that the scheme would not break even until 2076 are not accepted. The embodied carbon and associated emissions from the cables and BESS are assessed ES Volume 1, Chapter 7: Climate Change [APP-059]. The Applicant is preparing a separate technical note to address the point around carbon break-even to be submitted at Deadline 3 of Examination. To summarise, the applicant does not accept that the break even or payback year assessment is a useful metric for considering the significance of the scheme in offsetting carbon emissions. There are several limitations with using this approach as put forward by Stop Lime Down. 1) The GHG assessment considers global emissions (e.g. shipping from China, embodied carbon from products sourced outside of the UK)

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				and compares this to a UK only emissions value which does not consider the embodied carbon from developing energy infrastructure. The high level approach used in ES Volume 1, Chapter 7: Climate Change [APP-059] is illustrative that even with this point of comparison, there remains a net negative change in emissions. 2) The assessment considers that future operational emissions associated with replacement products will be the same as those in the baseline operational year. E.g. replacement panels will have the same embodied carbon emissions in 40 years as they do in the assessment year of 2025. In reality, as global efforts move towards Net Zero from all sources, this is a highly conservative approach and in reality emissions in future are likely to be far lower. This approach has been taken so as to be conservative and in the absence of forecast emissions reductions approaches.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				3) The point of comparison against a forecast UK grid average was chosen so as to compare against a realistic but low grid average for emissions. Previous assessments have compared against other energy generating methods such as CCGT. Should the scheme be compared against CCGT and the same methodology applied, the 'pay back' would occur within 2 years'. Should the scheme be compared against existing UK grid average emissions, (i.e. not forecast) the scheme would 'pay back' emissions within 4 years. There are several limitations with using this approach as put forward by Wiltshire Council which will be detailed within the technical note being prepared for Deadline 3, but to summarise. 1) The GHG assessment considers global emissions (e.g. shipping from China, embodied carbon from

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				products sourced outside of the UK) and compares this to a UK only emissions value which does not consider the embodied carbon from developing energy infrastructure. The high level approach used in ES Volume 1, Chapter 7: Climate Change [APP-059] is illustrative that even with this point of comparison, there remains a net negative change in emissions. 2) The assessment considers that future operational emissions associated with replacement products will be the same as those in the baseline operational year. E.g. replacement panels will have the same embodied carbon emissions in 40 years as they do in the assessment year of 2025. In reality, as global efforts move towards Net Zero from all sources, this is a highly conservative approach and in reality emissions in future are likely to be far lower. This approach has been taken so as to be conservative

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				and in the absence of forecast emissions reductions approaches. 3) The point of comparison against a forecast UK grid average was chosen so as to compare against a realistic but low grid average for emissions. Previous assessments have compared against other energy generating methods such as CCGT. Should the scheme be compared against CCGT and the same methodology applied, the 'pay back' would occur within 2 years'. Should the scheme be compared against existing UK grid average emissions, (i.e. not forecast) the scheme would 'pay back' emissions within 4 years. The Applicant confirms the assessment findings in ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068] estimated a loss of up to 20FTE jobs in the agricultural sector as a result of the Scheme. Where losses to agriculture employment have been identified, these are worst-case

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				estimates based on likely significant effects from the Scheme, and do not include additional mitigation measures being applied. 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 continue their agricultural practices. 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

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				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]. Finally, in terms of decommissioning, a requirement to decommission the Scheme is set out in Requirement 20 of the Draft DCO [REP1-007]; failing to comply with that requirement would be a criminal offence. The requirement to decommission the Scheme would sit with the owner at the time of decommissioning. Decommissioning is also covered in agreements with landowners, which includes decommissioning securities to cover the cost of decommissioning in the event of any breach by the Applicant or in the event of the insolvency of the Applicant. The amount of such decommissioning security is regularly re valued throughout the lifecycle of

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				the Scheme and topped up if necessary.
PB-014	Climate Change and Energy Need	Efficiency	F. ENERGY REALITIES - NATIONAL CONTEXT Stop Lime Down supports renewable energy delivered responsibly and in appropriate locations. The following four claims relate to national policy; they are included here because they are relevant to understanding the scale and context of proposals like Lime Down. CLAIM 13: This solar farm could power 115,000 homes. Source: Island Green Power project information. Reality: This is a peak output figure. In practice, UK solar farms generated between 10-15% of their installed capacity on average in 2024, produce zero power at night, and very little in winter. This is when electricity demand is highest. • UK solar PV load factors fell below 10% in 2024 (DUKES 2025, GOV.UK) meaning it delivers less	See above response on 'carbon breakeven not happening until 2076'. The Statement of Need [REP1-085] explains at Paragraph 6.4.15 that the average load factor of the UK's aggregated solar generation assets between 2016 and 2023 was 10.4%. The Applicant agrees that 2024 was lower; but notes that (although the final statistics are not yet available) that 2025 was higher. The Government has established a Clean Power Target, (Section 2.9 of the Statement of Need) which is that, in a typical weather year, Clean sources produce at least as much power as Great Britain consumes in total and at least 95% of Great Britain's generation. Using an average load factor is therefore an appropriate way of assessing scheme outputs. A reasonable assessment of the capacity deliverable at the Scheme would, at a reasonable average load factor, generate an

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			than one tenth of its claimed output over the year • Solar output peaks in summer when demand is lowest; it falls to zero every night and to minimal levels throughout winter • Continuous power to a single home requires 24/7 generation; solar cannot provide this without substantial backup from gas, nuclear or other firm sources • Wiltshire Council's own analysis indicates Lime Down would not reach carbon break-even until approximately 2076	amount of energy equivalent to the annual energy consumption of approximately 115,000 homes in the UK. The inclusion of battery storage as associated development supports the solar scheme by storing generated energy when energy is in abundance, and releasing it when it is needed more, supporting the scheme to match supply to demand. NESO has explained (see Statement of Need [REP1-085] Paragraph 4.6.4) that future electricity peaks may not occur in the future when they have occurred in the past, ostensibly as a result of decarbonising supplies through renewable energy sources. The government has, however, explained that "secure, reliable, affordable, net zero consistent system in 2050 is likely to be composed predominantly of wind and solar" (NPS EN-1 (2023) Paragraph 3.3.20). Section 8.5 of the Statement of Need [REP1-085] describes how a portfolio of low carbon generation which includes

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				solar, onshore and offshore wind, and a low carbon base, if delivered, is capable of closely matching a future projection of national electricity demand on a month-average level.
PB-015	Climate Change and Energy Need The Applicant	Energy price	CLAIM 14: Solar Energy is cheap. Source: Ed Miliband, September 2026 Energy UK Conference Reality: Large-scale solar relies on substantial government subsidies paid by consumers through energy bills. The cost of maintaining parallel backup generation capacity to cover intermittency is not included in solar's headline price. • Renewable electricity subsidies cost consumers approximately £25.8 billion per year (Renewable Energy Foundation analysis of Ofgem data) • Equivalent to over £900 per household per year in current subsidies and support costs • These figures exclude additional grid costs: transmission upgrades, constraint payments and balancing	NPS EN-3 (2023) Paragraphs 2.10.5 - 2.10.6 state that "Solar farms are one of the most established renewable electricity technologies in the UK and the cheapest form of electricity generation. Solar farms can be built quickly and, coupled with consistent reductions in the cost of materials and improvements in the efficiency of panels, large-scale solar is now viable in some cases to deploy subsidy-free". Chapter 9 of the Statement of Need [REP1-085] sets out evidence behind the affordability benefits of large-scale solar generation and concludes that solar generation decarbonises the electricity system and lowers the wholesale market price of electricity. Figure 31 of the Statement of Need [REP1-085] shows that solar generation is, on a levelised cost

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			services required to manage variable output • Wholesale gas trades at around £24/MWh; offshore wind contracts are locked in at £133/MWh, a mechanism that increases the subsidy gap as gas prices fall	basis, significantly cheaper than new gas generation under a wide range of input fuel cost scenarios. The characterising of large scale solar relying on substantial support via a one-way subsidy is inaccurate. The primary mechanism used, Contracts for Difference (CfD) for example, acts as a two-way price stabilisation mechanism which directly helps balance long term energy prices. The Scheme has not been subsidised in its development and has been funded through private means only and without consent, would not be eligible for a CfD. The claim that falling gas prices increase a subsidy gap ignores the long-term risk of fossil fuel price volatility, where as an increase in UK based renewable capacity reduces the energy system's exposure to global market disruptions.
PB-016	Climate Change and Energy Need	Alternatives	CLAIM 15: The UK is ideal for large-scale ground-mounted solar.	The Statement of Need [REP1-085] how and why the Scheme addresses all relevant aspects of

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			Source: Chris Hewett, Solar Energy UK Reality: The UK's solar resource is significantly below the global average. Low productivity means large areas of agricultural land must be used to generate relatively modest amounts of power , a trade-off that does not arise in southern Europe, and which can be avoided by prioritising rooftops and warehouses in the UK. • The UK ranks among the lowest tier of countries globally for solar photovoltaic potential (World Bank Global PV Potential Study) • Typical UK solar capacity factor is around 10–15%, compared with 25–30% in Spain or Portugal, meaning the same energy requires two to three times the land area • The government's own Rooftop Solar Action Plan acknowledges that 250,000 commercial rooftops remain available and largely unused; warehouse rooftops near the grid would deliver	government policy. In particular, Chapter 3 sets out Government's policy position, that large-scale solar is needed to support achieving the Government's energy objectives, because "Solar farms are one of the most established renewable electricity technologies in the UK and the cheapest form of electricity generation" (NPS EN-1 (2023) Paragraph 2.10.13. That other geographies have greater solar resources than the UK is not a relevant point for this examination, because solar resources in Great Britain, and at the Site, are sufficient to support the benefits the Applicant has stated, and solar facilities in other countries do not support the UK to achieve its national decarbonisation and energy security aims. The Applicant is supportive of smaller solar schemes (including rooftop and distributed schemes) but aligns with the Government's position, for reasons described in the Statement

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			power without agricultural land loss • France has tightened its agrivoltaic rules to require that ground-mounted solar on agricultural land must not significantly affect food production; the UK has no equivalent safeguard	of Need [REP1-085] that such schemes are needed alongside, rather than as an alternative to, large-scale schemes such as this Scheme. As detailed in Section 2.4 of ES Volume 3, Appendix 4-1: Site Selection Assessment Report [APP-185], the Applicant has considered alternative locations, including rooftops. It was concluded that it was unlikely that there would be rooftops or combined premises of an adequate area to facilitate a large-scale solar project or provide a viable network of sites in close proximity covering an area of approximately 1,100 ha. National policy and government guidance, as set out in the Statement of Need [REP1-085], recognise that while rooftop and smaller-scale solar installations are an important part of the energy mix, they cannot alone meet the scale of capacity required to achieve clean power and net zero objectives. Large-scale ground

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				mounted solar therefore remains necessary in addition to, not instead of, rooftop solar.
PB-017	Climate Change and Energy Need	BESS efficiency	CLAIM 15: Battery Storage makes large-scale solar reliable and strengthens UK energy security. Source: DESNZ/UK Government Net Zero Strategy Reality: K battery storage systems provide only 2–4 hours of discharge at full power, not the days of backup needed for genuine energy security. The Lime Down BESS, like most UK facilities, is primarily a commercial trading asset, not an energy security asset. • All UK BESS systems provide only hours of storage, not days; they cannot bridge multi-day periods of low wind and solar • Batteries consume 15–30% of the electricity put into them as round-trip losses; the Lime Down scheme itself acknowledges a round-trip efficiency of 85–88%	Section 5.11 of the Statement of Need [REP1-085] describes battery storage (BESS) facilities, characteristics and functions in the GB electricity market. The BESS proposed as associated development to the Scheme is designed as a typically shorter duration electricity storage system to support the operation of the solar PV system by balancing supply from the solar panels with demand on the grid. Energy prices are the signal through which all generation assets, including storage assets, adjust their output to meet market need, providing critical energy security and system operation support, rather than a purely commercial construct. The import facility from the grid means that at times when the BESS is not needed to support the solar

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			• BESS are primarily used to buy power when grid prices are low and sell when high, a commercial arbitrage function, not an energy security function • The Lime Down scheme has an import capacity of 250MW, meaning it would routinely draw power from the National Grid, potentially from fossil fuel generation, particularly at night This is relevant context for a 60-year infrastructure stewardship commitment	scheme, the infrastructure can also help to balance the GB power system in other ways without significant additional infrastructure needs. Section 5.11 of the Statement of Need [REP-085] also explains that short duration storage systems complement the generation profile of solar facilities and provide system functions which support the operation of the solar facility by (among other functions) balancing supply with demand.
Julie Heather Terrington REP1-221				
JHT-001	Landscape and Visual	Mitigation	I notice that whilst the applicant has stated that they intend to plant multiple hedges and trees in order to minimise the negative effects on conservation, wildlife and the environment, that they do not however appear to have made any plans to maintain them once they are in! As a result most of these "new trees and hedges" will, almost certainly die long before becoming established. As	The Applicant acknowledges that any new tree and hedge planting carries a potential risk of some sapling/whip failures, which could be down to a wide range of factors, such as damage to the plant prior to planting, soil factors, and disease. The Outline LEMP [APP-283] provides details of how newly planted trees and hedgerows will be managed. the management of newly

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			any professional horticulturist will tell them, new seedlings require thinning out and regular watering through the early stages when planted, in order for them to become established in soil which will have been badly disturbed during the construction of the Solar farm.	planted trees and hedgerows. This includes the regular watering of newly-planted specimens, as well as prescribing replacement planting of any plants and trees are found to be dying, damaged or diseased. The need for replacement planting will be monitored regularly throughout the operational phase, as per Section 1.4: Ecological Monitoring of the Outline LEMP [APP-283]. The preparation, approval and implementation of the detailed Landscape and Ecological Management Plan, substantially in accordance with the Outline LEMP [APP-283], is secured through Requirement 7 in Schedule 2 of the Draft DCO [REP1-007] and will be legally binding.
JHT-002	Scheme Description and DCO Process	General remarks	I submit that Lime Downs proposal in this area is either badly thought through, or just an attempt to try and appease those questioning the long term - and in some cases irreversible- damage to the local habitats and wildlife.	The Applicant notes this comment and has responded in full under Reference ID JHT-001.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
Patrick Williams REP1-231				
PW-001	Scheme Description and DCO Process	General remarks	I wish to formally object to this proposal.	The Applicant has responded to comments related to general sentiment in detail in Table 2-1, Section D-01, on Page 138 of the Applicant's Response to Relevant Representations (Part 2) [PDB-004] , where it is explained that the Applicant's Statement of Need [REP1-085] provides evidence that an unprecedented capacity of new low-carbon generation schemes is urgently needed for the UK to meet its legally binding climate change targets. The government has confirmed that solar energy is at the heart of the Clean Power 2030 Mission [NPS EN-3 (2025) Paras 2.10.1 & 2.10.2]. The Statement of Need confirms that the need for the Scheme is urgent and that substantial weight should be given to the need for the Scheme [NPS EN-1 (2023) Para 3.2.6-3.2.7].
PW-002	Soils and Agriculture	Agricultural Land Use	It is a vast area of good productive agricultural land.	ES Volume 3, Appendix 17-1: Agricultural Land Classification and Soil Resource Survey Report

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				[REP1-063] confirms that approximately two-thirds of the land within the Solar PV Sites is in Subgrade 3b and Grade 4, which is not considered to be among the Best and Most Versatile agricultural land. There is no land of Grade 1 present within the Solar PV Sites or in the Cable Route Corridor. Land of Grade 2 quality is present in the east of the Solar PV Sites and amounts to approximately 4% of the area, and land of Subgrade 3a accounts for approximately 29%.
PW-003	Site Selection and Alternatives	Scale	The proposal has already been rejected by Wiltshire County Council as being invasive to the countryside and too large a construction.	The Applicant has responded to comments related to scale in detail in Table 2-2, Section SS-01, on Page 138 of the Applicant's Response to Relevant Representations (Part 2) [PDB-004], where it is explained that the Scheme has been designed to deliver the greatest practicable benefit from the available land and the available grid connection, whilst avoiding, minimising and/or mitigating harmful environmental effects.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
PW-004	Climate Change and Energy Need Site Selection and Alternatives	Efficiency	The project requires a long distance cable network to any locality where the electricity may be used, hence losses will occur and as it is, solar is only really effective in certain times of the year.	The Applicant acknowledges that solar generation has a seasonal and daily generation profile. Figure 29 of the Statement of Need [REP1-085] and related commentary provides insight into how a combined national portfolio of wind and solar will work together to closely matching a future projection of national electricity demand on a month-average level. The Applicant has responded on the point raised around electrical line losses in the Written Summary of the Applicant's Oral Submissions and Responses at Issue Specific Hearing 1 and Responses to Action Points [REP1A-012] Action Point 4 (electronic page 63 of 70).
PW-005	Site Selection and Alternatives	Alternatives	The scheme in this plan is unacceptable and other smaller scale developments including wind, are more appropriate to achieve sustainable energy solutions.	The Applicant has addressed this point under reference ID CC-30 in the Applicant's Response to Relevant Representations Part 2 [REP1-117] . In summary, the Applicant agrees that other low carbon technologies are urgently needed to meet the UK's climate legal

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				targets, however, solar is the most suitable low carbon technology at the proposed location. Whilst the energy production from land under solar is of a similar order of magnitude to the energy production from land under onshore wind, the environmental effects of solar schemes may be significantly lower.
PW-006	Landscape and Visual	Visual impact	To accept something of this vast scale would be like committing rural and community vandalism.	Please refer to reference ID CC-33 in the Applicant's Response to Relevant Representations Part 2 [REP1-117] which explains that it is the Government's policy to support the development of large-scale schemes. In addition, the Statement of Need [REP1-085] explains why solar development is required at this scale to meet the Government's targets as set out in the Clean Power 2030 Action Plan. It is the Government's policy to support the development of large-scale schemes in order to meet the urgent need for unprecedented levels of clean electricity. Relevant planning

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				policy (specifically NPS EN-1 paragraph 3.3.12) recognises that meeting the country's energy needs requires the use of largescale, centralised electricity generating facilities via a high-voltage transmission system, which enables the pooling of both generation and demand, which in turn offers a number of economic and other benefits, such as more efficient bulk transfer of power and enabling surplus generation capacity in one area to be used to cover shortfalls elsewhere. NPS EN-3 paragraph 2.10.31 recognises that at this scale, solar development is likely to use some agricultural land. The LVIA in ES Volume 1, Chapter 8: Landscape and Visual [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

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				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). 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. The LVIA recognises that there are Significant Adverse 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 development adjacent to the National Landscape where it would affect its setting and avoiding development where it would be visually intrusive

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				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 Appendix 8-6. 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.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				The Significant Beneficial Moderate effects on Landscape Fabric at Year 15 are set out in Table 8-16 ES Volume 1, Chapter 8 Landscape and Visual [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 • Groundcover 702.8 ha. Mitigation and enhancement measures are detailed in the Outline LEMP [APP-283] and the Outline EPMS [REP1-106], which set out habitat creation, species protection measures, buffer zones and long-term ecological management.
Dermot Farrington REP1-202 , REP1-203 and REP1-204				

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
DF-001	Socio-Economics, Recreation and Tourism	Local businesses	If this proposal is approved my Business will close with the effects on the local economy and livelihoods described below.	The Applicant refers to the responses to January Farrington under Section 2.6 of the Written Summary of the Oral Submissions at the Open Floor Hearing 1 and the Applicant's Responses [REP1A-013]. As an equestrian facility, potential impacts on West Park Farm have been considered and assessed. Potential impacts on public rights of way such as bridleways and byways have also been considered as specific recreational receptors in the assessment in the ES Volume 1, Chapter 16: Socio Economics, Tourism and Recreation [APP-068]. The likely effects on West Park Farm in particular are specifically and individually assessed in ES Volume 3, Appendix 16-2: Tourism and Recreation Receptor Tables [APP-241], which identifies up to a moderate-minor adverse effect due to immediate views of Lime Down D from within the equestrian facilities, and on hacking routes nearby. This is

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				not however, considered a significant effect.
DF-002	Socio-Economics, Recreation and Tourism Transport and Access	Local businesses Equine impact	Lime Down cannot guarantee that their construction will not lead to my horses going through fences and ending up on a public road, with the consequences that follow for them and for any motorists involved.	The Applicant wishes to confirm that there is no direct physical contact between the Scheme's construction site and the respondent's landholding so the risk of horses interacting with Scheme infrastructure is significantly reduced by the intervening distance and animal security fencing would remain with the landowner. Furthermore, there are no routes proposed for the movement of construction vehicles which are adjacent to the respondent's landholding. The Outline CEMP [REP1-096] provided offsetting of noisy construction activities away from neighbouring paddocks and sensitive receptors where reasonably practicable.
DF-003	Hydrology, Flood Risk and Drainage Ground Conditions	Flood risk	They cannot guarantee that my paddocks will not flood with their silt and top soil,	The Applicant cannot guarantee that flood events will not occur in areas with existing flood risk. The relevant issue is whether the Scheme would materially increase flood risk,

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				silt runoff or topsoil transfer to neighbouring land. The submitted assessment concludes that it would not. The concern about silt and topsoil entering paddocks is a construction-phase runoff and sediment control issue. It is addressed through the Outline CEMP [REP1-096] and Outline SRMP [APP-280]. Those documents secure soil handling controls, wet weather working restrictions, protection of drainage pathways, sediment control, reinstatement and remediation of compaction where required. The same risk pathway is identified in published solar hydrology research: bare ground, compacted soil and connected flow paths can increase runoff and erosion if unmanaged. Lime Down controls those factors through embedded mitigation. On that basis, the Scheme would not

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				materially increase silt-laden runoff or flood risk to neighbouring paddocks.
DF-004	Air Quality	Construction impacts	or that the air my horses breathe during construction will not be loaded with respirable particulate.	An assessment of the effects of construction activities on air quality is provided in ES Volume 1, Chapter 15: Air Quality [REP1-023] . The assessment concludes that, with embedded mitigation measures in place, construction-phase air quality effects as a result of the Scheme, including potential health effects from increased exposure to particulates, would not be significant for any receptors within the relevant study areas. As indicated in ES Volume 3, Appendix 15-1: Construction Dust Methodology and Assessment [APP-238] , the highest level of mitigation measures have been proposed, in accordance with best practice guidance. These measures are set out in the Outline CEMP [REP1-096] and the Outline CTMP [REP1-112] . These include measures such as dust suppression, site management controls, routing and scheduling of construction traffic, and management of plant and machinery.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				The preparation, approval and implementation of detailed construction management plans, substantially in accordance with the outline plans, are secured through Schedule 2 of the Draft Development Consent Order (DCO) (Rev 2) [REP1-007], ensuring that air quality impacts during construction are appropriately controlled. The Applicant recognises that animals, including horses, can be sensitive to dust and construction activity. The management measures described above are specifically designed to minimise dust at source and reduce the potential for construction related emissions to affect nearby receptors, including equine facilities. It should also be noted that where construction dust emissions occur, these are typically dominated by coarse particles (greater than 10 µm diameter) which tend to

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				settle relatively quickly, meaning they are typically associated with localised dust soiling effects rather than widespread respiratory exposure. It tends to be fine particulate matter (PM_{2.5}, i.e. particles smaller than 2.5 µm diameter) which is of most concern for health. As set out in the IAQM Guidance on the Assessment of Dust from Demolition and Construction, the proportion of PM_{2.5}, which penetrates deeper into the respiratory system, is typically low, with PM_{2.5} generally comprising around 10% of PM₁₀ (particles smaller than 10 µm diameter) for construction activities. On this basis, the primary risk associated with construction dust is typically temporary nuisance (e.g. dust deposition) at close distances to the source, rather than significant adverse effects on respiratory health. The embedded mitigation measures, including dust suppression, site management controls and monitoring, are specifically designed to minimise

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				all potential adverse effects associated with dust emissions, so that they are not significant.
DF-005	Other Environmental Matters	BESS safety	They cannot guarantee that BESS infrastructure will not present a fire and inhalation risk.	The Applicant has submitted an Outline BSMP [REP1-110] which has been prepared for the Scheme using guidance from Dorset and Wiltshire Fire and Rescue Service and incorporating recommendations of the National Fire Chiefs Council. The safety objectives for the design of the BESS site are listed in Section 2.4 of the Outline BSMP [REP1-110]. 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 that demonstrate there is no fire propagation to adjacent BESS

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				enclosures or ESS equipment. D&WFRS intervention in worst case scenarios would typically be limited to boundary cooling of adjacent BESS and Energy Storage System (ESS) units to prevent the fire from spreading. This strategy will be finalised with D&WFRS and be clearly communicated in the Emergency Response Plan (ERP); • To ensure that fire, smoke, and any release of toxic gases does not significantly impact site operatives, first responders, and the local community; and • To ensure that firewater run-off is contained and tested before release or, if necessary, removed by tanker and treated offsite." Section 5 of the Outline BSMP [REP1-110] covers all requisite firefighting requirements for the Scheme including fire service access, firefighting water supply, and

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				emergency planning requirements and is fully compliant with NFCC guidance. As now mandated under NFPA 855 (2026) the Applicant will only be able to select a BESS system that has undertaken Large Scale Fire Testing (LSFT). At the detailed design stage, the selected BESS LSFT data will be leveraged to fully inform inputs for risk assessment tools which will be utilised together with detailed consequence modelling to provide a comprehensive site operations and emergency response safety audit, this is stipulated in the OBSMP pre-construction requirements (Section 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 Battery Safety Management Plan has been submitted to and approved by the

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				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 Fire and Rescue Service and the Environment Agency before determining the application, and that the Battery Safety Management Plan must be implemented as approved. The Applicant has also committed to commissioning an additional Plume Analysis Study at the detailed design stage as stipulated in Section 5.5.9 of the Outline BSMP [REP1-110] and secured through the DCO: “<i>..at the detailed design stage a BESS system and site specific Plume Analysis study will be conducted to assess the environmental impact of a site incident to sensitive receptors within a 1 km radius. Toxic gas emissions to sensitive receptors must be below</i>

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				<i>relevant public health exposure limit guidelines when the battery system of a BESS is fully consumed (burnt out), production of Particulate Matter (PM) and a visibility impact assessment on any transport links within a 1 km radius of the BESS area will also be included. The ERP produced at the detailed design stage (template outlined in Section 5.4.4) will incorporate all necessary emergency response procedures and actions based upon thermal runaway test data supplied by the BESS system provider."</i> The Applicant also commissioned BESS fire emissions assessment (as detailed in ES Volume 3, Appendix 15-2: BESS Fire Emissions Modelling [EN010168/APP/6.3 (Rev 2)]) to ensure the selected BESS area would have no significant off-site impacts if credible BESS failure scenarios occurred. The study has been undertaken using professional judgement in the absence of specific regulatory guidance, and adopts a

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				conservative, worst case approach throughout. The assessment demonstrates that, even under worst case assumptions, a BESS fire would not result in significant effects on human health or safety. The modelling assumes: • Worst case BESS fire locations within the BESS area closest to sensitive receptors; • Worst case release height, temperature and plume parameters; and Use of five years of hourly meteorological data, with the maximum predicted concentration extracted at each receptor, assuming the fire coincides with the poorest dispersion conditions.
DF-006	Ecology and Biodiversity	Equine Impact	And they cannot show me, on paper or otherwise, the equine-specific risk assessment that ought to underpin every one of their conclusions.	An equine-specific risk assessment on an has not been completed. As set out in the response to JF-003 and JF-030, the ES has considered potential impacts to sensitive receptors across a range of topics.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				Where mitigation has been identified as suitable for human receptors, it is also considered likely to benefit animals, including horses, particularly in relation to noise and air quality impacts. The Scheme's approach has assessed the likely direct impact of construction on equestrian facilities, and accessibility and amenity impacts on those facilities and surrounding rights of way used for hacking. The Applicant confirms that the majority of significant adverse effects can be mitigated, however understands that some significant adverse effects to users of routes in Lime Down E cannot be mitigated further during construction. West Park is located North of Lime Down D. No significant residual effects are anticipated during the operational phase of the Scheme. The Applicant has committed to ensuring the operation or recreational use of equestrian facilities and PROWs is protected as much as possible

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				through the implementation of embedded and additional mitigation measures set out in the Outline CTMP [REP1-112] and Outline PRoWPPMP [REP1-104] , secured respectively by Requirements 15 and 16 in Schedule 2 to the Draft DCO [REP1-007] .
DF-007	Ecology and Biodiversity Socio-Economics, Recreation and Tourism	Equine impact	On the evidence as it stands, the Environmental Statement cannot be considered adequate. The current proposal is, in my view, fundamentally incompatible with the operation of a thoroughbred stud farm and the wider thoroughbred industry that depends on the conditions of this landscape.	The Applicant refers to the responses to January Farrington under Section 2.6 of the Written Summary of the Oral Submissions at the Open Floor Hearing 1 and the Applicant's Responses [REP1A-013]. The Applicant considers the assessment of recreational receptors in the ES Volume 1, Chapter 16: Socio Economics, Tourism and Recreation [APP-068] to be robust and maintains that the Scheme does not pose a threat to local rural businesses or the local equestrian economy.
DF-008	Socio-Economics,	Equine Impact	Respondent appended 'EN010168-001252-1. A Review -	The Applicant has reviewed the study provided. It is acknowledged that the report covers industrial-scale solar

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
	Recreation and Tourism Ecology and Biodiversity		Large Scale Infrastructure Projects and Their Impacts on Studfarms'	and wind energy developments with consideration to noise, light pollution, dust, fire hazards and restricted access as posing risks to equine health and safety. The Applicant has committed to ensuring the operation or recreational use of equestrian facilities and PROWs is protected as much as possible through the implementation of embedded and additional mitigation measures set out in the Outline CTMP [REP1-112] and Outline PROWPPMP [REP1-104], secured respectively by Requirements 15 and 16 in Schedule 2 to the Draft DCO [REP1-007]. The Applicant confirms that the Scheme design includes provision of approximately 12.6 km of permissive paths for pedestrians, and for pedestrians, cyclists and equestrian users, to improve connectivity across the Sites and the wider public rights of way network. These are secured through the Outline LEMP [APP-

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				283] and Outline PRoWPPMP [REP1-104] Requirements 7 and 16 of Schedule 2 to the Draft DCO [REP1-007]. The Applicant recognises that animals, including horses, can be sensitive to dust and construction activity. Management measures within the Outline CEMP [REP1-096] and the Outline CTMP [REP1-112] include measures such as dust suppression, site management controls, routing and scheduling of construction traffic, and management of plant and machinery which are specifically designed to minimise dust at source and reduce the potential for construction related emissions to affect nearby receptors, including equestrian properties. Construction noise effects would be controlled through the implementation of the Outline CEMP [REP1-096], secured through Requirement 13 of Schedule 2 to the Draft DCO [REP1-007]. In particular, Sections 2.5 and

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				3.9 of the Outline CEMP [REP1-096] set out a range of embedded mitigation measures, including adherence to best practicable means in accordance with BS 5228, restrictions on core construction working hours, management of out-of-hours working through Section 61 agreements where required, use of temporary acoustic fencing around HDD compounds where necessary, and implementation of additional site specific mitigation measures where activities have the potential to affect nearby noise-sensitive receptors. Additional mitigation measures include the careful siting and orientation of temporary construction compounds and plant, use of quieter plant where practicable, and offsetting noisy construction activities away from neighbouring paddocks and sensitive receptors where reasonably practicable. The Outline CEMP [REP1-096] also includes measures relating to lighting control

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				and traffic management to minimise disturbance during construction. An Outline BSMP [REP1-110] has been prepared for the Scheme using guidance from Dorset and Wiltshire Fire and Rescue Service and incorporating recommendations of the National Fire Chiefs Council. The Outline BSMP [REP1-110] ensures that risks associated with battery storage are appropriately mitigated. As set out in ES Volume 1, Chapter 3: The Scheme [APP-055] all construction lighting will be deployed in accordance with the following recommendations to prevent or reduce the impact on human and ecological receptors: The use of lighting will be minimised to that required for safe site operations, Lighting will 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

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				angle greater than 20° from horizontal); and lighting will be directed towards the middle of the Order limits rather than towards the boundaries. Measures to control lighting are set out in the Outline CEMP [REP1-096]. Lighting is not required within the Solar PV Sites during the operation and maintenance phase of the Scheme. Motion sensing security lighting would be provided within substations and within the BESS Area to maintain safe working conditions in winter months, for security purposes, and for maintenance activities. The lighting commitments for the operation and maintenance phase are set out in the Outline OEMP [REP1-098], including details on lighting design to minimise light spill.
DF-009	Socio-Economics, Tourism and Recreation	Impact of Local Economy and Livelihoods	Bottom Line Up Front If this proposal is approved my Business will close with the effects on the local economy and livelihoods described below.	The Applicant responds to the points raised below.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
DF-010	Socio-Economics, Tourism and Recreation Transport and Access	Equine Impacts - Construction and Traffic	Lime Down cannot guarantee that their construction will not lead to my horses going through fences and ending up on a public road, with the consequences that follow for them and for any motorists involved.	Equestrian facilities, including private stables and paddocks, studs, riding schools, and on public rights of way such as bridleways and byways have been considered as specific recreational receptors in the assessment in the ES Volume 1, Chapter 16: Socio Economics, Tourism and Recreation [APP-068]. The likely effects on these locations and receptors are specifically and individually assessed in ES Volume 3, Appendix 16-2: Tourism and Recreation Receptor Tables [APP-241]. Equestrian facilities, including private stables and paddocks, studs, riding schools, and on public rights of way such as bridleways and byways have been considered as specific recreational receptors in the assessment in the ES Volume 1, Chapter 16: Socio Economics, Tourism and Recreation [APP-068].

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				The likely effects on these locations and receptors are specifically and individually assessed in ES Volume 3, Appendix 16-2: Tourism and Recreation Receptor Tables [APP-241] .
DF-011	Hydrology, Flood Risk and Drainage	Equestrians	They cannot guarantee that my paddocks will not flood with their silt and top soil,	The Applicant has responded to this comment under Reference ID DF-003.
DF-012	Air Quality	Construction	or that the air my horses breathe during construction will not be loaded with respirable particulate.	The Applicant responded to this comment under Reference ID DF-004.
DF-013	Scheme Description and DCO process	Environmental Statement	On the evidence as it stands, the Environmental Statement cannot be considered adequate.	The effects on residential properties and local communities are assessed in ES Volume 1, Chapter 8: Landscape and Visual [APP-060], Chapter 13: Transport and Access [REP1-019], Chapter 14: Noise and Vibration [REP1-021], Chapter 15: Air Quality [REP1-023], Chapter 16: Socioeconomics, Tourism and Recreation [APP-068], and Chapter 18: Human Health [APP-070] . These chapters identify both beneficial and adverse effects as a result of the Scheme, proposing measures to mitigate any adverse effects. Mitigation measures are also

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				contained within various outline management plans which are secured via Schedule 2 of the Draft DCO [REP1-007]. The Planning Statement [REP1-087] considers the adverse and beneficial effects of the Scheme in the application of the planning balance and concludes that the benefits of the Scheme outweigh the residual adverse impacts identified. The benefits of the Scheme are set out in Section 5.3 of the Planning Statement [REP1-085] and include the delivery of large amounts of affordable, secure, and low carbon electricity which will help the UK to achieve net zero by 2050, ecological and landscape enhancements, biodiversity net gain, permissive paths, employment generation, economic benefits and skills training.
DF-014	Socio-Economics,	Local businesses	The current proposal is, in my view, fundamentally incompatible with the operation of a	The Applicant refers to responses to comments in Reference ID DF-002 to DF-013.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
	Recreation and Tourism		thoroughbred stud farm and the wider thoroughbred industry that depends on the conditions of this landscape.	
DF-015	Socio-Economics, Recreation and Tourism	Local businesses	Who I am, and why this matters I started my own Equine Bloodstock Company thirty years ago and have built a significant international bloodstock advisory and trading business. On average it facilitates over £5m of investment in thoroughbred bloodstock each year, plus the ongoing keep and maintenance behind that. In 2026 alone we have already exceeded that figure. I have been directly responsible for success at the highest level of the sport, including multiple Royal Ascot winners and many Group 1 and Classic winners, with elite horses in every major racing jurisdiction in the world: Ireland, England, France, Hong Kong, Dubai, the USA, Canada, Japan, Australia, New Zealand and Argentina.	The Applicant notes this comment.
DF-016	Socio-Economics,	Equestrian	It is not a hobby yard. It is a working stud and bloodstock	Equestrian facilities, including private stables and paddocks, studs, riding

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
	Recreation and Tourism		operation, and a vital piece of an international business. If Lime Down is consented to in its current form, that business and my clients' continued investment in the Wiltshire and wider UK thoroughbred racing industry will not survive on this site as it stands today. I am not putting that in for effect. We have already stopped further investment in our infrastructure and plans are on hold. We have begun handing notice to staff because I cannot guarantee long-term positions next to a development of this scale, and we have stopped actively recruiting trainees. Over the last six years we have helped over twenty young school and college leavers take their first step into the thoroughbred industry, several of whom have gone on to genuine careers. That stops the moment a solar farm of this size is built next to the hub of our business. The Applicant's suggestion that affected staff "can retrain" is not a	schools have been considered as specific recreational receptors in the assessment in the ES Volume 1, Chapter 16: Socio Economics, Tourism and Recreation [APP-068]. The likely effects on these locations are specifically assessed in ES Volume 3, Appendix 16-2: Tourism and Recreation Receptor Tables [APP-241] which identifies no significant residual effects to their operation or recreational use as a result of noise impacts, subject to implementation of embedded and additional mitigation measures with any mitigation requirements (such as noise screening and offsetting away from neighbouring paddocks) secured through the relevant management documents.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			serious answer. It is a one-liner with no substance behind it.	
DF-017	Socio-Economics, Recreation and Tourism	Equestrian	Lime Down sits in the heart of equine country. That is a defining characteristic of this area, both culturally and economically - thoroughbred stud farms, 3 day eventing, racing, dressage, polo, hunting, point-to-pointing, and everyday leisure riding. Olympians and internationally significant operations are linked to this landscape. Almost 400 of the Relevant Representations specifically raise equine concerns. Mine is one drop in that much wider sea of objections. Despite that, the Applicant has not assessed this scheme through an equine welfare lens at all. Horses, and the businesses that depend on them, have not been treated as sensitive receptors. Static solar-panel guidance has been applied to large-scale tracking panels. Noise has been assessed against human thresholds rather than equine response.	This has been covered in Written Summary of the Oral Submissions at the Open Floor Hearing 1 and the Applicant's Responses [REP1A-013] in JF-001 and JF-002 where the scheme's impact on West Park Farm has been considered as not a significant effect. Further no residual effects to operation, business or recreational use have been identified. Although a specific equine assessment has not been undertaken, the EIA has sought to identify and minimise potential effects on sensitive receptors across a range of technical topics, with embedded mitigation and management measures incorporated where appropriate. Equestrian facilities, including private stables and paddocks, studs, riding schools, and on public rights of way such as bridleways and byways have been considered as specific

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				recreational receptors in the assessment in the ES Volume 1, Chapter 16: Socio Economics, Tourism and Recreation [APP-068]. The likely effects on these locations and receptors are specifically and individually assessed in ES Volume 3, Appendix 16-2: Tourism and Recreation Receptor Tables [APP-241]. The likely effects on these locations and receptors are specifically and individually assessed in ES Volume 3, Appendix 16 2: Tourism and Recreation Receptor Tables [APP-241]. The Scheme's approach has assessed the likely direct impact of construction on equestrian facilities, and accessibility and amenity impacts on those facilities and surrounding rights of way used for hacking. The Applicant confirms that the majority of significant adverse effects can be mitigated, however understands that some significant adverse effects to users of routes in Lime Down E cannot be mitigated further during

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				construction. No significant residual effects are anticipated during the operational phase of the Scheme. The Applicant has committed to ensuring the operation or recreational use of equestrian facilities and PROWs is protected as much as possible through the implementation of embedded and additional mitigation measures set out in the Outline CTMP [REP1-112] and Outline PROWPPMP [REP1-104], secured respectively by Requirements 15 and 16 in Schedule 2 to the Draft DCO [REP1-007]. The Applicant confirms that the Scheme design includes provision of approximately 12.6 km of permissive paths for pedestrians, and for pedestrians, cyclists and equestrian users, to improve connectivity across the Sites and the wider public rights of way network. These are secured through the Outline LEMP [APP-283] and Outline PROWPPMP [REP1-104] Requirements 7 and 16

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				of Schedule 2 to the Draft DCO [REP1-007]. The Applicant confirms that the approach to equestrian and PROW impacts is under discussion with Wiltshire Council's Countryside Access Team (as part of discussions with Wiltshire Council in general), the British Horse Society, and the Wiltshire Bridleway Association. Progress on each of these discussions is set out in the relevant Statements of Common Ground. Construction noise effects would be controlled through the implementation of the Outline CEMP [REP1-096], secured through Requirement 13 of Schedule 2 to the Draft DCO [REP1-007]. In particular, Sections 2.5 and 3.9 of the Outline CEMP [REP1-096] set out a range of embedded mitigation measures, including adherence to best practicable means in accordance with BS 5228, restrictions on core construction working hours, management of out-

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				of-hours working through Section 61 agreements where required, use of temporary acoustic fencing around HDD compounds where necessary, and implementation of additional site specific mitigation measures where activities have the potential to affect nearby noise-sensitive receptors. Additional mitigation measures include the careful siting and orientation of temporary construction compounds and plant, use of quieter plant where practicable, and offsetting noisy construction activities away from neighbouring paddocks and sensitive receptors where reasonably practicable. The Outline CEMP [REP1-096] also includes measures relating to lighting control and traffic management to minimise disturbance during construction. With regards to horses, as there is currently no established regulatory guidance for assessing noise induced behavioural change in livestock or horses, the approach where noise for

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				humans and horses are considered in terms of a receptor are addressed as potential amenity impacts on equestrian facilities, including private stables, paddocks, stud farms and riding schools, which have been assessed in ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068] and its supporting ES Volume 3, Appendix 16-2: Tourism and Recreation Receptor Tables [APP-241] . The chapter concludes there would be no significant residual effects to their operation or recreational use as a result of noise impacts, subject to implementation of embedded and additional mitigation measures with any mitigation requirements (such as noise screening and visual screening between onsite infrastructure and neighbouring paddocks).
DF-018	Noise and Vibration	Assessment	Static solar-panel guidance has been applied to large-scale tracking panels. Noise has been assessed against human	As explained in Section 14.4 of ES Volume 1, Chapter 14: Noise and Vibration [REP1-021] , noise from moveable panels would not be audible at residential properties.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			thresholds rather than equine response.	Paragraph 14.1.2 of ES Volume 1, Chapter 14: Noise and Vibration [REP1-021] clarifies that the scope of the noise assessment is limited to human receptors. The assessment of noise on horses is outside the scope of an Environmental Statement, although the potential impact this may have on local equine businesses is covered in ES Volume 1, Chapter 16: Socio Economics, Tourism and Recreation [APP-068] .
DF-019	Transport and Access	Local Road Network	Rural lanes have been downgraded on the basis of low user counts.	The Applicant makes not of this comment. In the assessment of transport impacts we assign a receptor to the nearest highway link and identify the sensitivity of receptors based on the relationship with the highway environment in line with paragraph 1.31 IEMA transport and access guidelines. The relationship to the highway environment is determined on the following transport factors: • Severance of communities • Road vehicle driver and passenger delay

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				• Non-motorised user delay • Non-motorised amenity • Fear and intimidation on and by road users • Road user and pedestrian safety Hazardous/large loads The potential impact of the Scheme on non-motorised users (NMU) is assessed in ES Volume 1, Chapter 13: Transport and Access [REP1-019] which concludes that there would be no significant impact on NMU as a result of the Scheme. Highway widths of construction routes have been assessed and provide sufficient opportunities and width for HGV traffic to comfortably pass cyclists, equestrians and pedestrians. ES Volume 1, Appendix 13-1: Transport Assessment [REP1-057 and REP1-059] concludes that the level of flow change will not result in a step change in fear and intimidation

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				as defined in the IEMA guidance at Tables 3.1, 3.2 and 3.3. An Outline CTMP [REP1-112] and Outline PRowPPMP [REP 1-104] support the DCO Application and include outline measures to ensure impacts to NMU along highways and PRow are minimised as far as practicable.
DF-020	Socio-Economics, Recreation and Tourism	Equine impact	The vulnerability of broodmares, foals and young stock has not been addressed.	The Applicant confirms that the assessment in ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068] has considered impacts on equestrian facilities primarily as recreational or recreation-dependent businesses. Whilst breeding and rearing has not been explicitly referenced, this has been understood as part of the function of equestrian facilities: including stud farms, liverys, riding schools, and private stables. Table 2-10 in ES Volume 3, Appendix 16-2: Tourism and Recreation Receptor Tables [APP-241] provides a description of which equestrian

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				facilities were identified in the Study Area around the Scheme and indicates whether they were taken forward for full assessment. The Applicant considers that the Environmental Statement has fully assessed the impacts of the Scheme on all receptors. The Applicant is committed to ensuring impacts on equestrian facilities such as West Park Farm can be mitigated wherever practicable, and therefore is undertaking, and encourages further, engagement with relevant stakeholders through the DCO process. Following the written representations submitted at Deadline 1 and 1A relating to horses and equine businesses, the Applicant is considering the technical information provided in detail and will provide further commentary at Deadline 3.
DF-021	Socio-Economics,	Equine impact	This is not a question of an assessment that is on the right track but underestimates effects.	The Applicant recognises that animals, including horses, can be sensitive to dust and construction

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
	Recreation and Tourism		The wrong framework has been applied. Horses, and especially thoroughbreds, cannot be treated as ordinary agricultural receptors or general "countryside users". They are flight animals with highly developed sensory systems, evolved to detect and react to threats through sound, movement, light and environmental change. The peer-reviewed evidence on this is unambiguous and is referenced at the end of this representation. The Applicant's submitted material does not engage with it.	activity. Management measures within the Outline CEMP [REP1-096] and the Outline CTMP [REP1-112] include measures such as dust suppression, site management controls, routing and scheduling of construction traffic, and management of plant and machinery which are specifically designed to minimise dust at source and reduce the potential for construction related emissions to affect nearby receptors, including equestrian properties. Glint and glare effects upon bridleway users have been assessed in Section 8 of ES Volume 3, Appendix 20-4: Solar Photovoltaic Glint and Glare Study [APP261]. No significant effects are predicted as the sensitivity of receptors is considered to be low. There is no evidence that horses are significantly affected by solar reflections. The approach where noise for humans and horses are considered in terms of a receptor are addressed as

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				potential amenity impacts on equestrian facilities, including private stables, paddocks, stud farms and riding schools aligns with an accepted methodology based on expert advice in other DCOs, including Sunnica Energy Farm, where the Secretary of State (SoS) agreed with the methodology that an animals processing of decibel levels is sufficiently similar to a humans' that the established human-noise threshold is a fair benchmark for noise impacts to be considered. The Scheme's approach has assessed the likely direct impact of construction on equestrian facilities, and accessibility and amenity impacts on those facilities and surrounding rights of way used for hacking. Furthermore, the Applicant, notes a summary from the British Horse Society from August 2025 which contains a section on glint and glare: <i>"The society has no evidence of 'glint and glare' from solar panels and no evidence of horses reacting to it or of it being detrimental to the health and</i>

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				<i>wellbeing of horses. Reports from sites with both solar panels and horses, including a solar array beside an arena used for riding horses, indicate no reflection and no reaction from or impact on horse or rider."</i> The view put forward by the British Horse Society is that, whilst horses may initially react to new solar infrastructure, this is no different from how they might respond to any unfamiliar change in their environment, and is something they generally adapt to quickly. Any reaction is therefore attributed to a change in surroundings, rather than to anything specific about the panels themselves.
DF-022	Socio-Economics, Recreation and Tourism	Equine impact	The only equine organisation referred to anywhere in the Applicant's documentation is the British Horse Society, whose Wiltshire Access Team is a voluntary group and which itself formally objects to the scheme, describing it as a "mega industrial	The Applicant is preparing a Statement of Common Ground with the British Horse Society at Deadline 2 and has been in dialogue with the group.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			estate" in a rural landscape. When I spoke with BHS directly, they said they had not heard of IGP or Pager Power, and presumed any guidance must have been pulled from their website. The Applicant's chosen single equine "mention", in other words, opposes the project.	
DF-023	Socio-Economics, Recreation and Tourism	Equine impact	Even the BHS, by their own scope, do not cover the thoroughbred racing industry. a sport that on conservative figures, employs around 80,000 people and contributes over £4 billion to the UK economy each year. That is the industry Lime Down sits next to. Not one report in the application has been written by a thoroughbred industry expert, never mind by anyone with knowledge of itself.	While the respondent notes that the British Horse Society (BHS) scope is focused on recreational activity, the Applicant clarifies that its own ES [APP-052 to APP-265] goes significantly further than BHS guidance by individually assessing the operational needs of specific thoroughbred facilities. The Applicant confirms that the assessment in ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068] has considered impacts on equestrian facilities primarily as recreational or recreation-dependent businesses. Whilst specific conditions for thoroughbred racing stock have not been explicitly referenced, this

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				has been understood as part of the function of assessing equestrian facilities including stud farms, liveryes, and private stables. Table 2-10 in ES Volume 3, Appendix 16-2: Tourism and Recreation Receptor Tables [APP-241] provides a description of which equestrian facilities were identified in the Study Area around the Scheme and indicates whether they were taken forward for full assessment. The assessment concluded that no significant effect to West Park Farm is anticipated at any phase of the Scheme. The Applicant considers that the Environmental Statement has fully assessed the impacts of the Scheme on all receptors. The Applicant is committed to ensuring impacts on equestrian facilities such as West Park Farm can be mitigated wherever practicable, and therefore is undertaking, and encourages further, engagement with relevant

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				stakeholders through the DCO process. Following the written representations submitted at Deadline 1 and 1A relating to horses and equine businesses, the Applicant is considering the technical information provided in detail and will provide further commentary at Deadline 3.
DF-024	Socio-Economics, Recreation and Tourism	Equine impact	The flight response, and why it is a safety issue here It is well documented and accepted that horses are flight animals, easily spooked by unexpected noises and movements. Examples of spooked horses bolting blindly into fences, into cars, even out to sea, are not difficult to find. They put themselves at risk and they put anyone in their way at risk. That risk is amplified at because our horses are predominantly young foals, yearlings, and untrained two-year-olds and very lightly handled. They are not the trained riding horses the public imagine. There are tens of	The Applicant has incorporated buffers into the design to provide enough physical separation that horses are less likely to be spooked by onsite infrastructure. Public rights of way such as bridleways and byways and the use of the highway network for recreational users have been considered as specific recreational receptors in the assessment in the ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068] . The likely effects on individual PROWs are specifically assessed in ES Volume 3, Appendix 16-2: Tourism and Recreation Receptor Tables [APP-241] .

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			thousands of UK hospital admissions every year arising from horse-related injuries; thoroughbreds present the highest risk in the sector, and equine fatalities are not uncommon. By law I have to provide a safe working environment for staff working with the most unpredictable population of horses there is. I cannot honestly say I can do that next to years of construction noise, ground vibration and unpredictable heavy machinery activity.	The Applicant confirms that the majority of significant adverse effects can be mitigated, however understands that some significant adverse effects to users of routes in Lime Down E cannot be mitigated further during construction. No significant residual effects are anticipated during the operational phase of the Scheme. The Applicant has committed to ensuring the operation or recreational use of PROWs is protected as much as possible through the implementation of embedded and additional mitigation measures set out in the Outline CTMP [REP1-096] and Outline PROWPPMP [REP1-104] secured respectively by Requirements 15 and 16 in Schedule 2 to the Draft DCO [REP1-007]. An assessment on safety and accidents is provided in ES Volume 1, Chapter 13: Transport and Access [REP1-019].

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				Links with traffic increases above identified thresholds, were taken forward for further assessment. As part of the assessment, it is concluded that the level of construction traffic associated with the Scheme is unlikely to materially affect road safety on the links in the Study Area
DF-025	Socio-Economics, Recreation and Tourism	Equine impact	Loose horses on public roads are not hypothetical. April 2024 on the A303, the M4 in 2003, the A350 in 2022 and the A429 in 2025 all involved loose horses on major roads. We sit close to both the M4 and the A429. The British Horse Society's "Horse-i" data records 19,528 road incidents involving horses in the UK since the app launched, with 559 horses killed, almost 1,000 people injured and eight people killed. Those figures do not even include the higher-risk thoroughbred population in our area. People will also remember the trained Household Cavalry horses that bolted in central London in 2024, spooked by	The potential impact of the Scheme on non-motorised users (NMU) is assessed in ES Volume 1, Chapter 13: Transport and Access [REP1-019] which concludes that there would be no significant impact on NMU as a result of the Scheme. Highway widths of construction routes have been assessed and provide sufficient opportunities and width for HGV traffic to comfortably pass cyclists, equestrians and pedestrians. ES Volume 1, Appendix 13-1: Transport Assessment [REP1-057] concludes that the level of flow change will not result in a step change in fear and intimidation as

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			building construction; trained police horses in Sydney did the same that year. Those animals had been worked with for over a decade. My foals and yearlings have had little more than basic human handling. Where in the application is the equine-specific risk assessment that addresses any of this? I have not been able to find one.	defined in the IEMA guidance at Tables 3.1, 3.2 and 3.3. An Outline CTMP [REP1-112] and Outline PROWPPMP [REP1-104], secured by Requirements 15 and 16 respectively in Schedule 2 to the Draft DCO [REP1-007], support the DCO Application and include outline measures to ensure impacts to NMU along highways and PRoW are minimised as far as practicable. As the result of the finding in ES Volume 1, Chapter 13: Transport and Access [APP-065] and the implementation of secured mitigation measures, the assessment in ES Chapter 16: Socio-Economics, Tourism and Recreation [APP-068] confirms no significant adverse effect to recreational use of the local highway network (including for equestrian users) as a result of the Scheme.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				The Applicant considers that the Environmental Statement has fully assessed the impacts of the Scheme on all receptors. The Applicant is committed to ensuring impacts on equestrian facilities can be mitigated wherever practicable, and therefore is undertaking, and encourages further, engagement with relevant stakeholders through the DCO process. Following the written representations submitted at Deadline 1 and 1A relating to horses and equine businesses, the Applicant is considering the technical information provided in detail and will provide further commentary at Deadline 3.
DF-026	Socio-Economics, Recreation and Tourism	Equine impact	I would also draw the Examining Authority's attention to a written notice from my farrier: There is no way I will continue to trim and shoe your horses if a construction site like Lime Down is next to you. I cannot see how it could be safe for me to pick up the hind leg of a horse while someone within shouting distance bangs	The Applicant notes this comment.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			posts into the ground or drives heavy machinery while I try to safely work on your horses. That is from the person actually doing the work, not a paid consultant	
DF-027	Transport and Access	Construction traffic	Construction and operational impact – two distinct compounding layers The impacts on this site fall into two compounding categories. During construction the scheme introduces prolonged HGV traffic, piling up to approximately 4 metres, machinery noise, ground vibration and constant human activity into what is currently a calm and predictable environment. These impacts are time-limited but intense, and they will persist for years. There is no realistic way to insulate sensitive equestrian operations from them.	The Applicant has committed to minimising construction impacts through the mitigation measures secured through the Outline CEMP [REP1-096] and Outline CTMP [REP1-112] , secured by Requirements 13 and 15 respectively in Schedule 2 to the Draft DCO [REP1-007] . Together these documents set out how the Applicant intends to ensure dust, noise and vibration impacts from the Scheme's construction, and impacts from HGV movements, can be minimised.
DF-028	Scheme Description and DCO Process	Tracker panels	Once operational, the scheme introduces a permanent and chronic set of stimuli: tracker panels that move throughout the day, shifting reflections and shadows, inverter	The Applicant has committed to minimising operational impacts through the mitigation measures secured by the Scheme's design through the Design Principles and Parameters [REP1A-008] and by

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			noise, substations and BESS infrastructure. None of these features switch off. They are part of the landscape for the lifetime of the scheme, and the evidence shows their effects on horses, particularly breeding stock, are likely to be cumulative rather than diminishing over time. Beyond the obvious risk of horses escaping or injuring themselves, my staff or grooms, the wider research is clear that unfamiliar or unpredictable stimuli can trigger sustained stress responses repetitive walking inside paddocks, weight loss and broader health decline. Racehorses cannot be reared successfully in those conditions. Applying static-panel guidance to a tracking system is a fundamental methodological flaw, not a minor one.	landscape screening through the Outline LEMP [APP-283] , secured by Requirements 5 and 7 respectively in Schedule 2 to the Draft DCO [REP1-007] . Together these documents set out how the Applicant has offset from the Gauze Brook and by extension West Park Farm to increase the distance between onsite infrastructure and sensitive receptors, in this instance to reduce equine response to visual and auditory stimuli. For example, single-axis trackers rotate very slowly, and move incrementally every few minutes. This movement, if perceived, is extremely gradual and avoids any "startle" effect associated with rapid or sudden motion. The British Horse Society notes that while horses may initially notice new infrastructure, they generally adapt quickly to changes in their environment. With these measures in place, the Applicant is confident that the assessment outcome in ES Volume 3, Appendix 16-2: Tourism and Recreation Receptor Tables

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				[APP-241] of a long-term moderate-minor adverse effect (not a significant effect) is robust. The Applicant considers that the Environmental Statement has fully assessed the impacts of the Scheme on all receptors. The Applicant is committed to ensuring impacts on equestrian facilities such as West Park Farm can be mitigated wherever practicable, and therefore is undertaking, and encourages further, engagement with relevant stakeholders through the DCO process. Following the written representations submitted at Deadline 1 and 1A relating to horses and equine businesses, the Applicant is considering the technical information provided in detail and will provide further commentary at Deadline 3.
DF-029	Other Environmental Matters	Battery safety	The Battery Energy Storage System adds a further, distinct layer of risk. In the event of a thermal-runaway fire, veterinary evidence from comparable	The Applicant refers to the response given to DF-005.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			schemes confirms that horses, due to their respiratory physiology and behavioural response to fear, are particularly vulnerable both to direct inhalation injury and to severe trauma caused by uncontrollable herd flight during emergency events.	
DF-030	Noise and Vibration	Surveys	Noise, and the sound monitor placed on my land The Applicant's noise assessment is, in my view, not credible. A sound monitor was placed on my land on 12 October 2023 without permission, in a position that could not produce relevant data for our site. I provided the wrong date in my first written submission, which the Applicant was quick to use to claim no fault on their part. The corrected date is now on the record, and a date-stamped photograph can be provided. Separately, the contractor that carried out those surveys has admitted the error to me directly.	The Applicant has responded to this comment under Reference ID JF-029.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
DF-031	Noise and Vibration	Surveys	Respondent included a date/time stamped image of the sound monitor placed on their land in their Written Representation.	The Applicant has responded to this comment under Reference ID JF-029.
DF-032	Noise and Vibration	Surveys	If the location of the sound monitors cannot be reliably established, the survey data based on them cannot be relied on. And in any event, what the assessment lacks is not human noise mapping. It is any meaningful evaluation of how noise particularly intermittent, tonal or unpredictable noise during construction and from BESS or inverter operation will affect thoroughbred horses, who do not reliably habituate to such stimuli. The science is clear that noise anxiety is a genuine and significant welfare issue in horses. Lime Down's evidence base does not address it.	The location of the sound monitors is understood and displayed clearly in ES Volume 2, Figure 14-1: Noise Monitoring and Sensitive Receptor Locations [APP-159] . Paragraph 14.1.2 of ES Volume 1, Chapter 14: Noise and Vibration [REP1-021] clarifies that the scope of the noise assessment is limited to human receptors. The assessment of noise on horses is outside the scope of an Environmental Statement, although the potential impact this may have on local equine businesses is covered in ES Volume 1, Chapter 16: Socio Economics, Tourism and Recreation [APP-068] .
DF-033	Hydrology, Flood Risk and Drainage	Flood risk	Respondent included two images captioned: Left: Proposed site of the Solar Panels flooded adjoining to the South of [redacted] not flooded.	The photographs are acknowledged. They appear to show existing flooding of land within or adjacent to the known floodplain. They do not, on

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				their own, demonstrate that the Scheme would increase flood risk. Photographs do not provide surveyed flood levels, measured depths, flow velocities or hazard ratings. Existing floodplain behaviour has been considered in the relevant site-specific FRA, including ES Volume 3, Appendix 11-6: Flood Risk Assessment and Drainage Strategy Lime Down D [REP1-047] where relevant to Gauze Brook. The relevant assessment is whether the Scheme would materially increase flood risk, and the submitted assessment concludes that it would not.
DF-034	Soils and Agriculture Hydrology, Flood Risk and Drainage	Flood Risk	The Applicant has provided no real assurance that disturbance of the soil in the proposed development fields will not cause increased flooding on my side of the boundary. At consultation I saw little evidence that the project team understood that the fields they intend to develop sit on a flood plain, or that the area can carry	The Applicant recognises that land adjacent to Gauze Brook can experience flooding during heavy rainfall. That existing floodplain behaviour is reflected in ES Volume 3, Appendix 11-6: Flood Risk Assessment and Drainage Strategy Lime Down D [REP1-047] .

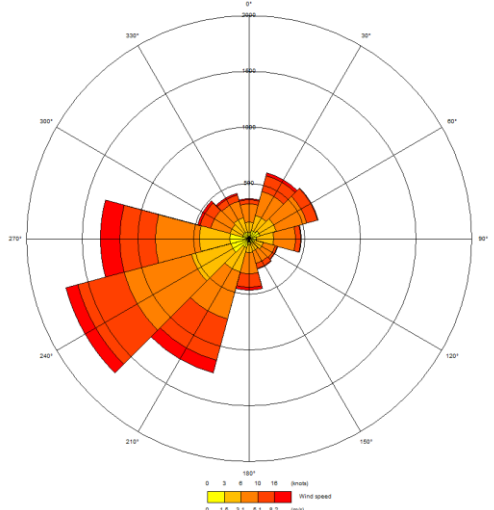
Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			approximately two foot of water spanning around 100 metres from the Gauze Brook in heavy rain. Video evidence is available. There are numerous examples of Malmesbury flooding with 2024 described as the worst event for 25 years.	The Scheme's interaction with that floodplain has been assessed. The BESS and substations are located in Flood Zone 1. Solar PV panels within areas of flood risk are flood-compatible and raised above ground. The Scheme would not materially reduce floodplain storage or displace floodwater onto neighbouring land. In relation to runoff from panelled areas, the Applicant's position is supported by national policy, drainage guidance and published research. NPS EN-3 paragraph 2.10.84 recognises that panels drain to ground. Research by Cook and McCuen (2013), Yavari et al. (2022), Elamri et al. (2018), Gullotta et al. (2023), Wang and Gao (2023) and Baiamonte et al. (2023) identifies ground cover, compaction, surface roughness and flow connectivity as the relevant controls on runoff response. These are secured through the Outline CEMP [REP1-096], Outline OEMP [REP1-098] and Outline SRMP [APP-280].

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
DF-035	Soils and Agriculture	Silt and debris	Disturbing this land at the wrong time of year, without the cover that crops or vegetation provide, risks the deposit of silt, top soil and debris on my land that would otherwise be held in place.	The Applicant acknowledges that soil disturbance at the wrong time of year could increase the risk of sediment and topsoil mobilisation if not properly managed. That is why the Application secures soil and water management controls through the Outline CEMP [REP1-096] and Outline SRMP [APP-280]. Controls will include appropriate soil handling, wet weather working restrictions, sediment management, protection of drainage pathways and reinstatement measures. These measures are specifically intended to prevent silt, topsoil and debris being mobilised from working areas and transferred to neighbouring land or watercourses.
DF-036	Hydrology, Flood Risk and Drainage	Property damage	here is also a real risk of fence damage where excess water is pushed across boundaries that, in normal conditions, divide the land naturally. This is not theoretical. There is now a meaningful body of international litigation specifically on this issue:	The cited examples relate to other projects in other jurisdictions and do not establish that the Lime Down Scheme would cause similar effects. They do, however, reinforce the importance of proper runoff, erosion and sediment controls during construction.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			• In 2023, Silicon Ranch and its construction contractor reportedly had a \$135m award made against them in the United States for silt and sediment erosion damaging neighbouring property. • Massachusetts local government required the developers of solar projects in Ware and New Braintree to pay over \$500,000 in fines after they failed to manage runoff from their sites. • In 2024, a Georgia court granted an injunction stopping Pine Gate Solar in its tracks because no proper pollution prevention plan was in place.	That is consistent with the Applicant's assessment. Published research on solar runoff identifies that erosion and runoff risk is associated with bare ground, compaction, degraded surface roughness, drip-line concentration and connected flow pathways. The Application includes controls for these pathways through the Outline CEMP [REP1-096] , Outline SRMP [APP-280] , Outline OEMP [REP1-098] and the site-specific drainage strategy. The Scheme would not rely on uncontrolled runoff leaving construction areas or crossing neighbouring boundaries.
DF-037	Hydrology, Flood Risk and Drainage	Flood risk	I do not see in Lime Down's submitted material the site-specific, location-by-location plan that would meaningfully address these risks at [redacted]. What I have received are box-ticking answers, generic plans, and reports that do not engage with the actual flood plain or boundary at our farm, or with the seasonal	The Applicant does not agree that the submitted material is generic or that individual flood observations displace the accepted methodology for flood risk assessment. Flood risk assessment is required to be based on robust, repeatable and long-term

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			extremes twenty or thirty days of consecutive rain, or three months of drought that this landscape regularly produces. The Applicant has not, in my dealings with them, attended in real time to specific events on the ground.	hydrological evidence. ES Volume 3, Appendix 11-1 to 11-9: Flood Risk Assessment and Drainage Strategy [REP1-037 to REP1-054] has therefore used recognised national datasets and industry-standard methods, including Environment Agency flood mapping, Product Data, LiDAR, site topography, watercourse mapping, surface water flood mapping, historical flood information and FEH/ReFH hydrology where drainage design or flow estimation is required. These methods use long-term rainfall and catchment datasets to define design events, including appropriate climate change allowances. That is the correct basis for assessing flood risk, rather than relying on anecdotal evidence from a single event. Local photographs and videos can be useful in illustrating existing floodplain behaviour, but they do not provide surveyed flood levels, measured depths, velocity data, catchment-wide flow data or design-event hydrology. They therefore cannot replace the

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				FEH-based and Environment Agency evidence base used in the submitted assessment. ES Volume 3, Appendix 11-1 to 11-9: Flood Risk Assessment and Drainage Strategy [REP1-037 to REP1-054] includes site-specific appendices for each Solar PV Site and the Cable Route Corridor, including assessment of the Gauze Brook floodplain where relevant. The outline management plans set the control framework which will be developed into detailed, location-specific construction measures before works commence. Seasonal extremes, wet weather working and soil condition are addressed through the soil and construction management controls secured through the Outline CEMP [REP1-096], Outline OEMP [REP1-098] and Outline SRMP [APP-280].
DF-038	Air quality	Dust	The dust-bowl effect It is well documented that disturbance of large areas of top soil over an extended construction period	An assessment of the effects of construction activities on air quality is provided in ES Volume 1, Chapter 15: Air Quality [REP1-023] . The

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			creates a “dust bowl” effect. I have not seen any submitted evidence on prevailing wind direction in this area, average wind speeds, or how dust generated by the construction site will be carried over my land and into the lungs of horses and people. Where is the dust management plan for humans, and where is the separate plan for the thoroughbred horses on the adjoining land? Again, this is not my view alone: The proposed large-scale solar development adjacent to equine grazing presents a material risk of clinically significant respiratory compromise in horses bred and managed for elite Thoroughbred performance. Construction activity will generate respirable airborne particulate matter, including dust and crystalline silica arising from soil disturbance, excavation, and heavy vehicular movement. In high-value equine populations, even subclinical lower airway inflammation is clinically relevant,	assessment concludes that, with embedded mitigation measures in place, construction-phase air quality effects as a result of the Scheme, including potential health effects from increased exposure to particulates, would not be significant for any receptors within the relevant study areas. The prevailing wind is from the south-west, as demonstrated in the wind rose from the Fairford meteorological station (2024) presented below. 

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			with well-established effects on performance and future racing potential. Peer-reviewed evidence demonstrates that inhalation of respirable dust induces neutrophilic airway inflammation, mucus accumulation, and reduced pulmonary function, with severity closely associated with exposure levels (Couëtil et al., 2016; Ivester et al., 2014). Even short-term exposure in susceptible horses may result in persistent airway inflammation, airway sensitisation, and sustained impairment of respiratory function, with potential for long-term or irreversible effects on athletic capacity. Given the horse's high minute ventilation, particularly during exercise, inhaled particulate dose is substantially amplified compared to humans. Sustained exposure to construction-related particulate matter particularly in downwind paddocks and training environments	(Wind Rose from Fairford Meteorological Station (2024)) However, the construction dust assessment considers all wind directions as a worst case, ensuring that potential impacts are assessed irrespective of prevailing conditions. As indicated in ES Volume 3, Appendix 15-1: Construction Dust Methodology and Assessment [APP-238], the highest level of mitigation measures have been proposed, in accordance with best practice guidance. These measures are set out in the Outline CEMP [REP1-096] and the Outline CTMP [REP1-112]. These include measures such as dust suppression, site management controls, routing and scheduling of construction traffic, and management of plant and machinery. The preparation, approval and implementation of detailed construction management plans, substantially in accordance with the

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			therefore represents a predictable and avoidable risk to respiratory health, performance, and breeding value. - [redacted] , BA (Mod) Biochem DBS DVM Cert Equine Sports Med, Senior Equine Veterinary Surgeon and Advanced Practitioner in Equine Sports Medicine	outline plans, are secured through Schedule 2 of the Draft DCO [REP1-007], ensuring that air quality impacts during construction are appropriately controlled. The Applicant recognises that animals, including horses, can be sensitive to dust and construction activity. The management measures described above are specifically designed to minimise dust at source and reduce the potential for construction related emissions to affect nearby receptors, including equine facilities. It should also be noted that where construction dust emissions occur, these are typically dominated by coarse particles (greater than 10 µm diameter) which tend to settle relatively quickly, meaning they are typically associated with localised dust soiling effects rather than widespread respiratory exposure. By contrast, it is finer particulate matter (PM_{2.5}), which can penetrate deeper

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				into the respiratory system, that is of greatest relevance for respiratory health effects. As set out in the IAQM Guidance on the Assessment of Dust from Demolition and Construction, the proportion of PM_{2.5} within construction dust is typically low, with PM_{2.5} generally comprising around 10% of PM₁₀ for construction activities. This indicates that the fraction of dust most relevant to respiratory health effects is limited. On this basis, the primary risk associated with construction dust is typically short-term and localised nuisance effects (e.g. dust deposition), rather than significant or widespread respiratory effects. The embedded mitigation measures, including dust suppression, site management controls and monitoring, are specifically designed to minimise all potential adverse effects associated with dust emissions, such that impacts are not significant. Accordingly, significant

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				adverse effects on nearby receptors, including horses, are not anticipated.
DF-039	Ecology and Biodiversity	Wildlife impact	Biodiversity, the "lake effect", and dead birds on grazing land The Applicant's claim that local habitat will actually be improved by this scheme does not, on the evidence, hold up. Research from Aix-Marseille University in France indicates that the presence of solar panels significantly affects biodiversity and soil respiration, with measurable negative effects on small soil organisms and plant survival. Murdoch University in Australia has shown that solar facilities affect fauna through habitat loss and fragmentation, altered microclimate, and the creation of a novel landscape that no longer functions as the previous one did.	The Applicant highlights studies from the UK which indicate solar farms can increase biodiversity, for instance a University of Cambridge study showed how bird numbers and diversity were greater at solar farms compared to nearby arable farmland (Copping et al. (2025) Solar farm management influences breeding bird responses in an arable-dominated landscape. Bird Study, 72(3), 217–222). The Scheme is expected to deliver an overall net gain for biodiversity as a result of the cessation of agricultural practices combined with delivery of considerable habitat creation and enhancement measures. This is quantified through the use of the DEFRA published Statutory BNG Metric (Rev 2) [REP1-093] with further details provided with the BNG Assessment Report (Rev 2) [REP1-089] which demonstrates in excess

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				of 10% BNG will result from the Scheme.
DF-040	Ecology and Biodiversity	Wildlife impact	In 2025 [redacted] of Murdoch University published work describing what she calls the "lake effect": migrating birds mistake solar farms for water, landing on them for rest and hydration, drawn down by polarised reflections and the abnormal insect populations those reflections attract. Wider analysis suggests roughly 17.1 million birds are killed worldwide each year as a direct consequence of solar installations, through collisions, burns, entrapment and starvation. Lime Down has not produced any meaningful study of how this will or will not happen here. Where the dead birds end up is not a peripheral question for me. It is a biosecurity question: The potential for avian mortality associated with large-scale solar installations also raises biosecurity considerations in equine environments. The presence of	The current UK guidance on the risk posed to birds from solar panels indicates that potential risk of collision is low, including the conclusions of a 2016 Natural England literature review (NEER012 – Evidence Review of the Impact of Solar Farms on Birds, Bats and General Ecology 2016). The principal recommendation of this guidance is the sensitive location of solar schemes away from large bodies of water or known wetland bird sites (such as estuaries), which has been achieved in the case of this Scheme. The Applicant wishes to note that the cited paper principally derives its extrapolated figures from research dominated by data from Concentrated Solar Power facilities in the US, which focus the sun's rays via large mirrors up to a tower-mounted heat engine to generate electricity. This is an entirely different technology to that proposed by the Scheme, which carries

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			bird carcasses within grazing land may pose a risk to horses through contamination of pasture with pathogenic organisms, including <i>Clostridium botulinum</i> , which is recognised as a cause of botulism in horses following ingestion of contaminated forage or carrion material. Horses are highly susceptible to botulinum toxin, and even low-level exposure can result in severe and potentially fatal neuromuscular disease. From a veterinary perspective, the introduction of carcass material into grazing systems represents an additional, avoidable risk to equine health.	significantly different risks to ground-mounted PV. Similarly, the 'lake effect' is particularly noticeable in arid regions, again usually not seen in European datasets. Therefore, and in light of the above Natural England literature review, it is not considered that the proposals constitute a significant risk to bird populations through collision or other direct physical harm. Consequently, the Applicant does not accept that there is a significant risk of secondary disease impacts on local livestock from dead birds.
DF-041	Ecology and Biodiversity	Hedgerows	At consultation I asked, more than once, what the Applicant's plan is for tree and hedge species along the boundary between the proposed development and our farm. I was told the council would maintain them. I could not get one named species from any representative I spoke to. That is not a serious answer to a serious	The Applicant has responded to comments related to landscape mitigation in detail in Table 2-5, Section LV-03, on Page 387 of the Applicant's Response to Relevant Representations (Part 2) [PDB-004] , where it is explained that details of the mitigation measures and their long-term management are set out in ES Volume 1, Chapter 8:

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			question on a 3,000-acre development.	Landscape and Visual [APP-060], ES Volume 2, Figure 3-4-1 to 3-4-5.2 Landscape and Ecology Mitigation Plan [REP1-029] and secured within the Outline LEMP [APP-283] .
DF-042	Socio-Economics, Tourism and Recreation	Employment Mental Health Impacts	The economic and human consequences on the ground This is not just about the horses. It is about the people who depend on them. Across this summer I had, on a single day, sixteen people on the farm at once permanent staff, part-timers and contractors. That is what a working stud at our scale supports day to day. We are also a customer of a long list of local businesses: farriers, vets, hay and straw suppliers, feed merchants, transporters, agricultural contractors, our farm accountant five miles away, local equipment suppliers. None of that is discretionary. It is the economy that exists because this landscape supports a working thoroughbred industry. I have already had to begin handing notice to a member	The assessment in ES Chapter 16: Socio-Economics, Tourism and Recreation [APP-068] and the supporting ES Volume 3, Appendix 16-2 Tourism and Recreation Receptor Tables [APP-241] have assessed the likely impacts of the Scheme at construction, operation, peak replacement, and decommissioning on individual equestrian facilities and the PRow network. The assessment finds no significant adverse effect to West Park Farm as a result of the Scheme being offset away from the Gauze Brook, and embedded mitigation measures to control transport and PROW effects. Should redundancies be required as a result of the Scheme, affected workers would be eligible for accessing skills and employment

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			of staff. The mental health impact of losing a job he genuinely loved sits with him and with me. Where in the Applicant's submitted material is the assessment of that? Where, more broadly, is the assessment of the loss of livelihood for the people who service our farm and others like it? Because if this landscape becomes incompatible with thoroughbred breeding, that economic activity does not relocate. Much of it disappears.	support measures as secured through the Outline SSCEP [REP1-108], secured by Requirement 18 in Schedule 2 to the Draft DCO [REP1-007], subject to the final SSCEP being agreed by Wiltshire Council and any other stakeholders. The Applicant has undertaken a comprehensive assessment of potential impacts on mental health and wellbeing during the construction, operation and decommissioning of the Scheme in ES Volume 1, Chapter 18: Human Health [APP-070]. This assessment identifies that while the prospect of the Scheme can cause distress and anxiety, the residual effects on population health and social wellbeing across the 2 km Study Area are assessed as not significant in planning terms. The Applicant acknowledges that the use of this term will not offer comfort to the respondent. To help mitigate concerns ahead of and during the construction phase,

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				the Applicant is committed establishing a Community Liaison Group (secured by Requirement 4 of Schedule 2 to the Draft DCO [REP1-007]) to act as a human intermediary between residents and the project team to ensure concerns are heard and responded to directly once consent is granted. Alongside the mitigation measures and offset distances between the infrastructure between the respondents property, the Applicant is confident many concerns held will be addressed and avoided.
DF-043	Transport and Access	Equine Impacts - Businesses	The wider equestrian economy farriers, vets, transporters, feed merchants, agricultural contractors has been left out.	Equestrian facilities, including private stables and paddocks, studs, riding schools, and on public rights of way such as bridleways and byways have been considered as specific recreational receptors in the assessment in the ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068] .

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				Following the written representations submitted at Deadline 1 and 1A relating to horses and equine businesses, the Applicant is considering the technical information provided in detail and will provide further commentary at a later deadline.
Tony Coombes REP1-242				
TC-001	Other Environmental Matters	BESS Alternatives	This question was intended to be put to the Applicant on Wednesday 22 April 2026 under Item 5 "Alternatives" of the "Issue Specific Hearing 1"; but there wasn't time to discuss all the issues. Has the applicant considered alternative battery technologies such as Sodium-ion (Na-ion) which has a significantly lower risk of thermal runaway compared to the standard Lithium-ion (Li-ion). While LFP (Lithium Iron Phosphate) is the current industry titan, Na-ion is rapidly carving out a niche as the "safety-first" alternative. Admittedly a Na-ion BESS will be slightly larger/heavier than an LFP system	The Applicant clarifies that the LFP concept design was referenced because this is currently the dominant BESS battery system chemistry and considered: <i>"a reasonable worst case for the purposes of the assessment in terms of BESS toxic gas emission potential (Hydrogen Fluoride production) and explosion risk (significant levels of hydrogen produced during thermal runaway)."</i> The Applicant is unable to predict what technologies will be available at the detailed design stage and has not made any commitment to selecting LFP battery systems. BESS safety is not driven solely by battery chemistry

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			for the same capacity, but the safety benefits are undeniable. Sodium-ion batteries are fundamentally more "forgiving" than Lithium-ion (NMC or LFP) during electrical or physical abuse... Higher Thermal Runaway Onset: Na-ion cells generally have a higher decomposition temperature (approx. 290°C+) compared to many Li-ion chemistries. This means they can survive hotter conditions before failing. Milder Failure Mode: When Na-ion cells do fail in "nail penetration" or "overcharge" tests, they often exhibit smoking or venting rather than the violent, self-sustaining flames typical of Lithium-ion. Reduced Toxic Off-gassing: Recent 2025/2026 data suggests that if a Na-ion system catches fire, it releases significantly less hydrofluoric acid (HF) and other toxic gases because it lacks the	and sodium-ion battery systems are still in the early stages of development and testing, this technology must demonstrate it is able to provide the requisite levels of performance and safety for BESS applications. The Applicant regularly reviews new BESS technology test data to evaluate potential for future BESS projects. Section 1.1.9 of the Outline BSMP [REP1-110] states: <i>"The exact technology and system chemistry type is still to be determined; however, it will be a lithium-ion battery cell type..... The final battery chemistry will be confirmed as part of the detailed design prior to the commencement of construction."</i> As now mandated under NFPA 855 (2026), the Applicant will only be able to select a BESS system that has undertaken Large Scale Fire Testing (LSFT). At the detailed design stage, the selected BESS LSFT data will be leveraged to fully inform inputs for

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			heavy metals (like Cobalt) found in NMC batteries. The UK government's Battery Strategy (updated in late 2025/2026) specifically identifies Sodium-ion as a "promising technology" for stationary storage. References Battery energy storage systems (BESS) - 23 June 2025 https://commonslibrary.parliament.uk/research-briefings/cbp-7621/ Sodium-ion battery momentum grows, but challenges remain - 17 February 2026 https://www.iea.org/commentaries/sodium-ion-battery-momentum-grows-but-challenges-remain	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). Sections 6.1.3 – 6.1.6 of the Outline BSMP [REP1-110] addresses the requisite risk assessments and consequence modelling that address all credible BESS failure events which will be provided at the detailed design stage. 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.
Warren Hateley REP1-245				
WH-001	Climate Change and Energy Need	Alternatives	Has consideration been given to adopting mixed technologies ie turbines and vernadium batteries sourced	Section 4.10 of ES Volume 1, Chapter 4: Alternatives and Design Evolution [APP-056] details the consideration of alternative

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
	Site Selection and Alternatives		and made in this country rather than depending on Chinese manufactured products.	generation technologies. As the Applicant is a solar PV and energy storage developer, no alternative types of low carbon electricity generation have been considered in the development of the Scheme. However, it is considered that the Site would not be suitable for other forms of renewable electricity generation at the same scale as the Scheme.
WH-002	Site Selection and Alternatives	Supply chain	Can the [redacted] that if the panels are sourced from China that they are not made using slave labour.	Island Green Power is part of the Solar Energy UK Supply Chain Commitment, which binds the Applicant to ensuring that its supply chains are free of slavery. As part of this, the solar sector in the UK and Europe has launched the Solar Stewardship Initiative (SSI), which independently inspects and certifies individual factories for sustainable and ethical practices. The Applicant will source its panels from factories within countries that are SSI-accredited.
Stephen Harvey REP1-240				
SH-001	Socio-Economics,	Cycle routes	Cycling objection to Lime Down.	The Applicant makes note of this comment and has responded to the

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
	Recreation and Tourism		Sherston Velo CC is a local cycle club based in Sherston as the name would suggest. The club has been in operation for the last 11 years. Over those years the club has grown to its current establishment of about seventy active members. I am writing this report both as an avid cyclist, member of the club and for 7 years was the chairperson of the club. The club is part of the fabric of the village and brings together people from all of the village's demographic and people of all different cycle abilities. People have moved across to Sherston Velo from other local clubs because of its welcoming nature and it's ethos of inclusivity. One of the benefits of cycling with a club is the companionship when out on rides but overriding this is the safety. As a club we are constantly monitoring risk associated with cycling around local roads as we are mindful of making sure that all our members	individual points made in this representation below.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			when out on a designated club ride can be rest assured that we have their safety at the foremost of our mind. Also, as a cyclist I feel privileged that I can benefit from cycling around small local roads that attract little traffic and set within an area of outstanding natural beauty. As a club we operate and publish rides both through winter and summer. We run several rides each week. We use the platform 'Strava' to publish rides. Each member then signs up to a ride on our dedicated Stava club page. Each of our rides are carefully considered taking into account, distance, destinations, type of roads – avoiding main roads wherever possible, weather conditions, rider abilities and what is paramount is safety. Each of our rides has a designated lead rider who takes on the responsibility of the safety of the ride. Most of our rides vary in distance but are generally between 40 – 60 miles. During the summer we may	

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			run some longer rides. Group size can vary but we generally ride in groups of six. This means if there is a large sign up for a ride it may be split into several groups setting out in predetermined timed intervals. As a local club ALL of our rides start and finish in Sherston. Generally, they start in the village hall car park and finish in the 'Courtyard café' As mentioned, we are privileged to be surrounded by safe roads, so no matter the destination we are cycling to we do not travel along main roads, we may cross a few and as we do a circuitous route we return along similar safe roads.	
SH-002	Transport and Access	Cycle Routes	Therefore, it is with total dismay that the 'lime down' project will completely destroy all of that and will put into absolute jeopardy the 'safety' of all our club riders as well as other riders that pass through the village and therefore use all the approach roads. During construction there will be large numbers of extra vehicles using	The Applicant makes note of this comment. The potential impact of the Scheme on non-motorised users (NMU) is assessed in ES Volume 1, Chapter 13: Transport and Access [REP1-019] which concludes that there would be no significant impact on NMU as a result of the Scheme.

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			many of the approach roads to Sherston and the same on exiting the village. A large proportion of these vehicles will be large in size up to and including HGV level. This means the majority of the roads we use as a club to go out on a ride and return from a ride will be turned from safe low level traffic roads into incredibly dangerous roads with high volumes of large vehicles. It will become almost impossible to undertake those rides without fear and trepidation of being involved in an accident. Riding along a road that was once a fairly quiet rural road is a totally different experience to being sucked into the pathway of large and articulated vehicles. 'Sucked into the pathway' is not an exaggeration. When a large vehicle comes passed, you literally get into a vortex that sucks you sideways towards the vehicle and you have to fight it both to keep away from the vehicle and to prevent losing control and coming	Highway widths of construction routes have been assessed and provide sufficient opportunities and width for HGV traffic to comfortably pass cyclists, equestrians and pedestrians. ES Volume 1, Appendix 13-1: Transport Assessment [REP1-057 and REP-059] concludes that the level of flow change will not result in a step change in fear and intimidation as defined in the IEMA guidance at Tables 3.1, 3.2 and 3.3. An Outline CTMP [REP1-112 and Outline PRowPMP [REP1-104] support the DCO Application and include outline measures to ensure impacts to NMU along highways and PRow are minimised as far as practicable. Construction vehicle movements will be managed through a Construction Traffic Management Plan. An Outline CTMP [REP1-112] has been prepared and submitted with the DCO application. The aim of the CTMP is to ensure that the effect of the

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			off. A rule of the club is that you must wear protective gear on a ride which in essence means a helmet. However, there is no protective cycling kit that is going to prevent serious injury when you get hit or dragged under one of these many vehicles that will now be using the road. The chances of an accident occurring involving a cyclist will increase significantly due to sheer increase in volume of traffic but also increase in the type of vehicle using those roads.	construction phase on the local highway network is minimised. The Outline CTMP [REP1-112] sets out measures to coordinate construction deliveries by HGVs to arrive and depart between 09:30 and 16:30 on weekdays where possible, to avoid peak network hours of 08:00–09:00 and 17:00–18:00. On weekends HGV deliveries will be restricted to 09:30–12:30 on Saturdays, with no HGV deliveries on Sundays. It also includes a community liaison element to keep local communities informed about the construction process and to provide a contact for feedback should any issues arise. Compliance with the CTMP will be monitored by the Developer, Contractor and Wiltshire Council as local highway authority. The preparation, approval and implementation of the final CTMP, 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

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				appropriately managed throughout the construction phase of the Scheme. Furthermore, the Applicant has assessed individual PRow and long-distance recreational routes likely to be affected by the Scheme in ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068] and the supporting ES Volume 3, Appendix 16-2 Tourism and Recreation Receptor Tables [APP-241], and is confident that impacts to cyclists' safety as a result of HGVs is not likely to be significantly impacted. That notwithstanding, the Applicant recognises that knowledge of HGV movement routes is likely to discourage users along these routes, as is the visual impact of construction works. As a result, the Applicant recognises there is a significant adverse effect to the Fosse Way and Wiltshire Way promoted cycle route during the Scheme's construction.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
SH-003	Transport and Access	Cycle routes	The fosse way, in particular between Grittleton and the unmettled road by Ladyswood farm is a stretch of road that is used so much by cyclists. It is basically a convenient link road between rides that are in the Chippenham area and beyond and for cyclists from that area coming over to cycle towards the Cotswolds and Bath area. It is not only busy with groups of cyclists out on club rides or singularly on a casual ride but is busy early mornings with cyclists commuting to and from work. Currently the width of the road for most of its distance between the two points mentioned above is barely wide enough for two cars to pass each other safely and you have to drop your speed significantly on approach of oncoming vehicles. When you throw cyclists into the mix then there is a bit of a battle between car and bike. However, because of its width it means vehicles have to slow down when cyclists are on	The Applicant has provided a response to this under Reference ID SH-002.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			the road. In particular there is no room to pass cyclists easily due to slight rises and twists in the road inhibiting vision. It means vehicles behind cyclists have to slow down and are sometimes kept from overtaking for some time. There are no real pull ins for cyclists to move over and let traffic by. This stretch of road in particular is going to be significantly altered by the lime down project to make it wider and more suitable for the large construction traffic. Not only large in numbers but large in vehicle size. This will mean that now traffic approaching cyclists will have a perceived confidence to squeeze passed the cyclists even with oncoming traffic approaching and will have the confidence to drive the road faster because of its new width. The inherent danger this will cause to cyclists needs no explanation. The confidence of having the knowledge that vehicles behind can only get by at certain points and are held behind at a	

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			slow pace will disappear and cyclists will be faced with a white-knuckle ride along the Fosse as vehicles of all sizes fly passed at speed and will undoubtedly have to pass in close proximity. This is currently just not the case. I mention later about being left with a legacy and this road will be the same. Once the project is complete there will be no rectifying it back to what it was, and it will be become forever a 'rat run' for traffic that currently do not use it. Therefore, once again a fairly reliable and safe cycle route will be destroyed by the project.	
SH-004	Transport and Access	Safety	Although we are a Sherson based club, not all of the seventy members are from Sherston. As mentioned, all the rides start and finish in Sherston. This means that some members have to cycle over to Sherston to start the ride. Such members will now have to negotiate those aforementioned roads just to join the rides and then have to travel down some	The Applicant has provided a response to this under Reference ID SH-002.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			further dangerous roads created by 'Lime down' as they set off on a ride.	
SH-005	Transport and access	Road safety	This will have a seriously detrimental effect on club membership as I know already from 'group chatter' whilst on current rides that they would not but themselves in such a vulnerable position as the chance of accident increases.	An assessment on safety and accidents is provided in ES Volume 1, Chapter 13: Transport and Access [REP1-019]. Links with traffic increases above identified thresholds, were taken forward for further assessment. As part of the assessment, it is concluded that the level of construction traffic associated with the Scheme is unlikely to materially affect road safety on the links in the Study Area. The Applicant confirms that the approach to equestrian and PROW impacts and highway safety are under discussion with Wiltshire Council's Countryside Access Team and Highways Team (as part of discussions with Wiltshire Council in general). Additional discussions specific to PROWs are being undertaken with the British Horse Society, and the Wiltshire Bridleway Association. Progress on each of

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				these discussions is set out in the relevant Statements of Common Ground with each of these parties to be submitted at Deadline 2.
SH-006	Socio-Economics, Recreation and Tourism	Tourism	Sherston is a village that many other clubs from across the county use as a stop on their routes or just a beautiful village that they pass through. Particularly clubs from Chippenham, Swindon, Bath, Cheltenham, and Gloucester. Certainly, when the construction commences and the roads become treacherous, they will of course be avoiding Sherston village as it will simply be deemed too much of a risk. This will also have a knock-on effect to other businesses.	The Applicant has assessed that there is a likely worst-case temporary loss of £1.76 million GVA per annum as a result of the Scheme's construction. The Applicant does not however agree with Wiltshire Council that this effect on tourism employment is significant, accounting for approximately 0.17% of tourism employment across Wiltshire and less than 0.15% of the value of the combined tourism industry value across Wiltshire (Visit Wiltshire, 2021). The Applicant also seeks to reiterate that this is a temporary effect, anticipated to occur during construction, based on a worst-case scenario determined by likely significant effects from the Scheme, with recovery to tourism businesses anticipated to begin when construction works are complete. Additional mitigation measures (which were not quantified for inclusion in the

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				assessment of potential losses to employment) secured in the Outline SSCEP [REP1-108] seek to reduce tourism employment losses through focussing on local recruitment, promoting local suppliers where practicable, and through providing retraining opportunities for workers in tourism-dependent industries. Further additional mitigation measures to reduce impacts from HGV traffic and to PROW users have been set out in the Outline CEMP [REP1-096] and Outline PRoWPPMP [REP1-104] to reduce impacts on individual receptors that contribute to tourism and recreation in the Study Area. These management documents are secured by Requirements 13, 16, and 18 in Schedule 2 to the Draft DCO [REP1-007] .
SH-007	Socio-Economics, Recreation and Tourism	Local businesses	The Courtyard café is a cycle friendly café with cycle racks installed. It is visited by cyclists from all the aforementioned clubs and more. The café derives a lot of business from the cycling	An assessment of the likely effects of the Scheme on the local economy and employment is provided in ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068] . This chapter

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			community, and the manager of the establishment has anecdotally mentioned to me on many occasions that without the business from the cyclists then the business would struggle.	considers potential impacts on construction and engineering sectors, agricultural activity, tourism-related businesses, and wider local economic conditions during construction, operation and decommissioning. Supporting evidence is provided in ES Volume 3, Appendix 16-3: Socio-Economics, Tourism and Recreation – Summary of Non-Significant Effects [APP-239], which summarises that effects on the local economy and economic prosperity are assessed as negligible to minor beneficial, with construction expenditure and employment generation contributing positive, temporary effects on local economic activity. The assessment therefore concludes that the Scheme would not result in significant adverse effects on local businesses or the wider local economy, and that socioeconomic benefits, including job creation and

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				local supply-chain opportunities, are expected during the construction phase, with more modest economic and skills and supply chain opportunities during the operational phase.
SH-008	Transport and Access	Construction traffic	The proposed altering of various roads surrounding the village to accommodate both the large number of vehicles and large type of vehicles required to complete the project will of course create a 'rat run' for other large vehicles, previously not experienced in this area. Once these roads become altered then they will become a viable route for other commercial vehicles not associated with the project. Previously these roads would not have been considered by other companies because they would have been deemed too small and unsuitable. Now all of a sudden, they become an attractive cut through. As soon as these alterations are completed other traffic will start to use these	The extent of proposed highway mitigation has been minimised as far as practicable to minimise impact on hedgerow, tress and character of the roads. It is unlikely that the extent of proposed highway mitigation set out in ES Volume 3, Appendix 13-1: Transport Assessment [REP1-057] will result in a material increase in HGVs from vehicles not associated with the project. Highway mitigation works associated with abnormal load movements will be temporary. Any changes resulting from these mitigation works will be reinstated following the construction phase.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			routes, possibly even before construction traffic.	
SH-009	Transport and Access	Road safety	This of course will be an everlasting devastating legacy. There are no plans that I am aware of to reinstate the roads back to what they were once the construction is complete. Therefore, they will always remain as I say an attractive cut through from traffic not previously there.	The Applicant has responded to this comment under Reference ID SH-008.
SH-010	Transport and Access	Road safety	Once again this means that the inherent dangers of that type of traffic to the very active cycling fraternity in the area will forever have the devastating impact on cycle rider safety which is the most important fact but of course will also destroy the beauty of the area which is another reason why cyclists have some much desire to pass through here. Having said all of the above my biggest fear is that cyclists are a pretty resilient bunch and may decide to ignore all the obvious dangers thrust upon them from this project and will attempt to continue	The Applicant has responded to this comment under Reference ID SH-008, confirming that highway improvement works associated with the Scheme are temporary and will not have a legacy effect on highway safety for non-motorised users. The Applicant is cognisant of the desirability of this area for recreational cycling as a result of the multiple promoted routes, large rural highway network away from busy roads, and the density of unsurfaced roads and PRowS that cyclists are able to access. Hence, these have been assessed in ES Volume 1,

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			to ride along these roads with total resolution and this will end up with a consequence of serious accident. This is not an attempt to over dramatize the issue but is a genuine concern. The number of cyclists that use the area cannot be underestimated. There has as far as I can see been no consideration by the authors of the project for other road users. Cycling is not undertaken purely for pleasure but there are a cohort of people in the area that use cycling as a means to commute to and from work. I am one of those people. When the roads become that inevitable danger then I will have to consider if commuting by bike is a safe option. I will then become another car driver adding to the countries issue with carbon emissions. This project will have a massive effect on the ability for cyclists in the area to cycle safely along what is currently relatively traffic free	Chapter 16: Socio-Economics, Tourism and Recreation [APP-068] and the supporting ES Volume 3, Appendix 16-2 Tourism and Recreation Receptor Tables [APP-241], to show the Applicant understands the likely impacts of the Scheme to cyclists in the area.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			country roads and I really believe could affect the sustainability of the local cycle club. This will ultimately undermine the very ethos of the club of bringing like-minded people together, to enjoy their sport and promote fitness in a safe environment.	
Alicia Hawker REP1-195				
AHA-001	Socio-Economics, Tourism and Recreation Transport and Access	Equine Impacts - Road Safety	Interested Party Reference - Alicia Hawker Eventing. RR-0145 I refer to The Applicants responses to my Relevant Representation. AHSL-002/003/004/005/006/007/008/009/012: The Applicant states the proposed scheme is unlikely to have a direct impact on my business, there will be no substantial changes to the safety and tranquillity of the environment around my business location and there is no significant effect to my facilities and business I strongly disagree for the following reasons. I have stables at two locations on our family farm: and	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. This included the capacity of local roads and infrastructure to accommodate construction vehicles . The assessment concludes that the level of construction traffic associated with the Scheme is unlikely to materially affect road safety on links within the Study Area, and no

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			. Both are directly affected. The Applicant claims the distance from my location was too far from the proposed scheme for it to have been scoped in. For horses being hacked out, 2.3km / 1.4 miles is a very short distance. My livery clients mostly hack. Nearly all of them ride every day, between 9am and 5pm depending on the season. Our hacking routes are (see attached ordinance survey extract with routes marked in orange) North of the M4 to the top of the fosse way (Lordswood Farm), West to Grittleton, East to Corston, South is through the villages of Leigh Delamere and Sevington. Very busy roads (A429, A350, B4039 & B4040) all are totally unsuitable for safe hacking due to the volume and speed of traffic which spooks horses. Almost every route they frequently ride along would be affected by construction traffic or	significant adverse effects on accident risk are anticipated. The assessment additionally concludes that with appropriate mitigation such as the CTMP in place, there would be no significant adverse impacts on the local highway network during the construction, operation and maintenance, and decommissioning phases of the Scheme. Construction vehicle movements will be managed through a Construction Traffic Management Plan. An Outline CTMP [REP1-112] has been prepared and submitted with the DCO application. The aim of the CTMP is to ensure that the effect of the construction phase on the local highway network is minimised. The Outline CTMP [REP1-112] sets out measures to coordinate construction deliveries by HGVs to arrive and depart between 09:30 and 16:30 on weekdays where possible, to avoid peak network hours of

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			by local's using 'rat run routes' trying to avoid construction traffic, not to mention by the actual construction of the panel sites, huge BESS at Hill hays, and the associated infrastructure.	08:00–09:00 and 17:00–18:00. On weekends HGV deliveries will be restricted to 09:30-12:30 on Saturdays, with no HGV deliveries on Sundays. It also includes a community liaison element to keep local communities informed about the construction process and to provide a contact for feedback should any issues arise. Compliance with the CTMP will be monitored by the Developer, Contractor and Wiltshire Council as local highway authority. The preparation, approval and implementation of the final CTMP, 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 The Applicant considers that the Environmental Statement has fully assessed the impacts of the Scheme on all receptors. The Applicant is

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				committed to ensuring impacts on equestrian facilities can be mitigated wherever practicable, and therefore is undertaking, and encourages further, engagement with relevant stakeholders through the DCO process. Following the written representations submitted at Deadline 1 and 1A relating to horses and equine businesses, the Applicant is considering the technical information provided in detail and will provide further commentary at Deadline 3.
AHA-002	Socio-Economics, Tourism and Recreation	PRoW	After construction the resulting industrialisation of the landscape will spoil the very enjoyment of riding in the countryside on country lanes, bridleways, and byways in this area – the very reason they own a horse! Wiltshire Council has already stated. “Substantial long-term harm to the landscape character”	The Applicant confirms that impacts to PROWs, unsurfaced roads, and the recreational use of the highway network have been assessed in ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068] and the supporting ES Volume 3, Appendix 16-2 Tourism and Recreation Receptor Tables [APP-241] . Consideration of the likely impact on views, character and the

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				desirability of these routes to users has been fundamental to the assessment of likely significant effects. The Applicant confirms that the majority of significant adverse effects can be mitigated, however understands that some significant adverse effects to users of routes in Lime Down E cannot be mitigated further during construction. Otherwise, no significant adverse effects to PROW and recreational highway users are anticipated at any phase of the Scheme. ES Chapter 8: Landscape and Visual [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.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				The LVIA recognises that there are some footpaths where there will be long term Significant adverse effects. These are set out in Table 8-30 Significant Long Term Visual Effects of ES Chapter 8: Landscape and Visual [APP-060]. All these receptors are PRoW with the majority being footpaths which diagonally cross fields where solar infrastructure is proposed and where mitigation such as hedgerow screening would be inappropriate to the legacy landscape. 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

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				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 Appendix 8-6. 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.
AHA-003	Transport and Access	Construction traffic	At location [redacted] Large amounts of construction traffic or additional local traffic, as mentioned, will pass directly outside the site. There is no doubt that many construction workers driving cars, along with coaches and HGVs from the East on the M4, will use the route from the A429 through Stanton St Quintin to reach the compound and cable route at Grittleton and beyond to the fosse way. This point has already been raised at the OFH on 21st April from worried residents who live in both Stanton st Quintin	The Outline CTMP [REP1-112] submitted at Deadline 1 included the following updates further clarifications as to what monitoring/reporting/actions would be implemented in cases where proposed construction routes are not followed. This includes a stringent monitoring and enforcement regime for construction routes 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

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			and Grittleton - numerous locals have cited this as major concern. If the M4 is shut between Junction 17 and 18 both villages, along with Hullavington are badly affected.	how any complaints will be processed and responded to. Drivers will receive training and be made aware of the routes to each access in advance of driving to the Site. The requirements of the DCO and Final CTMPs are legally binding and measures to enforce drivers to use construction routes will be set out in the Final CTMPs. Any drivers not following construction routes will receive retraining. Suppliers and subcontractors are required to book delivery slots via a secure online portal or app. The booking system will also be used as a means to monitor that drivers are using the appropriate routes.
AHA-004	Transport and Access	Construction workers	The Applicant's construction worker travel plan states they would "encourage" workers to use sustainable transport where possible, and that most non-local	The Applicant has responded to this comment under Reference ID Code AHA-003.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			workers will stay in local accommodation and be taken to site by shuttle buses. The Applicant also states the Travel Plan Coordinator (TPC) will "continuously monitor" whether workers follow the plan. I can find no mention of any definitive enforcement measures that would be used when drivers choose to ignore the Applicants construction workers travel plans, which is 100% inevitable. Locals have firsthand experience of construction traffic chaos, during the erection of far smaller sites (for example) Allington, Corston, Castle Combe & Long Newton.	
AHA-005	Socio-Economics, Tourism and Recreation	Local businesses	The Applicant states they will be operating from 9.30am-16.30pm weekdays and 9.30am to 13.30pm on Saturdays. Peak daytime, this would directly affect my ability to run my business as a professional event rider & livery. It potentially exposes an unacceptable safety risk to my staff, myself and my client's	The Applicant confirms that Alicia Hawker Eventing Ltd. was not identified as an equestrian facility in the DCO submission documentation and, as such, was not assessed in ES Volume 3 Appendix 16-2 Tourism and Recreation Receptor Tables [APP-241] . The Applicant has identified the location of this business based on the business'

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			safety on a daily basis. My livery Clients have said they will leave if the scheme gets the go ahead and are happy to confirm this in writing if required by the Examining Authority. My livelihood will be lost. I have 2 full time and 4 parttime staff who are equally likely to lose their employment too.	website and has identified that they are located approximately 2.3 km from the Cable Route Corridor, and 2.5 km from the nearest Solar PV Sites (Lime Down C and D). As such, the Applicant considers that they would have been minded to scope this location out from full assessment on the basis of the distance between the Scheme and this equestrian facility, and the minimal likelihood of direct impacts on their operations. Proposed construction routes for HGVs have been presented at ES Volume 2, Figures 13-11 and 13-12 [APP-156 and APP-157]. While there is potential for interaction with equestrians from Alicia Hawker Eventing on hacking routes west of the Cable Route Corridor or where crossing the A429, no construction routes are proposed within approximately 2 km of the facility (the A429, and the road from the A429 at Hullavington towards Norton). Given the amount of

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				optionality for hacking routes available to the facility's users, it is not anticipated that traffic associated with the Scheme will have a substantial impact on the safety of hacking in the area surrounding the facility. The Applicant furthermore points to the commitments that HGV movements associated with Scheme construction would be limited to 09:30-16:30 on weekdays and 09:30-13:30 on Saturdays, with no works being undertaken on Sundays. This is committed through the Outline CTMP [REP1-112], secured by Requirement 15 in Schedule 2 to the Draft DCO [REP1-007] As such, the Applicant is confident that there are sufficient measures to ensure equestrian users of highways are not significantly affected.
AHA-006	Transport and Access	Local Road Network	Respondent attached an ordinance survey extract with routes marked in orange to their Written Representation.	The Applicant notes this comment.
Josie Lewis REP1-220				

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
JL-001	Climate Change and Energy Need	Need for the Scheme	I fully support Stop Limedown's campaign to stop this solar farm. The solar farm is not needed. The 100s of new homes Limedown claims it can supply with power are also not needed as there are only a relatively few people on the local housing waiting list.	Regarding the justification for the Scheme, the Applicant maintains that the Statement of Need [REP1-085] and the accompanying ES [APP-052 to APP-265] provide a robust evidence base demonstrating that the Scheme is essential to the national interest. Large-scale solar and energy storage are classified as Critical National Priority (CNP) infrastructure and the Applicant remains confident that the Scheme's delivery of low-cost, low-carbon power is vital for achieving the UK's legally binding targets for decarbonisation and energy security. Furthermore, the Scheme will also deliver important benefits within Wiltshire which are set out in the Applicants Written Summary of the Oral Submissions at the Open Floor Hearing 1 and the Applicant's Responses [REP1A-013] in response to comment [JA-004] at pages 461-462.
JL-002	Soils and Agriculture	Food security	Farmland is more important, how else will we get our food and keep	The UKRI's Roadmap for Resilience: A UK Food Plan for 2050, addresses

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			land and countryside maintained and well balanced	future food security and self-sufficiency, which it notes would be achievable "but only with coordinated policy on production, diets and land use." The three core principles for the UK to become self-sufficient are: resilient agricultural production, which includes reducing livestock numbers and supporting farm diversification; integrated land use to sequester carbon and reduce agricultural emissions; and changing dietary choices, namely consuming less meat. The Applicant does not consider that cessation of arable production on a majority moderate to low quality agricultural land in Subgrade 3b and Grade 4 would significantly affect the UK's ability to become self sufficient in food production.
JL-003	Hydrology, Flood Risk and Drainage	Water resources	Water supply is a reason to block this application. Water can only come from the sky as rain!. Work out how much water one household needs for one day,	The Scheme is not a residential development and does not create a material operational water demand comparable to housing or domestic water use.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			(even for one toilet flush of 7 litres) then multiply it by 365, there is not enough water for the million odd homes the Government wants to be built.	The existing baseline is agricultural land. That land already receives rainfall and supports crop growth, with water used through evapotranspiration and, where undertaken, seasonal agricultural operations including irrigation during drier periods. The proposed solar use would not introduce a continuous household-type potable water demand. Operational water demand would be limited and intermittent, principally associated with maintenance activities such as occasional panel washing where required. Panel washing, if required, would be periodic rather than continuous and would be undertaken using authorised water supplies. It would not rely on uncontrolled abstraction from local watercourses or groundwater. Any operational maintenance activity with potential to affect drainage or water quality would

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				be managed through the Outline OEMP [REP1-098]. Any construction-phase water requirement would also be temporary and would be sourced through authorised means, such as mains supply or tanker delivery where required. Any abstraction or discharge would require the relevant approvals and would be managed through the Outline CEMP [REP1-096].
JL-004	The Applicant	Funding	So stop Limedown. The company is not even British. It will benefit financially to the detriment of the Malmebury area.	The Applicant clarifies that Lime Down Solar Park Limited and its parent company are registered in England and Wales and are subject to all applicable UK tax laws and regulations. Private financing through experienced infrastructure investors like Macquarie, who have invested over £65 billion in UK energy and infrastructure since 1999, is a common and robust structure used to deliver essential national projects faster and more efficiently while easing pressure on public finances.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
JL-005	Construction and Decommissioning	Decommissioning	Solar farms can also be a problem to maintain. And what happens to the equipment when it comes to the end of its life?	The Applicant notes this comment. The Applicant has sought to robustly and comprehensively assess the potential impacts of the Scheme in the ES [APP-052 to APP-265], and mitigate them as required through the management plans such as the Outline OEMP [REP1-098], and the Outline Decommissioning Strategy (Rev 2) [REP1-100]. Section 2.12 of the Outline OEMP [REP1-098] summarises the anticipated design life and replacement frequency for the main elements of the Scheme based on other similar solar NSIP schemes. The frequency of Solar PV Panel replacement is planned to be once during the operational phase. The Solar PV Panels are anticipated to be replaced over a 12 to 24 month period. Elements of the activities during the replacement programme would be similar to those carried out during construction, and mitigation identified to mitigate construction effects would be

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				applicable to the replacement programme.
JL-006	General Remarks	Sentiment	Reject the application once and for all.	The Applicant notes this comment.
GDPR-LDSF-086 REP1-208				
GDPR-LDSF-086-001	General remarks	Sentiment	As my original submission was lost in your data system, please accept the following as my representation in objection to the Lime Down Solar Park proposal. I strongly object to the Lime Down Solar Park project for the following personal reasons:	The Applicant notes this comment and has responded in detail below.
GDPR-LDSF-086-002	Hydrology, Flood Risk and Drainage	Flood risk	Flooding Risks I am [redacted] years old and live in Foxley. I have grown up knowing that the three lanes into and out of our village flood at least once each winter. This regularly causes delays and disruptions to my school route and the proposed development would likely exacerbate these issues through increased runoff and construction impacts.	The Applicant acknowledges that lanes around Foxley can flood and that this can affect local journeys. The assessment considers whether the Scheme would materially increase that flood risk. The panelled areas remain permeable and are not positively drained to local lanes or watercourses. This is consistent with NPS EN-3 paragraph 2.10.84, which recognises that solar PV panels drain to existing ground. Published

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				research identifies vegetation cover, soil compaction, surface roughness and flow connectivity as the controls on whether panel drip-line redistribution becomes runoff. These risks are managed through permanent ground cover, soil protection, wet weather working controls, compaction remediation, permeable tracks and retained overland flow routes. These measures are secured through the Outline CEMP [REP1-096], Outline OEMP [REP1-098] and Outline SRMP [APP-280]. Runoff from impermeable infrastructure will be attenuated and controlled. The Scheme would not materially increase flood risk to roads around Foxley.
GDPR-LDSF-086-003	Landscape and Visual	Visual impact	Impact on Historical and Unspoilt Landscape I regularly run a 3-4 mile loop between Foxley and Norton. The peace and unspoilt countryside	Impacts of the Scheme on mental health and wellbeing are assessed in ES Volume 1, Chapter 18: Human Health [APP-070]. This chapter provides a comprehensive

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			along this route has a positive effect on my mental health. If the Lime Down Solar project goes ahead, this route will become unpassable and dangerous during the construction phase. Once installed, I will be running past 4.5-metre-high panels, replacing the sounds of birds and wind with the industrial hum of nearby inverters. These impacts would significantly diminish my quality of life and the value of this local landscape.	assessment of the Scheme's potential effects on human health, including mental health and wellbeing, through consideration of a broad range of health determinants. These include access to open space and recreation, understanding the physical and mental benefits of access to PRow in the countryside for physical activity. The assessment applies a health "lens" to the findings of relevant technical chapters and concludes that, with the embedded mitigation and additional measures outlined in the relevant management plans [REP1-096 to APP-287] and secured by their respective requirements in Schedule 2 to the Draft DCO [REP1-007], the Scheme would not give rise to significant adverse effects on physical or mental health and wellbeing. Mitigation measures include (but are not limited to) ensuring PROWs remain open as much as is practicable, HGV movements are set to defined routes and within set hours, community liaison and

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				engagement is maintained, and construction impacts on noise and air quality are regulated.
Mark Vincent Judge REP1-226				
MVJ-001	Transport and Access	Road safety	Written representation by Mark Vincent Judge on behalf of Grittleton Tennis Club - my comments on responses made by the Applicant to Relevant Representations submitted on behalf of the club to the Planning Inspectorate Ref 4.42 RR-1744 of their document. Three tennis court venues were notified in the initial RR, all served from The Street, Grittleton, notably Grittleton House, Church House and the Village Hall (MUGA). The Applicants response has been written as though it is only the Village Hall and as such ignores the increased safety risk caused by large commercial vehicles when members are using The Street to walk between venues. This danger is covered in	The Applicant makes note of this comment and the reference to three tennis court venues with access taken from The Street. For clarity The Street through Grittleton does not form part of the HGV construction route to the Solar PV sites as shown in Figure 4.1 of the Outline CTMP [REP1-112]. It does however form part of the HGV construction route to serve two access points (ref: 101 and 102) to the Cable Route Corridor. The cable route will be constructed in four separate 5.5km sections. One access in operation in each section at any one time as rolling construction. Each access will be operation for approximately 90 days.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			detail within the document I now refer to - Written representation by Richard ("Dick") Jeffcote - my comments on responses made by the Applicant to Relevant Representations submitted by me to the Planning Inspectorate 23.11.25	The number of vehicle trips associated with each cable route corridor access are relatively low and temporary (see para 13.10.66 of ES Volume 1 Chapter 13: Transport and Access [REP1-019]). There are no current HGV restrictions on this route and given the low increase in trips shown in Table 13-34 of ES Volume 1 Chapter 13: Transport and Access [REP1-057] there was no requirement for further assessment. It was therefore concluded that impacts on the following transport factors are not significant: • Severance of communities • Road 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 Hazardous/large loads

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
MVJ-002	Transport and Access	Road Safety	The 2nd paragraph of the Applicants response notes "...the use of The Street for HGV movements during construction...." whilst the 3rd paragraph states "...The Street is not part of the construction route..." The Street is clearly identified in the submission as the access route for the main compound next to Grittleton Village Hall and the construction of the cable route. I fail to see why, at this stage, the Applicant is so unsure of what their application proposes in terms of the use of the road network, their documents and submissions seem to contradict themselves.	The Applicant refers to its response provided to Reference Code MVJ-001.
MVJ-003	Transport and Access	Road safety	I strongly disagree with the Applicants desk top studies suggesting that road safety is not affected and that no significant adverse effect on accident risk are anticipated.	The Applicant refers to its response provided to Reference Code MVJ-001.
MVJ-004	Site Selection and Alternatives	Site selection	The Applicant refers to their own Site Selection Assessment Report (APP-185) as a way of supporting their alleged considered sequential	An appraisal of alternative sites was undertaken by the Applicant as detailed in ES Volume 3, Appendix 4-1: Site Selection Assessment

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			approach to the site selection. The Issue Specific Hearing 1 meeting on Wednesday 22nd April 2026 proved that the Site Selection approach utilised by the Applicant was FLAWED. The initial assessments of sites in a 5km radius of the connection were only dealt with by way of a desk top study and were assessed to not utilise Grade 1, 2 or 3 farmland. There was no exercise undertaken at the time to consider the consolidation of those initially identified parcels. During the process of increasing the radius of search through 10, 15 and finally 20km the criteria was widened to include Grade 3 land, when this occurred is not known. This was not done sequentially by including Grade 3b first and only incorporating Grade 3a if absolutely necessary. The initial sites in the 5km radius were not reassessed on the new criteria. Consolidation of sites through the process of expanding	Report [APP-185]. This included a sequential approach in regard to agricultural land, with lower grade agricultural land considered first before the search area was expanded to higher grades of agricultural land. Pages 11 and 12 of the Written Summary of the Applicant's Oral Submissions and Responses at Issue Specific Hearing 1 and Responses to Action Points [REP1A-12] explains how agricultural land was considered in site selection and the rationale for using the provisional agricultural land classification mapping from the 1970s which does not distinguish between Grade 3a and Grade 3b land. The 1970s mapping was used as it provides a broad dataset across the full 20 km search area whereas the more detailed 1988 agricultural land classification mapping has much more limited coverage across the search area. Therefore, the 1988 mapping did not provide comprehensive data to enable a

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			the radius have not been considered. The final proposed scheme includes Grade 2 farmland. With such a flawed process the only realistic way to ensure the impact of any proposed scheme minimises the effect on the environment, on mental health, on safety, on the balance of renewable energy and productive farmland etc is to undertake a new site selection process from scratch. If the site identification is FLAWED then everything following is also FLAWED.	reasonable assessment of all potential sites at the initial stage. The Applicant has carried out a proportionate approach to its site selection assessment, in line with NPS EN-1 paragraph 4.3.22. The Applicant does not consider it proportionate to assess all sites in various combinations, or to redraw previously discounted PDAs. It is considered that this goes beyond the policy requirements for the consideration of alternatives. However, in order to address the comment, the Applicant has further considered whether any of PDAs 1-4 could have been enlarged to incorporate land that was introduced at the later stages of the site selection assessment. This is set out in the technical note on Site Selection Assessment [APP-185]. The Applicant does not consider it proportionate to assess all sites in various combinations, or to redraw previously discounted PDAs. It is considered that this goes beyond the

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				policy requirements for the consideration of alternatives. However, in order to address this comment, the Applicant has further considered whether any of the PDAs could have been redrawn to remove constraints and then combined in order to create new PDAs or 'clusters.' This is set out in the technical note on Site Selection Assessment [APP-185]. This further analysis has resulted in three "clusters" of PDAs being considered. However, none of the clusters are considered to be reasonable alternatives for the Scheme. Therefore the conclusions of the Site Selection Assessment Report [APP-185] remain unchanged. The conclusion of that further analysis is that PDAs 1-4 would remain unsuitable and therefore the conclusions of the Site Selection Assessment Report [APP-185] in relation to PDAs 1-4 remain unchanged.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
MVJ-005	Scheme Description and DCO Process	Surveys	Notwithstanding the above, too many relevant surveys are still outstanding to be able to properly assess the development impacts and necessary mitigations that affect design.	The Applicant has published all findings of the environmental assessments and design work in the Environmental Statement (ES) which is available to view online in the Examination Library for Lime Down. During the Examination process amendments have been made to the ES and additional documents have been submitted in support of the application, these can also be viewed in the Examination Library.
MVJ-006	Scheme Description and DCO Process	Lifespan	The overall scheme assessment is FLAWED as it is assessed on a 60 year life but much, if not all of the scheme, would only have a 40 year life as some of the land only has a 40 year lease term.	As set out in the Written Summary of the Oral Submissions at the Open Floor Hearing 1 and the Applicant's Responses [REP1A-013] , the terms of the Option Agreements are confidential and the Applicant cannot provide details without the landowner's consent. However, as an example, the Applicant has the landowner's consent to confirm that the Option Agreement dated 21 February 2023 in respect of Site E is for a maximum term of 40 years and therefore any extension to 60 years would be by agreement. As further stated,

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				Requirement 20 of the Draft DCO [REP1-007] provides a maximum time period during which the Scheme can operate. There is no obligation on the Applicant to operate the generating station for a prescribed or minimum amount of time and this is consistent with the approach taken in made solar DCOs to date. For the purposes of assessment, the Applicant considers that assessing a 60-year operational period represents the reasonable worst case as it takes into account the GHG emissions during the maximum operational period which includes emissions associated with replacement activities.
MVJ-007	Scheme Description and DCO Process	Funding	We are all being put through a massively disruptive process by a foreign investment company who are trying to [redacted] in a dash for profit, to run rough shod over people, their health and their livelihoods, to fit a suite of supporting documents around their	For the purposes of assessment, the Applicant considers that assessing a 60-year operational period represents the reasonable worst case as it takes into account the GHG emissions during the maximum operational period which includes emissions

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			end goal and hide behind a premise of helping the UK deliver on its' renewable target. Maybe we should not be surprised at this approach when we consider the involvement in this countries water industry by the [redacted].	associated with replacement activities.
Joan Marie Bassler REP1-218 and REP1-219				
JMB-001	Consultation and engagement	Adequacy	Comments on Relevant Representations 1. Introduction I did not participate in the Applicant's first consultation because I did not understand the true scale or location of the Lime Down scheme. Although I saw some early flyers, the plots appeared to be possible options rather than areas intended for one full development, and nothing conveyed the extent of the project as a whole. I only looked further into it after local "Stop Lime Down" banners appeared, and even then the issues remained unclear. Having since reviewed a number of the	The acceptance of the Applicant's application for examination by the Planning Inspectorate (PINS) serves as confirmation that the Applicant has fulfilled its statutory pre-application duties. This process included a thorough assessment of the Consultation Report [APP-022], which details the Applicant's approach to pre-application consultation. Throughout the consultation period, anyone was welcome and encouraged to get in touch through any of the free-to-use communication channels provided, including email, freephone and post. Respondents were also invited to attend the in-

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			Relevant Representations, I note that more than 80 residents describe similar confusion about the project's scale, locations, and ecological implications. I support landowners' rights and the urgent need to reduce CO ₂ , but had the Applicant's early communications been clearer, I would have engaged much sooner. As a Malmesbury resident who values the character of our countryside, I am concerned that the Applicant's public-facing documents and the structure of the early consultation did not enable affected communities to understand the full nature of what was being proposed.	person and virtual community information events, where they could view the maps and ask questions or seek clarification directly to the Applicant's team. The Applicant also notes that the examination process provides a further opportunity for interested parties to comment on the Scheme. This examination is managed by an independently appointed Examination Authority. Further to this, the Applicant provided an extended Relevant Representation period beyond the minimum statutory timeframe to allow sufficient time for members of the public to review the submitted application documents and register as an Interested Party.
JMB-002	Consultation and Engagement	Materials	Misleading Information in Public-Facing Materials Across the RRs I reviewed in detail, I saw the same concerns coming up again and again about the way the Applicant presented information to the public. Many respondents felt the materials were misleading, incomplete, selective, or simply	The Applicant notes this comment and refers to its response provided to Reference ID JMB-001.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			not accurate enough to give a fair understanding of what was being proposed. These concerns fell into several clear themes.	
JMB-003	Scheme Description and DCO Process	Scheme Name	2.1 Misleading naming and geographic framing A significant number of RRs objected to the project name "Lime Down," because it does not correspond to any known local place. Several respondents said the name gave the impression of a single, distant, or benign feature, rather than a large, dispersed scheme spread across miles of countryside. As [redacted] put it, "The project name implies that Lime Down is some single geographic feature, the reality is otherwise... The site will affect 11 square miles of countryside." Others made similar points, noting that the name suggested open downland rather than a landscape made up of villages, hamlets, farms, and long-established communities. This concern was often paired with objections to the use of the term	The Applicant notes this comment and confirms that the Scheme is defined as the collective infrastructure required for the generating station, as set out in ES Volume 1, Chapter 3: The Scheme [APP-055]. While the name "Lime Down Solar Park" identifies the Scheme as a whole, the Applicant clarifies that the Scheme is clearly defined as comprising five land areas, Lime Down A, B, C, D and E, also known as the Solar PV Sites, a Cable Route Corridor alongside further works to the Existing Melksham Substation. The Applicant followed a staged approach to assessment, taking into consideration a range of planning, environmental, and operational factors. ES Volume 1, Chapter 4: Alternatives and Design Evolution [APP-056] and ES Volume 3,

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			"Solar Park," which many felt implied a single, contained site rather than a network of separate parcels of land. One RR described it simply as "a misnomer... this is not a park."	Appendix 4-1: Site Selection Assessment Report [APP-185] explain the methodology that has been applied when identifying and evaluating potential sites for the Scheme. The Applicant confirms that both contiguous land parcels and land parcels near one another were considered, and the name of the Scheme is not intended to reflect the land parcels that have been selected.
JMB-004	Scheme Description and DCO Process	Scheme name	These naming choices, combined with maps that left out key settlements and transport routes and lacked shading to indicate residential areas or built-up communities, created a public-facing picture that made the scheme appear smaller, simpler, and further from people's homes than it actually is.	The Applicant considers that the Application, including maps, are adequate and informative, and are prepared using standard mapping conventions appropriate to the scale and purpose of the material. The locations of key settlements and transport routes are available within the Application, notably the Location Plan [APP-005] and the Streets Plan [APP-008] .
JMB-005	Consultation and Engagement	Materials	As Catherine Anna O'Dwyer observed in her Relevant Representation, the project	The Applicant considers that the consultation materials referenced by Catherine Anna O'Dwyer, including

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			boundary maps omitted Malmesbury and the A429, a concern echoed by many residents who felt the visual material did not reflect the true context of the scheme.	maps, were adequate and informative, and were prepared using standard mapping conventions appropriate to the scale and purpose of the material. The locations of Malmesbury and the A429, are available within the Application, notably the Location Plan [APP-005] and the Streets Plan [APP-008] .
JMB-006	Consultation and engagement	Consultation materials	2.2 Misleading visual simulations and photographic representations Fourteen RRs raised concerns about the Applicant's visual materials. Many felt the images understated the height, massing, and visibility of the infrastructure. Andrew Carnegie noted that "Panels are 5m high, significantly taller than any current hedge," yet the visualisations suggested they could be screened easily. Rosamund Bull pointed to "a very misleading photo... showing sheep amongst panels which are nowhere near 4.5m high."	Table 3.1 of ES Volume 1, Chapter 3: The Scheme [APP-055] confirms that the maximum height of the Solar PV Panels will 4.5 m. Please see the Applicant's detailed response in relation to viewpoints and photomontages at JJ006 .

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
JMB-007	Landscape and visual	LVIA Photomontages	A number of RRs also highlighted what was missing: winter views, views from public rights of way, and any realistic depiction of glint and glare. Several respondents said the simulations did not show the worst-case scenarios, which meant the public could not get a true sense of the visual impact.	The Applicant was requested by the Examining Authority to prepare additional Year 15 winter photomontages to show the worst case, long term effects of the Scheme. These will be submitted at Deadline 2.
JMB-008	Soils and Agriculture Consultation and engagement	Consultation materials	2.3 Misleading claims about agricultural compatibility Several Relevant Representations challenged the Applicant's suggestion that sheep grazing would continue beneath the panels. Elizabeth Anne Threlfall described "misleading suggestions that sheep can graze underneath," and others noted that the land in question is predominantly arable, not pasture. Andrew Carnegie wrote, "There are no sheep in any quantity here... this is prime Wiltshire agricultural land with arable crops." Taken together, these comments indicate that the Applicant's imagery and descriptions may have conveyed	The Applicant has not claimed that sheep grazing will continue across the Solar PV Sites, only that there are no known restrictive covenants that would prevent grazing. The potential for some continued agricultural use within the Solar PV Sites has not been relied upon as mitigation in any of the assessments. The land is predominantly under arable use in its current condition, however, all arable use would cease at construction and the land would be sown to grass, which would support sheep grazing should that option be pursued. The Applicant has not claimed that existing agricultural practices could continue unchanged but has, on the contrary, repeatedly

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			an impression of a more "farm-friendly" scheme than is realistic, implying that existing agricultural practices could continue largely unchanged when that is not the case.	stated that the primary use of the Solar PV Sites as agricultural land would cease, for example in paragraphs 17.10.7 and 17.10.8 in ES Volume 1, Chapter 17: Soils and Agriculture [REP1-025] .
JMB-009	Construction and Decommissioning	Decommissioning	2.4 Misleading assertions about temporariness and reversibility Ten RRs questioned the Applicant's repeated use of the word "temporary." Many felt that a 40–60 year lifespan is effectively permanent for the people who live here now and for the next generation. Finlay McLeish wrote, "A 40-year installation is not 'temporary'." Sheralyn Blackett added, "The idea that land could be restored after 60 years is naive and misleading." Others raised concerns about long-term soil compaction, habitat fragmentation, and the loss of Best and Most Versatile farmland, all of which cast doubt on the idea that the land could simply be returned to its previous condition.	Please refer to reference ID SA-01 in the Applicant's Response to Relevant Representations Part 2 [REP1-117]. In summary, there are no significant permanent effects on agricultural land, as all land will be returned to its original use and condition as far as practicable following the decommissioning of the Scheme. An Outline Decommissioning Strategy [REP1-100] has been prepared and is secured by Schedule 2, Requirement 20 of the Draft DCO [REP1-007]. The Outline Decommissioning Strategy [REP1-100] identifies how commitments made in the ES will be translated into actions on site during decommissioning. A detailed

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				Decommissioning Strategy will be prepared for the decommissioning phase of the Scheme.
JMB-010	Scheme Description and DCO Process	Other projects	2.5 Misleading comparisons to 'similar projects' Six RRs noted that the Applicant's Environmental Statement relies on comparisons to projects that do not exist at this scale or in such sensitive landscapes. Mrs Penelope Farquharson wrote, "Assumptions... based on similar projects are misleading since no similar projects have ever been built." George Edward Harford made a similar point, saying that claims about comparable schemes were "misleading" because nothing of this size and configuration exists in England.	The Applicant does not agree that the use of precedent or comparable schemes within the ES is misleading or inappropriate. It is standard practice in EIA to draw upon relevant experience from comparable developments in order to inform the identification and assessment of likely significant effects. The Applicant does not assert that directly identical projects exist but applies a proportionate use of evidence from other similar consented solar NSIPs. Whilst it is noted that most consented solar NSIPs are not yet built, it is considered appropriate to proportionately apply the methodologies and conclusions of these.
JMB-011	Climate Change and Energy Ned	Efficiency	2.6 Misleading energy generation claims Several respondents challenged the Applicant's claim that the scheme would power	ES Volume 1, Chapter 7 Climate Change [APP-059] explains at paragraph 7.10.73 that the total energy generated by the Scheme

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			115,000 homes. Mostyn Neil Hamilton wrote, "This disguises the reality that, in the winter, very little solar generation is possible." Mary Smith also questioned the figures, noting that the stated output would require the panels to operate at full capacity for far more hours per day than the UK's seasonal daylight allows.	would be around 23.54 TWh and 24.26 TWh over the 60-year Scheme lifespan for tracker and fixed panels respectively (noting that 1TWh = 1,000,000 MWh. Government statistics (Ref 16(2) of the Statement of Need [REP1-085] provide that the mean average annual domestic electricity consumption (kWh per household) in 2023 in England was 3.4622 MWh. Dividing the estimation of renewable energy over the lifetime of the Scheme by the average household consumption and the period of operation of the Scheme gives a number of 113,300 to 116,800 homes, the numerical average of which is 115,000. Figure 29 of the Statement of Need [REP1-085] and associated narrative demonstrates how a national portfolio of low-carbon technologies, including wind and solar, is capable of closely matching a future projection of national electricity demand on a month-

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				average level, throughout the twelve months of the year.
JMB-012	Consultation and Engagement	Adequacy	2.7 Misleading or inadequate consultation A number of RRs described selective information, inconsistent answers, and a general sense that the consultation process did not give people the information they needed. Sally Cambridge wrote that "public-facing consultation materials relied on misleading photographs, diagrams and claims." Edward Henby said the boards were misleading and that staff "gave different answers to the same questions." Taken together, these themes show a pattern in the Applicant's public-facing materials that tended to minimise the perceived impacts and obscure the true scale and nature of the proposal.	The Applicant is confident in the quality of consultation materials produced for all stages of consultation. Throughout the consultation period, anyone was welcome and encouraged to get in touch through any of the free-to-use communication channels provided, including email, freephone and post. Respondents were also invited to attend the in-person and virtual community information events, where they could view the maps and ask questions or seek clarification directly to the Applicant's team.
JMB-013	Scheme Description and DCO Process	Local Democracy	Coercive Behaviour, Financial Inducements, and Suppression of Early Opposition Alongside concerns about unclear or incomplete information, a separate	The Applicant notes earlier response at JMB-001 regarding consultation, and highlights the robust level of consultation the Applicant has provided since the early stages.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			and troubling theme emerged from the Relevant Representations: several respondents described interactions with the Applicant that they perceived as pressurised, financially one-sided, or discouraging of early discussion. I was not surprised to see these concerns raised. When I first learned of the project's size, a local resident mentioned that some landowners had been asked not to talk about the proposals while negotiations were ongoing. I initially dismissed this as unlikely — it sounded more “Wild West” than Wiltshire countryside — but after reading the RRs and understanding that a scheme of this scale could bypass the local council through the DCO process, I can appreciate why some residents felt uneasy. This has made me more concerned about how large-scale projects of this nature may affect the future of our countryside.	The Applicant has addressed individual speakers at the Open Floor Hearing, so specific comments and their responses can be found in the Written Summary of the Oral Submissions at the Open Floor Hearing 1 and the Applicant's Responses [REP1A-013]. The Applicant rejects the suggestion that voluntary commercial negotiations are representative of financial inducements and would involve coercive behaviour. The Development Consent Order (DCO) process is a regulated statutory framework under the Planning Act 2008, which allows the right of all parties to participate and assurances regarding ongoing and concluded negotiations to date are provided in the Land and Rights Negotiations Tracker [REP1-246], which is regularly updated in Examination and demonstrates the Applicants effort to reach voluntary agreements in order to deliver the Scheme.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				It is also not correct that the Council is "bypassed". The Applicant has and continues to engage with Wiltshire Council on all matters of the DCO. Wiltshire Council also retains control and oversight through its role in discharging Requirements, approving management plans and components of detailed design, and through its monitoring role for the implementation of management plan measures. The Applicant is also negotiating protective provisions for the benefit of Wiltshire Council as local highway authority, which provide it with control over matters relating to the local highway network.
JMB-014	Scheme Description and DCO Process	CRC Heads of Terms	3.1 Financial inducements tied to withdrawal of objections Multiple Relevant Representations described letters sent to around 45 landowners offering up to £50,000 on the condition that they withdraw objections. M4 Property Solutions Ltd referred to a "financial incentive to withdraw their objections."	The Applicant confirms that its primary objective is to reach voluntary agreements with landowners for the land and rights required to deliver the Scheme, including those necessary for the Cable Route Corridor. This approach is intended to ensure that the Scheme is delivered through negotiated settlements. As is

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			Clancy Chamberlain described the attempt as "buying locals' silence." David Webb quoted clauses requiring landowners to "not object... and withdraw any previous objections." These accounts were consistent across several RRs and were also reported in local media.	standard practice in the development of large-scale infrastructure and fair to the parties involved, there are commercial terms attached to these agreements. These terms are designed to account for the acquisition of legal rights, such as easements for cables), and provide fair compensation for any demonstrable losses or impacts incurred by the landowner during the construction and operation of the Scheme. These terms are not in any way offered to buy the silence of involved parties as asserted and, as evidenced through the process of examination to date, such parties have been able to object to the Scheme whilst still engaging in negotiations with the Applicant as detailed in the Land Rights and Negotiations Tracker [REP1-246] .
JMB-015	Scheme Description and DCO Process	Engagement with landowners	3.2 Pressure, coercion, and undue influence Some RRs described landowners or tenant farmers feeling pressured or intimidated. David Webb wrote that "one farmer... felt threatened and had	The Applicant rejects the assertion of pressure or intimidation. The Applicant is keen to draw attention to the Land Rights and Negotiations Tracker [PDA-004] which details negotiation progression and the

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			no option but to sign." Mattias Ljungman referred to "landowner coercion or misleading lease agreements." These comments suggest that some people may not have felt free to express their views openly during the early stages of the project.	desire to enter into voluntary agreements with landowners supported by their land agents. The Applicant encourages all parties along the Cable Route Corridor to engage in discussions over the voluntary agreement to ensure practical concerns can be accounted for. The Applicant welcomes the participation in Examination of all parties with land interests contained in the Book of Reference [REP1-011]
JMB-016	Scheme Description and DCO Process	Engagement with landowners	3.3 Suppression of democratic participation Several respondents framed these actions as attempts to suppress public involvement. Rachel Bristow wrote that such inducements "undermine democratic participation and breach the Aarhus Convention." David Craig Copeland described the letters as "financial inducements to stifle democratic opposition."	The Applicant expressly rejects the suggestion that voluntary commercial negotiations are intended to, or have the effect of, stifling democratic opposition or suppressing public involvement. The Development Consent Order (DCO) process is a regulated statutory framework under the Planning Act 2008, which allows the right of all parties to participate.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
JMB-017	Consultation and Engagement	Engagement with landowners	3.4 Consequences for early engagement If landowners and tenant farmers were discouraged from discussing the project, it helps explain why early engagement was unusually low for a scheme of this size. Without open discussion, the wider community would not have understood the scale, location, impacts, or even that they had an opportunity to participate. This has direct implications for the fairness and completeness of the consultation process.	The Applicant publicised every stage of consultation through various methods with the aim of encouraging as many people as possible to participate and provide feedback. To publicise the non-statutory consultation, a community consultation postcard was sent to over 11,400 local homes and businesses within the vicinity of the Scheme, as well as producing various consultation materials (Information Leaflet, Feedback Form) and updating the Applicant's website with the latest consultation information. Furthermore, a press release was issued to local and regional publications, and advertisements publicising consultation opportunities was published in The Wiltshire Times, The Wiltshire Gazette, The Swindon Advertiser and Melksham Independent News. As detailed in Section 4 of the Consultation Report [APP-022], The Applicant welcomed over 960 attendees at the non-statutory

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				consultation information events, with over 100 attendees at the two online community webinars. The Applicant received over 1,300 submissions of feedback during the non-statutory consultation, which was considered and responded to through the Stage One Consultation Summary Report, published in October 2024. Throughout the consultation period, anyone was welcome and encouraged to get in touch through any of the free-to-use communication channels provided, including email, freephone and post. Respondents were also invited to attend the in-person and virtual community information events, where they could view the maps and ask questions or seek clarification directly to the Applicant's team. The Applicant also notes that the examination process provides a further opportunity for interested parties to comment on the Scheme. This examination is managed by an

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				independently appointed Examination Authority. Further to this, the Applicant provided an extended Relevant Representation period beyond the minimum statutory timeframe to allow sufficient time for members of the public to review the submitted application documents and register as an Interested Party.
JMB-018	Ecology and Biodiversity	Assessments	Consequences for Ecological Evidence and Public Participation 4.1 Missed opportunities for community-generated ecological evidence Because many residents did not realise the true scale or location of the proposal until much later, they were unable to take part in early ecological surveys or share local knowledge that could have strengthened the environmental baseline. This meant people could not set up wildlife cameras, record seasonal flooding, document flora and fauna, or walk fields during key seasons.	The Applicant maintains that a sufficiently robust assessment of impacts of the Scheme on ecology and biodiversity has been undertaken, and is presented within ES Volume 1, Chapter 9: Ecology and Biodiversity [REP1-015] . This assessment is based on extensive suite of baseline surveys. All surveys followed best practice methodologies summarised in Table 9-3 of ES Volume 1, Chapter 9: Ecology and Biodiversity [REP1-015] , including being conducted during the optimal time of year and during suitable weather conditions for all survey types. The Applicant considers the baseline survey data to be sufficiently robust to underpin the

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				assessment presented in ES Volume 1, Chapter 9: Ecology and Biodiversity [REP1-015]. 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. 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. The Applicant welcomes any further comments Interested Parties may have on ecological and environmental matters, which can be submitted throughout the Examination process.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
JMB-019	Ecology and Biodiversity	Assessments	Several Relevant Representations also raised concerns about the ecological surveys themselves, including limited coverage, poor timing, and lack of detail. In my own reading of the Applicant's ecological documents, I noted that some surveys appeared to have been carried out by less-experienced staff, which may help explain why certain ecological features were not identified.	The Applicant maintains that a sufficiently robust assessment of impacts of the Scheme on ecology and biodiversity has been undertaken, and is presented within ES Volume 1, Chapter 9: Ecology and Biodiversity [REP1-015] . This assessment is based on extensive suite of baseline surveys. The scope of ecological and species-specific survey across the Order Limits has been completed using a proportionate, risk-based approach. All surveys followed best practice methodologies summarised in Table 9-3 of ES Volume 1, Chapter 9: Ecology and Biodiversity [REP1-015] , including being conducted during the optimal time of year and during suitable weather conditions for all survey types. The Applicant considers the baseline survey data to be sufficiently robust to underpin the assessment presented in ES Volume 1, Chapter 9: Ecology and Biodiversity [REP1-015] .

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				All surveys were completed by professional ecologists who are members or pending members of the Chartered Institute of Ecology and Environmental Management Chartered IEEM and follow the Institute's Code of Professional Conduct when undertaking ecological work. The competence of all field surveyors was assessed and confirmed with respect to the CIEEM Competencies for Species Survey (available at: www.cieem.net/competencies-for-species-survey-css-).
JMB-020	Ecology and Biodiversity	Assessments	4.2 A weakened environmental baseline When you combine unclear public information, low early participation, and limited ecological engagement, it becomes difficult to feel confident that the Applicant's environmental evidence fully reflects what is actually on the ground. Michael William Eccles mentions, 'The council identified significant gaps in the ecological baseline data,'	The Applicant has responded to this comment under Reference ID JMB-019.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
JMB-021	Consultation and Engagement	Adequacy	4.3 A consultation process that did not meet the spirit of the Planning Act 2008 The Planning Act expects consultation to be transparent, accessible, meaningful, honest, and free from coercion. The concerns raised in the RRs make it reasonable to question whether those standards were met in this case. Based on my own experience and the repeated themes in the Relevant Representations, I believe many residents would have been more vocal and more involved in the first consultation had the scale, locations, and physicality of the scheme been clearly presented from the outset.	Each Relevant Representation (RR) submitted by the general public and any other non-statutory party not responded to at Deadline A, has been systematically reviewed and a summary of the issues raised has been prepared and presented in Applicant's Response to Relevant Representations (Part 2) [REP1-117]. These summaries are presented alongside the corresponding unique reference ID, enabling a clear audit trail between the original representation and the Applicant's response. The Applicant therefore had regard to all RRs received and has provided a response to the issues raised. The Examination process, led by the Examining Authority, will further consider all RRs, alongside the Applicant's responses and any subsequent submissions, in reaching a recommendation on the Scheme. The Applicant notes that the free-to-use Scheme communication channels remain open for anyone to

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				contact the Applicant regarding questions about submissions and responses to comments. 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

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				in hard-form, and free-to-use communication channels to respond back to the Applicant team.
JMB-022	General Remarks	Sentiment	Conclusion Taken together, these concerns — unclear public information, accounts of pressure or inducements, and the absence of early community engagement — point to a pattern in how the Applicant has managed public-facing material. This pattern appears to have reduced early scrutiny, limited public understanding, and weakened the ecological evidence base. These matters go directly to the reliability of the Applicant's submissions and whether they can be treated as a full and accurate account of the scheme's impacts.	The Applicant notes these conclusions and has addressed each of the comments in detailed under Reference IDs JMB-001 to JMB-021.
JMB-023	Climate Change and Energy Need	Need for the Scheme	On this basis, and given the scale of land-take involved, I do not believe the Applicant has demonstrated that this scheme is an appropriate or proportionate response to the challenge of delivering Net Zero.	Paragraph 3.3.20 of National Policy Statement EN-1 (2023) explains that it is Government's view that a "secure, reliable, affordable, net zero consistent system in 2050 is likely to be composed predominantly of wind and solar". Paragraph 3.3.20 of NPS

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			I support the transition to low-carbon energy, but I believe it should be achieved through smaller-scale, locally integrated solutions such as geothermal, rooftop solar, brownfield development, and other decentralised technologies — approaches that strengthen communities rather than displacing them, and that do not require extensive, expensive new grid infrastructure or the industrialisation of rural landscapes.	EN-1 (2023) explains that decentralised and community energy systems, which by definition would include rooftop solar installations, could lead to some reduction in demand on the main transmission system, but “the government does not believe they will replace the need for new large-scale electricity infrastructure to meet our energy objectives.” This is for reasons which are set out at Paragraph 3.2.10 and Section 6.2 of the Statement of Need [REP1-085] . It is therefore Government's policy position that the urgent need for such schemes is established, that substantial weight should be given to this need, and that the specific contribution of any individual project to satisfying the need established within the NPS is not required to be considered by the SoS. (NPS EN-1 (2023) Paragraphs 3.2.6 - 3.2.8).
JMB-024	Site Selection and Alternatives	Scale	Large, dispersed solar schemes of this kind risk significant harm to environmental ecology, cultural	The Applicant is confident that the proposed management and mitigation measures set out in the Environmental Statement (ES) are

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			ecology, and the wellbeing of rural communities,	comprehensive and robust and that the Scheme aligns with national and local planning policy; this is outlined in the Planning Statement [REP1-087] . Of particular relevance are Annex A: National Policy Statement Accordance Tables and Annex B: Local Policy Accordance Tables, of the Planning Statement which set out an appraisal of the Scheme against national and local planning policies.
JMB-025	Climate Change and Energy Need	Carbon emissions	and their extensive groundworks and long grid connections can generate far more embodied CO ₂ than smaller, decentralised alternatives.	The conclusions of the greenhouse Gas assessment within the Climate Change ES Chapter demonstrate that the overall effect of the scheme is beneficial in terms of total greenhouse gas emissions compared to a without scheme scenario.
JMB-026	General Remarks	Sentiment	For these reasons, and based on the evidence and patterns outlined above, I do not believe consent should be granted. Respectfully, Joan Bassler Note regarding use of AI - In preparing this response, I used Microsoft Copilot as a drafting assistant to help refine wording,	The Applicant notes these conclusions and has addressed each of the detailed points raised in the responses above. The Applicant welcomes the transparency around use of AI within Ms. Bassler's submissions.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			improve clarity, and ensure that my points were expressed in a structured and professional way. All arguments, evidence, interpretations, and conclusions are my own, and are based on my reading of the application documents, the Relevant Representations, and my knowledge of the local area. Copilot assisted only with phrasing and organisation; the substance of this submission reflects my own views and judgement.	
JMB-027	Socio-Economics, Recreation and Tourism	Recreation	The footpaths, lanes, and quiet rural roads across this area are used daily by walkers and cyclists. They visit the surrounding villages, pubs, cafés, and small businesses. These routes are part of the local economy as well as the local way of life. Large-scale solar developments of this kind would divert visitors away from the area, but more importantly, they risk discouraging local people from getting out into the countryside at all.	The Applicant notes this comments and 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].

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				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 effects can be mitigated.
JMB-028	Socio-Economics,	Recreation	I am a resident of Malmesbury and an active walker who spends much	The Applicant confirms that opportunities to improve access on

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
	Recreation and Tourism		of my time on the footpaths, lanes, and green spaces around the town and the surrounding parishes. My connection to this landscape is not abstract: it is part of my daily life, my wellbeing, and my sense of belonging. I support the transition to low-carbon energy, but I believe it must be achieved in a way that strengthens communities, protects ecosystems, and respects the character of our countryside. If we race toward renewable energy targets without recognising the love and connection people feel for their countryside, we risk a future built on the ruins of the very landscapes that hold our communities together. This Written Representation sets out my concerns about the Lime Down Solar Scheme and explains why I believe large, dispersed solar developments of this kind are not an appropriate or proportionate response to the challenge of delivering Net Zero in the UK. More effective alternatives exist —	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 considers that the Scheme complies with Wiltshire Core Policies “CP51: Landscape” and “CP42(i): Standalone Renewable Energy Installations” and the reasoning is set out in further detail in Annex B – Local Policy Accordance

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			ones that strengthen home-grown businesses, support the economy, and deliver genuinely sustainable renewable energy without sacrificing the landscapes that sustain us.	Tables of the Planning Statement [REP1-087] (see pages 687 and 707 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. Site selection is addressed 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]. An appraisal of alternative sites within a 20km radius

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				of the Existing National Grid Melksham Substation has been undertaken, which concludes that there are no more suitable locations within the 20km search area than the proposed location for the Scheme. The Statement of Need [REP1-085] explains why solar development is required at this scale to meet the Government's targets as set out in the Clean Power 2030 Action Plan. It is the Government's policy to support the development of large-scale schemes in order to meet the urgent need for unprecedented levels of clean electricity. Relevant planning policy (specifically NPS EN-1 paragraph 3.3.12) recognises that meeting the country's energy needs requires the use of largescale, centralised electricity generating facilities via a high-voltage transmission system, which enables the pooling of both generation and demand, which in turn offers a number of economic and other benefits, such as more efficient bulk

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				transfer of power and enabling surplus generation capacity in one area to be used to cover shortfalls elsewhere. NPS EN-3 paragraph 2.10.31 recognises that at this scale, solar development is likely to use some agricultural land. The Planning Statement [REP1-087] considers the adverse and beneficial effects of the Scheme in the application of the planning balance and concludes that the benefits of the Scheme outweigh the residual adverse impacts identified. The benefits of the Scheme are set out in Section 5.3 of the Planning Statement [REP1-085] and include the delivery of large amounts of affordable, secure, and low carbon electricity which will help the UK to achieve net zero by 2050, ecological and landscape enhancements, biodiversity net gain, permissive paths, employment generation, economic benefits and skills training.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				The LVIA [APP-060] recognises there are adverse visual effects on a number of residential receptors, footpaths and local roads as set out in Table 8-19 Significant Visual Effects: Private Receptors, Table 8-20 Significant Visual Effects: Public Receptors and Table 8-21 Significant Visual Effects: Transport Receptors in in ES Volume 1, Chapter 8: Landscape and Visual [APP-060]. The LVIA [APP-060] 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. 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

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				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 Appendix 8-6. 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 helping to mitigate the adverse effects of the Scheme on landscape character and visual amenity which, once established will provide significant beneficial effects to the fabric of the Sites and the legacy landscape.
JMB-029	Cultural Heritage Landscape and Visual	Heritage impacts	Equally important is the cultural ecology of the countryside — the relationship between people and place. Landscapes shape identity, wellbeing, and community cohesion. When familiar views are replaced by industrial infrastructure, the loss is not	The Applicant notes the comment. ES Volume 1, Chapter 12: Cultural Heritage [APP-064], supported by detailed technical appendices in ES Volume 3, Appendices 12-1 to 12-7 [APP-219 to APP-231] has assessed the potential impact of the scheme

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			merely visual; it affects mental health, sense of belonging, and the continuity of rural life. For walkers, farmers, and residents, these changes are profound.	on identified archaeological and built heritage assets. Where required appropriate mitigation is proposed. Embedded mitigation measures to avoid or reduce harm to heritage assets are set out in Section 12.9 of ES Volume 1, Chapter 12: Cultural Heritage [APP-064], with additional mitigation detailed in Section 12.11. An overarching archaeological mitigation strategy is provided in ES Volume 3, Appendix 12-6: Outline AMS [APP-230]. The Applicant has also assessed likely impacts on community and social wellbeing, and on the impacts of the Scheme on sense of community and sense of place and rurality (under then assessment category 'community identity, culture, resilience and influence') in ES Volume 1, Chapter 18: Human Health [APP-070]. The assessment concludes that there are no significant adverse

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				effects anticipated to population and community or social health and wellbeing. The LVIA in ES Volume 1, Chapter 8 Landscape and Visual [APP-060] takes into account the effects on landscape character and visual amenity in detail and recognises there are adverse visual effects on a number of residential receptors, footpaths and local roads as set out in Table 8-19 Significant Visual Effects: Private Receptors, Table 8-20 Significant Visual Effects: Public Receptors and Table 8-21 Significant Visual Effects: Transport Receptors in in ES Volume 1, Chapter 8: Landscape and Visual [APP-060]. ES Volume 1, Chapter 8: Landscape and Visual [APP-060] 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.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				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 Appendix 8-6. 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 helping to mitigate the adverse effects of the Scheme on landscape character and visual amenity which, once established will provide significant

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				beneficial effects to the fabric of the Sites and the legacy landscape.
JMB-030	Landscape and Visual	Visual Impact	2. Landscape, Wellbeing, and a Sense of Belonging Our countryside has a strong and distinctive sense of place. North Wiltshire is shaped by its open rural character, historic field patterns, pockets of Cotswold stone buildings, and the network of footpaths and informal walking routes used regularly by local residents. This landscape contributes directly to community identity, recreational amenity, and people's wellbeing. Large-scale industrial development in this setting would fundamentally alter the area's character and the way people experience and value it. As a keen pub walker, I experience the countryside at human-scale with birdsong in my ear — through footpaths, farm tracks, hedgerows, fields, and the quiet continuity of rural life. It cannot be experienced in pictures or on a screen. It is visceral. You have to be in it to feel	Please refer to the Applicant's responses to reference IDs JMB-027 and JMB-028 above, which address concerns regarding recreational access, use of local footpaths and quiet rural routes, and the relationship between the countryside, wellbeing and landscape character.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			it and understand it. These landscapes nourish the soul and are part of what makes England distinctive and cherished.	
JMB-031	Socio-Economics, Recreation and Tourism Human Health	Recreation Mental Health	The knock-on effects would be significant: reduced footfall for rural businesses, and a direct negative impact on the physical and mental wellbeing of residents who rely on these landscapes for everyday exercise, connection, and respite.	The Applicant confirms that impacts to the tourism-dependent economy have been assessed in ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068] and finds no significant adverse effects at any phase of the Scheme, with a worst-case temporary loss of up to 50 FTE jobs over the Study Area during construction. The assessment in ES Volume 1, Chapter 18: Human Health [APP-070] also considers the physical and mental health impacts of changes to recreation and countryside access under the assessment topic 'open space, leisure and play', and concludes that no significant adverse effects are anticipated at any phase of the Scheme. The Applicant has also assessed likely impacts on community and social

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				wellbeing, and on the impacts of the Scheme on sense of community and sense of place (under the assessment category 'community identity, culture, resilience and influence') in ES Chapter 18: Human Health [APP-070] . The assessment concludes that there are no significant adverse effects anticipated to population and community or social health and wellbeing.
JMB-032	Landscape and Visual Climate Change and Energy Need	Scale	Industrialising these spaces for energy generation risks eroding the very qualities that make rural England worth living in and protecting. In the rush toward Net Zero, we must not destroy these landscapes, because they sustain our communities, strengthen individuals, and already help fight climate change by storing carbon, absorbing carbon, and supporting biodiversity. Pursuing sprawling solar schemes at the expense of these living systems ultimately harms the very foundations of our own future. In	The Applicant has addressed this point under reference ID LV-01 in the Applicant's Response to Relevant Representations Part 2 [REP1-117] . In summary, the effects of the Scheme on the surrounding landscape have been assessed in ES Volume 1, Chapter 8: Landscape and Visual [APP-060] . Mitigation measures have been proposed to address any landscape and visual effects, and the Scheme design incorporates minimum offsets from existing landscape features to further limit visual impacts.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			effect, we would be shooting ourselves in the foot.	
JMB-033	Site Selection and Alternatives Landscape and Visual	Site Selection Assessment	3. The Unsuitability of Large-Scale Solar in a Small Island Nation The UK is not China, Australia or the USA. In fact, it's not even as big as California. We are a small island with limited land, a densely interwoven rural-urban fabric, and landscapes that carry cultural, ecological, and historical significance far beyond their physical footprint. Our countryside is not empty space waiting to be repurposed; it is a living system that supports farming, biodiversity, recreation, heritage, and national identity. This was reflected so powerfully in the opening ceremony of the 2012 Olympics.	Please refer to reference ID CC-33 in the Applicant's Response to Relevant Representations Part 2 [REP1-117] which explains that it is the Government's policy to support the development of large-scale schemes. In addition, the Statement of Need [REP1-085] explains why solar development is required at this scale to meet the Government's targets as set out in the Clean Power 2030 Action Plan. It is the Government's policy to support the development of large-scale schemes in order to meet the urgent need for unprecedented levels of clean electricity. Relevant planning policy (specifically NPS EN-1 paragraph 3.3.12) recognises that meeting the country's energy needs requires the use of large-scale, centralised electricity generating facilities via a high-voltage transmission system, which enables the pooling of both generation and

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				demand, which in turn offers a number of economic and other benefits, such as more efficient bulk transfer of power and enabling surplus generation capacity in one area to be used to cover shortfalls elsewhere. NPS EN-3 paragraph 2.10.31 recognises that at this scale, solar development is likely to use some agricultural land.
JMB-034	Climate Change and Energy Need	GHG Emissions	Sprawling solar schemes require vast land-take, extensive groundworks, and long grid connections. These release significant embodied CO ₂ and disrupt soil systems that currently act as carbon sinks. In many cases, the CO ₂ released during panel construction, transportation, and installation may outweigh the near-term carbon savings of the panels themselves. In a country where land is scarce and landscapes do vital climate work, this is a poor trade-off. There are better solutions to our emissions problem.	The Greenhouse Gas assessment within the ES Volume 1, Chapter 7: Climate Change [APP-059] considers embodied carbon, this is inclusive of extraction, processing and manufacture of materials. There is also analysis of the carbon benefit of the scheme and replacement of key components over the lifetime of the scheme within this ES Chapter. The overall findings show that the scheme will have a positive effect on climate change. While not specifically assessed, the change of the Solar PV Sites from arable land to grassland would increase carbon sequestration.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
JMB-035	Ecology and Biodiversity	Wildlife Impacts	4. Ecological and Cultural Impacts The environmental impacts of large solar schemes extend far beyond the carbon footprint of the panels. They alter hydrology, fragment habitats, disturb soils, and displace wildlife. The Applicant's documents often frame these impacts as temporary or reversible, but lived experience and ecological research suggest otherwise. Once a landscape is industrialised, its ecological function rarely returns to its previous state.	The comment refers generally to hydrology and landscape change. Hydrology, flood risk and drainage effects have been assessed in ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [REP1-017] and ES Volume 3, Appendix 11-1 to 11-9: Flood Risk Assessment and Drainage Strategy [REP1-037 to REP1-054]. The assessment considers construction, operation and decommissioning effects, including runoff, soil compaction, drainage disruption, water quality and flood risk. The Scheme retains permeable ground across the Solar PV Sites and includes secured controls for soil protection, vegetation establishment, compaction remediation, watercourse protection and drainage management. The Applicant does not agree that the Scheme would give rise to significant adverse hydrology or flood risk

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				effects. The management of soils, vegetation and runoff is secured through the Outline CEMP [REP1-096], Outline OEMP [REP1-098] and Outline SRMP [APP-280]. The Solar Energy UK Factsheet: Solar Farms and Agricultural Land (2024) notes that the level of disturbance to the soils within panel areas is minimal, typically amounting to approximately 2% of the total site area being subject to disturbance. ES Volume 1, Chapter 17: Soils and Agriculture [APP-069] states that most soil disturbance is anticipated to arise from installation of access tracks, substations and compounds, not from the panel structures themselves. The majority of the land and soil will remain in-situ, broadly undisturbed. Potential impacts on ecology and biodiversity are fully assessed in ES Volume 1, Chapter 9: Ecology and Biodiversity [REP1-015]. The assessment identifies avoidance, miti

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				gation 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 identifies embedded and additional mitigation measures and concludes that, with these measures in place, no significant adverse effects are anticipated on protected and notable species with the exception of ground-nesting birds of open habitats, and hedgerows. Residual significant adverse effects on these receptors are anticipated at a local-level of geographical importance only for skylark and hedgerows, and at site level for other ground-nesting bird species. Measures to ensure potential impacts on habitats and protected and notable species are minimised and ecological enhancements are delivered will be

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				secured via Development Consent Order (DCO) Requirements including the Outline LEMP [APP-283] and the Outline EPMS [REP1-106] .
JMB-036	Climate Change and Energy Need	Alternatives	5. Better Alternatives Exist I support renewable energy, but I believe the UK should protect its countryside and prioritise geothermal, rooftop solar, brownfield solar, decentralised local energy systems, and community-scale renewables integrated into existing infrastructure. These approaches minimise land-take, reduce embodied CO₂, strengthen local economies, preserve rural landscapes, and avoid the need for extensive new grid connections. They are far better aligned with the UK's scale, geography, and settlement patterns than large, dispersed solar farms.	Please refer to reference IDs SS-06 and SS-07 in the Applicant's Response to Relevant Representations Part 2 [REP1-117] which summarises the Applicant's approach to identifying and evaluating potential sites for the Scheme. Based on this approach, it has been concluded that there are no more suitable and available locations within the search area than the proposed location for the Scheme.
JMB-037	Climate Change and Energy Need	Alternatives	6. Conclusion For the reasons set out above — and those detailed in my Relevant Representation and Comments on	The Applicant followed a staged approach to site assessment, taking into consideration a range of planning, environmental and

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			Relevant Representations — I do not believe the Lime Down Solar Scheme is an appropriate or proportionate response to the UK's energy needs. It would cause significant ecological, cultural, and landscape harm while delivering limited and uncertain carbon benefits. We cannot run blindly toward some solar Nirvana. It is time to pause and rethink our journey to Net Zero. There are better solutions that can strengthen Britain's economy and local industry without sacrificing large areas of countryside. If we reach for renewable energy targets blinkered by dreams of solar expansion, we risk a future built on the ashes of the very landscapes that hold our communities together. Lime Down is one more example of progress pursued at the expense of the countryside that sustains us. I urge the Examining Authority to consider whether this	operational factors. ES Volume 1, Chapter 4: Alternatives and Design Evolution [APP-056] and ES Volume 3, Appendix 4-1: Site Selection Assessment Report [APP-185] explain the methodology that has been applied when identifying and evaluating potential sites for the Scheme. It identifies a number of potential development areas for the Scheme and presents how each of those areas perform against a range of planning, environmental and operational constraints and opportunities. This report concludes that there are no more suitable and available locations within the search area than the proposed location for the Scheme, based on the criteria identified. The Statement of Need [REP1-085] describes that there is an urgent and unprecedented need for new low carbon generation in the UK to meet our climate change, energy security and affordability.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			development represents the right solution for a small island nation whose much-loved countryside is both environmentally vital and culturally irreplaceable.	Further, the Government considers that a secure, reliable, affordable, net zero consistent system in 2050 is likely to be composed predominantly of wind and solar (NPS EN-1, Para 3.3.20). Notably, large-scale energy schemes are supported by the Government as per Para 3.3.12 of NPS EN-1. In terms of environmental effects, the Scheme has been developed through an iterative design process undertaken in response to consultation and in accordance with the mitigation hierarchy to avoid, reduce and mitigate adverse effects on the environment. The assessments set out in the various chapters of the ES [APP-052 to APP-265] detail what impacts are expected as a result of the Scheme based on the minimum and maximum parameters of the Scheme, and the mitigation and enhancement measures that are proposed to reduce these impacts. The Planning Statement [REP1-087] considers the

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				adverse and beneficial effects of the Scheme in the application of the planning balance and concludes that the benefits of the Scheme outweigh the residual adverse impacts identified. The benefits of the Scheme are set out in Section 5.3 of the Planning Statement [REP1-087] and include the delivery of large amounts of affordable, secure, and low carbon electricity which will help the UK to achieve net zero by 2050, ecological and landscape enhancements, biodiversity net gain, permissive paths, employment generation, economic benefits and skills training.
Michaela Boldy REP1-229				
MB-001	Transport and Access	Routes	I wish to raise an additional point following my Relevant Representation submitted in January regarding the Lime Down Solar Project. Are the Planning Inspectorate and Island Green Power aware that the route from Easton Grey to Norton and onto Hullavington is regularly used by	The Applicant makes note of this comment. ES Volume 1, Chapter 13: Transport and Access [REP1-019] has been assessed impacts on all road users based IEMA transport and access guidelines. The potential effects of construction traffic on the local highway network

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			vehicles travelling to and from the Highgrove Estate when accessing the M4? My daughter and I have personally witnessed the royal motorcade passing along this route en route to the Duke of Edinburgh's funeral, and such movements are not uncommon. In light of this, the construction phase and long-term operation of the proposed solar development, as well as any major incidents associated with it, could present significant security risks	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. This included the capacity of local roads and infrastructure to accommodate construction vehicles. The assessment concludes that the level of construction traffic associated with the Scheme is unlikely to materially affect road safety on links within the Study Area, and no significant adverse effects on accident risk are anticipated. The assessment additionally concludes that with appropriate mitigation such as the CTMP in place, there would be no significant adverse impacts on the local highway network during the construction, operation and maintenance, and decommissioning phases of the Scheme.
MB-002	Socio-Economics,	Recreation	As noted in my previous submission, I use	A detailed assessment of the likely significance of effects from the

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
	Recreation and Tourism		these lanes and bridleways daily for running and dog walking. They are an important part of safe local recreation. The Lime Down project would therefore not only have a detrimental impact on community wellbeing but may also raise wider national security risks.	Scheme on the use and desirability of individual PROW and recreational access to the countryside is included in ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068] and ES Volume 3, Appendix 16-2: Tourism and Recreation Receptor Tables [APP-241]. This assessment considers the impact on individual recreational routes, including their practical use, enjoyment and desirability. The Applicant confirms that the majority of significant adverse effects can be mitigated. However, some significant adverse effects to users of PROW and unsurfaced roads in Lime Down E during construction cannot be mitigated further. No significant residual effects are anticipated during the operational phase of the Scheme. The assessment in ES Volume 1, Chapter 18: Human Health [APP-070] also considers the physical and mental health impacts of changes to recreation and countryside access

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				under the assessment topic 'open space, leisure and play', and concludes that no significant adverse effects are anticipated at any phase of the Scheme.
MB-003	Scheme Description and DCO Planning Process	Consultation with statutory consultees	I respectfully request that the Examining Authority ensures these factors are fully assessed, and that the appropriate security bodies, including Royal and Specialist Protection, are consulted before any decision is made.	The Applicant notes this comment
MB-004	Transport and Access	Routes	Please find attached the Zone B and Zone D Lime Down maps, with the royal motorcade route highlighted in yellow. It is clear to see their route will be significantly affected by the proposed Lime Down.	The Applicant refers to the response given to Reference ID MB-001.
MB-005	Consultation and Engagement	Relevant Representations	Please see attached email stream regarding two Missing Relevant Representations. These were Relevant Representations from a [redacted] year old and a [redacted] year old. As seen in the responding email, Deborah Allen (Planning manager) suggested I highlight the missing	The Applicant notes this comment. This is a matter for the Examining Authority to respond to.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			representations to the Examining Authority. Unfortunately, I now realise there was a deadline of March 9th. I am writing this comment with a hope that it is noted there was an inadequacy in the IT structure when submitting the Relevant Representations. As a result, two young adults were unable to have their views against Lime Down counted in the Planning Inspectorate Investigation.	
GDPR-LDSF-018 REP1-207				
GDPR-LDSF-018-001	Socio-Economics, Tourism and Recreation	Equine impact	Dear Planning I decided to send you a simple map of the locations of horses near the proposed site so I ask why has the application little or no information regarding horses ?	The Applicant has not been provided with the plan that was mentioned so cannot make comment on that at this point. In regard to the information that the Applicant has provided, equestrian facilities, including private stables and paddocks, studs, riding schools, and on public rights of way such as bridleways and byways have been considered as specific recreational receptors in the assessment in the ES Volume 1, Chapter 16:

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				Socio-Economics, Tourism and Recreation [APP-068]. The likely effects on these locations and receptors are specifically and individually assessed in ES Volume 3, Appendix 16-2: Tourism and Recreation Receptor Tables [APP-241]. The Applicant confirms that the majority of significant adverse effects can be mitigated, however understands that some significant adverse effects to users of routes in Lime Down E, and to the equestrian business at Park Farm, Yatton Keynell cannot be mitigated further during construction and will therefore be considered in the planning balance when the DCO is determined. No significant residual effects are anticipated during the operational phase of the Scheme. The Applicant has committed to ensuring the operation or recreational use of equestrian facilities and PRowS is protected as much as practicable through the implementation of embedded and

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				additional mitigation measures set out in the Outline CTMP [REP1-112] and Outline PROWPPMP [REP1-104] , secured respectively by Requirements 15 and 16 in Schedule 2 to the Draft DCO [REP1-007] .
GDPR-LDSF-018-002	Climate Change and Energy Need	Energy generation	In addition I don't like the spin that these solar farms will power thousands of houses as I'm sure that's just for only a very short time each day otherwise they will be storing electricity in dangerous batteries.	As stated on the Applicant's project website (https://www.limedownsolar.co.uk/), the Scheme is anticipated as being able to deliver up to 500 megawatts (MW) of renewable electricity through ground-mounted solar photovoltaic (PV panels). This is enough clean, affordable electricity to power approximately 115,000 homes every year.
GDPR-LDSF-018-003	The Applicant	Funding	Why after the mess that Thames Water is in are we letting people closely connected take over our countryside . Please don't give planning to a company that has no connections to the area creating a mess that will never bother them as my generation has to clean it up. Thank You Poppy	The Applicant wishes to clarify that Macquarie's involvement in Thames Water has been repeatedly mischaracterised. Macquarie-managed funds were part owners of Thames Water for 11 years between 2006 & 2017. In that time, the company invested £11 billion and Thames Water's assets almost doubled, from £6.5 billion to £12.9 billion. There were significant

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			I think it's important to hear from the next generation as opposed to the generation that will not have to clean this mess up	improvements in water quality (ranked amongst the sector's best), water leakage was cut by around 22%, the second-best improvement in the sector over this time, and pollution incidents were down by 75% between 2008 and 2012. This investment programme was delivered while achieving the third lowest customer bills for water and wastewater in England and Wales at the time of Macquarie's full exit, while from 2009 to 2012, the debt to assets ratio reduced by about 6%. Furthermore, the context here is very different. The development of a privately owned new solar farm is a very different situation from an investment in a former publicly owned service company with existing operational assets that was privatised. In the case of the Scheme, Macquarie has provided the up-front equity capital to develop the Scheme and as such carry significant upfront

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				development risk. Until the Development Consent Order is secured, the Scheme would not generate any income at all, with no guarantee of return unless the Scheme progresses successfully through development, planning, construction and operation. This creates a strong long-term commercial incentive for Macquarie to see the Scheme through to completion. Finally, the Applicant, and any future operator of the Scheme, is bound by the legally enforceable requirements of the Development Consent Order (DCO) as set out in the Draft DCO [REP1-007]. These legally binding requirements are attached to the Scheme and pass directly to any new operator throughout the lifetime of operation and decommissioning. Under the Planning Act 2008, failing to comply with a DCO Requirement is a criminal offence. This provides the legal mechanism for the enforcement of responsibility directly on the project

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				operator, irrespective of its corporate structure.
Michael Llewellyn Palmer REP1-228				
MLP-001	Socio-Economics, Tourism and Recreation	Local businesses	I would like to object to this scheme which will have a detrimental effect on our farming business. Our farming business is typical of a modern farm which has diversified in recent years. Currently we grow crops, have grazing pasture land and have holiday cottages and a caravan site. I will break down my serious concerns for each of the three elements of our farm and rural business.	The Applicant notes this comment and refers to Table 2-1 in the Applicant Response to Local Impact Report [EN010168/EXAM/9.21] where the Applicant responds to queries regarding the impacts to hospitality and tourism within the area. With regards to the anticipated effects to the farming business, these are likely to be temporary and restricted to the width required for cable trenching works and any associated haul route, or entry and exit pits for horizontal directional drilling operations. Where fields have been bisected, working practices around cable laying works should allow for access to be maintained to both sides of the Cable Route Corridor to allow for agricultural work to be continued even during construction.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				The Outline CEMP [REP1-096] furthermore commits to the reinstatement of land affected by cabling works as soon as practicable to allow for agricultural work on the land to recommence as usual as soon as construction of that section of cable route is complete. This is secured through Requirement 13 of Schedule 2 to the Draft DCO [REP1-007]. Impacts to farming enterprises can be mitigated using various measures, including the installation of crossing points. The Applicant notes the respondent's concerns and is open to discussing those mitigation measures in good time ahead of construction.
MLP-002	Soils and Agriculture	Farming businesses	FARMING - We farm on a belt of sandy soil that sits between Startley and Dauntsey. Our land is highly productive with stone free soil. Sandy soils are hungry for nutrients and in particular Potassium (K) and phosphorous (P). Our principal source of this fertiliser is cow muck	A majority of the agricultural land within the Solar PV Sites is under arable use and does not support cattle farming. Farm yard manure is typically collected from cattle sheds and soiled bedding; manure is not collected from fields for spreading elsewhere. There are no cattle sheds within the Solar PV Sites

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			(cattle farmyard manure - FYM). Cow muck (FYM) is known as a complete fertiliser since it also contains Nitrogen (N) and provides soil structure. This information is backed up by AHNB Nutrient Management Guide (RB209). It is possible to obtain these nutrients via manufactured fertilisers but the production and transport and particularly the cost has a very considerable impact for our business. These manufactured fertilisers do not offer the soil structure which is important. It is worth noting that nitrogen fertiliser has quadrupled in price with recent disturbances to supply from the Middle East. Having farming land that produces FYM where Lime Down is proposed means farms locally are less exposed to global supplies. It is possible to obtain the FYM from other local farms to the East of us but with the limited availability of cattle farms in the area means the supply will be reduced and this will mean	that would contribute to the local supply of farm yard manure. The presence of the Scheme will not remove the machinery, knowledge or local man power resources available to the community, as the owner-occupied farm holdings will continue to operate. 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]. The Applicant has been in discussions with landowners and these discussions have included arrangements regarding existing tenancies. Whilst a worst case could

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			increased prices due to a reduced supply. Also if the distance for the FYM increases this adds transports costs as well. There are other impacts on the farming community with less farming taking place nearby related to mutual assistance from farmers. A considerable amount of work is shared between farms via machinery, knowledge, man power etc. It is a team effort at certain times of the year and less farmers locally means less machinery, knowledge and man power.	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.
MLP-003	Socio-Economics, Tourism and Recreation	Local businesses / Tourism	HOLIDAY LET COTTAGES - Our customers for our cottages come to see the beauty of the South Cotswolds with its lovely historic villages, wonderful footpaths and bridleways and views. The ancient and Roman Fosseway is a draw and Lime Down propose to tarmac this road and surround it with fencing, panels, lights and other industrial infrastructure. It will have a direct impact on our holiday let	The potential effects of the Scheme on tourism and recreation are assessed in ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068] , supported by ES Volume 3, Appendix 16-2: Tourism and Recreation Receptor Tables [APP-241] . The assessment considers baseline tourism activity, visitor attractions, recreational assets and tourism-

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			business as these walks and rural views is one of the reasons people stay with us. We get people from all over the world and London and other places. If this goes ahead our customers will simply choose another location that has protected its heritage and rural beauty.	dependent businesses within the study area. The assessment evaluates potential effects on the use, enjoyment and desirability of nearby tourism destinations, including impacts on individual visitor attractions, recreational routes, events and businesses reliant on tourism. It also considers whether changes to landscape character or visual amenity could influence visitor behaviour. The assessment identifies a worst-case scenario in which a temporary loss of up to 50 tourism-related jobs could occur locally during construction, and a long-term loss of up to 11 tourism-related jobs could occur during the operational phase of the Scheme. This represents a precautionary estimate based on conservative assumptions. The assessment concludes that, while some localised effects on tourism receptors are anticipated to occur, significant adverse effects on the

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				wider tourism economy are not anticipated. These findings are fully reported in the ES and will be weighed in the planning balance alongside the Scheme's wider economic and environmental benefits. The Applicant is discussing the approach to assessment of tourism impacts with Wiltshire Council's Economic and Regeneration Team and those discussions will be set out in the Statement of Common Ground with Wiltshire Council to be submitted at Deadline 1. An assessment of landscape and visual effects is provided in the Landscape and Visual Impact Assessment (LVIA) presented in ES Volume 1, Chapter 8: Landscape and Visual [APP-060]. The LVIA assesses effects on identified landscape and visual receptors, including residential properties and users of public rights of way,

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				and identifies where significant effects may occur. ES Volume 1, Chapter 8: Landscape and Visual [APP-060] recognises there would be Significant adverse effects on the Landscape character within the 1 km Study Area of the Site initially as a result of the change in land use from agricultural land to solar infrastructure. However, these effects would reduce to non-significant once the extensive mitigation measures mature. The LVIA found no significant long term visual effects to Residential Properties as a consequence of the Scheme. ES Volume 3, Appendix 8-3-3: Summary of Visual Effects [APP-192] provides a summary of the visual effects on Private Receptors. The scale of development within the Order Limits has been significantly reduced from the layout assessed in the Preliminary Environmental

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				Information Report (PEIR) through an iterative design process undertaken in response to consultation and in accordance with the mitigation hierarchy to avoid, reduce and mitigate adverse effects. As part of this design evolution, panels along the edge of the Cotswolds National Landscape and along the Fosse Way have been removed. These measures are set out in Section 8.9 of the LVIA [APP-060]. Mitigation measures to address landscape and visual effects are set out in ES Volume 1, Chapter 8: Landscape and Visual [APP-060], Figure 3-4-1 to 3-4-5.2: Landscape and Ecology Mitigation Plan [REP1-029] and detailed within the Outline LEMP [APP-283] and the Outline EPMS [REP1-106]. These documents include proposals for new and enhanced planting, retention of existing hedgerows and woodland, and landscape integration measures to reduce visual effects over time.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				In addition, the Scheme design incorporates minimum offsets from existing landscape features, including residential properties, ancient woodland, woodland, hedgerows, public rights of way and watercourses, to further limit visual impacts. The preparation, approval and implementation of detailed landscape and ecological management plans, substantially in accordance with the Outline LEMP [APP-283] and Outline EPMS [REP1-106], are secured through requirements in Schedule 2 of the Draft Development Consent Order [REP1-007], ensuring that the identified mitigation measures are delivered and maintained throughout the lifetime of the Scheme.
MLP-004	Socio-Economics, Tourism and Recreation	Local businesses	CARAVAN SITE - Our caravan customers come to our caravan site on the south side of Great Somerford looking for a nice spot to hang out for a few days or even	The Applicant refers to its response given to Reference ID MLP-003. The LVIA in ES Volume 1, Chapter 8 Landscape and Visual [APP-

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			longer. They usually come with a car which allows them to explore the local area. This includes visits to the local villages, footpaths and historic views. We often direct them to the bridle path between Rodbourne and Stanton that goes via Bincombe wood. It is very unlikely they will now want to visit an industrial landscape. Again this will have a direct and almost immediate impact on our caravan site business.	060] has robustly assessed the effects of the Scheme including the effects on Public Rights of Way and local roads. The LVIA recognises that there are some footpaths where there will be long term Significant adverse effects. These are set out in Table 8-30 Significant Long Term Visual Effects of the LVIA in ES Volume 1 Chapter 8: Landscape and Visual [APP-060]. All these receptors are PRow with the majority being footpaths which diagonally cross fields where solar infrastructure is proposed and where mitigation such as hedgerow screening would be inappropriate to the legacy landscape. For WT[MALW]59 (receptor TP168) which follows Rodbourne Brook below Bincombe Wood from Rodbourne Major/Moderate Adverse Significant effects were recorded during to Construction and Year1, reducing to Minor Adverse

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				and No Effect at Year 15 and Decommissioning respectively as a result of the proposed mitigation.
MLP-005	Socio-Economics, Tourism and Recreation	Local businesses	SUMMARY - It is impossible to give you a set of reliable figures in terms of extra costs to the crop farming business and the reduced income to our holiday cottages and caravan site business. All I know is it will be significant and immediate. We have so many challenges as a rural farm from lack of policing (farm thefts), poor broadband, non-existent mobile coverage, increased regulation (red tape), increased taxes etc etc. To have this proposal for Lime Down proceed it will be hugely difficult and financially painful for us.	The Applicant notes the challenges cited by the respondent. The potential effects of the Scheme on tourism and recreation are assessed in ES Volume 1, Chapter 16: Socio Economics, Tourism and Recreation [APP-068], supported by ES Volume 3, Appendix 16-2: Tourism and Recreation Receptor Tables [APP-241]. The assessment of likely impacts and effects is set out in section 16.10. The assessment identifies a worst-case scenario in which a temporary loss of up to 50 tourism-related jobs and £1.76 million in annual spending could occur locally during construction, and a long-term loss of up to 11 tourism-related jobs/ £395,000 in visitor spending per annum could occur during the operational phase of the Scheme. This represents a precautionary estimate based on conservative

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				assumptions. The assessment concludes that, while some localised effects on tourism receptors are anticipated to occur, significant adverse effects on the wider tourism economy are not anticipated. Additional mitigation measures (which were not quantified for inclusion in the assessment of potential losses to employment) secured in the Outline SSCEP [REP1-108] seek to reduce tourism employment losses through focussing on local recruitment, promoting local suppliers where practicable, and through providing retraining opportunities for workers in tourism-dependent industries. This is secured through Requirement 18 of Schedule 2 to the Draft DCO [REP1-007] .
Alex Lloyd-Jones REP1-194				
ALJ-001	Socio-Economics, Tourism and Recreation	Local community impacts	I would request the examining authority carefully review and check the impact of this proposal on the local and wider population, their health and wellbeing.	Impacts on physical and mental health and wellbeing are assessed in ES Volume 1, Chapter 18: Human Health [APP-070] . This chapter provides a comprehensive assessment of the Scheme's

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				potential effects on human health, including physical health and wellbeing, through consideration of a broad range of health determinants with physical health pathways. These include access to housing, access to open space and recreation, transport and connectivity, climate change, air quality, water quality, land quality, noise and vibration, and access to health and social care services. Mental health and wellbeing assessment determinants include access to open space and recreation, transport and connectivity, community identity and cohesion, employment and income, noise and vibration, air quality, and access to health and social care services. The assessment in ES Volume 1, Chapter 18: Human Health [APP-070] applies a health based review of relevant technical chapters to identify potential pathways by which the Scheme could affect physical and mental health. It concludes that, with the embedded

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				mitigation and additional measures secured through the relevant management plans [REP1-096 to APP-287] secured by their respective requirements in Schedule 2 to the Draft DCO [REP1-007] , the Scheme would not give rise to significant adverse effects on population physical health at any phase of the Scheme.
ALJ-002	Socio-Economics, Tourism and Recreation	Local community impacts	Communities are already being ripped apart and daily, weekly routines set to be destroyed with reduced opportunities for social interaction (footpaths ruined, pubs and cafes closed and tourists lost). I believe the examining authority are grossly underestimating the personal, family and community devastation caused by IGP and the landowners to date and moving forward.	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 directly assessing the impacts on community identity, culture, resilience and influence during construction, operation, and decommissioning. 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

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				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.

Reference	Theme	Issue	Comments/Issue Raised	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 during the construction of the Scheme.
ALJ-003	The Applicant	Funding	Many of the landowners behind the applicant are on public record saying they do not even care about the environment and they "just want the money".	The Applicant notes this is a speculative comment upon which it cannot respond further.
ALJ-004	Community Benefits Climate Change and Energy Need	Local Community Impact	There is no mitigation and no compensation or basic support being offered to the victims. The development plans fail any basic test of proportionality, the magnitude of harm is not being balanced out at all and it makes no sense given the availability of alternative and lower impact energy generation options.	The Applicant respectfully disagrees with the assertion that no mitigation is being offered. The Scheme has been designed in accordance with the mitigation hierarchy (avoid, reduce, and mitigate) to minimise adverse effects. The Planning Statement [REP1-087] considers the adverse and beneficial effects of the Scheme in the application of the planning balance and concludes that the

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				benefits of the Scheme outweigh the residual adverse impacts identified. The benefits of the Scheme are set out in Section 5.3 of the Planning Statement [REP1-085] and include the delivery of large amounts of affordable, secure, and low carbon electricity which will help the UK to achieve net zero by 2050, ecological and landscape enhancements, biodiversity net gain, permissive paths, employment generation, economic benefits and skills training.
ALJ-005	Consultation and Engagement	Adequacy	This process seems unfairly weighted against enabling the engagement of young people, and less well off working professionals (who cannot just take days off in the middle of the working week to attend hearings!!). I don't feel the community engagement has been at all inclusive and representative other than amongst the retirees.	The Applicant notes that the pre-application consultation was designed to be accessible to a wide-range of consultees, including younger people. As set out in the Consultation Report [APP-022] , the Applicant identified young people as an under-represented or seldom-heard group, and issued communications to gateway organisations, and to local primary and secondary schools, colleges and universities, to notify them of all stages of consultation. Information events held

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				during the non-statutory and statutory consultation ran from early afternoon into the evening, providing opportunities for people different working patterns and education commitments to join. Furthermore, The Applicant held online information events at all stages of consultation, held during the evening, to provide further opportunities for consultees to attend.
ALJ-006	Socio-Economics, Tourism and Recreation	Local community impacts	Approval of this scheme in its current format would prove that established and growing future communities and the younger generations who actually want to look after our nature and countryside and many of whom want to farm sustainability can be overridden, lives destroyed and ignored without justification.	When designing the Scheme, the Applicant thought carefully about how it might affect the local community and how people feel. The Applicant understands that some might worry that the countryside could feel less peaceful or different. Some people may think that the Scheme is helpful, while others may think it causes problems. Because of this, some people could feel upset, stressed or worried. The Applicant believes that these effects would, overall, not be significant.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				To help people during the building work, there will also be a community liaison group. This group will: - Listen to people's worries and questions; - Pass information between the builders and the community; - Help solve problems quickly; and - Guide people to mental health support if they need extra help. The group is there to make sure people are heard, informed and supported while the Scheme is being built and operated. If the Scheme goes ahead, there will be a binding legal condition that makes sure the group exists. This is in the Draft DCO [REP1-007], as Requirement 4 in Schedule 2. There is more information in ES Volume 1, Chapter 18: Human Health [APP-070].
Don Queen REP1-205				

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
DQ-001	Consultation and Engagement	Relevant Representations	I do not believe that the Limedown Applicant's thematic responses sufficiently resolved the written representations that I have already made. I attended the Planning Inspectorate meetings part physically and part virtually and do not feel that my issues were resolved there either. I continue to object to the Applicant's Limedown Proposal on the original grounds that I raised.	The Applicant refers to its response provided under reference ID CE-26 in Applicant's Response to Relevant Representations (Part 2) (Rev 2) [REP1-117] regarding its approach to responding to submissions. Each RR submitted by the general public, and any other non-statutory parties not responded to at Deadline A, has been systematically reviewed and a summary of the issues raised has been prepared. These summaries are presented alongside the corresponding unique reference ID, enabling a clear audit trail between the original representation and the Applicant's response. The Applicant therefore had regard to all RRs received and has provided a response to the issues raised. The Examination process, led by the Examining Authority, will further consider all RRs, alongside the Applicant's responses and any subsequent submissions, in

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				reaching a recommendation on the Scheme. The Applicant notes that the free-to-use Scheme communication channels remain open for anyone to contact the Applicant regarding questions about submissions and responses to comments.
Maggie Pivars REP1-224				
MP-001	Site Selection and Alternatives Landscape and Visual	Scale	The project covers such a vast area of outstanding beauty.... As well as peoples homes and work places.	The Applicant notes this comment. The effects on residential properties and local communities are assessed in ES Volume 1, Chapter 8: Landscape and Visual [APP-060], Chapter 13: Transport and Access [REP1-019], Chapter 14: Noise and Vibration [REP1-021], Chapter 15: Air Quality [REP1-023], Chapter 16: Socioeconomics, Tourism and Recreation [APP-068], and Chapter 18: Human Health [APP-070]. These chapters identify both beneficial and adverse effects as a result of the Scheme, proposing measures to mitigate any adverse effects.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				Mitigation measures are also contained within various outline management plans which are secured via Schedule 2 of the Draft DCO [REP1-007]. The Planning Statement [REP1-087] considers the adverse and beneficial effects of the Scheme in the application of the planning balance and concludes that the benefits of the Scheme outweigh the residual adverse impacts identified. The benefits of the Scheme are set out in Section 5.3 of the Planning Statement [REP1-085] and include the delivery of large amounts of affordable, secure, and low carbon electricity which will help the UK to achieve net zero by 2050, ecological and landscape enhancements, biodiversity net gain, permissive paths, employment generation, economic benefits and skills training.
MP-002	Other Environmental Matters	Security	It is so vast it will be almost impossible to secure against vandalism and terrorism.	The Applicant has responded to concerns regarding terrorism risk and vandalism in The Applicant's Response to Relevant

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				Representations (Part 2) [PDB-004] in response O-28 at pages 972-973 which confirms that the Scheme is unlikely to be a target for terrorism related events and that appropriate measures such as cameras, perimeter fencing and lighting are in place to prevent vandalism.
Richard Jeffcoate REP1-237				
RJ-001	Transport and Access	Routes	Written representation by Richard ("Dick") Jeffcoate – my comments on responses made by the Applicant to Relevant Representations submitted by me to the Planning Inspectorate on 23.11.25 My name is Richard Jeffcoate. I live in Grittleton and have done so for about 35 years. I submitted Relevant Representations to the Planning Inspectorate on 23 November 2025. I also made an oral submission (speaker number 29) Open Floor Hearing 1 ("OFH1") on 21 April 2026.	The applicant makes note of this comment. The Street is a two-way single carriageway road. It is noted that there is existing on-street parking present. However, opportunities to pass are available and existing HGVs already travel along this route without restriction. As a result, there is no requirement for vehicles to mount kerbs. Part of the HGV construction route to serve two access points (ref: 101 and 102) to the Cable Route Corridor. The cable route will be constructed in four separate 5.5km sections. One access in operation in each section at any one time as rolling construction.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			An issue raised in my Relevant Representations and focused upon in my oral submission is designation of The Street, Grittleton as an access to the proposed contractor's compound on the east side of Grittleton village and as part of the construction route to the "Cable Route Corridor" access point, also on the east side of Grittleton village. In particular, use of The Street for use by Abnormal Indivisible Loads. In my opinion, The Street, Grittleton is unsuitable for use by traffic of the type that would be generated by the proposed Lime Down development and I respectfully refer you to my comments on this issue, as set out in my Relevant Representations and my oral submission. By the way, I have seen The Street, Grittleton referred to as "Main Street" but that is not its correct name. The Street is the	Each access will be operation for approximately 90 days. The number of vehicle trips associated with each cable route corridor access are relatively low and temporary (see para 13.10.66 of ES Volume 1 Chapter 13: Transport and Access [REP1-019]). There are no current HGV restrictions on this route and given the low increase in trips shown in Table 13-34 of ES Volume 1 Chapter 13: Transport and Access [REP1-019] there was no requirement for further assessment. It was therefore concluded that impacts on the following transport factors are not significant: • Severance of communities • Road 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 • Hazardous/large loads

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			correct name of the road running east from Grittleton crossroads	A swept-path of an abnormal load has been tracked along this route in Appendix D of the Outline CTMP [REP1-112] , which demonstrate feasibility of this movement. AIL movements will be subject to Special Type General Orders (STGO)/ Individual Special Orders (VSO) where required and will be separate to the DCO. This will be secured by the Final CTMP and undertaken using the standard process for managing AIL movements on the public highway. Abnormal loads will be escorted to site to maintain highway safety. This will either be undertaken by private escort or likely by police escort for larger abnormal load deliveries such as the transformers. The delivery of abnormal loads will be relatively infrequent and undertaken outside of highway peak hours to minimise disruption and limit impact on existing users
RJ-002	Transport and Access	Routes	I wish to make comments on the Applicant's responses to my	The Applicant refers to its response to Reference ID RJ-001.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			Relevant Representations. My comments are listed below, in no particular order, numbered for convenience. 1) At reference T-53 in the Applicant's Response to Relevant Representations (Part 2) April 2026 and in response to the concerns expressed as regards "impact of traffic on Grittleton, including Main Street [sic]", the Applicant has commented as follows: "The main Street in Grittleton is not proposed as part of any construction routes." That statement does not appear to me to be correct. I refer to paragraphs 1.2.41 and 1.2.42 of the Applicant's Environmental Statement Volume 3 APP-233 in which The Street, Grittleton is listed as one of the roads that are to form part of the construction routes to the Cable Route Corridor access points.	

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
RJ-003	Transport and Access	AILs	With further reference to paragraph 1.2.42 of the Applicant's Environmental Statement Volume 3 APP-233, The Street, Grittleton is described as "a two-way single carriageway road". Whilst that is technically correct, the Applicant has made no reference to the presence of vehicles lawfully parked on The Street. As mentioned in my Relevant Representations and my oral submission, residents of numerous houses adjacent to or fronting The Street, including mine, have no off-street parking available to them. We all park on The Street. Take into account home delivery grocers' vans; visitors' cars; parcel delivery vans; deliveries to the pub; pub visitors; people attending the church; oil tankers delivering heating oil; bin lorries; garden contractors with equipment trailers etc, street parking is integral to village life. Vehicles parked lawfully on The Street reduce the available width of	The Applicant refers to its response to Reference ID RJ-001.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			the roadway for use by other vehicles. In effect, this makes lengthy sections of The Street single track. Assumptions made by the Applicant as regards highway width and suitability of The Street for traffic associated with the proposed project should, I believe, be rigorously questioned. As I understand it, an "abnormal load" such as a cable delivery would have a width of at least three metres and a rigid length of at least 18.65 metres.	
RJ-004	Transport and Access Socio-Economics, Recreation and Tourism	Footpath Impact	As acknowledged by the Applicant within paragraph 1.2.42 of the Environmental Statement Volume 3 APP-233, there is pedestrian infrastructure within Grittleton. Indeed, there are footpaths on both sides of The Street all of the way from The Neeld Arms public house to Malmesbury Lodge on the eastern edge of the village. Along the remainder of The Street within Grittleton there are footpaths on one or other sides of The Street. All such footpaths are	The Applicant refers to its response to Reference ID RJ-001.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			actively used by the village community. Vehicles mounting the kerbs at the side of The Street in their endeavour to overcome restrictions caused by vehicles parked lawfully on The Street (please see my comments on this issue in my oral submission at OFH1) are at conflict with safe use by pedestrians of footpaths along The Street.	
RJ-005	Transport and Access	AILs	With reference to my previous representations and submission, the situation with The Street and the traffic problem we have is bad enough, as it is, without being exacerbated by additional and abnormal traffic generated by the proposed Lime Down project. At paragraph 5.5.1 of the Applicant's Outline Construction Management Plan, it is stated that all abnormal load movements will be co-ordinated by a haulage specialist and traffic management will be in place to support the movement. It is further stated that the exact	The Applicant refers to its response to Reference ID RJ-001.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			nature of traffic management, to be agreed with the local highway authority, is likely to include measures such as "rolling road closures". The Applicant refers to management of vehicle movements through a Construction Traffic Management Plan an outline of which talks about coordination of deliveries, delivery scheduling, liaison with the local highway authority, community liaison, provision of a contact for feedback and such like. The Applicant has commented that suitable mitigation measures will be put in place so as to avoid significant impacts on the local highway network. In my opinion, adverse impacts on the community of Grittleton from use of The Street as an access to the proposed contractor's compound on the east side of Grittleton village and as part of the construction route to the "Cable Route Corridor" access point also on the east side of Grittleton village would be	

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			exceptional, beyond mitigation and a considerable challenge to the community. The ebb and flow of vehicular movement within the community will be adversely affected by the proposals.	
RJ-006	Transport and Access	Emergency Access	I am mindful of car borne attendees of pre-booked events such as weddings or funerals at the church on The Street, pre-booked events and gatherings at Grittleton House, also at The Neeld Arms pub and the Village Hall on The Street. Also, I am concerned for emergency vehicles – police, ambulances and fire engines – needing to make their way through or attend a situation within the village, unhindered by congestion on The Street. Abnormal Indivisible Loads passing through Grittleton would do so at a slow pace, thereby obstructing use of The Street by other vehicles for some while.	The Applicant refers to its response to Reference ID RJ-001.
RJ-007	Transport and Access	Traffic Impacts	I mentioned in my oral submission having witnessed chaotic scenes	The Applicant refers to its response to Reference ID RJ-001.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			on The Street, particularly bad when traffic using sat nav is unofficially diverted from the M4 - vehicles coming from opposing directions, attempting to pass through Grittleton are obstructed by parked vehicles. Vehicles mount the kerbs at the side of The Street, drive along the pavements and dash for a gap in an effort to get through. Typically, unofficial diversions from the M4, such as described, occur several times each year. On one such occasion within the last twelve months, traffic approaching Grittleton crossroads from The Gibb queued from Lime Kiln corner on The Gibb to Grittleton. Combined with traffic loads generated by the proposed project, problems caused by situations such as this would be exacerbated. I urge the Examining Authority to form the view that designation of The Street, Grittleton as an access to the proposed contractor's	

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			compound on the east side of Grittleton village and as part of the construction route to the "Cable Route Corridor" access point, also on the east side of Grittleton village, in particular, use of The Street by Abnormal Indivisible Loads, is not appropriate, even with mitigation measures mentioned by the Applicant in place.	
Andrew Pivars REP1-196				
AP-001	Transport and Access Socio-Economics, Tourism and Recreation	Traffic Delays and Impact on Business	I do not feel that my original concerns have been fully or adequately addressed. I would therefore like to provide further clarification and request that the following points are given more detailed consideration. Firstly, the proposals have a direct and tangible impact on my business operations. My work involves regular travel between multiple locations to clients premises in my role as a farrier. The disruption to local traffic works during periods of construction is inevitably	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. This included the capacity of local roads and infrastructure to accommodate construction vehicles. The assessment concludes that the level of construction traffic associated with the Scheme is unlikely to

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			unmanageable, evidence of which is regularly seen when there are closures to access roads around the M4. Closures to any feeder routes to the main motorways leads to grid lock for miles. In my professional role, animal welfare is key and I remain unconvinced that the proposals have outlined how to circumvent these issues. Having spoken to many local residents this is a view shared by many small business owners who worry about our future due to the Lime Down proposals. As a registered farrier with Farriers Registration Council (FRC) - (a statutory corporate body established by Parliament under the Farriers (Registration) Act 1975) I follow and adhere to the practising standards set out for the protection of equine and owners. As a registered business I follow strict health and safety measures to ensure the safety of myself, employees, clients and those around me. Set out within	materially affect road safety on links within the Study Area, and no significant adverse effects on accident risk are anticipated. The assessment additionally concludes that with appropriate mitigation such as the CTMP in place, there would be no significant adverse impacts on the local highway network during the construction, operation and maintenance, and decommissioning phases of the Scheme. Construction vehicle movements will be managed through a Construction Traffic Management Plan. An Outline CTMP [REP1-112] has been prepared and submitted with the DCO application. The aim of the CTMP is to ensure that the effect of the construction phase on the local highway network is minimised. The Outline CTMP [REP1-112] sets out measures to coordinate construction deliveries by HGVs to arrive and depart between 09:30 and

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			the FRC guidelines to owners, a safe working area for both farrier and horse free of distractions should be provided. There is no doubt that the development of large scale solar farms will prevent my ability to provide a service safely in the surrounding fields. This work is essential to the welfare of these horses in both the long-term development of the horse and the short term in occasions when first aid is required. Any increase in traffic congestion or delays will significantly affect my ability to meet scheduled commitments, maintain reliable service, and ensure continuity of care. In addition, there are clear animal welfare considerations. Horses require consistent daily care, including exercise, feeding, and monitoring. Delays caused by traffic or restricted access to bridleways may compromise the standard of care. This is especially	16:30 on weekdays where possible, to avoid peak network hours of 08:00–09:00 and 17:00–18:00. On weekends HGV deliveries will be restricted to 09:30-12:30 on Saturdays, with no HGV deliveries on Sundays. It also includes a community liaison element to keep local communities informed about the construction process and to provide a contact for feedback should any issues arise. Compliance with the CTMP will be monitored by the Developer, Contractor and Wiltshire Council as local highway authority. The preparation, approval and implementation of the final CTMP, 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.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			critical where time-sensitive care is required.	
AP-002	Ecology and Biodiversity	Wildlife Impact	I would also like to raise concerns regarding ecology and flood risk. Any development or changes to land use have the potential to disrupt local habitats, wildlife corridors, and biodiversity. It is important that a thorough ecological assessment is undertaken, with appropriate mitigation measures clearly evidenced.	Potential impacts on ecology and biodiversity are fully assessed in ES Volume 1, Chapter 9: Ecology and Biodiversity [REP1-015] . The assessment 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. With identified embedded and additional mitigation measures in place, the assessment concludes that no significant adverse effects on ecology and biodiversity are anticipated as a result of the Scheme, with the exception of ground-nesting birds of open habitats, and hedgerows. Residual significant adverse effects on these receptors are anticipated at a local-level of geographical importance only for skylark and hedgerows, and at

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				site level for other ground-nesting bird species.
AP-003	Ecology and Biodiversity	Wildlife impact	Potential impacts on ecology and biodiversity are fully assessed in ES Volume 1, Chapter 9: Ecology and Biodiversity (Rev 2) [REP1-015]. The assessment 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. With identified embedded and additional mitigation measures in place, the assessment concludes that no significant adverse effects on ecology and biodiversity are anticipated as a result of the Scheme, with the exception of ground-nesting birds of open habitats, and hedgerows. Residual significant adverse effects on these receptors are anticipated at a local-	A detailed flood risk assessment has been submitted with the Application. ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [REP1-017] and the ES Volume 3, Appendix 11-1 to 11-9: Flood Risk Assessment and Drainage Strategy [REP1-037 to REP1-054] assess flood risk from fluvial, surface water, groundwater, sewer, reservoir and drainage sources. The Scheme retains permeable ground across the Solar PV Sites. Solar PV panel areas drain to ground and are managed through secured soil and vegetation controls. Runoff from impermeable infrastructure will be attenuated and controlled. Construction-phase safeguards, including drainage protection, pollution prevention, sediment management and soil compaction controls, are secured through

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			level of geographical importance only for skylark and hedgerows, and at site level for other ground-nesting bird species.	the Outline CEMP [REP1-096] and associated DCO Requirements. These safeguards address the concern that drainage patterns, ground permeability or watercourses could be adversely affected.
AP-004	Other Environmental Matters	BESS safety	In addition, I remain concerned regarding fire risk, potential toxic hazards,	The Applicant confirms that robust fire safety measures are inherent in the BESS design plans to fully mitigate any potential impacts on agricultural land and livestock. The Applicant has submitted an Outline BSMP [REP1-110] which has been prepared for the Scheme using guidance from Dorset and Wiltshire Fire and Rescue Service and incorporating recommendations of the National Fire Chiefs Council. The safety objectives for the design of the BESS site are listed in Section 2.4 of the Outline BSMP [REP1-110] . The Outline BSMP [REP1-110] has been amended at Deadline 1 to fully accommodate the latest BESS safety requirements contained in NFPA 855 (2026) ensuring that any credible risks associated with battery storage

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				are either prevented or fully mitigated if a BESS failure occurs. As now mandated under NFPA 855 (2026) the Applicant will only be able to select a BESS system that has undertaken Large Scale Fire Testing (LSFT). At the detailed design stage, the selected BESS LSFT data will be leveraged to fully inform inputs for risk assessment tools which will be utilised together with detailed consequence modelling to provide a comprehensive site operations and emergency response safety audit, this is stipulated in the Outline BSMP [REP1-110] pre-construction requirements (Section 6). The Applicant has also committed to commissioning an additional Plume Analysis Study at the detailed design stage as stipulated in Section 5.5.9 of the Outline BSMP [REP1-110] and secured through the DCO: “<i>..at the detailed design stage a BESS system and site specific Plume Analysis study will be conducted to assess the</i>

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				<i>environmental impact of a site incident to sensitive receptors within a 1 km radius. Toxic gas emissions to sensitive receptors must be below relevant public health exposure limit guidelines when the battery system of a BESS is fully consumed (burnt out), production of Particulate Matter (PM) and a visibility impact assessment on any transport links within a 1 km radius of the BESS area will also be included. The ERP produced at the detailed design stage (template outlined in Section 5.4.4) will incorporate all necessary emergency response procedures and actions based upon thermal runaway test data supplied by the BESS system provider."</i> The Applicant can confirm that outdoor workplaces such as stables, grazing areas, arable farmland, etc. can be included as sensitive receptors under NFCC guidance if they are located within the 1 km radius of the BESS area.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				The Applicant also commissioned a BESS fire emissions assessment (as detailed in ES Volume 3, Appendix 15-2: BESS Fire Emissions Modelling [EN010168/APP/6.3 (Rev 2)]) to ensure the selected BESS area would have no significant off-site impacts if credible BESS failure scenarios occurred. The study has been undertaken using professional judgement in the absence of specific regulatory guidance, and adopts a conservative, worst case approach throughout. The assessment demonstrates that, even under worst case assumptions, a BESS fire would not result in significant effects on human health or safety. The modelling assumes: • Worst case BESS fire locations within the BESS area closest to sensitive receptors; • Worst case release height, temperature and plume parameters; and

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				• Use of five years of hourly meteorological data, with the maximum predicted concentration extracted at each receptor, assuming the fire coincides with the poorest dispersion conditions. Given the inherent uncertainty in available BESS fire emissions data, a sensitivity test was also undertaken whereby emission rates were doubled. Even under this highly conservative sensitivity test, predicted concentrations remained well below the relevant health-based thresholds. Six worst case BESS fire locations (i.e. locations within the BESS Area closest to sensitive receptors) have been modelled as depicted in ES Volume 2, Figure 15-5: BESS Fire Emissions Study Area [APP-166], Receptors and Modelled BESS Locations. The Concentrations of carbon monoxide (CO), formaldehyde, hydrogen chloride (HCl), hydrogen cyanide (HCN),

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				hydrogen fluoride (HF), ammonia (NH₃), nitrogen dioxide (NO₂) and particulates from a potential BESS fire have been modelled using an air quality dispersion model to determine the likely effects on human health. A high-level visibility assessment has also been undertaken using the modelled particulates results to determine the effect of BESS fire emissions on visibility on the local road and rail network to inform the Outline BSMP [REP1-110]. ES Volume 3, Appendix 15-2: BESS Fire Emissions Modelling [APP-239] concludes that there would be no significant air quality effects as a result of a BESS fire incident and visibility issues were not predicted.
AP-005	Soils and Agriculture	Agricultural land use	and the loss of agricultural land.	The primary agricultural use of the land within the Solar PV Sites will cease, however land beneath the panels will remain in-situ. No agricultural land will be lost. Reverting the land from arable cultivation to grassland is anticipated to result in

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				beneficial effects to soils within the Solar PV Sites, as noted in ES Volume 1, Chapter 17: Soils and Agriculture [APP-069] , as well as benefits to other agricultural land without the Solar PV Sites, as highlighted in the Outline LEMP [APP-283] .
AP-006	Other Environmental Matters	Fire risk and flooding	Any proposal that introduces increased fire risk, whether through construction, operation, or associated infrastructure; must clearly demonstrate how such risks will be prevented and managed, particularly given the proximity to rural agricultural land and livestock.	The Applicant has responded to this comment under Reference ID AP-004.
AP-007	Hydrology, Flood Risk and Drainage	Contamination	The potential for toxic substances, emissions, or runoff also raises serious questions about the safety of animals, land, and water sources.	Risks to receptors such as human health, soils, ecology and water resources are considered in ES Volume 1, Chapter 19 Ground Conditions [REP1-027] and in the associated Appendices [REP1-065 to REP1-080] . Mitigation to ensure protection of receptors potentially impacted by the scheme is presented in the Outline CEMP [REP1-096] . Further to this, ground

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				investigation will be undertaken prior to the commencement of the construction phase to better understand ground conditions and hydrogeology on and below the scheme, allowing for refinement of those risk assessments. The Outline OEMP [REP1-098] describes the measures that will be taken during the operation of the solar park to ensure that soil and groundwater is no contaminated by activities undertaken in maintenance of equipment within the Scheme. From a hydrology and water resources perspective, the potential for contaminated runoff to affect animals, land or water sources is addressed through the Outline CEMP [REP1-096], Outline OEMP [REP1-098], WFD Assessment [REP1-094] and the ES Volume 3, Appendix 11-1 to 11-9: Flood Risk Assessment and Drainage Strategy [REP1-037 to REP1-054].

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				These documents secure measures to protect surface water and groundwater receptors, including pollution prevention controls, watercourse buffers, drainage management and incident response measures. Where relevant, BESS and substation drainage and containment arrangements are also addressed through the Firewater Containment and Drainage Strategies [REP1-124 and REP1-125] .
AP-008	Socio-Economics, Tourism and Recreation	Local businesses	Furthermore, the permanent loss or degradation of agricultural land would have a detrimental impact on local farming viability and the wider rural economy, as well as reducing available grazing and land used for equestrian businesses that I rely on.	The primary agricultural use of the land within the Solar PV Sites will cease, however land beneath the panels will remain in-situ. No agricultural land will be lost. Reverting the land from arable cultivation to grassland is anticipated to result in beneficial effects to soils within the Solar PV Sites, as noted in ES Volume 1, Chapter 17: Soils and Agriculture [REP1-025] , as well as benefits to other agricultural land without the Solar PV Sites, as highlighted in the Outline LEMP [APP-283] .

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				A majority of the agricultural land within the Solar PV Sites is in arable use and therefore not relied upon for grazing horses. The assessment of impacts to the agricultural industry in ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068] has determined a worst-case long-term loss of up to 20 full-time equivalent jobs as a result of direct impacts to farm holdings on the Scheme, and resultant indirect effects to suppliers and downstream businesses.
AP-009	Socio-Economics, Tourism and Recreation	Local businesses Traffic routes	Finally, I would emphasise that my role falls within the scope of essential services relating to animal care. As such, any disruption to access routes or travel reliability has broader implications beyond personal inconvenience, potentially affecting the welfare of animals under my responsibility.	The Applicant notes this comment and has responded under Reference IDs AP-001 to AP-008.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
AP-010	Socio-Economics, Tourism and Recreation	General remarks	I would ask that these points are reviewed in more detail and that the impact on equestrian activities, rural businesses, animal welfare, ecology, and flood risk is more thoroughly assessed. Where possible, I am happy to provide further information or evidence to support these concerns.	The Applicant notes this comment and has responded under Reference IDs AP-001 to AP-008.
AP-011	Hydrology, Flood Risk and Drainage	Flood Risk	Furthermore, alterations to drainage patterns, ground permeability, or watercourses may increase the risk of surface water flooding in surrounding areas. Given the rural nature of the area and existing pressures on drainage infrastructure, I request that a detailed flood risk assessment is reviewed and that robust safeguards are put in place.	A detailed flood risk assessment has been submitted with the Application. ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [REP1-017] and ES Volume 3, Appendix 11-1 to 11-9: Flood Risk Assessment and Drainage Strategy [REP1-037 to REP1-054] assess flood risk from fluvial, surface water, groundwater, sewer, reservoir and drainage sources. The Scheme retains permeable ground across the Solar PV Sites. Solar PV panel areas drain to ground and are managed through secured soil and vegetation controls. Runoff from impermeable infrastructure will

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				be attenuated and controlled. Construction-phase safeguards, including drainage protection, pollution prevention, sediment management and soil compaction controls, are secured through the Outline CEMP [REP1-096] and associated DCO Requirements. These safeguards address the concern that drainage patterns, ground permeability or watercourses could be adversely affected.
Christian de Coulon REP1-199				
CDC-001	Socio-Economics, Recreation and Tourism	Local businesses	I would like to stress the real threat this will have on the hospitality businesses and tourism industry in the area	The Applicant refers to Table 2-1 in the Applicant Response to Local Impact Report [EN010168/EXAM/9.21], submitted at Deadline 2, where the Applicant responds to queries regarding the impacts to hospitality and tourism within the area. The assessment in ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068] identifies a peak temporary loss of 50 FTE jobs in tourism-dependent industries

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				during construction. This is not considered significant as this accounts for less than 0.7% of industry jobs within the 5 km Study Area (based on Business Registry and Employment Survey 2023 information).
Colin Richard Wootton REP1-201				
CRW-001	Hydrology, Flood Risk and Drainage	Flood Risk	Since my previous submissions to the Planning Inspectorate I have become aware of the experience and knowledge of local residents who have observed the regular patterns of flooding over many years. I am very concerned that known flood risk points such as Norton would be far more frequently affected by more severe flooding as a result of the increased runoff from panels and infrastructure sites. Existing flooding often renders local roads impassable for residents and the local services on which we all rely, including the emergency services.	The Applicant acknowledges the concern regarding Norton and existing flooding of local roads. The submitted assessment considers whether the Scheme would materially increase flood risk to downstream receptors, including roads and settlements. The panelled areas remain permeable and are not positively drained to watercourses. This approach is consistent with NPS EN-3 paragraph 2.10.84 and published research which identifies vegetation cover, bare ground, compaction, surface roughness, slope and hydraulic

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				connectivity as the controls on runoff response from solar arrays. At Lime Down, those risk factors are controlled through permanent ground cover, soil protection, wet weather working controls, compaction remediation, permeable tracks and retained overland flow routes. These measures are secured through the Outline CEMP [REP1-096], Outline OEMP [REP1-098] and Outline SRMP [APP-280]. Runoff from impermeable infrastructure will be attenuated and controlled through the ES Volume 3, Appendix 11-1 to 11-9: Flood Risk Assessment and Drainage Strategy [REP1-037 to REP1-054]. The Scheme would not materially increase flood risk to Norton or local services using the road network.
CRW-002	Transport and Access	Construction traffic	Regarding traffic and the condition of roads within the proposed site area, answers given by IGP during the ISH on 22/04/26 confirmed that 'Highway Improvements' were intended only to facilitate their	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 the highway and verges during the construction

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			HGV traffic during the construction phase. This calls into question the condition of the roads and lanes in the site area for normal traffic including agricultural and light commercial vehicles, buses, cars, cycles, horses and pedestrians. Our local roads are fragile and potholed already without the additional wear and tear of heavy construction vehicles. I object that there is apparently no provision in the application to repair and restore local roads to their proper condition when construction is completed. I also object that many of the proposed 'Highway Improvements' will undoubtedly affect views and landscape with the removal of ancient hedgerows.	period. The details of these surveys will be confirmed as part of the Final CTMP. The proposed mitigation within the highway improvement area on Alderton Road is shown in Annex I of ES Volume 3 Appendix 13-1: Transport Assessment [REP1-057]. These proposals avoid the requirement to remove hedgerow. Road widening undertaken in the Cotswold National Landscape (CNL) will use appropriate materials, such as conservation kerbs where practicable, and subject to the technical approval of the highway authority. Conservation kerbs are designed for environmentally sensitive areas and provide a high-quality aesthetic finish. As set out above, the proposed Highway Improvements do not necessitate the removal of any sections of hedgerow.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				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 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. A Hedgerow Removal Plan showing anticipated permanent hedgerow losses is provided in the Outline EPMS [REP1-106].

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
CRW-003	Transport and Access	Traffic Impacts	As a volunteer coordinator for the charity Malmesbury and District LINK, I am increasingly concerned about the charity's ability to transport often frail and elderly patients to medical appointments across the proposed site during the construction phase, which it appears may be considerably longer than the proposed 2 years, noting:	The Applicant makes note of this comment. All routes will remain open during the construction phase. As such, no significant adverse effects to access to medical or care services is anticipated.
CRW-004	Construction and Decommissioning	Construction phase	That a contributor to the OFH on 21/04/26 with experience of working on Solar development projects expressed significant doubts about the length of the 2 year construction period, citing smaller projects which had exceeded similar timescales.	Please refer to reference ID CD-13 in the Applicant's Response to Relevant Representations (Part 2) [REP1-117] which addresses this point. In summary, a 24-month construction programme has been calculated as worst case based on industry knowledge. Further, the 24-month construction programme is standard practice for schemes of a similar scale.
CRW-005	Construction and Decommissioning	Construction phase	That discussion during the ISH on 22/04/26 appeared to highlight uncertainties regarding the commencement of construction of	Section 3 of the Outline CEMP [REP1-096] states that works during the construction phase will be phased and staggered across the Solar PV Sites and Cable Route Corridor to

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			different sectors of the proposed development.	reduce impacts on environmental receptors, to reduce the peak number of construction workers requiring access to local amenities and to reduce the peak intensity of onsite works. Specific details will be confirmed in the detailed Construction Environmental Management Plan which will be prepared for the construction phase of the Scheme. At Deadline 1, the Applicant provided amendments to Requirement 2 of the Draft DCO [REP1-007] for the provision of a construction phasing plan to Wiltshire Council before construction can commence.
CRW-006	Other Environmental Matters - Major Accidents and Disasters Ground Conditions	BESS Safety Contamination	1. I am increasingly concerned about the risks associated with large BESS installations and the likely outcome of fires. It seems that BESS fires cannot be extinguished but only left to burn out while attempts are made to prevent the spread to neighbouring units. This, I understand, is highly likely to result in very	The Applicant acknowledges that a potential BESS fire would result in emissions of airborne pollutants. The assessment presented in ES Volume 3, Appendix 15-2: BESS Fire Emissions Modelling [APP-239] has considered these emissions using a conservative dispersion modelling approach. The results of the assessment demonstrate that predicted concentrations of all

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			significant levels of both airborne toxins and toxic groundwater. The latter could, I understand, risk contamination of the underlying aquifer from which drinking water is extracted.	modelled pollutants at relevant receptors are well below the applicable Acute Exposure Guidance Levels (AEGs), which are internationally recognised health-based thresholds for short-term exposure. These results indicate that any effects associated with airborne emissions would be limited to short-term, transient conditions and would not give rise to significant adverse effects on human health. While it is recognised that BESS fires can generate emissions over the duration of an incident, such events are very low probability and short duration in nature, and the modelling has been undertaken using conservative assumptions to characterise a realistic worst-case scenario. The assessment demonstrates that, even under these assumptions, airborne pollutant concentrations reduce rapidly with distance from the source due to dispersion and dilution.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				On this basis, the assessment does not identify a risk of “very significant levels of airborne toxins” affecting surrounding receptors. The conclusions are supported by the detailed dispersion modelling undertaken for the Scheme and are considered robust and proportionate for the assessment of potential air quality effects. From a water environment perspective, the relevant issue is whether contaminated firewater or incident runoff could reach groundwater or surface water receptors. This is addressed through the Firewater Containment and Drainage Strategies [REP1-124 and REP1-025], the Outline BSMP [APP-286] and the Outline CEMP [REP1-110]. The BESS drainage system will be capable of isolation and containment during an incident. Contained water would be tested and removed for appropriate

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				disposal where required. The Scheme does not rely on uncontrolled discharge of contaminated firewater to the underlying aquifer.
CRW-007	Other Environmental Matters - Major Accidents and Disasters Hydrology, Flood Risk and Drainage	BESS Safety Water resources	I question whether a) sufficient water supply would be available for cooling and b) containment of contaminated water would be adequate, particularly in the possible event of fire spread to multiple BESS modules.	The availability of firefighting water and the containment of contaminated water are addressed through the Outline BSMP [REP1-110] and the Firewater Containment and Drainage Strategies [REP1-124 and REP1-125]. The final BESS fire safety design and water supply arrangements will be developed with the Fire and Rescue Service at detailed design stage. The containment strategy is based on credible incident scenarios and includes drainage isolation so that potentially contaminated runoff can be retained, tested and removed for appropriate disposal. The Scheme would not rely on discharge of contaminated firewater to ground or watercourses.
CRW-008	Other Environmental Matters - Major	BESS Safety	I also object strongly to the possibility of significant quantities of airborne toxins being released in	The Applicant acknowledges that a potential BESS fire would result in emissions of airborne pollutants. The

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
	Accidents and Disasters		close proximity to homes and the villages and towns in this area. The 40th anniversary of the Chernobyl nuclear accident should be a reminder of the unpredictable spread of contamination, on any scale. I object that I have not seen anything in the proposal which provides any reassurance, warning or support for affected residents in the event of an incident.	assessment presented in ES Volume 3, Appendix 15-2: BESS Fire Emissions Modelling [EN010168/APP/6.3 (Rev 2)] has considered these emissions using a conservative dispersion modelling approach. The results of the assessment demonstrate that predicted concentrations of all modelled pollutants at relevant receptors are well below the applicable Acute Exposure Guidance Levels (AEGLs), which are internationally recognised health-based thresholds for short-term exposure. These results indicate that any effects associated with airborne emissions would be limited to short-term, transient conditions and would not give rise to significant adverse effects on human health. While it is recognised that BESS fires can generate emissions over the duration of an incident, such events are very low probability and short duration in nature, and the modelling has been undertaken using

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				conservative assumptions to characterise a realistic worst-case scenario. The assessment demonstrates that, even under these assumptions, airborne pollutant concentrations reduce rapidly with distance from the source due to dispersion and dilution. On this basis, the assessment does not identify a risk of “very significant levels of airborne toxins” affecting surrounding receptors. This is consistent with published evidence. For example, a literature review of BESS fires undertaken by Fire and Risk Alliance, LLC (Assessment of Potential Impacts of Fires at BESS Facilities, 2025) indicates that airborne emissions from such incidents are generally short-lived and localised, while evidence of wider environmental effects on soil and water is limited, and does not indicate widespread or persistent contamination.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				From a hydrology and water resources perspective, the relevant issue is whether a BESS incident could generate contaminated firewater, suppression water or incident runoff capable of reaching surface water, groundwater or the underlying aquifer. This is addressed through the Firewater Containment and Drainage Strategies [REP1-124 and REP1-125], the Outline BSMP [REP1-110], the Outline CEMP [REP1-096] and the operational management controls secured for the Scheme. The BESS drainage system will be capable of isolation and containment during an incident. Potentially contaminated water would therefore be retained, tested and removed for appropriate disposal, rather than being discharged uncontrolled to ground, watercourses or groundwater. This provides the relevant hydrology and water quality safeguard in the event of an incident.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				Resident warning, emergency response and incident management would be led through the fire safety and emergency planning arrangements for the BESS, in consultation with the Fire and Rescue Service at detailed design stage. Those matters sit primarily within the battery safety and major accidents framework, rather than the flood risk and drainage assessment.
CRW-009	Soils and Agriculture	Food Security	5) I am increasingly concerned that the issue of agricultural land use, particularly BMV land, has not apparently been properly assessed in identifying the proposed site for solar generation, as discussed during the ISH on 22/04/26. I strongly object to the loss of productive agricultural land at a time when our national food supply is already over reliant on imports, global markets and uncertain supply chains.	The primary agricultural use of the land within the Solar PV Sites will cease, however land beneath the panels will remain in-situ. No agricultural land will be lost. As stated in ES Volume 3, Appendix 17-1: Agricultural Land Classification and Soil Resource Survey Report [REP1-063] approximately two-thirds of the land within the Solar PV Sites is in Subgrade 3b and Grade 4, which is not considered to be among the Best and Most Versatile agricultural land. The UKRI's Roadmap for Resilience: A UK Food Plan for 2050, addresses

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				future food security and self-sufficiency, which it notes would be achievable "but only with coordinated policy on production, diets and land use." The three core principles for the UK to become self-sufficient are: resilient agricultural production, which includes reducing livestock numbers and supporting farm diversification; integrated land use to sequester carbon and reduce agricultural emissions; and changing dietary choices, namely consuming less meat. The Applicant does not consider that cessation of arable production on land that is a majority moderate to low quality agricultural land in Subgrade 3b and Grade 4 would significantly affect the UK's ability to become self sufficient in food production.
CRW-010	Noise and Vibration	Construction traffic noise	Further to my previous comments on noise and HGV traffic I was appalled to hear a resident who spoke at the OFH meeting on 21/04/26 reporting how	The Applicant confirms that at no stage has it been communicated to any party that they would need to leave or move out of their home during any phase of the Scheme,

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			representatives of IGP suggested that they should move out of their property if they would be inconvenienced by noise or construction traffic.	including construction, operation, and decommissioning. Construction noise, as reported in Table 14-18 of ES Volume 1, Chapter 14: Noise and Vibration [REP1-021] , is well below any temporary rehousing threshold (defined in Annex E of BS5228 Code of practice for noise and vibration control on construction and open sites).
CRW-011	Community benefit	Residential properties	This obviously raises serious questions about the attitude of the applicants to local residents and also provision of compensation for displaced residents if relocation became necessary. It also became apparent at the OFH that some residential property within the proposed scheme had not even been identified by IGP, which in my opinion is a disgraceful omission.	The Applicant clarifies that the Scheme does not require the relocation of any residents, nor will any individuals be displaced from their homes. All relevant residential receptors have been identified and during the formal stages of the project and fully assessed in the ES [APP-052 to APP-265] .
Dr Annemarie Farrington REP1-197				
DAF-001	Air Quality	Equine impact	The proposed large-scale solar development adjacent to equine grazing presents a material risk of clinically significant respiratory	An assessment of the effects of construction activities on air quality is provided in ES Volume 1, Chapter 15: Air Quality [REP1-023] . The

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			compromise in horses bred and managed for elite Thoroughbred performance. Construction activity will generate respirable airborne particulate matter, including dust and crystalline silica arising from soil disturbance, excavation, and heavy vehicular movement. In high-value equine populations, even subclinical lower airway inflammation is clinically relevant, with well-established effects on performance and future racing potential.	assessment concludes that, with embedded mitigation measures in place, construction-phase air quality effects as a result of the Scheme, including potential health effects from increased exposure to particulates, would not be significant for any receptors within the relevant study areas. As indicated in ES Volume 3, Appendix 15-1: Construction Dust Methodology and Assessment [APP-238], the highest level of mitigation measures have been proposed, in accordance with best practice guidance. These measures are set out in the Outline CEMP (Rev2) [REP1-096] and the Outline CTMP [REP1-112]. These include measures such as dust suppression, site management controls, routing and scheduling of construction traffic, and management of plant and machinery. The preparation, approval and implementation of detailed construction management plans, substantially in accordance with the

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				outline plans, are secured through Schedule 2 of the Draft DCO [REP1-007], ensuring that air quality impacts during construction are appropriately controlled. The Applicant recognises that animals, including horses, can be sensitive to dust and construction activity. The management measures described above are specifically designed to minimise dust at source and reduce the potential for construction related emissions to affect nearby receptors, including equine facilities. It should also be noted that where construction dust emissions occur, these are typically dominated by coarse particles (greater than 10 µm diameter) which tend to settle relatively quickly, meaning they are typically associated with localised dust soiling effects rather than widespread respiratory exposure. It tends to be fine particulate matter (PM2.5, i.e. particles smaller than 2.5

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				µm diameter) which is of most concern for health. As set out in the IAQM Guidance on the Assessment of Dust from Demolition and Construction, the proportion of PM_{2.5}, which penetrates deeper into the respiratory system, is typically low, with PM_{2.5} generally comprising around 10% of PM₁₀ (particles smaller than 10 µm diameter) for construction activities. On this basis, the primary risk associated with construction dust is typically temporary nuisance (e.g. dust deposition) at close distances to the source, rather than significant adverse effects on respiratory health. The embedded mitigation measures, including dust suppression, site management controls and monitoring, are specifically designed to minimise all potential adverse effects associated with dust emissions, so that they are not significant. The Applicant considers that the Environmental Statement has fully

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				assessed the impacts of the Scheme on all receptors. The Applicant is committed to ensuring impacts on equestrian facilities can be mitigated wherever practicable, and therefore is undertaking, and encourages further, engagement with relevant stakeholders through the DCO process.
DAF-002	Air Quality	Equine impact	Peer-reviewed evidence demonstrates that inhalation of respirable dust induces neutrophilic airway inflammation, mucus accumulation, and reduced pulmonary function, with severity closely associated with exposure levels (Couëtil et al., 2016; Ivester et al., 2014). Importantly, even short-term exposure in susceptible horses may result in persistent airway inflammation, airway sensitisation, and sustained impairment of respiratory function, with potential for long-term or irreversible effects on athletic capacity. Given the horse's high minute ventilation, particularly during exercise,	The Applicant has provided a response to this in the above response (Reference ID DAF-001).

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			inhaled particulate dose is substantially amplified compared to humans. From a reproductive perspective, pregnant mares represent a particularly sensitive cohort. Maternal respiratory compromise and systemic inflammation associated with inhalation of respirable dust may adversely affect oxygen delivery and physiological stability during gestation. In late pregnancy, where fetal growth and oxygen demand are maximal, even mild reductions in pulmonary function or chronic low-grade inflammation may have implications for fetal development and neonatal viability	
DAF-003	Ecology and Biodiversity	Equine impact	Additionally, environmental stressors may influence endocrine responses in pregnant mares, with potential downstream effects on foal health and early development. While such effects may be subclinical, they are of clear relevance in high-value breeding	The Applicant notes this comment

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			populations where optimal maternal and foal outcomes are critical.	
DAF-004	Ecology and Biodiversity	Birds	The potential for avian mortality associated with large-scale solar installations also raises secondary biosecurity considerations in equine environments. The presence of bird carcasses within grazing land may pose a risk to horses through contamination of pasture with pathogenic organisms, including Clostridium botulinum, which is recognised as a cause of botulism in horses following ingestion of contaminated forage or carrion material.	The current UK guidance on the risk posed to birds from solar panels indicates that potential risk of collision is low, including the conclusions of a 2016 Natural England literature review (NEER012 – Evidence Review of the Impact of Solar Farms on Birds, Bats and General Ecology 2016). The principal recommendation of this guidance is the sensitive location of solar schemes away from large bodies of water or known wetland bird sites (such as estuaries), which has been achieved in the case of this application. Therefore, and in light of the above Natural England literature review, it is not considered that the proposals constitute a significant risk to bird populations through collision or other direct physical harm. Consequently, the Applicant does not accept that there is a significant risk

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				of secondary disease impacts on local livestock from dead birds.
DAF-005	Ecology and Biodiversity	Equine impacts	Horses are highly susceptible to botulinum toxin, and even low-level exposure can result in severe and potentially fatal neuromuscular disease. From a veterinary perspective, the introduction of carcass material into grazing systems therefore represents an additional, avoidable risk to equine health.	The Applicant does not accept that the Scheme presents a significant risk of secondary disease impacts on local livestock from dead birds as set out earlier in the response to DAF-004.
DAF-006	Air Quality	Equine impacts	Sustained exposure to construction-related particulate matter, together with potential biosecurity risks arising from carcass contamination of grazing land—particularly in downwind paddocks and training environments—represents a predictable and avoidable risk to equine respiratory health, reproductive outcomes, performance, and breeding value. Such impacts, even where subtle, are of clear clinical relevance and carry material welfare and economic consequences.	An assessment of the effects of construction activities on air quality is provided in ES Volume 1, Chapter 15: Air Quality [REP1-023] . The assessment concludes that, with embedded mitigation measures in place, construction-phase air quality effects as a result of the Scheme, including potential health effects from increased exposure to particulates, would not be significant for any receptors within the relevant study areas. As indicated in ES Volume 3, Appendix 15-1: Construction Dust Methodology and Assessment [APP-238] , the highest level of

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				mitigation measures have been proposed, in accordance with best practice guidance. These measures are set out in the Outline CEMP [REP1-096] and the Outline CTMP [REP1-112]. These include measures such as dust suppression, site management controls, routing and scheduling of construction traffic, and management of plant and machinery. The preparation, approval and implementation of detailed construction management plans, substantially in accordance with the outline plans, are secured through Schedule 2 of the Draft DCO [REP1-007], ensuring that air quality impacts during construction are appropriately controlled. The Applicant recognises that animals, including horses, can be sensitive to dust and construction activity. The management measures described above are specifically designed to minimise dust at source

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				and reduce the potential for construction related emissions to affect nearby receptors, including equine facilities. It should also be noted that where construction dust emissions occur, these are typically dominated by coarse particles (greater than 10 µm diameter) which tend to settle relatively quickly, meaning they are typically associated with localised dust soiling effects rather than widespread respiratory exposure. It tends to be fine particulate matter (PM_{2.5}, i.e. particles smaller than 2.5 µm diameter) which is of most concern for health. As set out in the IAQM Guidance on the Assessment of Dust from Demolition and Construction, the proportion of PM_{2.5}, which penetrates deeper into the respiratory system, is typically low, with PM_{2.5} generally comprising around 10% of PM₁₀ (particles smaller than 10 µm diameter) for construction activities.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				On this basis, the primary risk associated with construction dust is typically temporary nuisance (e.g. dust deposition) at close distances to the source, rather than significant adverse effects on respiratory health. The embedded mitigation measures, including dust suppression, site management controls and monitoring, are specifically designed to minimise all potential adverse effects associated with dust emissions, so that they are not significant. The Applicant does not accept that the Scheme presents a significant risk of secondary disease impacts on local livestock from dead birds as set out earlier in the responses to both DF-039 and DAF-003.
Erica Boldy REP1-206				
EB-001	Landscape and Visual Soils and Agriculture Ecology and Biodiversity	Agricultural land use Wildlife Impacts	I object to the following proposed development for the negative impact it will have on the local community, the destruction of valuable agricultural land,	The primary agricultural use of the land within the Solar PV Sites will cease, however land beneath the panels will remain in-situ. No agricultural land will be lost. As stated in ES Volume 3, Appendix 17-1:

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			destroying of beautiful wildlife/habitats.	Agricultural Land Classification and Soil Resource Survey Report [REP1-063] approximately two-thirds of the land within the Solar PV Sites is in Subgrade 3b and Grade 4, which is not considered to be among the Best and Most Versatile agricultural land. Impacts on community cohesion have been considered as part of the assessment of "community identity, culture, influence and resilience" in ES Volume 1, Chapter 18: Human Health [APP-070]. The Applicant has considered how changes to perceptions of rurality, community sense of place, pride, engagement and difference in consideration of importance of different aspects of the Scheme (for example opposing views on harms versus benefits) may lead to a degree of impact to communities. The assessment has considered that this is likely to be up to a minor adverse effect on local communities and thus on residents' mental health and

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				wellbeing. This is not considered a significant effect. Potential impacts on ecology and biodiversity are fully assessed in ES Volume 1, Chapter 9: Ecology and Biodiversity [REP1-015]. The assessment 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 identifies embedded and additional mitigation measures and concludes that, with these measures in place, no significant adverse effects are anticipated on protected and notable species with the exception of ground-nesting birds of open habitats, and hedgerows. Residual significant adverse effects on these receptors are anticipated at a local-level of geographical importance only for skylark and

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				hedgerows, and at site level for other ground-nesting bird species. Measures to ensure potential impacts on habitats and protected and notable species are minimised and ecological enhancements are delivered will be secured via Development Consent Order (DCO) Requirements including the Outline LEMP [APP-283] and the Outline EPMS (Rev 2) [REP1-106].
EB-002	Hydrology, Flood Risk and Drainage	Flood Risk	The proposed development would also increase flood risk and cause long term damage.	The Applicant does not agree that the proposed development would increase flood risk or cause long-term hydrological damage. Flood risk from all relevant sources has been assessed in ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [REP1-017] and ES Volume 3, Appendix 11-1 to 11-9: Flood Risk Assessment and Drainage Strategy [REP1-037 to REP1-054]. The Scheme retains permeable ground across the Solar PV Sites. Solar PV panel areas drain to ground

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				and are not connected to a drainage network. The main potential runoff risk is not the panel surface itself, but unmanaged bare ground, soil compaction, reduced surface roughness and connected flow paths. Those risks are controlled through the Outline CEMP [REP1-096] , Outline OEMP [REP1-098] and Outline SRMP [APP-280] . Runoff from impermeable infrastructure is assessed separately and attenuated.
EB-003	General Remarks	Sentiment	I highly object. I do not support this development and I am concerned for the future of the area.	The Applicant notes this comment.
GDPR-LDSF-030 REP1-209				
GDPR-LDSF-030-001	Ecology and Biodiversity	Wildlife impact	Lots of animals and wildlife will have their homes demolished by solar energy.	Potential impacts on ecology and biodiversity are fully assessed in ES Volume 1, Chapter 9: Ecology and Biodiversity [REP1-015] . The assessment identifies avoidance, mitigation and enhancement measures to address potential impacts on habitats and protected and notable species. It also identifies opportunities for

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				ecological enhancement, including the creation and long-term management of habitats, and delivery of biodiversity net gain. The assessment identifies embedded and additional mitigation measures and concludes that, with these measures in place, no significant adverse effects are anticipated on protected and notable species with the exception of ground-nesting birds of open habitats, and hedgerows. Residual significant adverse effects on these receptors are anticipated at a local-level of geographical importance only for skylark and hedgerows, and at site level for other ground-nesting bird species. Measures to ensure potential impacts on habitats and protected and notable species are minimised and ecological enhancements are delivered will be secured via DCO Requirements including the Outline LEMP [APP-283] and the Outline EPMS [REP1-106].

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				The Scheme is expected to deliver an overall net gain for biodiversity as a result of the cessation of agricultural practices combined with delivery of considerable habitat creation and enhancement measures. This is quantified through the use of the DEFRA published Statutory Biodiversity Metric [REP1-091] with further details provided with the Biodiversity Net Gain Assessment Report [REP1-089] which demonstrates in excess of 10% BNG will result from the Scheme.
GDPR-LDSF-030-002	Cultural Heritage	The Fosse Way	The Roman Fosse Way will be ruined as well. We learnt about the Fosse Way in history, it is very ancient and precious. No one will want to visit it anymore if it is surrounded by giant monster panels.	The potential effects of the Scheme on the Roman Roads (i.e. the Fosse Way), as well as other Roman archaeological assets are fully assessed in ES Volume 1, Chapter 12: Cultural Heritage [APP-064] , supported by detailed technical appendices in ES Volume 3, Appendices 12-1 to 12-7 [APP-219 to APP-231] . Where an adverse effect has been identified to Roman archaeological assets appropriate mitigation is proposed. See Section

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				12.9 of ES Volume 1, Chapter 12: Cultural Heritage [APP-064] for embedded mitigation and Section 12.11 for additional mitigation. An overarching archaeological mitigation strategy is provided in ES Volume 3, Appendix 12.6 Archaeological Mitigation Strategy [APP-230]. Since the design presented at PEIR stage, Field C26, the westernmost part of Field C25, and the majority of Field C13 have been entirely removed from the Order Limits. Solar PV Panels have also been removed entirely from within Fields B1-B5, C24-C25, and C13. A number of fields abutting the Fosse Way within which Solar PV Panels will be erected have had offsets established with their boundaries with Fosse Way, including Fields B6, C10-C12, and C22-C23. Appendix 12.1: Heritage Statement [APP-219] identified that the overall setting and significance of the Fosse Way will remain intact, and

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				the asset will retain its legibility as a roadway within a largely agrarian landscape. Consequently no significant effects were identified to the asset. Likewise, no impact was identified as a result of the Scheme to the Scheduled Romano-British settlement, earthwork enclosure and a section of the Fosse Way, 415m west of Whatley Manor (NHLE reference 1013354).
GDPR-LDSF-030-003	The Applicant	Funding	When you were at school, did you learn about doing the right thing? Well I don't think it is right for anyone to ruin our happy peaceful place just so they can make giant piles of money.	The Scheme aims to help meet national targets for clean energy and net zero targets set out in legislation and policy. The aim is to deliver long term environmental benefit alongside a secure energy supply. The Applicant recognises that both landowners and the local community are key stakeholders. While landowners will receive a lease income, as is normal in any commercial lease agreements, the Scheme also aims to deliver wider benefits, including biodiversity enhancements, opportunities for local supply chain involvement, and onsite and offsite community benefit

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				initiatives, which will be developed in consultation with local representatives.
GDPR-LDSF-030-004	Ecology and Biodiversity	Ecological impact	So many flowers and so much nature will be ruined by the big machines and panels and our fields and animals will die of sadness.	Solar farms, and this Scheme, will not lead to loss of homes for wildlife. The Applicant has conducted surveys, presented in ES Volume 1, Chapter 9: Ecology and Biodiversity [REP1-015], to see what wildlife exists and the current habitat available. This information has been used to design the Scheme, which will be built to increase the space for wildlife, including creating new habitats that will support local animals. The Scheme will do this by planting areas of flowers, trees and bushes so that there will be more of these than before. The Outline Landscape and Ecological Management Plan [APP-283] explains what the Applicant will do to protect the landscape and nature from construction until the Scheme ends, including plans for new planting. The Outline Ecological Protection and Mitigation Plan [REP1-

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				106] explains how the Applicant will protect nature and the environment during construction, while the Statutory Biodiversity Metric [REP1-091] and the Biodiversity Net Gain Assessment Report [REP1-089] shows how the Applicant will make sure the Scheme gives nature more space to thrive.
GDPR-LDSF-030-005	Site Selection and Alternatives	Alternatives	Solar panels are supposed to be on rooftops and buildings not on our beautiful fields that we treasure so much.	The Applicant notes this comment and agrees that it is important that people build small solar schemes for their homes and businesses. The Applicant also agrees with the government's NPS EN-1 for planning which states that small solar schemes should be considered alongside, rather than instead of, large scale solar. Further information can be found in Section 6.3 of the Statement of Need [REP1-085] in the application.
GDPR-LDSF-030-006	Landscape and Visual	Visual impact	The panels will be right next to some of my favourite trees that us children love playing under! Me and my family go on lots of lovely walks that we enjoy so much. Please think about it, all we will	The Applicant has applied a series of buffers which have been embedded into the layout of the Scheme, which includes a 50m offset from the curtilage of residential properties. The Scheme has been designed to

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			see if greyness and that will make me feel, well I can't even describe it. I will feel like a lost and sad shadow, and trust me you don't want almost all the people in North Wiltshire to feel like that.	accommodate adjacent residential properties and infrastructure has been set back to allow separation and space for mitigation. 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 commitments to landscaping measures are delivered and maintained throughout the lifetime of the Scheme.
GDPR-LDSF-030-007	Ecology and Biodiversity	Wildlife impacts	It will also stop the lovely deer that I see all the time running through the fields and think what they'll feel like!	The Scheme design incorporates fencing around the Solar PV Arrays that is permeable to wildlife, with the exception of deer. This means animals (excluding deer only) will be able to freely access habitats within the Solar PV Sites without the need for wildlife gates. In addition, wider buffers are retained around the peripheries of the Solar PV Sites to

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				allow wildlife, including deer, to move between favoured habitats. These measures are described in ES Volume 1, Chapter 9: Ecology and Biodiversity [REP1-015] and detailed in the Outline EPMS [REP1-106]. The preparation, approval and implementation of the detailed Ecological Protection and Mitigation Strategy, substantially in accordance with the Outline EPMS [REP1-106] is secured through Requirement 8 in Schedule 2 of the Draft DCO [REP1-007], ensuring that fencing design and maintenance measures are delivered and maintained throughout the lifetime of the Scheme.
GDPR-LDSF-030-008	Landscape and Visual	Visual impact	It will ruin our beautiful countryside and it will be for 60 whole years, and by that time I will be [redacted]. I do not want to live in a sad grey land until I am old.	An assessment of landscape and visual effects is provided in the Landscape and Visual Impact Assessment (LVIA) presented in ES Volume 1, Chapter 8: Landscape and Visual [APP-060] . The LVIA assesses effects on identified landscape and visual receptors,

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				including residential properties and users of public rights of way, and identifies where significant effects may occur. Mitigation measures to address landscape and visual effects are set out in ES Volume 1, Chapter 8: Landscape and Visual [APP-060], Figure 3-4-1 to 3-4-5.2 Landscape and Ecology Mitigation Plan [REP1-029 to REP1-032] and detailed within the Outline LEMP [APP-283] and the Outline EPMS [REP1-106]. These documents include proposals for new and enhanced planting, retention of existing hedgerows and woodland, and landscape integration measures to reduce visual effects over time. The preparation, approval and implementation of detailed landscape and ecological management plans, substantially in accordance with the Outline LEMP [APP-283] and Outline EPMS [REP1-106], are secured through Requirement 7 and 8 in Schedule 2 of the Draft DCO [REP1-007], ensuring that the

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				identified mitigation measures are delivered and maintained throughout the lifetime of the Scheme.
GDPR-LDSF-030-009	Landscape and Visual	Visual impact	In our area we are for solar, but my teacher said there are lots of different ways of making energy that do not harm farms, animals and our countryside. Why don't we think about solar rooftops and buildings? Or you could ask whoever is in charge of the sea if you could put more wind turbines there.	The Applicant has shown in the Statement of Need [REP1-085] that a cheaper and cleaner energy system will consist mainly of wind and solar power. Both these energy sources work well together and will provide reliable, low-carbon energy while also supporting the move to reduce the UK's dependency on volatile global fossil fuels.
GDPR-LDSF-030-010	The Applicant	Funding	We absolutely hate it if you ruin our countryside forever. Please do not take away something that is so important to us and makes us all so happy, we might have to do a rebellion. Have you read Jack and the Beanstalk? All the giant could think about was money, money, and look what happened to him. Please stop thinking about money, and think about people and animals. My friends and I would never come to where you live and make you sad, so why do you want	When designing the Scheme, the Applicant thought carefully about how it might affect the local community and how people feel. The Applicant understands that some might worry that the countryside could feel less peaceful or different. Some people may think that the Scheme is helpful, while others may think it causes problems. Because of this, some people could feel upset, stressed or worried.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			to make us sad? Please be reasonable, STOP LIME DOWN and save our countryside. I know I am only [redacted] and you probably think only grown-ups are important, but please take my reasons seriously, make them count and I'm counting on you to STOP LIME DOWN.	The Applicant believes that these effects would, overall, not be significant. To help people during the building work, there will also be a community liaison group. This group will: - Listen to people's worries and questions; - Pass information between the builders and the community; - Help solve problems quickly; and - Guide people to mental health support if they need extra help. The group is there to make sure people are heard, informed and supported while the Scheme is being built and operated. If the Scheme goes ahead, there will be a binding legal condition that makes sure the group exists. This is in the Draft DCO [REP1-007], as Requirement 4 in Schedule 2. More information can be found within ES Volume 1, Chapter 18: Human Health [APP-070].

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
Geoffrey Philipps REP1-210				
GP-001	Socio-Economics, Recreation and Tourism Landscape and Visual	PRoWs	The design principles state: "We are exploring the improvement of walking routes". At least 30 people a day use the footpath along the Gause Brook up stream of Corston – This footpath will be significantly impacted by passing along the fence to the development, thereby reducing the enjoyment to the Corston community and others.	The Applicant acknowledges that there will be some significant impacts as a result of the Scheme including socioeconomic effects on users of bridleway MALW54 near Corston and the unsurfaced roads parallel to, and crossing the railway (Cabbage Lane) in Lime Down E both during the construction phase which may be a source of concern for local residents. No significant effects are anticipated to any other route in the Corston area, or at any other phase of the Scheme. The Applicant has committed to ensuring the use of PRoWs is protected as much as possible during construction through the implementation of embedded and additional mitigation measures (such as controlling of HGV movements, signage, banksmen and reinstatement of surfaces once construction works are complete) set out in the Outline CTMP [REP1-112] and Outline PRoWPPMP [REP

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				1-104], secured respectively by Requirements 15 and 16 in Schedule 2 to the Draft DCO [REP1-007]. During the operation of the Scheme, effects on PRow users shall be mitigated through the use of offset buffers to onsite infrastructure, landscape screening planting, biodiversity enhancement planting, and the provision of permissive paths to increase PRow network connectivity. These measures are secured through the Outline LEMP [APP-283] and Outline PRowPPMP [REP 1-104], secured respectively by Requirements 7 and 16 in Schedule 2 to the Draft DCO [REP1-007].
GP-002	Hydrology, Flood Risk and Drainage	Flood risk	The design principles state: "Our Project design will make sure the risk of flooding is not increased anywhere else". Lime Down FAQ states: "no increase in flood risk is expected on or off site, including adjacent communities and downstream settlements". Chapter 11 projects Lime Down D as being predominantly in Flood Zone	The Applicant acknowledges that Gauze Brook has an existing floodplain and that Corston can be affected by flooding. This is not disputed. The issue is whether the Scheme would materially increase flood risk at Corston or at the A429 bridge.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			1 (0.1% annual probability of flooding). Gauze Brook passes through a significant flood plain down stream of Lime Down. In 2025 that flood plain flooded some 17 times. The development of the solar park might be expected to impact the natural workings of the flood plain and in particular to increase the run off and therefore affect the speed at which the water level would rise at times of heavy rainfall. This could overwhelm the A429 bridge in Corston and potentially endanger residential properties in Corston. There appears to be no mitigation provisions in the information provided.	Lime Down D is predominantly in Flood Zone 1, with limited solar PV interaction with the Gauze Brook floodplain. This has been assessed in FRA Appendix 11-6: Lime Down D / BESS [REP1-047]. Solar PV panels within flood risk areas are flood-compatible and raised above ground. They would not materially reduce floodplain storage or obstruct flood flows. Runoff from impermeable infrastructure will be attenuated and controlled. The concern that panels would increase the speed at which water levels rise is not supported by the assessment. Solar panels can redistribute rainfall locally, but that does not automatically create additional connected runoff to Gauze Brook. Published research identifies vegetation cover, soil compaction, surface roughness, slope and hydraulic connectivity as the controls on runoff response. Those variables are controlled at Lime Down through

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				permanent ground cover, soil protection, compaction remediation, permeable tracks and retention of overland flow routes secured through the Outline CEMP [REP1-096] , Outline OEMP [REP1-098] and Outline Soil Resources Management Plan [APP-280] . The Scheme would not materially increase flood risk at Corston or the A429 bridge.
GP-003	Landscape and Visual	Visual impact	At a public consultation event it was stated that 4.5m high hedges would be used to landscape the panels. There appears no provision for how a 4.5m hedge might be maintained rather than being allowed to grow into a belt of trees which would not provide a visible barrier for walkers on the foot paths.	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] , which includes the management of native hedgerows and hedgerow trees. Post consent a detailed LEMP would need to be provided, substantially in accordance with the Outline LEMP [APP-283] and will be secured through Requirement 7 in Schedule 2 of the Draft Development Consent Order [REP1-007] .

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
GP-004	Construction and Decommissioning	Decommissioning Bond	How will the DCO ensure that decommissioning is properly carried out bearing in mind the developer is a Bermuda based company over which the UK Government has little or no jurisdiction. There is also the potential for the Operating Entity to be sold off during the life of the project, possibly to a single purpose company which can simply be wound up to avoid its obligations. Is there any provision for a percentage of revenues to be placed in a blocked account to provide the funding for decommissioning?	A requirement to decommission the Scheme is set out in Requirement 20 of the Draft DCO [REP1-007]; failing to comply with that requirement would be a criminal offence. The requirement to decommission the Scheme would sit with the owner at the time of decommissioning. Decommissioning is also covered in agreements with landowners, which includes decommissioning securities to cover the cost of decommissioning in the event of any breach by the Applicant or in the event of the insolvency of the Applicant. The amount of such decommissioning security is regularly re valued throughout the lifecycle of the Scheme and topped up if necessary. Decommissioning is secured through Requirement 20 in Schedule 2 of the Draft DCO [REP1-007]. The Applicant has produced an Outline Decommissioning Strategy [REP1-100], submitted with the DCO

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				Application. A final decommissioning strategy will be prepared and agreed with the relevant authorities at that time of decommissioning and will include detailed measures and timescales. These statutory obligations are "attached" to the project itself; if the Scheme is sold, the legal responsibility to decommission passes directly to the new owner or successor in title. Finally, a company cannot be wound up voluntarily if there are outstanding legal or contractual obligations, which would include the decommissioning commitments secured through the DCO.
GP-005	Noise and Vibration	Construction noise	As a resident of [redacted] in Corston I am concerned about the noise both during construction and after commissioning. The noise of pile driving during construction will significantly impact our quality of life and the Db level and frequency of noise from the substation and batteries although it may have a	The Applicant has responded to comments related to noise and vibration in detail in Table 2-12, Section N-01, on Page 778 of the Applicant's Response to Relevant Representations (Part 2) [PDB-004] , where it is explained that an assessment of the effects of the Scheme on noise and vibration is

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			low volume is likely to adversely impact the value of our house that we moved to for our retirement 3 years ago.	provided in ES Volume 1, Chapter 14: Noise and Vibration [REP1-021]. The Applicant understands and appreciates this concern but, with reference to ES Volume 1, Chapter 14 Noise and Vibration [REP1-021], noise levels in Corston, both during construction and operation, will not be significant. With reference to Figure 14-1 Noise Monitoring and Sensitive Receptor Locations [APP-159], receptors R08 and R13 represent locations between Corston and the Scheme, and can therefore be considered indicative of worst-case impacts in Corston. Table 14-18 of ES Volume 1, Chapter 14 Noise and Vibration [REP1-021] shows that average construction levels in these locations are likely to be around 55 dB LAeq which is the level of regular conversation. Additionally, solar PV piling uses small mini-piling rigs which are quieter than the worst-case assumption in ES Volume 1, Chapter 14: Noise and Vibration

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				[REP1-021] and the duration of noise events from such activity would be short. With appropriate mitigation measures as committed to in the Outline Construction Environmental Management Plan [REP1-096], including prior warning to local residents of any noisy works, no significant effects from construction noise or vibration are expected. A noise monitoring programme agreed with Wiltshire Council will be carried out during construction. The preparation, approval and implementation of the Construction Environmental Management Plan, substantially in accordance with the Outline CEMP [REP1-096], is secured through Requirement 13 in Schedule 2 of the Draft Development Consent Order [REP1-007], ensuring that construction noise and vibration are appropriately controlled. In terms of the operational noise, and with reference to the sound power

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				spectra provided in Appendix 14-4 Noise Modelling [REP1-061], only the substation transformers produce a tonal hum and this will not be the dominant sound source in the Corston area. And with absolute noise levels below the existing background, as shown in Table 8 and 9 of Appendix 14-4 Noise Modelling [REP1-061], it is not expected that the Scheme infrastructure will be audible in Corston. The Outline Operational Environmental Management Plan [REP1-098] commits to these low levels. The preparation, approval and implementation of the detailed OEMP, substantially in accordance with the outline plan, are secured through Requirement 14 of Schedule 2 of the Draft Development Consent Order [REP1-007], ensuring operational noise is appropriately controlled throughout the lifetime of the Scheme.
Hannah Marwick REP1-211				

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
HM-001	Site Selection and Alternatives	Assessment	CLAIM 1: The Lime Down site was selected following a comprehensive and transparent assessment of alternatives. Source: IGP Application / Lime Down Solar website Reality: Evidence submitted to the Planning Inspectorate shows that site selection at Lime Down was significantly driven by commercial land agreements with a small number of large landowners, not by a systematic assessment of least-impact locations. - The Site Selection Assessment Report adopted an illogical and inconsistent approach to environmental constraints: sites were not compared against the same criteria, meaning the comparison is unreliable - IGP's own documents acknowledge the process was driven by land agents identifying 'potentially willing landowners with large areas of land. This was commercial	ES Volume 1, Chapter 4: Alternatives and Design Evolution [APP-056] and ES Volume 3, Appendix 4-1: Site Selection Assessment Report [APP-185] detail the staged approach to site selection undertaken by the Applicant. This includes consideration of a range of planning, environmental and operational factors. Although the availability of large-scale land holdings was a consideration, it was not the only consideration in the site selection process as suggested by the respondent. The Applicant does not consider it proportionate to assess all sites in various combinations, or to redraw previously discounted PDAs. It is considered that this goes beyond the policy requirements for the consideration of alternatives. However, the Applicant has further considered whether any of the PDAs could have been redrawn to remove constraints and then combined in order to create new PDAs or

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			availability, not environmental suitability - Closer, less sensitive combinations of land parcels near Melksham were not meaningfully tested, despite potentially offering shorter cable routes and lower landscape harm - The resulting 22km cable route is itself evidence that this is not the most suitable available location; a shorter route to the grid would indicate a better-sited scheme and not affect villages such as Castle Coombe. 4,958 Relevant Representations, 99% opposing, were submitted; the highest number ever recorded for any solar NSIP in England, exceeding Gatwick Airport	"clusters." This is set out in the Technical note on Site Selection Assessment [EN010168/EXAM/9.26]. This further analysis has resulted in three "clusters" of PDAs being considered. However, none of the clusters are considered to be reasonable alternatives for the Scheme. Therefore the conclusions of the Site Selection Assessment Report [APP-185] remain unchanged. The design evolution of the Cable Route Corridor and consideration of alternatives is detailed within ES Volume 1, Chapter 4: Alternatives and Design Evolution [APP-056]. Several factors were considered and the corridor was designed to take a direct route whilst following existing features, such as roads, and avoiding sensitive receptors as far as practicable, such as habitat designations, residential and commercial properties, heritage assets, and a large number of land

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				interests, including private residences and gardens. The Applicant welcomes the submissions received during the Relevant Representation period and has reviewed and provided responses to all submissions in Applicant's Response to Relevant Representations (Part 1) [PDA-009] and Applicant's Response to Relevant Representations (Part 2) (Rev 2) [REP1-117]. Throughout the development process, the Applicant has considered all feedback received. The Consultation Report [APP-022] and its Appendices [APP-023 to APP-051] provide a detailed account of how consultation feedback, including prescribed consultees and public comments, have been considered and, where appropriate, how it has influenced the evolution of the Scheme.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
HM-002	Cumulative and In-Combination Impacts	Assessment	CLAIM 2: Wiltshire is not disproportionately affected by solar development Source: Solar Power Portal 'Wiltshire ideally situated for solar power' Reality: Wiltshire already hosts multiple large solar installations. Lime Down at 500MW would be one of the largest NSIP solar developments in England and would make Wiltshire one of the most solar-industrialised counties in the country. • Existing major sites in the county include Lyneham, Wroughton and Snarlton • Two additional large sites are already approved: Leigh Delamere (50MW) and Red Barn • Lime Down's five individual solar sites would each independently qualify as Nationally Significant Infrastructure Projects in their own right • The combined development footprint - panels, cable route, substations and associated	Consideration of combined effects is an important part of the application. The Applicant has responded to comments relating to cumulative effects in detail on page 806-807 and page 870-871 of the Applicant's Response to Relevant Representations [PDA-009], where it is explained that full and extensive engagement, consideration, assessment and reporting of intra- and inter-project cumulative effects has been undertaken with the conclusions set out within ES Volume 1, Chapter 21 Cumulative and In-Combination Effects [APP-073]. The Applicant reaffirms that ES Chapter 21 Cumulative and In-Combination Effects [APP-073] fully considers each of the existing and proposed solar and BESS schemes shown on ES Figure 21-1 [APP-178] and Figure 21-2 [APP-179]. Cumulative effects have therefore been assessed in accordance with the EIA Regulations and relevant guidance as listed within ES Volume

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			infrastructure, covers approximately 50 square kilometres of North Wiltshire countryside • No equivalent concentration of NSIP-scale solar exists in any other county in England	1, Chapter 21 Cumulative and In-Combination Effects [APP-073].
HM-003	Scheme Description and DCO Process	Planning process	CLAIM 3: Every solar project undergoes an impartial planning process Source: The Political Quarterly Reality: Nationally Significant Infrastructure Projects are determined by the Secretary of State, who can and does override Planning Inspectors' recommendations. Lime Down has generated the most locally opposed response ever recorded in English planning history. • In 2024, Ed Miliband approved the Sunnica Solar NSIP against the Planning Inspector's recommendation to refuse, demonstrating that ministerial priorities can override expert assessment	The weight given to the recommendations of the Planning Inspector and any decision made by the Secretary of State is a matter for the Secretary of State to consider.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			• Wiltshire Council voted 85 – 0 against Lime Down, the clearest possible democratic expression of local opposition; under NSIP rules, it carries no binding weight • 4,958 Relevant Representations were submitted, 99% objecting, exceeding the previous record for any NSIP, including Gatwick Airport's expansion • No statutory consultee offered clear support for the scheme; objections were raised by National Grid, Historic England, Natural England and the Environment Agency • The Planning and Infrastructure Bill proposes further acceleration of developer led outcomes and reduced local oversight	
HM-004	Soils and Agriculture	Land use	B. LAND, FARMING & FOOD SECURITY CLAIM 4: Solar farms use low-value land. Source: Solar Power Portal Reality: Government policy directs that Best and Most Versatile (BMV) agricultural land should be avoided	Please refer to response ID SS-06 and SS-07 in the Applicant's Response to Relevant Representations (Part 2) [REP1-117] which addresses the use of agricultural land and consideration of alternatives. In summary, the Applicant has undertaken an

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			where possible. At Lime Down, the applicant itself acknowledges that approximately 240 hectares, around 33% of the solar PV area is BMV, which it describes as 'significant.' • Natural England has stated that the BMV land assessment methodology is still under discussion, raising questions about whether the true BMV proportion is higher than claimed • The Sunnica Solar NSIP (approved 2024) was subsequently found to include approximately 50% BMV land, far exceeding the developer's initial figure of 4%, demonstrating that applicant BMV assessments cannot be taken at face value • The cable route corridor passes through land that is approximately 75% BMV in some sections • NPS EN-3 (2025) states applicants 'should avoid the use of Best and Most Versatile agricultural land where possible'	appraisal of alternative sites which concludes that there are no more suitable or available locations within 20km of the grid connection at the Existing National Grid Melksham Substation than the proposed location for the Scheme. A sequential approach has been adopted in regard to agricultural land, with lower grade agricultural land considered first before the search area was expanded to higher grades of agricultural land. In terms of the Cable Route Corridor, ES Volume 1, Chapter 4: Alternatives and Design Evolution [APP-056] details the design evolution and the alternatives that have been considered. Several factors were considered and the corridor was designed to take a direct route whilst following existing features, such as roads, and avoiding sensitive receptors as far as practicable, such as habitat designations, residential and commercial properties, heritage assets, and a large number of land

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			compliance with this cannot yet be demonstrated • The NFU has warned that removal of planning protections for BMV land will 'create further instability for those facing compulsory purchase of their land'	interests, including private residences and gardens. The methodology employed for the Agricultural Land Classification survey work undertaken is set out in ES Volume 3, Appendix 17-1: Agricultural Land Classification and Soil Resources Survey Report [REP1-063]. The methodology was agreed in consultation with Natural England and the final observation densities achieved have subsequently been confirmed as acceptable. There were several disputes regarding the quality of the ALC studies at Sunnica, including the reliability of the data, and also whether the presence of irrigation should be accounted for or not. In droughty soils, the ALC guidance at the time noted that land could be upgraded by one grade if a reliable irrigation system was in place. The ALC report discounted irrigation; much of the upgrade to

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				BMV referred to in this comment was due to irrigation being accounted for. Irrigation on droughty, sandy soils is not an issue relevant to Lime Down. The survey methodology and full schedule of soil profile data are provided at ES Volume 3, Appendix 17-1: Agricultural Land Classification and Soil Resources Survey Report [REP1-063] and are supported by photographs of each soil type and laboratory analysis results.
HM-005	Soils and Agriculture	Food security	CLAIM 5: Utility scale solar does not affect food security. Source: Solar Energy UK Reality: At Lime Down, approximately 2,200 acres would be removed from food production for up to 60 years, a generational change in land use, not the temporary one described by the applicant. Twelve tenant farmers face displacement. • The UK imported £64.1 billion of food in 2024 but exported only £24.6 billion, a large and growing	The total area of the Solar PV Sites noted in ES Volume 1, Chapter 3: The Scheme [APP-055] is 748 hectares, which equates to 1,848 acres, not 2,200. The UKRI's Roadmap for Resilience: A UK Food Plan for 2050, addresses future food security and self-sufficiency, which it notes would be achievable "but only with coordinated policy on production, diets and land use." The three core principles for the UK to become self-sufficient are: resilient agricultural production, which

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			deficit (DEFRA UK Trade in Food 2024) • Only 62% of all food consumed in the UK was domestically produced in 2023 (UK Food Security Report 2024) • A 60-year operational life is functionally permanent: no scheme of this scale has ever been decommissioned and there is no reliable evidence that land can be fully restored afterwards • The scheme is enabled by nine landowners, many of whom do not farm the land themselves, displacing twelve tenant farmers • Proposed 'soil improvement' under panels is based on studies of ten years or fewer; no credible evidence supports the improvements claimed over 60-year timescales	includes reducing livestock numbers and supporting farm diversification; integrated land use to sequester carbon and reduce agricultural emissions; and changing dietary choices, namely consuming less meat. The Applicant does not consider that cessation of arable production on a majority moderate to low quality agricultural land in Subgrade 3b and Grade 4 would significantly affect the UK's ability to become self-sufficient in food production. Finally, DEFRA's recently published "Land Use Framework- March 2026" sets out how there is enough land to deliver objectives for nature restoration and development without reducing domestic food production or compromising on the framework's objectives. Within this it is detailed within the Category D objective- Renewables, that 1% of England would be needed for solar & wind targets to 2035, and a further

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				1% for 2050 targets, with some of this land still able to continue to be used for food production, and that land for Renewables overlaps into Category C – Land use change toward climate change and nature benefits.
HM-006	Soils and Agriculture Ecology and Biodiversity Ground Conditions	Dual land use	CLAIM 6: Dual-use farming and sheep grazing under solar panels provides genuine agricultural benefit Source: Lightsource bp (Australian study) Reality: At Lime Down, the 4.5-metre tracking panels are substantially taller than standard solar installations and create conditions incompatible with meaningful agricultural activity. 'Dual use' is a marketing term, not an independently verified outcome. • Up to 700,000 panels at 4.5 metres high, with tracking motors, cabling and inverter compounds create direct injury risks for livestock • Shading under panels can reduce herbage yield by up to 56%, even	The Applicant notes that the design of the Solar PV Sites is compatible with some farming practices, such as sheep grazing, which could provide an opportunity to limit the effects on agricultural production during the Scheme's operation. As detailed in ES Volume 1, Chapter 3: The Scheme [APP-055], Section 3.5, whilst grazing of livestock (sheep) beneath the solar panels may be possible, the Applicant has not relied on sheep grazing beneath the panels for mitigation in any part of the assessment, and does not state grazing to be a "genuine agricultural benefit", only that it would represent some continued agricultural use, should the land be grazed. Furthermore, the Applicant does not rely on livestock grazing as the sole

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			where stocking rates are managed to compensate (US agrivoltaic research) • Livestock grazing under panels damages the ground vegetation, which must remain intact to absorb water runoff and prevent soil erosion, a direct conflict of land uses • The Australian study cited was conducted at a conventional fixed-tilt farm; its findings do not apply to the 4.5m tracking panels proposed at Lime Down • Microplastic shedding from panel degradation is an emerging and unquantified risk for livestock and soils; no assessment has been carried out	mechanism for managing runoff or flood risk. The hydrology position is based on the retention of permeable ground, management of construction-phase compaction, maintenance of vegetation cover and formal drainage controls for impermeable infrastructure. The point raised about vegetation damage from grazing is relevant only if grazing were unmanaged and resulted in bare, compacted or degraded ground. That is not the basis of the Scheme. Operational land management will need to maintain ground cover and soil condition beneath and between panels. This is secured through the Outline OEMP [REP1-098], Outline CEMP [REP1-096] and Outline Soil Resources Management Plan [APP-280]. Published solar hydrology research identifies that runoff risk is controlled by vegetation cover, compaction, surface roughness and

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				hydraulic connectivity. Those risks are embedded within the Scheme's management approach. The Scheme would not materially increase runoff or flood risk as a result of the proposed operational land management approach. Microplastics have been shown to be introduced to greenfield agricultural land via standard fertiliser application operations, with one study (published by the James Hutton Institute in May 2025) showing microplastic abundance to increase by up to 1,445% following application of sewage sludge. Removing the agricultural land within the Solar PV Sites from arable production will negate the requirement for annual application of fertilisers, and remove that potential pathway of microplastic contamination. No studies on microplastic shedding from solar panels specifically have been reviewed as part of the assessment of effects on soils, however it should be acknowledged that there are

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				existing pathways for microplastics to enter the soil; any shed from solar panels would not necessarily represent the introduction of new contamination, rather a different source.
HM-007	Ecology and Biodiversity	Wildlife impact	CLAIM 7: Solar farms are good for wildlife Source: Solar Energy UK Reality: At Lime Down, Wiltshire Council and Natural England identified significant gaps in the ecological survey data, meaning the impacts on numerous protected species have not been properly assessed. Large fenced industrial sites inevitably fragment habitats. • Survey data is absent for brown hare, hedgehog, polecat, dormice, harvest mice, reptiles, invertebrates, otters, water voles and white-clawed crayfish across the site • 17 hectares of the cable route corridor were entirely unsurveyed due to access issues; no bat surveys were	Habitats present within the Solar PV Sites have been assessed for their potential to support protected / notable species, including brown hare, hedgehog, polecat, dormice, harvest mice, reptiles, invertebrates, otters, water voles and white-clawed crayfish. Detailed water vole and otter surveys have been conducted at the Solar PV Sites as detailed in ES Volume 2, Appendix 9.6: Otter and Water Vole Survey Report [APP-203] Where habitat suitability assessments identified potential for protected / notable species, their presence has been assumed, in line with the precautionary principle. On this basis, it was determined that species-specific surveys were not necessary, as a reasonable worst-case scenario has been applied. An assessment of potential impacts of the Scheme for

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			conducted despite the site's proximity to bat Special Areas of Conservation • The applicant's own Environmental Statement admits that approximately 71% of skylark and yellow wagtail nesting habitat within the panel areas would be destroyed • Approximately 10 kilometres of new security fencing would fragment wildlife corridors, affecting movement of mammals and ground-nesting birds across the site In July 2025, a BBC report documented deer being trapped inside a UK solar farm, illustrating real-world welfare risks from large fenced installations	each of the aforementioned species has been presented within ES Volume 1, Chapter 9: Ecology and Biodiversity [REP1-015]. The Applicant acknowledges that some areas within the Cable Route Corridor had not been subject to ecological survey at the point of finalising ES Chapter 9 [REP1-015] Since the preparation of the Chapter 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, Chapter 9 [REP1-015] for the rest of the Cable Route Corridor. The Applicant has updated ES Volume 1, Chapter 9: Ecology and Biodiversity (Rev 2) [REP1-015] and ES Volume 3, Appendix 9-1: Ecological Baseline Report (Rev 2) [REP1-076] and revised versions have been submitted at Deadline 1

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				with the findings of these surveys. It is considered these do not materially change the assessment of likely significant effects presented in the chapter. Comprehensive bat surveys have been undertaken as detailed in ES Volume 2, Appendix 9.3: Bat Survey Report [APP-200]. The assessment in ES Volume 1, Chapter 9: Ecology and Biodiversity [REP1-015] also identifies skylarks as a key species of conservation interest within the Scheme area. It concludes that approximately 71.5% of the quantified number of territories belonging to the current skylark population will be displaced from the Solar PV Sites. This is expected to give rise to an adverse residual effect at a Local level which is transparently reported. Skylark-specific mitigation and habitat enhancement measures are incorporated into the Scheme design to reduce effects as far

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				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] and detailed in the Outline LEMP [APP-283]. The Scheme design incorporates fencing around the Solar PV Arrays that is permeable to wildlife, with the exception of deer. This means all wildlife (excluding deer only) will be able to freely access habitats within the Solar PV Sites without the need for wildlife gates. In addition, wide buffers are retained around the peripheries of the Solar PV Sites to allow wildlife, including deer, to move between favoured habitats. These measures are described in ES Chapter 9 and detailed in the Outline EPMS [REP1-106]. Fencing will be subject to regular inspection and maintenance to ensure continued

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				permeability to wildlife and effective functioning over the lifetime of the Scheme, with measures for ongoing ecological management and maintenance set out in the Outline LEMP [APP-283] .
HM-008	Ecology and Biodiversity	Biodiversity Net Gain	CLAIM 8: Lime Down will enhance wildlife habitats and achieve biodiversity net gains. Source: Lime Down Solar website Reality: The biodiversity net gain figures submitted for Lime Down are modelled on paper, not measured in reality. The calculations contain errors, were submitted in a format that cannot be independently verified and include double counting. • The BNG calculations were not submitted in the required unlocked format, making independent verification impossible • IGP's own submission acknowledges that the BNG trading rules, which set minimum requirements to	The Applicant notes this comment and a copy of the Statutory Biodiversity Metric [PDA-008] in excel form was submitted at Procedural Deadline A. A full justification for the single habitat trading rule not being met is provided in paragraphs 1.11.10 - 1.11.16 of the Biodiversity Net Gain Assessment Report [REP1-091]. This relates to the loss of habitats within the 'Cropland' broad habitat type, and is considered an artefact of the Statutory Metric, given that these habitats will in reality be retained and enhanced through the Scheme. Therefore, taking into account professional judgement, the BNG assessment is considered to be fully compliant with all trading rules.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			compensate for specific habitat losses, have not been satisfied • Habitats created as mitigation for destroyed habitat have been counted a second time as biodiversity gain inflating the claimed net benefit • Wildflower meadows, the primary claimed habitat creation, require nutrient-poor soils, which at Lime Down means deliberately downgrading productive agricultural land that currently supports a wide range of species • No independent long-term evidence exists for biodiversity improvement under solar farms of this scale over 60 years in the UK	The Applicant confirms that habitat created as part of compensation or mitigation measures can indeed contribute to BNG values and this is accordance with guidance provide by DEFRA on this matter (for instance DEFRA article 'What you can count towards a development's biodiversity net gain' (May 2023) found at https://www.gov.uk/guidance/what-youcan-count-towards-a-developmentsbiodiversity-net-gain-bng The Applicant acknowledges that cessation of agricultural inputs is proposed at land within the Solar PV Sites, in order to maximise the biodiversity outcomes. The Applicant agrees that there are no examples of solar farms in the UK which have been in existence for close to 60 years. However, A comprehensive package of habitat creation and enhancement measures are shown in ES Volume 2, Figure 3-4: Landscape and Ecological

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				Mitigation Plan [REP1-029 to REP1-032] and detailed in the Outline LEMP [APP-283] . These measures have been carefully designed based on the extensive knowledge of ecological conditions at the Order Limits collected through comprehensive desk studies and field surveys, as well as extensive professional experience of ecological enhancement measures which are both feasible and appropriate for the Scheme and its locality.
HM-009	Hydrology, Flood Risk and Drainage	Flood Risk	CLAIM 9: Solar Farms do not increase flood risk. Source: Solar Energy UK Reality: Lime Down sits in an area already experiencing severe and increasing flood events. Storm Bert (November 2024) flooded Chippenham and Bradford-on-Avon; Storm Claudia (November 2025) flooded Malmesbury for the second time in twelve months. The Environment Agency was not satisfied with the applicant's flood assessment.	The Applicant acknowledges recent flood events in the Bristol Avon catchment and the existing flood sensitivity of local watercourses. Existing flooding is part of the baseline. The relevant question is whether the Scheme would materially worsen that risk. The majority of the Scheme is located in Flood Zone 1. Limited interaction with Flood Zones 2 and 3 occurs primarily at Lime Down D and Lime Down E2 and has been assessed in the relevant site-specific FRAs. The

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			• The Environment Agency's scoping response identified factual inaccuracies and inconsistencies in the flood risk assessment, stating it was 'not satisfied' with the site description or its conclusions • Significant areas of Lime Down D and E already fall within Flood Zones 2 and 3 • The 4.5-metre tracking panels are larger than standard solar; rainfall falling from 2.5 metres height has over six times the kinetic energy of water from standard panel height, increasing runoff and soil erosion risk • The applicant's flood assessment used rainfall data from Yeovilton, 68km away, despite 11 closer Met Office stations all recording higher rainfall and resulting in a 14% underestimation of climate-adjusted rainfall effects • Bradford-on-Avon's flood defence scheme was cancelled in July 2025 despite Storm Bert devastation, leaving downstream	BESS and substations are located in Flood Zone 1 where practicable. The suggestion that larger fixed or tracking panels should be treated as impermeable hardstanding is not supported by national policy, published guidance or the available research. NPS EN-3 paragraph 2.10.84 recognises that solar PV panels drain to the existing ground. Norfolk County Council LLFA guidance treats panel areas as not impermeable. The Essex Design Guide describes solar farms as relatively low risk in surface water terms where mitigation is provided. Doncaster Council's solar drainage advice requires consideration of soil, slope, vegetation and SuDS, but does not require panel fields to be treated as impermeable catchments. Published studies including Cook and McCuen (2013), Yavari et al. (2022), Elamri et al. (2018), Gullotta et al. (2023), Wang and Gao (2023) and Baiamonte et al. (2023) show that panels can redistribute rainfall

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			communities without protection if the scheme increases runoff	locally, but that increased runoff risk depends on bare ground, compaction, reduced roughness, slope and hydraulic connectivity. At Lime Down, those risk factors are controlled through permanent ground cover, soil protection, wet weather working controls, compaction remediation, permeable tracks and retained overland flow routes. These measures are secured through the Outline CEMP [REP1-096], Outline OEMP [REP1-098] and Outline Soil Resources Management Plan [APP-280]. Climate change allowances have been applied in the flood risk and drainage assessment. The status of downstream flood defence schemes does not change the conclusion that the Scheme would not materially increase flood risk elsewhere.
HM-010	Cultural Heritage	Assessment	CLAIM 10: Lime Down's heritage impacts have been properly identified and assessed. Source: IGP Application	Bradfield Manor Farmhouse is described as Grade I listed within ES Volume 1, Chapter 12 Cultural Heritage [APP-064] , and the supporting appendices in ES Volume

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			Reality: Historic England identified a material error in the heritage assessment: Bradfield Manor was described throughout as Grade II* listed, when it is in fact Grade I. This is the highest heritage designation in England. The implications of this error for the assessment remain unaddressed. • Bradfield Manor (Grade I, NHLE 1198808) is located adjacent to the proposed BESS facility. It's designation was misstated throughout the application, undermining confidence in the heritage assessment as a whole • Historic England formally identified unresolved harm and serious documentation gaps in its Relevant Representation to the Planning Inspectorate • The Fosse Way Roman Road, a Scheduled Ancient Monument and iconic heritage route, runs through the scheme for approximately 4.5km; the significance of the	3, Appendices 12-1 to 12-7 [APP-219 to APP-231]. 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 terms). The Applicant submitted a technical note at Deadline 1 [REP1-121 TO REP1-123], which included the visualisations as requested by WC and Historic England, which support the results of the assessment of harm on Bradfield Manor Farmhouse. Site visits were undertaken with Historic England on the 28th March 2025 and the Wiltshire County Council Conservation Officer on the 11th April 2025, which included visiting land adjacent to Grade I Listed Bradfield Manor. A second site visit with Historic England was undertaken in the grounds of

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			character change to this historic landscape has been underestimated • Site visits to assess heritage and visual impacts were conducted in October, April and July, when vegetation was in leaf and screening was at its maximum, not in winter when worst-case impacts would be visible • Corsham Court (Grade II*) has been scoped out of the heritage assessment despite the cable route passing within 250 metres of this designated asset	Bradfield Manor on the 22nd May 2025 (see table 12-2 in Chapter 12: Cultural Heritage [APP-064]). Feedback provided during the site visits was used to inform the Scheme design and assessment provided in Chapter 12: Cultural Heritage [APP-064]. The potential effects of the Scheme on the Roman Roads (i.e. the Fosse Way), as well as other Roman archaeological assets are fully assessed in ES Volume 1, Chapter 12: Cultural Heritage [APP-064], supported by detailed technical appendices in ES Volume 3, Appendices 12-1 to 12-7 [APP-219 to APP-231]. Where an adverse effect has been identified to Roman archaeological assets appropriate mitigation is proposed. See Section 12.9 of ES Volume 1, Chapter 12: Cultural Heritage [APP-064] for embedded mitigation and Section 12.11 for additional mitigation. An overarching archaeological mitigation strategy is provided in ES Volume 3,

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				Appendix 12.6 Archaeological Mitigation Strategy [APP-230]. Since the design presented at PEIR stage, Field C26, the westernmost part of Field C25, and the majority of Field C13 have been entirely removed from the Order Limits. Solar PV Panels have also been removed entirely from within Fields B1-B5, C24-C25, and C13. A number of fields abutting the Fosse Way within which Solar PV Panels will be erected have had offsets established with their boundaries with Fosse Way, including Fields B6, C10-C12, and C22-C23. Appendix 12.1: Heritage Statement [APP-219] identified that the overall setting and significance of the Fosse Way will remain intact, and the asset will retain its legibility as a roadway within a largely agrarian landscape. Consequently no significant effects were identified to the asset.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				A small section of the north eastern boundary of the Grade II* Listed Corsham Court extends within the 250m buffer of the cable route corridor. The asset was scoped out of detailed assessment as there was no potential for impacts as a result of the installation of cabling in the cable route corridor. As stated above a through scoping exercise was undertaken for heritage assets and assets scoped out of assessment were agreed with Historic England and Wiltshire Council.
HM-011	Other environmental matters	Battery safety	D. SAFETY CLAIM 11: Grid-scale batteries are completely safe and Lime Down BESS will be safely managed. Source: Lime Down Solar Reality: Grid-scale lithium-ion battery storage carries well-documented risks of thermal runaway, fire, explosion and toxic gas release. The proposed Lime Down BESS 1GWh, one of the largest in England, would be sited above a principal drinking water aquifer, next to a mainline railway,	Please refer to Applicant's Detailed Response to Stop Lime Down Deadline 1 Submission on BESS Fire Emissions [EN010168/EXAM/9.25] , submitted at Deadline 2 in relation to the point concerning the 1km study area. In relation to water resources, the Applicant has prepared standalone Firewater Containment and Drainage Strategies [REP1-124 and REP1-125] . These address how potentially contaminated firewater, suppression water or incident runoff

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			and close to Grade I listed Bradfield Manor. • The Moss Landing facility in California (January 2025) caught fire and required evacuation over a 4-mile radius; post-fire concentrations of nickel, cobalt and manganese in nearby wetlands rose by up to an order of magnitude (Nature, 2025) • The National Fire Chiefs Council states BESS pose 'a significant fire risk due to thermal runaway, resulting in rapid production of large volumes of toxic and explosive vapours leading to explosion and fire • A 2025 Commons debate confirmed 'there are no laws specifically governing the safety of battery energy storage sites' the UK lacks statutory lifecycle regulation • The entire Lime Down site sits within a Groundwater Source Protection Zone; firefighting water contaminated with battery chemicals poses a direct risk to	would be isolated, contained, tested and removed for appropriate disposal. The BESS drainage system will be capable of isolation and containment during an incident. This means contaminated runoff would not be allowed to discharge uncontrolled to ground, watercourses or the underlying aquifer. The approach is supported by the Outline BSMP [REP1-110] and Outline CEMP [REP1-096] and wider groundwater protection measures in the Application. The Applicant has followed National Fire Chiefs Council (NFCC) guidance and commissioned a BESS fire emissions assessment (as detailed in ES Volume 3, Appendix 15-2: BESS Fire Emissions Modelling [EN010168/APP/6.3 (Rev 2)]) to model toxic gas emissions and visibility impacts from a BESS fire on all sensitive receptors within a 1km radius of the BESS area. The fire emissions modelled in the report

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			drinking water supplies for Chippenham and Bath The applicant's own plume assessment was restricted to a 1km radius, the Moss Landing evacuation radius was 4 miles (6.4km); no credible worst-case scenario for a facility of this size has been modelled	were based upon recent UK Health Security Agency (UKHSA) requests for DCO BESS projects which explore both immediate air quality impacts together with annual UK air quality requirements, the selected gases are representative of emissions recorded from a range of LFP battery systems integrated in current BESS designs. The UKHSA is a statutory consultee for the Scheme and has confirmed in their relevant representation [RR-4798] that <i>“Following our review of the submitted documentation the UKSHA are satisfied that the proposed development should not result in any significant adverse impact on public health”</i>. The spacing distances of the illustrative BESS site design are based upon Large Scale Fire Testing (LSFT) where no fire propagation occurred; therefore, this is a credible worst-case scenario. ES Volume 3, Appendix 15-2: BESS Fire Emissions Modelling [APP-239] concludes that there would be no significant air quality effects as a

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				result of a BESS fire incident and visibility issues were not predicted. The Applicant emphasises that even a worst-case scenario such as the Moss Landing Fire did not require mass evacuations, and the preliminary precautionary evacuation of 1200 people living in the closest proximity to the Moss Landing Site was not triggered by air monitoring alerts. Emissions in these areas initially evacuated never exceeded public health thresholds. The Applicant points out that the referenced Moss Landing fire involved old generation legacy systems that were not compliant with NFPA 855 and integrated NMC pouch cell, air-cooled battery systems; these type of systems will not be considered for the Scheme. Section 4.1.30 of the Outline Battery Safety Management Plan (Outline BSMP) [REP1-110] stipulates the selected BESS design will integrate: <i>"Battery liquid cooling systems with automated fail-safe operation (air</i>

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				<i>cooling systems will not be considered for the Scheme).</i>" It is not credible to consider that the range and impact of the Moss Landing smoke plume generated from more than 55,000 battery modules (which also burnt through a significant portion of the gas plant roof), is in anyway comparable to the impacts of a smoke plume generated from a fire within single non-combustible enclosure BESS designs typically containing 40-60 battery modules. As witnessed in numerous BESS LSFT (2024-2026), the peak of fire propagation of battery systems results in maximum flame heights of 4-5 metres out of the roof of the BESS. Typically, these flames are channelled through roof level deflagration vents resulting in peak flaming of 8-9 metres above ground level. To validate the final BESS site design, the Applicant has also committed to commissioning an

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				additional Plume Analysis Study at the detailed design stage as stipulated in Section 5.5.9 of the Outline BSMP [REP1-007] and secured through the DCO: “..at the detailed design stage a BESS system and site specific Plume Analysis study will be conducted to assess the environmental impact of a site incident to sensitive receptors within a 1 km radius. Toxic gas emissions to sensitive receptors must be below relevant public health exposure limit guidelines when the battery system of a BESS is fully consumed (burnt out), production of Particulate Matter (PM) and a visibility impact assessment on any transport links within a 1 km radius of the BESS area will also be included. The ERP produced at the detailed design stage (template outlined in Section 5.4.4) will incorporate all necessary emergency response procedures and actions based upon thermal runaway test data supplied by the BESS system provider.”

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				An Outline BSMP [REP1-110] has been prepared for the Scheme using guidance from Dorset and Wiltshire Fire and Rescue Service and incorporating recommendations of the National Fire Chiefs Council. The safety objectives for the design of the BESS site are listed in Section 2.4 of the Outline BSMP [REP1-110] . The Outline BSMP [REP1-110] has been amended at Deadline 1 to fully accommodate the latest BESS safety requirements contained in NFPA 855 (2026) ensuring that any credible risks associated with battery storage are either prevented or fully mitigated if a BESS failure occurs. As now mandated under NFPA 855 (2026) the Applicant will only be able to select a BESS system that has undertaken Large Scale Fire Testing (LSFT). At the detailed design stage, the selected BESS LSFT data will be leveraged to fully inform inputs for risk assessment tools which will be utilised together with detailed consequence modelling to provide a

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				comprehensive site operations and emergency response safety audit, this is stipulated in the OBSMP pre-construction requirements (Section 6). 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 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);

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				• To ensure that fire, smoke, and any release of toxic gases does not significantly impact site operatives, first responders, and the local community; and • To ensure that firewater run-off is contained and tested before release or, if necessary, removed by tanker and treated offsite." The Applicant is currently drafting a Statement of Common Ground (SOCG) with the Environment Agency (EA) on Scheme environmental protection issues including the BESS area drainage strategy. The Applicant's Outline BSMP [REP1-110] Section 5.5 documents agreed drainage strategy for the BESS area. The Applicant confirms that firefighting water containment for the BESS has been designed on the basis of credible incident scenarios, including the potential for multiple units to be involved, and is not limited to routine or minor events.

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				The approach set out in the Outline BSMP [REP1-110] and the standalone Firewater Containment and Drainage Strategy – Lime Down BESS [REP1-124] is to contain and isolate firefighting water within the BESS Area, rather than allow discharge to the environment. This is achieved through a sealed and isolatable drainage system, capable of retaining firefighting water and rainfall during an incident. The agreed strategy document 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. The Outline BSMP [REP1-110] is secured through Requirement 6 (Battery safety management) in

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				Schedule 2 of the Draft DCO [REP1-007] , which provides that Work No. 2 must not commence until a Battery Safety Management Plan has been submitted to and approved by the relevant planning authority. The approved plan must be substantially in accordance with the Outline BSMP [REP1-110] . The Draft DCO [REP1-007] also requires the relevant planning authority to consult with Dorset and Wiltshire Fire and Rescue Service and the Environment Agency before determining the application, and that the BSMP must be implemented as approved
HM-012	Socio-Economics, Recreation and Tourism Community Benefit Soils and Agriculture Decommissioning	Local community impact	E. COMMUNITY & LOCAL IMPACT CLAIM 12: Impacts on local communities are limited and outweighed by national benefits. Source: IGP / Industry Reality: Lime Down has generated 4,958 Relevant Representations, 99% objecting, the highest number ever recorded for any NSIP application in England. Despite over 400 of these raising equine	Equestrian facilities, including private stables and paddocks, studs, riding schools, and on public rights of way such as bridleways and byways have been considered as specific recreational receptors in the assessment in the ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068] . The Applicant confirms that the majority of significant adverse effects can be mitigated. The assessment

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			welfare concerns, the applicant has not conducted a single equine-specific impact assessment. • The bloodstock and equine sector is a defining feature of the North Wiltshire rural economy; no equine specific assessment has been carried out despite more than 400 Relevant Representations explicitly raising equine concerns • The applicant has itself admitted that construction will cause unmitigable significant adverse effects on at least one equestrian business yet has not applied the same assessment to other equine and bloodstock businesses in the area • Wiltshire Council's own climate analysis indicates Lime Down would not reach carbon break-even until approximately 2076, meaning it increases net carbon emissions for over 50 years before delivering any climate benefit • The scheme displaces twelve tenant farmers, those least able to absorb the disruption, for the	has identified some location-specific significant adverse effects to users of routes in Lime Down E (bridleway MALW54, and unsurfaced road parallel to and crossing the railway), and to the equestrian business at Park Farm, Yatton Keynell due to direct construction impacts. These matters will therefore be considered in the planning balance when the DCO is determined. While impacts on equestrian businesses are not anticipated to be significant (with the exception of Park Farm during construction), the Applicant confirms that where employment may be affected as a result of the Scheme, affected workers would be eligible for accessing skills and employment support measures as secured through the Outline SSCEP [REP1-108] by Requirement 18 of Schedule 2 to the Draft DCO [REP1-007], subject to the final SSCEP being agreed by Wiltshire Council and any other stakeholders. The Applicant is committed to undertaking and

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			benefit of nine landowners, many of whom do not farm the land themselves • There is no provision for secured decommissioning bonds; the community has no guarantee the land will be restored, particularly given the likelihood of asset transfer or resale over a 60-year period	encouraging further engagement with relevant equestrian stakeholders through the DCO process. The Applicant is also undertaking further technical advice specific to equine care that will be forthcoming during the examination process. The findings of Wiltshire Council that the scheme would not break even until 2076 are not accepted. The embodied carbon and associated emissions from the cables and BESS are assessed ES Volume 1, Chapter 7: Climate Change [APP-059]. The Applicant is preparing a separate technical note to address the point around carbon break-even to be submitted at Deadline 3 of Examination. To summarise, the applicant does not accept that the break even or payback year assessment is a useful metric for considering the significance of the scheme in offsetting carbon emissions.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				There are several limitations with using this approach as put forward by Stop Lime Down. 1) The GHG assessment considers global emissions (e.g. shipping from China, embodied carbon from products sourced outside of the UK) and compares this to a UK only emissions value which does not consider the embodied carbon from developing energy infrastructure. The high level approach used in ES Volume 1, Chapter 7: Climate Change [APP-059] is illustrative that even with this point of comparison, there remains a net negative change in emissions. 2) The assessment considers that future operational emissions associated with replacement products will be the same as those in the baseline operational year. E.g. replacement panels will have the same embodied carbon emissions in 40 years as they do in the assessment year of 2025. In reality,

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				as global efforts move towards Net Zero from all sources, this is a highly conservative approach and in reality emissions in future are likely to be far lower. This approach has been taken so as to be conservative and in the absence of forecast emissions reductions approaches. 3) The point of comparison against a forecast UK grid average was chosen so as to compare against a realistic but low grid average for emissions. Previous assessments have compared against other energy generating methods such as CCGT. Should the scheme be compared against CCGT and the same methodology applied, the 'pay back' would occur within 2 years'. Should the scheme be compared against existing UK grid average emissions, (i.e. not forecast) the scheme would 'pay back' emissions within 4 years. There are several limitations with using this approach as put forward by Wiltshire Council which will

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				be detailed within the technical note being prepared for Deadline 3, but to summarise. 1) The GHG assessment considers global emissions (e.g. shipping from China, embodied carbon from products sourced outside of the UK) and compares this to a UK only emissions value which does not consider the embodied carbon from developing energy infrastructure. The high level approach used in Chapter 7: Climate Change [APP-059] is illustrative that even with this point of comparison, there remains a net negative change in emissions. 2) The assessment considers that future operational emissions associated with replacement products will be the same as those in the baseline operational year. E.g. replacement panels will have the same embodied carbon emissions in 40 years as they do in the assessment year of 2025. In reality,

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				as global efforts move towards Net Zero from all sources, this is a highly conservative approach and in reality emissions in future are likely to be far lower. This approach has been taken so as to be conservative and in the absence of forecast emissions reductions approaches. 3) The point of comparison against a forecast UK grid average was chosen so as to compare against a realistic but low grid average for emissions. Previous assessments have compared against other energy generating methods such as CCGT. Should the scheme be compared against CCGT and the same methodology applied, the 'pay back' would occur within 2 years'. Should the scheme be compared against existing UK grid average emissions, (i.e. not forecast) the scheme would 'pay back' emissions within 4 years. The Applicant confirms the assessment findings in ES Volume 1,

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				Chapter 16: Socio-Economics, Tourism and Recreation [APP-068] estimated a loss of up to 20FTE jobs in the agricultural sector as a result of the Scheme. Where losses to agriculture employment have been identified, these are worst-case estimates based on likely significant effects from the Scheme, and do not include additional mitigation measures being applied. 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

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				would be sought for tenants to continue their agricultural practices. 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]. Finally, in terms of decommissioning, a requirement to decommission the Scheme is set out in Requirement 20 of the Draft DCO [REP1-007]; failing to comply with that requirement would be a criminal offence. The requirement to decommission the Scheme would sit with the owner at the time of decommissioning. Decommissioning is also covered in agreements with landowners, which

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				includes decommissioning securities to cover the cost of decommissioning in the event of any breach by the Applicant or in the event of the insolvency of the Applicant. The amount of such decommissioning security is regularly re valued throughout the lifecycle of the Scheme and topped up if necessary.
HM-013	Climate Change and Energy Need	Efficiency	F. ENERGY REALITIES - NATIONAL CONTEXT Stop Lime Down supports renewable energy delivered responsibly and in appropriate locations. The following four claims relate to national policy; they are included here because they are relevant to understanding the scale and context of proposals like Lime Down. CLAIM 13: This solar farm could power 115,000 homes. Source: Island Green Power project information. Reality: This is a peak output figure. In practice, UK solar farms generated between 10-15% of their installed capacity on average in	See above response on 'carbon breakeven not happening until 2076'. The Statement of Need [REP1-085] explains at Paragraph 6.4.15 that the average load factor of the UK's aggregated solar generation assets between 2016 and 2023 was 10.4%. The Applicant agrees that 2024 was lower; but notes that (although the final statistics are not yet available) that 2025 was higher. The Government has established a Clean Power Target, (Section 2.9 of the Statement of Need) which is that, in a typical weather year, Clean sources produce at least as much power as Great Britain consumes in total and at least 95% of Great

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			2024, produce zero power at night, and very little in winter. This is when electricity demand is highest. • UK solar PV load factors fell below 10% in 2024 (DUKES 2025, GOV.UK) meaning it delivers less than one tenth of its claimed output over the year • Solar output peaks in summer when demand is lowest; it falls to zero every night and to minimal levels throughout winter • Continuous power to a single home requires 24/7 generation; solar cannot provide this without substantial backup from gas, nuclear or other firm sources • Wiltshire Council's own analysis indicates Lime Down would not reach carbon break-even until approximately 2076	Britain's generation. Using an average load factor is therefore an appropriate way of assessing scheme outputs. A reasonable assessment of the capacity deliverable at the Scheme would, at a reasonable average load factor, generate an amount of energy equivalent to the annual energy consumption of approximately 115,000 homes in the UK. The inclusion of battery storage as associated development supports the solar scheme by storing generated energy when energy is in abundance, and releasing it when it is needed more, supporting the scheme to match supply to demand. NESO has explained (see Statement of Need [REP1-085] Paragraph 4.6.4) that future electricity peaks may not occur in the future when they have occurred in the past, ostensibly as a result of decarbonising supplies through renewable energy sources. The government has, however, explained that "secure, reliable, affordable, net

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				zero consistent system in 2050 is likely to be composed predominantly of wind and solar" (NPS EN-1 (2023) Paragraph 3.3.20). Section 8.5 of the Statement of Need [REP1-085] describes how a portfolio of low carbon generation which includes solar, onshore and offshore wind, and a low carbon base, if delivered, is capable of closely matching a future projection of national electricity demand on a month-average level.
HM-014	Climate Change and Energy Need The Applicant	Energy price	CLAIM 14: Solar Energy is cheap. Source: Ed Miliband, September 2026 Energy UK Conference Reality: Large-scale solar relies on substantial government subsidies paid by consumers through energy bills. The cost of maintaining parallel backup generation capacity to cover intermittency is not included in solar's headline price. • Renewable electricity subsidies cost consumers approximately £25.8 billion per year (Renewable Energy Foundation analysis of Ofgem data)	NPS EN-3 (2023) Paragraphs 2.10.5 - 2.10.6 state that "Solar farms are one of the most established renewable electricity technologies in the UK and the cheapest form of electricity generation. Solar farms can be built quickly and, coupled with consistent reductions in the cost of materials and improvements in the efficiency of panels, large-scale solar is now viable in some cases to deploy subsidy-free". Chapter 9 of the Statement of Need [REP1-085] sets out evidence behind the affordability benefits of large-

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			• Equivalent to over £900 per household per year in current subsidies and support costs • These figures exclude additional grid costs: transmission upgrades, constraint payments and balancing services required to manage variable output • Wholesale gas trades at around £24/MWh; offshore wind contracts are locked in at £133/MWh, a mechanism that increases the subsidy gap as gas prices fall	scale solar generation and concludes that solar generation decarbonises the electricity system and lowers the wholesale market price of electricity. Figure 31 of the Statement of Need [REP1-085] shows that solar generation is, on a levelised cost basis, significantly cheaper than new gas generation under a wide range of input fuel cost scenarios. The characterising of large scale solar relying on substantial support via a one-way subsidy is inaccurate. The primary mechanism used, Contracts for Difference (CfD) for example, acts as a two-way price stabilisation mechanism which directly helps balance long term energy prices. The Scheme has not been subsidised in its development and has been funded through private means only and without consent, would not be eligible for a CfD. The claim that falling gas prices increase a subsidy gap ignores the long-term risk of fossil fuel price

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				volatility, where as an increase in UK based renewable capacity reduces the energy system's exposure to global market disruptions.
HM-015	Climate Change and Energy Need	Alternatives	CLAIM 15: The UK is ideal for large-scale ground-mounted solar. Source: Chris Hewett, Solar Energy UK Reality: The UK's solar resource is significantly below the global average. Low productivity means large areas of agricultural land must be used to generate relatively modest amounts of power , a trade-off that does not arise in southern Europe, and which can be avoided by prioritising rooftops and warehouses in the UK. • The UK ranks among the lowest tier of countries globally for solar photovoltaic potential (World Bank Global PV Potential Study) • Typical UK solar capacity factor is around 10–15%, compared with 25–30% in Spain or Portugal, meaning the same energy requires two to three times the land area	The Statement of Need [REP1-085] how and why the Scheme addresses all relevant aspects of government policy. In particular, Chapter 3 sets out Government's policy position, that large-scale solar is needed to support achieving the Government's energy objectives, because "Solar farms are one of the most established renewable electricity technologies in the UK and the cheapest form of electricity generation" (NPS EN-1 (2023) Paragraph 2.10.13. That other geographies have greater solar resources than the UK is not a relevant point for this examination, because solar resources in Great Britain, and at the Site, are sufficient to support the benefits the Applicant has stated, and solar facilities in other countries do not support the UK to

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			• The government's own Rooftop Solar Action Plan acknowledges that 250,000 commercial rooftops remain available and largely unused; warehouse rooftops near the grid would deliver power without agricultural land loss • France has tightened its agrivoltaic rules to require that ground-mounted solar on agricultural land must not significantly affect food production; the UK has no equivalent safeguard	achieve its national decarbonisation and energy security aims. The Applicant is supportive of smaller solar schemes (including rooftop and distributed schemes) but aligns with the Government's position, for reasons described in the Statement of Need [REP1-085] that such schemes are needed alongside, rather than as an alternative to, large-scale schemes such as this Scheme. As detailed in Section 2.4 of ES Volume 3, Appendix 4-1: Site Selection Assessment Report [APP-185], the Applicant has considered alternative locations, including rooftops. It was concluded that it was unlikely that there would be rooftops or combined premises of an adequate area to facilitate a large-scale solar project or provide a viable network of sites in close proximity covering an area of approximately 1,100 ha. National policy and government guidance, as set out in the Statement

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				of Need [REP1-085] , recognise that while rooftop and smaller-scale solar installations are an important part of the energy mix, they cannot alone meet the scale of capacity required to achieve clean power and net zero objectives. Large-scale ground mounted solar therefore remains necessary in addition to, not instead of, rooftop solar.
Simon Henry Durrant REP1-239				
SHD-001	Other Environmental Matters - Major Accidents and Disasters	BESS Safety	My contention is that, because BESS as currently used, cause an increase in environmental damage compared to not using BESS, further BESS deployment should be paused until surplus power from renewable sources is available to charge them.	As highlighted in National Policy Statement EN-1, BESS technology is critical for providing the flexibility required to integrate low carbon power onto the network. This development would provide additional energy generation from a renewable source and so would contribute to BESS charging from renewable sources. The inclusion of BESS within the Scheme has been fully assessed throughout the ES [APP-052 to APP-267] , with safety matters specifically considered and addressed within the Outline BSMP [REP1-110] .

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				Furthermore, the Statement of Need [REP1-085] also sets out ways in which the scheme can benefit wider network operational faults in Section 7.4.9: <i>“Additionally, the inclusion of BESS as part of the Scheme will provide NESO with a cost-effective tool to help manage power flows on the NETS in the vicinity of the Scheme over its operational life. For example, extreme weather conditions such as concurrent high wind and high solar irradiation, or unplanned power station failures may require NESO to balance supply with demand either locally near Melksham or nationally. Minimising these in a cost-effective way would be to the commercial benefit of consumers.”</i> The Scheme is designed to allow charging from both the on-site Solar PV arrays and electricity from the grid. Grid import typically occurs during periods of oversupply, for example when national generation is high and demand is low, rather than

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				targeting fossil fuel generation. The stored electricity can then be exported later when demand is higher. A high-level visibility assessment has also been undertaken using the modelled particulates results to determine the effect of BESS fire emissions on visibility on the local road and rail network to inform the Outline BSMP [REP1-110]. For further details on BESS safety measures, the Applicant refers to its response to JF-054.
SHD-002	Climate Change and Energy need	GHG Emissions	This representation calculates the CO2 environmental damage that will be caused by the proposed Lime Down site. Further, it calculates the CO2 environmental damage from the existing installed base of BESS in the UK.	The comment is noted. ES Volume 1, Chapter 7: Climate Change [APP-059] assesses the impacts of the Scheme on climate change, including the BESS.
SHD-003	Climate Change and Energy need	Efficiency	The solar power industry does not wash its dirty laundry in public! Meaning that information on some of the negative performance aspects of the industry are not	The Statement of Need [REP1-085] identifies a typical Round-Trip Efficiency (RTE) is 88%, representing an approximate 12% energy loss during the storage and conversion

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			published. I have used Internet searches and AI supported searches to find the numbers for things like battery Round Trip Efficiency (RTE). In almost every case, a range of values is returned because until the values for a specific equipment are known it cannot be specific. In all cases, I have taken the mid-point in the value range for the calculation. In consequence of the above, I would expect Lime Down Ltd and IGP to challenge the numbers. The best action for the examining team is to require Lime Down Ltd to provide details for the specific equipment planned and to have the analysis done by independent experts in the field. This will allow the reality of the situation to be properly understood and communicated.	process. It is also noted that BESS units are not typically operated across a full zero to 100% range in order to preserve cell life, and instead cycle between approx. 10% and 90% State of Charge (SoC). As highlighted in National Policy Statement EN-1, BESS technology is critical for providing the flexibility required to integrate low carbon power onto the network and this accounts for the losses/RTE's highlighted. It is accepted that there are a range of potential sources for emissions factors for different products and activities. ES Volume 1, Chapter 7: Climate Change [APP-059] utilises DESNZ government accounting factors wherever possible as a standard approach but where this has not been used, this is clearly set out within the text of the Climate Change ES chapter. There is potential for slightly different products to emerge between the

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				application and the construction. The Climate Change assessment has used the best available information at the time of writing so as to provide a useful assessment of total potential GHG emissions, though it should not be expected that the number calculated is an exact amount of emissions to be generated, rather a useful approximation for the purpose of understanding significance.
SHD-004	Climate Change and Energy need	GHG Emissions	The ostensible objective of Lime Down and like schemes is to help UK achieve net zero emissions, in fact, because of the massive carbon debt incurred in building the site and because of environmentally negative operational factors such as fossil fuel generation to charge the BESS, the scheme may never even break even in environmental damage terms.	The embodied carbon and associated emissions from the cables and BESS are assessed within. ES Volume 1, Chapter 7: Climate Change [APP-059] . The Applicant is preparing a separate technical note to address the point around carbon break-even to be submitted at Deadline 3 of Examination. To summarise, the applicant does not accept that the break even or payback year assessment is a useful metric for considering the significance of the scheme in offsetting carbon emissions.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
SHD-005	Climate Change and Energy need	BESS	BESS operators are charging BESS overnight at a low tariff in order to sell that electricity the next day at a high tariff, and to profit from the tariff differential. The consequence is that the power used is generated using Combined Cycle Gas Turbines (CCGT). This conclusion is reached because the power generated to charge the BESS is additional to the normal demand and will be generated using CCGT. Look at gridwatch.co.uk for the evidence.	The point of comparison against a forecast UK grid average was chosen so as to compare against a realistic but low grid average for emissions. Previous assessments have compared against other energy generating methods such as CCGT. Should the scheme be compared against CCGT and the same methodology applied, the 'pay back' would occur within 2 years'.
SHD-006	Climate Change and Energy need	BESS	The issue is that there are a significant number of losses involved in the use of BESS in this way. These losses can be summarised as: • Transmission losses. In the case of Lime Down, because of the extreme distance (25km) between Lime Down and the grid connection point at Melksham, transmission losses are estimated as: • Based on typical technical parameters for a 400kV buried	Firstly, a 1% loss of efficiency with a subsequent annual 0.4% loss of efficiency is considered for the purpose of the operational CO₂e emissions. Transmission losses associated with the Scheme were discussed during Issue Specific Hearing as detailed in Written Summary of the Applicant's Oral Submissions and Responses at Issue Specific Hearing 1 and Responses to Action Points [REP1A-012] where it

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			HVAC cable system (using XLPE insulated 1000mm² aluminium conductors), the estimated energy loss is approximately 1.2% to 1.8% of the transmitted power over 25km. Assume 1,5% • For a 500MW transfer, this translates to roughly 6 MW to 9 MW of power loss, mainly due to resistive (copper) losses, though capacitive charging currents in buried cables can increase losses depending on reactive compensation. Transformer losses from 400kV to 132kV = 0.5% Transformer losses from 132kV to 690V = 1% (690 V is the operational AC electrical connection voltage of the BESS systems as stated in the manufacturers data sheet. https://info-support.sungrowpower.com/application/pdf/2024/12/07/ST5015UX-2H-US_ST5015UX-4H-US%20Datasheet.pdf)	is stated that the Applicant has calculated that the transmission losses associated with the 400kV single circuit cable between the 400kV Substation and the Existing National Grid Melksham Substation would be circa 0.1% or lower, depending on the cable material used. The loss percentage would be the same for electricity flows in either direction (import or export). While the respondent's figures provide a conservative, overestimate of the losses involved, the Applicant notes these from internet searches and AI and median figures are used. Noting the comparison in voltages provided by the respondent. The Applicant responded to Wiltshire Council's query regarding any differences of impacts from a 132kV vs 400kV connection in Item 7 of the Written Summary of the Applicant's Oral Submissions and Responses at Issue Specific Hearing 1 and Responses to

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			Battery Round Trip Efficiency (RTE) (Typical range between 90% and 95% but this degrades with age and charge cycles) Not quoted for the Sungrow ST5015UX-2H-US_ST5015UX-4H-US units specified for Lime Down. Assume 93% RTE, hence losses of 7%. Transformer losses from 690V to 132kV = 1% Transformer losses from 132kV to 400kV = 0.5% Transmission losses 1.5% back to the grid connection point. Total Losses of 13% of the energy generated and supplied through the BESS taking advantage of tariff differential.	Action Points [REP1A-012] where it is stated that the use of a 132kV circuits would materially reduce transmission efficiency around nine times greater than for a 400Kv circuit, increasing losses to 0.9%.
SHD-007	Climate Change and Energy need	BESS	Because charging the BESS at night uses Combined Cycle Gas Turbine generation (CCGT) (The only source of additional load available at night) we must consider the environmental impacts of this use of generating resource. Combined Cycle Gas Turbine (CCGT) electricity generation,	The Statement of Need [REP1-085] explains at Paragraph ES20 that "storage assets support the operation of the renewable technologies they are co located with ... by storing energy when it is generated in abundance and releasing it later when it is needed" and at Paragraph 8.3.4 provides NESO's view of the future electricity system:

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			while more efficient than older fossil fuel plants, causes significant environmental damage in the UK through greenhouse gas emissions, methane leakage, and impacts on water resources. While UK CCGT footprints have improved, reaching as low as 365 gCO₂eq/kWh for modern technology, they still contribute to the nation's climate change goals by requiring decarbonization. [1, 2, 3, 4, 5]	"Traditionally, risks to meeting electricity security of supply, have been at times of high demand [however] as we move to higher volumes of weather-dependent renewable energy, we will also face additional challenges around both the oversupply and undersupply of renewable generation." Section 5.11 of the Statement of Need [REP1-085] sets out the types of BESS operation and the context provided by Paragraph 8.3.4 (above) means that any of these types of operation could be required at any time of the year, dependent on levels of national demand, the weather, and the evolving composition of the future GB generation fleet. Section 9.2 of the Statement of Need [REP1-085] provides an explanation on the mechanics of pricing in the GB electricity market, which by extension explains why BESS support co-located schemes by storing energy when supply is

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				stronger than demand, and release that energy when demand is stronger than supply. This action is to the benefit of the GB consumer through supporting security of supply and providing downward pressure on prices at times of low renewable generation. During the operational phase of the scheme, the BESS is not anticipated to store fossil fuel generation overnight because fossil fuel generation would run overnight only if it was required to meet system demand and running 'in excess' for storage would not be commercially rational. The much lower risk and lower cost approach for fossil fuel generators would be to keep their source energy in its fossil fuel form until it is needed, rather than incurring efficiency and conversion related losses associated instead with burning that fuel, generating electricity, transmitting electricity to the BESS and storing it for later dispatch. This is because doing so would make the "stored then

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				dispatched" energy more expensive than any energy generated directly from the fossil fuel at the later time (if at all) it was needed. It should be noted that the Climate Change GHG assessment has not considered CCGT as a comparable baseline, though if it were the Scheme would be a highly effective alternative. While disputed for helpfulness, should the 'carbon payback year' assessment methodology consider the scheme against CCGT, the scheme would generate a carbon payback within 2 years.
SHD-008	Climate Change and Energy need	GHG emissions	Greenhouse Gas Emissions: CCGT plants are a significant source of CO2 emissions, responsible for a large portion of the 44.1 Mt CO2e total UK emissions from power plants (excluding biomass) in 2023.	This is accepted.
SHD-009	Climate Change and Energy need	Contamination	Methane Leakage: Methane, a potent greenhouse gas, can leak during natural gas production and transport, significantly increasing	This is accepted.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			the life cycle GHG emissions of CCGT, sometimes accounting for roughly 50% of the emissions from European natural gas supply.	
SHD-010	Climate Change and Energy need	BESS	Water Usage and Thermal Pollution: CCGT plants require large volumes of water for cooling, which can lead to aquatic environmental damage by: - Discharging water at higher temperatures than the receiving water, affecting aquatic flora and fauna. - Fish impingement and entrainment, where fish are drawn into the cooling systems.	This is accepted.
SHD-011	Air Quality	Pollution	Air Pollution (NO _x): Combustion processes produce nitrogen oxides (NO _x), which contribute to acid rain and form smog, reducing local air quality.	It is recognised that combustion processes can give rise to nitrogen oxides (NO _x). The assessment includes nitrogen dioxide (NO ₂) (NO ₂ is the fraction of NO _x most relevant to human health) within the dispersion modelling undertaken for the BESS fire scenario. As presented in ES Volume 3, Appendix 15-2 BESS Fire Emissions Modelling [APP-239] , predicted NO ₂ concentrations at all receptors are

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				well below the relevant AEGL thresholds for short-term exposure. These thresholds are based on internationally recognised health criteria and indicate that effects would be limited to transient, non-harmful levels. The comment regarding acid rain and smog relates to long-term, cumulative atmospheric processes associated with repeated or sustained emissions over extended periods. A potential BESS fire by contrast represents a short-duration, infrequent event and therefore would not materially contribute to regional air pollution phenomena such as acid deposition or photochemical smog formation. On this basis, while NO_x formation in the unlikely event of a BESS fire is acknowledged, the assessment demonstrates that concentrations associated with the assessed fire scenario would not give rise to

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				significant adverse effects on local air quality or human health.
SHD-012	Climate Change and Energy need	Efficiency	Variable Efficiency Issues: Operating CCGT plants below their optimum capacity, such as for backup power, can lead to higher fuel consumption and, consequently, increased emission intensities (both CO_2 and NO_x) per MWh produced. [1, 2, 3, 4, 5, 6, 7, 8]	This is accepted.
SHD-013	Climate Change and Energy need	Efficiency	Total BESS capacity proposed for Lime Down are 270 x 5MWh (Sungrow ST5015UX-4HLN&ST5015UX4H-US-LN) batteries giving a total capacity of 1.350 MWh Assuming all CCGT operate with a CO_2 emission of 365 $\text{gCO}_2\text{eq/kWh}$ = 365 $\text{kgCO}_2\text{eq/MWh}$ (The best-case number) One full charge of the Lime Down BESS causes $365 \times 1.35 = 492.75\text{kg}$ of CO_2 emissions (Plus all the other environmental impacts of course)	The Applicant notes this analysis but does not consider it to be relevant for the examination for the reasons stated above. The government is aiming for a Clean Power System (Section 2.9 of the Statement of Need [REP1-085]) such that the contribution of fossil fuel generation to the national generation mix is no more than 5% annually from 2030 onwards. The methodology used is appropriate for calculating emissions. However, it is not the case that CCGT is the only means of charging the BESS at night.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			Over one year, this is 179.85375 Tonnes of CO2 emissions. Those CO2 emissions would be the same if the demand were met at time of that demand – during the day. Except that, using the BESS incurs losses of 13%, as calculated above. $179.85375 \times 13\% = 23.38$ Tonnes per year of additional CO2 emissions due to Lime Down BESS losses. Over a 60 year operational life this is 1,403 Tonnes of added CO2 emissions. The UK already has 10.5 GWh of installed BESS capacity.	The current make up of the UK grid is 26.8% Gas, 6.5% Solar, 29.7% wind, 1.6% hydroelectric, 11.8% Nuclear and 6.9% Biomass. The proposed approach does not account for the additional savings from Solar energy generation used to charge the BESS or emissions saved by the Scheme in comparison to CCGT, including where the BESS is discharged overnight to meet grid demand and further reduce reliance on CCGT, nor for the possibility that achieving a clean power system would mean that carbon emitting sources made up less than 5% of GB electricity generation.
SHD-014	Climate Change and Energy need	BESS	While many of these BESS will be closer to their grid connection points, and will benefit from lower transmission losses than Lime Down, this is only 3% of the total losses. As battery RTE increases with battery age and charge cycles, and is the largest single contributor to the losses, assuming	The Applicant refers to its response given to SHD-013 above.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			the same 13% loss to the installed base of BESS is probably being kind to the BESS installed base. 1,403 tonnes CO₂ for 1.35 MWh = 17.32 tonnes CO₂ per MWh per year. For the installed base of 10.5GWh = 181,860 tonnes CO₂ additional per year from the installed base of BESS taking advantage of the tariff differential. https://www.renewableuk.com/energypulse/blog/stacking-up-the-storage-where-the-uk-battery-market-stands-in-2025/	
SHD-015	Scheme Description and DCO Process Climate Change and Energy need	GHG emissions	Is the assumption of a 60 year operational life valid for Lime Down? The SSEN paper on "The challenges with undergrounding at 400kV" https://www.ssen-transmission.co.uk/globalassets/projects/2030-projects/2030-project-documents/the-challenges-with-undergrounding-at-400kv.pdf says that the operational life expected of 400kV underground cables is 40 years, mainly due to deterioration in insulation and other factors. This	The Applicant refers to its response given to SHD-013 above. For the purpose of the GHG assessment in ES Volume 1, Chapter 7: Climate Change [APP-059], a 20% replacement of cables has been assumed over the scheme lifetime. The Applicant notes that SSEN paper on the challenges with undergrounding 400kV cables

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			is not consistent with a 60 year operational life for Lime Down. Wiltshire county council has prepared a paper analysing the carbon debt incurred in construction of Lime Down. This calculates that the Lime Down scheme will only break even in terms of carbon emissions after 50 years. This suggests that schemes like Lime Down "front load" carbon emissions, and continue to increase CO2 emissions before any net benefit is delivered and, without the full 60 year operational life, will be of no benefit at all.	appears to be based in part on the premise that overhead lines (OHL) are generally more cost effective for network operators with undergrounding. The Applicant is a privately funded developer and has sought to reduce the overall impacts of the Scheme's 400kV cable connection by proposing to underground these cables. This approach has been taken notwithstanding the additional cost associated with undergrounding compared with the use of OHL's, and without the same financial constraints that would be expected to apply more to a regulated network entity such as SSEN Transmission. The Applicant has fully considered the engineering and civil works implications of undergrounding the 400kV cables, including the construction methodology, installation requirements and operational considerations up to 60 years.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				The assessments set out in the various chapters of the ES [APP-052 to APP-265] detail what impacts are expected as a result of the Scheme based on the minimum and maximum parameters of the Scheme, and the mitigation and enhancement measures that are proposed to reduce these impacts. These include the temporary effects during the construction and installation of the 400kV cable within the cable route corridor as defined in the Scheme's Order Limits. All effects are temporary and would be reversible upon the completion of the work.
SHD-016	Design	Cable Route Corridor	Is Lime Down a secure item of nationally important infrastructure? No! With 25km of indefensible cable that will be a natural and easy target for any terrorist group or foreign power, it would be highly vulnerable. Additionally, the same SSEN paper cited above states that finding and fixing faults on buried HVAC cable systems can take months. Indeed, the SSEN	The Applicant has responded to concerns regarding terrorism risk in The Applicant's Response to Relevant Representations (Part 2) [PDB-004] in response O-28 at pages 972-973 which confirms that the Scheme is unlikely to be a target for terrorism related events. Once the cable route corridor is constructed it will be entirely buried and therefore

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			paper contains a number of reasons not to use buried HVAC systems, any one of which undermines the case for Lime Down and its location being so far from the nearest grid connection point.	not a visible target for terrorism related risks.
SHD-017	Climate Change and Energy need	GHG emissions	The Lime Down solar scheme will damage the environment due to the operational model used to exploit tariff differential.	See above responses. Further, the findings of ES Volume 1, Chapter 7: Climate Change [APP-059] demonstrate that there would be a significant beneficial effect of the scheme on Climate Change.
SHD-018	Climate Change and Energy need	GHG emissions	Furthermore, its viability in terms of total carbon impact is negative without an operational life that is inconsistent with some of the components planned for the scheme. It will be a vulnerable element in our national energy infrastructure with either faults or "bad actor" interventions potentially causing months of disruption to availability. It is an ill-considered scheme in the wrong place, bad for the environment and consumers alike.	The findings of ES Volume 1, Chapter 7: Climate Change [APP-059] demonstrate that there would be a significant beneficial effect of the scheme on Climate Change.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
Karen Hallam REP1-222				
KH-001	Landscape and Visual	Visual impact	I have already written in with my reasons for opposing this and will not repeat them but would like to add a request for consideration to be given to the extreme affect of the proposed development on my house and those of my neighbours. Our houses will be surrounded on all sides by panels. All roads nearby will be lined by panels. Fields of panels will be visible from all sides of my house.	The LVIA in ES Volume 1, Chapter 8 Landscape and Visual [APP-060] takes into account the effects on landscape character and visual amenity in detail and recognises there are adverse visual effects on a number of residential receptors, footpaths and local roads as set out in Table 8-19 Significant Visual Effects: Private Receptors, Table 8-20 Significant Visual Effects: Public Receptors and Table 8-21 Significant Visual Effects: Transport Receptors in in ES Volume 1, Chapter 8: Landscape and Visual [APP-060]. ES Volume 1, Chapter 8: Landscape and Visual [APP-060] 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.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				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 Appendix 8-6. 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 helping to mitigate the adverse effects of the Scheme on landscape character and visual amenity which, once established will provide significant beneficial effects to the fabric of the Sites and the legacy landscape.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
KH-002	Other Environmental Matters	BESS	The battery storage area is but 3 fields away.	An Outline BSMP [REP1-110] has been prepared for the Scheme using guidance from Dorset and Wiltshire Fire and Rescue Service and incorporating recommendations of the National Fire Chiefs Council. The safety objectives for the design of the BESS site are listed in Section 2.4 of the Outline BSMP [REP1-110]. The Outline BSMP [REP1-110] was amended at Deadline 1 to fully accommodate the latest BESS safety requirements contained in NFPA 855 (2026) ensuring that any credible risks associated with battery storage are either prevented or fully mitigated if a BESS failure occurs. Section 2.4.2 of the Outline BSMP [REP1-110] stipulates that: "Final BESS design and site layout will have been validated through mandatory Large Scale Fire Testing (LSFT) and rigorous consequence modelling to minimise the requirement for any D&WFRS intervention in a thermal runaway incident. LSFT

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				must establish minimum equipment spacing distances that demonstrate there is no fire propagation to adjacent BESS enclosures or ESS equipment. D&WFRS intervention in worst case scenarios would typically be limited to boundary cooling of adjacent BESS and Energy Storage System (ESS) units to prevent the fire from spreading. This strategy will be finalised with D&WFRS and be clearly communicated in the Emergency Response Plan (ERP); • To ensure that fire, smoke, and any release of toxic gases does not significantly impact site operatives, first responders, and the local community; and • To ensure that firewater run-off is contained and tested before release or, if necessary, removed by tanker and treated offsite." As now mandated under NFPA 855 (2026) the Applicant will only be able to select a BESS system that has undertaken Large Scale Fire Testing

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				(LSFT). At the detailed design stage, the selected BESS LSFT data will be leveraged to fully inform inputs for risk assessment tools which will be utilised together with detailed consequence modelling to provide a comprehensive site operations and emergency response safety audit, this is stipulated in the Outline BSMP [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. 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.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				The Applicant has drafted a Statement of Common Ground with the Environment Agency [EN010168/EXAM/8.6] on Scheme environmental protection issues including the BESS area drainage strategy. The Firewater Containment and Drainage Strategy – Lime Down D Battery Energy Storage System [REP1-124] was submitted at Deadline 1. 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. Final comprehensive risk assessment reports, BESS design and site-specific consequence modelling, and detailed Emergency Response Plans (ERPs) can only be drafted when based upon the specific BESS design selected at the detailed design stage. Key safety content requires that all

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				equipment within the BESS area is defined, battery system operating limits and test data are fully defined, and the BESS failure protection system is defined. Incident response tactics require significant test data and rigorous consequence modelling from the specific BESS design to develop safe protocols for incident response. Section 5.4.9 – 5.4.11 of the Outline BSMP [REP1-110] stipulates that the ERP will follow NFCC and NFPA 855 (2026) guidelines and stipulates the minimum content that an ERP must contain, including: “<i>Emergency procedures for all credible hazards and risks, including building, infrastructure and vehicle fire, wildfires, impacts on local respondents, impacts on transport infrastructure.</i>” All risk assessments to be conducted at detailed design for BESS projects required by the Health and Safety Executive (HSE) to assess fire and

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				explosion risk are stipulated in Section 6.1.5 of the Outline BSMP [REP1-110]. NFPA 855 (2026) defines a safe BESS exclusion zone as follows: "Potential debris impact radius is defined as 100 feet (ft) or 30.5 metres (m) i.e. this is a typical explosion risk safe exclusion zone radius as modelling and previous BESS incidents typically show 25 m to be maximum radius." The railway line referred to is located at a substantially greater distance, such that no direct thermal effects, blast overpressure or debris impacts will be capable of affecting rail operations under credible worst-case scenarios. 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.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				The Applicant has followed National Fire Chiefs Council (NFCC) guidance and commissioned a BESS fire emissions assessment (as detailed in ES Volume 3, Appendix 15-2: BESS Fire Emissions Modelling [EN010168/APP/6.3 (Rev 2)]) to model toxic gas emissions and visibility impacts from a BESS fire on all sensitive receptors within a 1km radius of the BESS area. The fire emissions modelled in the report were based upon recent UK Health Security Agency (UKHSA) requests for DCO BESS projects which explore both immediate air quality impacts together with annual UK air quality requirements. The UKHSA is a statutory consultee for the Scheme and has stated in their relevant representation [RR-4798] that <i>“Following our review of the submitted documentation the UKSHA are satisfied that the proposed development should not result in any significant adverse impact on public health”</i>. The spacing distances of the illustrative BESS site design are

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				based upon LSFT where no fire propagation occurred; therefore this is a credible worst-case scenario. The Applicant commissioned the BESS fire emissions assessment (as detailed in ES Volume 3, Appendix 15-2: BESS Fire Emissions Modelling [EN010168/APP/6.3 (Rev 2)]) to ensure the selected BESS area would have no significant off-site impacts if credible BESS failure scenarios occurred. The study has been undertaken using professional judgement in the absence of specific regulatory guidance, and adopts a conservative, worst case approach throughout. The assessment demonstrates that, even under worst case assumptions, a BESS fire would not result in significant effects on human health or safety. The modelling assumes: • Worst case BESS fire locations within the BESS area closest to sensitive receptors;

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				- Worst case release height, temperature and plume parameters; and - Use of five years of hourly meteorological data, with the maximum predicted concentration extracted at each receptor, assuming the fire coincides with the poorest dispersion conditions. Given the inherent uncertainty in available BESS fire emissions data, a sensitivity test was also undertaken whereby emission rates were doubled. Even under this highly conservative sensitivity test, predicted concentrations remained well below the relevant health-based thresholds. Six worst case BESS fire locations (i.e. locations within the BESS Area closest to sensitive receptors) have been modelled as depicted in ES Volume 2, Figure 15-5: BESS Fire Emissions Study Area, Receptors and Modelled BESS Locations [APP-166]. The Concentrations of carbon monoxide (CO), formaldehyde, hydrogen chloride (HCl), hydrogen cyanide (HCN),

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				hydrogen fluoride (HF), ammonia (NH₃), nitrogen dioxide (NO₂) and particulates from a potential BESS fire have been modelled using an air quality dispersion model to determine the likely effects on human health. A high-level visibility assessment has also been undertaken using the modelled particulates results to determine the effect of BESS fire emissions on visibility on the local road and rail network to inform the Outline BSMP [REP1-110]. ES Volume 3, Appendix 15-2: BESS Fire Emissions Modelling [APP-239] concludes that there would be no significant air quality effects as a result of a BESS fire incident and visibility issues were not predicted.
KH-003	Human Health	Health impact	Are you aware of health risks being surrounded by panels?	The Applicant does not consider there to be any inherent health risks associated with Solar PV infrastructure. That notwithstanding, the Applicant has undertaken a comprehensive

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				assessment of likely physical and mental health impacts as a result of the construction, operation, and decommissioning of the Scheme in ES Volume 1, Chapter 18: Human Health [APP-070] . This identifies no significant adverse effects to human health and wellbeing.
KH-004	Human health	Mental Health impact	This development affects my mental health and therefore my physical health through the immense stress imposed.	The Applicant has sought to provide robust and transparent information about the Scheme throughout the pre-application consultation process undertaken, as recorded in the Consultation Report [APP-022] and its supporting appendices [APP-023 to APP-051] . This has included the opportunity for all affected persons to make contact with the Applicant team through free-to-use services. This has been done to ensure residents and business owners have had access to as much material as practicable at each stage of the DCO process, to be able to reduce anxiety or concerns from being unsure of what impacts the Scheme may have to them.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				The Applicant has undertaken a comprehensive assessment of potential impacts on mental health and wellbeing during the construction, operation and decommissioning of the Scheme in ES Volume 1, Chapter 18: Human Health [APP-070]. That stated, the Applicant acknowledges that this does not include for the consultation and DCO application process, as this is outside the scope of what the Environmental Assessment of the Scheme should cover. This assessment identifies that while the prospect of change associated with large scale infrastructure can cause concerns and anxiety, the residual effects on population health and social wellbeing across the 2 km Study Area are assessed as not significant in planning terms across the assessed phases of the Scheme. The Applicant acknowledges that this will not offer comfort to the respondent.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				If the DCO is consented, to help mitigate concerns ahead of and during the construction phase, the Applicant is committed establishing a Community Liaison Group (secured by Requirement 4 of Schedule 2 to the Draft DCO [REP1-007]) to act as a human intermediary between residents and the project team to ensure concerns are heard and responded to directly once consent is granted. Alongside the mitigation measures and offset distances between the infrastructure between the respondent's property, the Applicant is confident many concerns held will be addressed and avoided.
KH-005	Socio-Economics, Recreation and Tourism	Property saleability	Despite my best efforts to retain an independent and secure pension/old age this will be destroyed as my house will become unsaleable due to the close proximity on all sides by this development.	Impacts of the Scheme on property prices and the saleability of properties have not been assessed as these have been agreed by the Planning Inspectorate to be scoped out of assessment in the ES, as set out in ES Volume 3, Appendix 1-2: Scoping Opinion Response Table [APP-181] .

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
KH-006	Community Benefit	Community impact	There is no benefit whatsoever to anyone living in the locality (except the farmers whose land will be leased) but there is extreme damage. Regards Karen Hallam	The Scheme would deliver long term environmental benefit alongside a secure energy supply, which benefits all consumers, including those in Wiltshire and Nationally. The Scheme also aims to deliver wider benefits, including biodiversity enhancements, opportunities for local supply chain involvement, and onsite and offsite community benefit initiatives, which will be developed in consultation with local representatives. The Applicant has sought to robustly and comprehensively assess the potential impacts of the Scheme in the ES [APP-052 to APP-265] and mitigate them as required through the management plans secured through the Requirements in Schedule 2 of the Draft DCO [REP1-007]. This has been done to fully demonstrate the potential impacts of the Scheme against its benefits (including but not limited to energy production, economic, employment and skills, local ecology and biodiversity benefits) so that these matters can be

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				considered in the planning balance when the DCO is determined.
Mark Ledlie Hawkesworth REP1-225				
MLH-001	Planning, Site Selection and Design Evolution	Cable Route Corridor	Distribution Network and Grid Connection Scottish and Southern Networks (SSEN) serves as the Distribution Network Operator for the area where the Lime Down scheme is proposed. SSEN has published a pamphlet entitled "The challenges with undergrounding at 400 kV", which addresses issues related to a double 400 kV circuit. This publication provides insight into the complexities associated with high-voltage underground connections.	The Applicant wishes to clarify that SSEN Transmission is responsible for the transmission network in parts of Scotland, while their distribution arm operates the voltage network at 132kv and below in the area nearby to the Scheme's Order limits, and therefore is not responsible for the 400kV transmission network in proximity to the Scheme which is operated by National Grid Energy Transmission (NGET). The paper itself focuses on the challenges with undergrounding 400kV cables and appears to be based in part on the premise that overhead lines (OHL) are generally more cost effective for network operators with undergrounding. The Applicant is a privately funded developer and has sought to reduce the overall impacts of the Scheme's

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				400kV cable connection by proposing to underground these cables. This approach has been taken notwithstanding the additional cost associated with undergrounding compared with the use of OHLs, and without the same financial constraints that would be expected to apply more to a regulated network entity such as SSEN Transmission. The use of underground 400kV cables is common for large scale energy generation projects, for example 400kV cables are often used for the onshore cable connections for offshore wind farms. It is also noted that the document states challenges associated with a "double 400 kV circuit," while the Scheme will be connected to the National Energy Transmission Network (NETS) via a single 400 kV circuit, the parameters of which are contained in Table 3-1 of the ES, Chapter 3: The Scheme [APP-055]. The Scheme is backed by the Applicant's experienced team of technical

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				consultants and industry experts in civil engineering who have a proven track record of delivering successful grid connections for large-scale renewable energy infrastructure at this scale and voltage. The Cable Route Construction Method Statement [APP-183] details the engineering solutions planned for the 22km route from the substation at Lime Down D, to the Existing 400kV substation at Melksham.
MLH-002	Planning, Site Selection and Design Evolution	Grid connection	Grid Connection Length and Infrastructure One notable concern is the length of the grid connection, of 22 kilometers. This extended connection, along with the additional cabling and infrastructure required to link five separate panel array sites, poses significant logistical challenges and major disruption. The necessity for a 400 kV connection appears to be driven by the need to minimize transmission losses over such a long distance.	As outlined 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], the Applicant extensively engaged with National Grid to determine an appropriate point of connection. The Existing National Grid Melksham Substation was identified as having available capacity to deliver the Scheme. The methodology for site selection is explained in ES Volume 1, Chapter 4: Alternatives and Design

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				Evolution [APP-056] and ES Volume 3, Appendix 4-1: Site Selection Assessment Report [APP-185]. A number of potential development areas within a 20 km radius of the point of connection were considered for the Scheme against a range of planning, environmental and operational factors. This resulted in the proposed location for the Scheme being chosen (the five sites) with the report concluding that there are no more suitable and available locations within the search area than the proposed location for the Scheme. The design evolution of the Cable Route Corridor is detailed in ES Volume 1, Chapter 4: Alternatives and Design Evolution [APP-056]. Several factors were considered and the Cable Route Corridor was designed to take a direct route whilst following existing features, such as roads, and avoiding sensitive receptors as far as practicable, such as habitat designations, residential and commercial properties, heritage

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				assets, and a large number of land interests. The assessments set out in the various chapters of the Environmental Statement detail what impacts are expected as a result of the Scheme based on the minimum and maximum parameters of the Scheme, and the mitigation and enhancement measures that are proposed to reduce these impacts. As confirmed in Action point 4 of the Written Summary of the Applicant's Oral Submissions and Responses at Issue Specific Hearing 1 and Responses to Action Points [REP1A-012]- The Applicant has calculated that the transmission losses associated with the 400kV single circuit cable between the 400kV Substation and the Existing National Grid Melksham Substation would be circa 0.1% or lower, depending on the cable material used. The loss percentage would be the same for

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				electricity flows in either direction (import or export). Additionally, in response to Wiltshire Council's submission regarding any differences of impacts from a 132kV vs 400kV connection in Action point 7 of the same document, the Applicant confirmed that the use of a 400kV circuit between the 400kV substation at Lime Down D and the point of connection at the Existing 400kV Melksham Substation allows for the Scheme to export the full 500MW of generation, and import up to 250MW of power, using a single circuit with negligible efficiency losses as set out in response to Action Point 4 above. As set out in Table 3-1 of ES Volume 1, Chapter 3 The Scheme [APP-055] under "Grid Connection Cables", the cable infrastructure can be installed within a single trench with an approximate width of 1.7m. By way of comparison, more than one 132kV circuit would be required to deliver the Scheme's connection,

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				resulting in an increase in width of the overall trench, or require multiple trenches, in order to install the cabling, thus increasing the land temporarily disturbed along the Cable Route Corridor. Finally, the use of a 132kV circuits would materially reduce transmission efficiency around nine times greater than for a 400Kv circuit, increasing losses to 0.9%. Furthermore, the use of 132kV circuits would also require further infrastructure and land take to step up voltage from 132kV to 400kV (e.g. an additional substation) before connecting into the Existing Melksham 400kV Substation, because the secured grid entry point remains at 400kV
MLH-003	Materials and Waste Climate Change and Energy Need	Material Use and Sustainability	Material Use and Sustainability As the energy sector shifts away from fossil fuels toward renewable generation, it is crucial to consider the volume and sourcing of materials used and their sustainability. This includes evaluating finite resource	The Greenhouse Gas assessment within ES Volume 1, Chapter 7: Climate Change [APP-059] considers embodied carbon, this is inclusive of extraction, processing and manufacture of materials. There is also analysis of the carbon benefit of the Scheme

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			availability and the potential for recycling. Often overlooked are the carbon emissions associated with the extraction, processing, and manufacture of these materials, particularly when these activities occur offshore. There is no analysis of the carbon benefit of the scheme and consideration of the replacement of key components over the life of the scheme. The need for maintaining frequency and load balancing on the grid to cater for the intermittency of the solar scheme should be included in the carbon analysis.	and replacement of key components over the lifetime of the Scheme. The overall findings show that the scheme will have a positive effect on climate change. The inclusion of battery storage as associated development supports the solar scheme by storing generated energy when energy is in abundance, and releasing it when it is needed more, supporting the scheme to match supply to demand. The Statement of Need [REP1-085] also explains at Paragraph 6.9.16 that at times when the BESS is not supporting the operation of the principal solar site, it may be useful for the BESS to support the national supply and demand balance by importing directly from the grid rather than from the co-located solar. Figures 20 to 24 of Statement of Need [REP1-085] shows how the co-located scheme can support load

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				balancing and frequency response on the grid, and Table 2 of the Statement of Need [REP1-085] provides a list of the system services the BESS may be able to provide (supported in part by its import connection). By including a flexible asset as part of the Scheme, the Scheme is able to generate low carbon energy, release it to the grid when it is needed, and play an important role in maintaining electricity system operation.
MLH-004	Climate Change and Energy Need	Efficiency	The capacity factor of solar in the UK is only about 10%, and the need for alternative generators or storage to back up supply is evident. The BESS installation of 1,000MWh can produce up to 500MW for two hours, and should provide some of the load balancing resulting from the solar generator, but clearly not for prolonged periods of low output from solar.	Paragraph 3.3.20 of National Policy Statement EN-1 (2023) explains that it is Government's view that a "secure, reliable, affordable, net zero consistent system in 2050 is likely to be composed predominantly of wind and solar" and at Paragraph 3.3.2 that the larger the installed capacity of generators connected to the electricity system, "the more resilient the system will be in dealing with unexpected events, and consequently the lower the risk of a supply interruption," although it also recognises that a balance must be

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				struck. Section 8.5 of the Statement of Need [REP1-085] describes how multi-technology portfolios can work together in combination to support security of energy supply. NPS EN-1 also describes the need for flexible assets (NPS EN-1(2023) Paragraph 3.3.6) and the Scheme includes a BESS to support the operation of the Scheme by storing energy generated by the Scheme when energy is in abundance, and releasing it when it is needed more. Paragraph 5.11.20 of the Statement of Need [REP1-085] explains that BESS complement the generation profile of solar facilities and provide system functions which support the operation of the solar facility by (among other functions) balancing supply with demand.
MLH-005	Other Environmental Matters – Waste and Materials	Replacements	Equipment Lifespan and Recycling There has been insufficient information provided regarding the expected lifespan of key components, including solar	The Applicant confirms in Section 3.5 of ES Volume 1, Chapter 3: The Scheme [APP-055] the expected lifespan of Solar PV Panels, BESS batteries, and transformers.

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			panels, inverters, batteries, and other equipment. Most of this equipment will require replacement within 30 years, and currently, there is limited capacity for recycling these materials. Even the 400 kV cabling may need replacement after 40 years.	Component replacement has been assessed in Section 20.3 Materials and Waste paragraphs 20.3.73-20.3.84 of ES Volume 1, Chapter 20: Other Environmental Matters [APP-072]. The Outline OEMP [EN010168/APP/7.13 (Rev 3)] submitted with the DCO Application sets out the commitment of the Applicant to maximise reuse and recycling of Scheme components at the end of their life. Recycling routes are generally available for component replacement waste at present, and it is likely that there will be even greater opportunities for recycling in the future, not least because the recycling market will have expanded to meet demand as solar PV installations increase. Private sector waste companies will develop these facilities to respond to market demands. At present, solar PV panel waste generation is low, therefore there is a limited demand for facilities and their associated limited available capacity. It is therefore

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				expected that the facilities which reuse, recycle, or recover end of-life solar PV panels will be developed as the quantities of this waste stream increase.
MLH-006	Site Selection and Alternatives	Alternatives	Site Selection and Project Layout While there are several reasons to oppose the Lime Down scheme, the primary concern here is the suboptimal siting of the solar farm, which is exacerbated by its split locations and the lengthy grid connection. It is worth considering whether alternative sites could offer a more integrated layout and a shorter grid connection, thereby improving the overall efficiency and sustainability of the project. The current siting will cause major disruption to local communities over the construction period, and the road access to the construction sites is inadequate.	Please refer to reference IDs SS-06 and SS-07 in the Applicant's Response to Relevant Representations Part 2 [REP1-117] which summarises the Applicant's approach to identifying and evaluating potential sites for the Scheme. Based on this approach, it has been concluded that there are no more suitable and available locations within the search area than the proposed location for the Scheme. The design evolution of the Cable Route Corridor is detailed in ES Volume 1, Chapter 4: Alternatives and Design Evolution [APP-056]. Several factors were considered and the Cable Route Corridor was designed to take a direct route whilst following existing features, such as roads, and avoiding sensitive

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				receptors as far as practicable, such as habitat designations, residential and commercial properties, heritage assets, and a large number of land interests. Annex J of ES Volume 3, Appendix 13-1: Transport Assessment [REP1-057] 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]. 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

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				passing place opportunity for two HGVs along the construction routes. Construction vehicle movements will be managed through a CTMP. An Outline CTMP [REP1-112] has been prepared and submitted with the DCO application. The aim of the CTMP is to ensure that the effect of the construction phase on the local highway network is minimised. The Outline CTMP [REP1-112] sets out measures to coordinate construction deliveries by HGVs to arrive and depart between 09:30 and 16:30 where practicable, to avoid peak network hours of 08:00–09:00 and 17:00–18:00. It also includes a community liaison element to keep local communities informed about the construction process and to provide a contact for feedback should any issues arise. Compliance with the CTMP will be monitored by the Developer, Contractor and Wiltshire Council as local highway authority.

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				The preparation, approval and implementation of the final CTMP, substantially in accordance with the Outline CTMP [REP1-112], 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.