



# **Lime Down**

## Solar Park

# **Applicant's Response Deadline 1A Submissions**

**Revision 1**

**May 2026**

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**The Infrastructure Planning (Examination Procedure) Rules 2010**

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## 1 Introduction

### 1.1 Purpose of this Document

- 1.1.1 This document provides the Applicant's response to the submissions made at Deadline 1A (8 May 2026) by Interested Parties. It is noted that Deadline 1A submissions primarily consist of written summaries of Interested Parties who spoke at the Open Floor Hearing, held on 21 April 2026. Given the Applicant has provided detailed responses to those comments in the **Written Summary of the Oral Submissions at the Open Floor Hearing 1 and the Applicant's Responses [REP1A-013]** those responses are not repeated in this document.
- 1.1.2 Table 1-1 provides a summary of Deadline 1A submissions, and where a response has previously been given in the **Written Summary of the Oral Submissions at the Open Floor Hearing 1 and the Applicant's Responses [REP1A-013]**, a signpost to where this is set out is provided. If new information has been provided as part of the Deadline 1A submission, the Applicant has provided a response to it in this document. Table 1-1 also provides a signpost to where this information is set out.

### 1.2 Post Hearing Submission Summary

**Table 1-1: Summary of Submissions made at Deadline 1A**

Doc Ref.	Name	Applicant's response
REP1A-015	Grittleton Parish Council	The Applicant has addressed all the points raised in Section 2.55 of <b>Written Summary of the Oral Submissions at the Open Floor Hearing 1 and the Applicant's Responses [REP1A-013]</b> .
REP1A-016	St Paul Malmesbury Without Parish Council	The Applicant has addressed the points relating to flooding, Battery Energy Storage System (BESS) and contamination, visual impact, noise and highways issues in in Section 2.53 of <b>Written Summary of the Oral Submissions at the Open Floor Hearing 1 and the Applicant's Responses [REP1A-013]</b> .  The Applicant's response to additional information provided in the Post Hearing Submission is provided in Table 2-1.
REP1A-017	Wiltshire Council	The Applicant's response is set out in Table 2-2.
REP1A-018	Easton Grey Parish Meeting	The Applicant has addressed all the points raised in Section 2.56 of <b>Written Summary of the Oral</b>

Doc Ref.	Name	Applicant's response
		<b>Submissions at the Open Floor Hearing 1 and the Applicant's Responses [REP1A-013].</b>
REP1A-019	Community Action - Whitley and Shaw	The Applicant's response is set out in Table 2-3.
REP1A-020	CPRE Wiltshire	<p>The Applicant has addressed all the points raised in Section 2.62 of <b>Written Summary of the Oral Submissions at the Open Floor Hearing 1 and the Applicant's Responses [REP1A-013].</b></p> <p>The Applicant notes the addition of supporting evidence in the post hearing submission, and a response to this is provided in Table 2-4.</p>
REP1A-021	Grenergy Renewables UK Limited	The Applicant's response is set out in Table 2-5.
REP1A-022	Stop Lime Down	The Applicant's response is set out in Table 2-6.
REP1A-023	Andrew Calderbank	<p>The Applicant has addressed all the points raised in Section 2.15 of <b>Written Summary of the Oral Submissions at the Open Floor Hearing 1 and the Applicant's Responses [REP1A-013].</b></p> <p>The Applicant notes that the provision of additional information and supporting evidence in the post hearing submission. The Applicant's response to this is provided in Table 2-7.</p>
REP1A-024	Ann Skinner	<p>The Applicant has addressed the points raised relating to the water environment in Section 2.8 of <b>Written Summary of the Oral Submissions at the Open Floor Hearing 1 and the Applicant's Responses [REP1A-013].</b></p> <p>The Applicant notes the addition of further points relating to construction traffic and landscape and visual impacts in the post hearing submission. The Applicant's response to these is provided in Table 2-8.</p>
REP1A-025	Anna Kate Fuller	The Applicant has addressed all the points raised in Section 2.20 of <b>Written Summary of the Oral Submissions at the Open Floor Hearing 1 and the Applicant's Responses [REP1A-013].</b>

Doc Ref.	Name	Applicant's response
REP1A-026	Charles Purkess	The Applicant has addressed all the points raised in Section 2.19 of <b>Written Summary of the Oral Submissions at the Open Floor Hearing 1 and the Applicant's Responses [REP1A-013]</b> .
REP1A-027	Christine Morton Macnee	The Applicant has addressed all the points raised in Section 2.11 of <b>Written Summary of the Oral Submissions at the Open Floor Hearing 1 and the Applicant's Responses [REP1A-013]</b> .
REP1A-028	Dan Pike on behalf of Councillor Peter Richardson, Community Action: Whitley and Shaw (CAWS) and Melksham Without Parish Council	The Applicant has addressed all the points raised in Section 2.59 of <b>Written Summary of the Oral Submissions at the Open Floor Hearing 1 and the Applicant's Responses [REP1A-013]</b> .
REP1A-029	Darren Rawlings	The Applicant has addressed all the points raised in Section 2.12 of <b>Written Summary of the Oral Submissions at the Open Floor Hearing 1 and the Applicant's Responses [REP1A-013]</b> .  The Applicant notes the addition of a map showing the bridge and the respondent's property in the Post Hearing Submission, as requested by the ExA. The Applicant is unable to view the details due to it being redacted and therefore has no further comments to provide.
REP1A-030	Elizabeth Claire Maxwell	The Applicant has addressed all the points raised in Section 2.30 of <b>Written Summary of the Oral Submissions at the Open Floor Hearing 1 and the Applicant's Responses [REP1A-013]</b> .
REP1A-031	Emma Vaux	The Applicant has addressed all the points raised in Section 2.23 of <b>Written Summary of the Oral Submissions at the Open Floor Hearing 1 and the Applicant's Responses [REP1A-013]</b> .
REP1A-032	Fiona Jill Shipsey	The Applicant has addressed all the points raised in Section 2.32 of <b>Written Summary of the Oral Submissions at the Open Floor Hearing 1 and the Applicant's Responses [REP1A-013]</b> .

Doc Ref.	Name	Applicant's response
		The Applicant notes that the provision of a publication called 'Sherston Walks', in the Post Hearing Submission, as requested by the ExA. As reported in Section 2.32 of <b>Written Summary of the Oral Submissions at the Open Floor Hearing 1 and the Applicant's Responses [REP1A-013]</b> , this document was considered within <b>ES Volume 1, Chapter 8: Landscape and Visual [APP-060]</b> . The Applicant therefore has no further response.
REP1A-033	Freddie Spickernell	The Applicant has addressed all the points raised in Section 2.21 of <b>Written Summary of the Oral Submissions at the Open Floor Hearing 1 and the Applicant's Responses [REP1A-013]</b> .
REP1A-034	Helen Hood	The Applicant has addressed all the points raised in Section 2.50 of <b>Written Summary of the Oral Submissions at the Open Floor Hearing 1 and the Applicant's Responses [REP1A-013]</b> .
REP1A-035	Helen King	The Applicant has addressed all the points raised in Section 2.39 of <b>Written Summary of the Oral Submissions at the Open Floor Hearing 1 and the Applicant's Responses [REP1A-013]</b> .
REP1A-036	Helen Worthey	The Applicant notes that due to ill health the respondent was unable to attend the Open Floor Hearing.  The Applicant's response to the Post Hearing Submission is provided in Table 2-9.
REP1A-037	Henry Jodrell	The Applicant has addressed all the points raised in Section 2.53 of <b>Written Summary of the Oral Submissions at the Open Floor Hearing 1 and the Applicant's Responses [REP1A-013]</b> .  The Applicant notes that the provision of a map of the Section 14 Wiltshire Cycleway and a photograph of the Courtyard Café interior being used by bicyclists from 31 March 2026. As reported in Section 2.53 of <b>Written Summary of the Oral Submissions at the Open Floor Hearing 1 and the Applicant's Responses [REP1A-013]</b> , Section 14 Wiltshire Cycleway is

Doc Ref.	Name	Applicant's response
		considered in in <b>ES Volume 3, Appendix 16-2: Tourism and Recreation Receptors [APP-241]</b> . The Applicant therefore has no further response.
REP1A-038	Isabel Ross	The Applicant has addressed all the points raised in Section 2.45 of <b>Written Summary of the Oral Submissions at the Open Floor Hearing 1 and the Applicant's Responses [REP1A-013]</b> .
REP1A-039	January Farrington	The Applicant has addressed all the points raised in Section 2.6 of <b>Written Summary of the Oral Submissions at the Open Floor Hearing 1 and the Applicant's Responses [REP1A-013]</b> .
REP1A-040	Jodie Collier	The Applicant has addressed all the points raised in Section 2.43 of <b>Written Summary of the Oral Submissions at the Open Floor Hearing 1 and the Applicant's Responses [REP1A-013]</b> .  The Applicant notes that the provision of a plan entitled 'Hawker Farms – CS Mid Tier Options &SFI Actions' and a letter from Stewart Dobson to Jodie Collier in the Post Hearing Submission. The Applicant's response is provided in Table 2-10.
REP1A-041	John Buckley	The Applicant has addressed all the points raised in Section 2.60 of <b>Written Summary of the Oral Submissions at the Open Floor Hearing 1 and the Applicant's Responses [REP1A-013]</b> .
REP1A-042	John Eavis	The Applicant has addressed all the points raised in Section 2.63 of <b>Written Summary of the Oral Submissions at the Open Floor Hearing 1 and the Applicant's Responses [REP1A-013]</b> .
REP1A-043	John Oglesby	The Applicant has addressed all the points raised in Section 2.35 of <b>Written Summary of the Oral Submissions at the Open Floor Hearing 1 and the Applicant's Responses [REP1A-013]</b> .
REP1A-044	Councilor Jon Atkey	The Applicant has addressed the points raised relating to accumulation of harm, the BESS and the planning balance in Section 2.61 of <b>Written Summary of the Oral Submissions at the Open Floor Hearing 1 and the Applicant's Responses [REP1A-013]</b> .

Doc Ref.	Name	Applicant's response
		The Applicant notes the submission of additional information for the carbon break-even analysis in the Post Hearing Submission. The Applicants response to this is provided in Table 2-11.
REP1A-045	Kim Morgan	The Applicant has addressed all the points raised in Section 2.9 of <b>Written Summary of the Oral Submissions at the Open Floor Hearing 1 and the Applicant's Responses [REP1A-013]</b> .
REP1A-046	Lawrence Copeland	The Applicant has addressed all the points raised in Section 2.29 of <b>Written Summary of the Oral Submissions at the Open Floor Hearing 1 and the Applicant's Responses [REP1A-013]</b> .
REP1A-047	Martin Smith	The Applicant has addressed all the points raised in Section 2.36 of <b>Written Summary of the Oral Submissions at the Open Floor Hearing 1 and the Applicant's Responses [REP1A-013]</b> .
REP1A-048	Matthew Hood	<p>The Applicant has addressed all the points raised in Section 2.18 of <b>Written Summary of the Oral Submissions at the Open Floor Hearing 1 and the Applicant's Responses [REP1A-013]</b>.</p> <p>The Applicant notes the submission of additional references by the respondent to support their open floor hearing submission in the Post Hearing Submission.</p> <p>The Applicants response to this is provided in Table 2-12.</p>
REP1A-049	Matthew Rose	The Applicant has addressed all the points raised in Section 2.2 of <b>Written Summary of the Oral Submissions at the Open Floor Hearing 1 and the Applicant's Responses [REP1A-013]</b> .
REP1A-050	Michael Pitt	The Applicant has addressed all the points raised in Section 2.14 of <b>Written Summary of the Oral Submissions at the Open Floor Hearing 1 and the Applicant's Responses [REP1A-013]</b> .
REP1A-051	Mike Holstead	The Applicant has addressed all the points raised in Section 2.13 of <b>Written Summary of the Oral</b>

Doc Ref.	Name	Applicant's response
		<b>Submissions at the Open Floor Hearing 1 and the Applicant's Responses [REP1A-013].</b>
REP1A-052	Neil Hamilton	The Applicant has addressed all the points raised in Section 2.4 of <b>Written Summary of the Oral Submissions at the Open Floor Hearing 1 and the Applicant's Responses [REP1A-013].</b>
REP1A-053	Nick Hare	The Applicant has addressed all the points raised in Section 2.56 of <b>Written Summary of the Oral Submissions at the Open Floor Hearing 1 and the Applicant's Responses [REP1A-013].</b>
REP1A-054	Paul Simmons	<p>The Applicant has addressed all the points raised in Section 2.48 of <b>Written Summary of the Oral Submissions at the Open Floor Hearing 1 and the Applicant's Responses [REP1A-013].</b></p> <p>The Applicant notes the submission of a report on a meeting with Liverpool Chief fire officer at the Carnegie Road BESS fire in the Post Hearing Submission. In Section 2.48 of <b>Written Summary of the Oral Submissions at the Open Floor Hearing 1 and the Applicant's Responses [REP1A-013]</b>, the Applicant notes that the Carnegie Road BESS fire involved old generation legacy systems that were not compliant with NFPA 855 (pre-dated) and integrated NMC pouch cell, air-cooled battery systems that will not be considered for the Scheme.</p> <p>The Applicant therefore has no further comments to provide.</p>
REP1A-055	Peter Phillips	The has addressed all the points raised in Section 2.65 of <b>Written Summary of the Oral Submissions at the Open Floor Hearing 1 and the Applicant's Responses [REP1A-013].</b>
REP1A-056	Philip Davey	<p>The has addressed all the points raised in Section 2.37 of <b>Written Summary of the Oral Submissions at the Open Floor Hearing 1 and the Applicant's Responses [REP1A-013].</b></p> <p>The Applicant notes the Post Hearing Submission has been expanded to include further references</p>

Doc Ref.	Name	Applicant's response
		to where information referenced was sourced from.
REP1A-057	Philip Moore	<p>The Applicant notes that due to time constraints, the respondent was unable to provide their full proposed submission at the open floor hearing and has provided the full proposed transcript as a Post Hearing Submission.</p> <p>The Applicant has addressed the points raised regarding representations from young people about potential environmental and economic impacts in Section 2.47 of <b>Written Summary of the Oral Submissions at the Open Floor Hearing 1 and the Applicant's Responses [REP1A-013]</b>.</p> <p>The Applicant's response to the level of objection to the Scheme is provided in Table 2-13.</p>
REP1A-058	Rachel Hamblin	The Applicant has addressed all the points raised in Section 2.3 of <b>Written Summary of the Oral Submissions at the Open Floor Hearing 1 and the Applicant's Responses [REP1A-013]</b> .
REP1A-059	Richard Jeffcoate	The Applicant has addressed all the points raised in Section 2.28 of <b>Written Summary of the Oral Submissions at the Open Floor Hearing 1 and the Applicant's Responses [REP1A-013]</b> .
REP1A-060	Sara Margaret Jane Sorby	<p>The Applicant has addressed all the points raised in Section 2.16 of <b>Written Summary of the Oral Submissions at the Open Floor Hearing 1 and the Applicant's Responses [REP1A-013]</b>.</p> <p>The Applicant notes the submission of additional photographs by the respondent to support their open floor hearing submission in the Post Hearing Submission.</p>
REP1A-061	Sean Magee	The Applicant has addressed all the points raised in Section 2.41 of <b>Written Summary of the Oral Submissions at the Open Floor Hearing 1 and the Applicant's Responses [REP1A-013]</b> .
REP1A-062	Simon Cox	The Applicant has addressed the points regarding BESS safety in Section 2.16 of <b>Written</b>

Doc Ref.	Name	Applicant's response
		<p><b>Summary of the Oral Submissions at the Open Floor Hearing 1 and the Applicant's Responses [REP1A-013].</b></p> <p>The Applicant notes the submission of a Significant Incident Report for Orsted BESS, Carnegie Road.</p> <p>The Applicant notes the submission of a research paper relating to BESS safety by the respondent to support their open floor hearing submission in the Post Hearing Submission. The Applicant has provided a response to this additional material in Table 2-14.</p>
REP1A-063	Simon Henry Durrant	The Applicant has addressed all the points raised in Section 2.5 of <b>Written Summary of the Oral Submissions at the Open Floor Hearing 1 and the Applicant's Responses [REP1A-013].</b>
REP1A-064	Sir Michael Pitt	The Applicant has addressed all the points raised in Section 2.14 of <b>Written Summary of the Oral Submissions at the Open Floor Hearing 1 and the Applicant's Responses [REP1A-013].</b>
REP1A-065	Stephanie Dampney	<p>The has addressed all the points raised in Section 2.25 of <b>Written Summary of the Oral Submissions at the Open Floor Hearing 1 and the Applicant's Responses [REP1A-013].</b></p> <p>The Applicant notes the Post Hearing Submission has been expanded to include further references to where information referenced was sourced from.</p>
REP1A-066	Stewart Dobson	The Applicant has addressed all the points raised in Section 2.27 of <b>Written Summary of the Oral Submissions at the Open Floor Hearing 1 and the Applicant's Responses [REP1A-013].</b>
REP1A-067	Stuart Fisher	The Applicant has addressed the points raised regarding site selection in Section 2.10 of <b>Written Summary of the Oral Submissions at the Open Floor Hearing 1 and the Applicant's Responses [REP1A-013].</b>

Doc Ref.	Name	Applicant's response
		<p>The Applicant notes the submission of additional mapping to support their open floor hearing submission in the Post Hearing Submission.</p> <p>The Applicant notes the submission comparing viewpoint photographs by the respondent to support their open floor hearing submission in the Post Hearing Submission. The Applicant has provided a response to this additional material in Table 2-15.</p>
REP1A-068	Tony McAleavy	<p>The Applicant has addressed all the points raised in Section 2.38 of <b>Written Summary of the Oral Submissions at the Open Floor Hearing 1 and the Applicant's Responses [REP1A-013]</b>.</p>
REP1A-069	Tracy Worcester	<p>The Applicant has addressed all the points raised in Section 2.40 of <b>Written Summary of the Oral Submissions at the Open Floor Hearing 1 and the Applicant's Responses [REP1A-013]</b>.</p> <p>The Applicant notes the submission of additional material by the respondent to support their open floor hearing submission in the Post Hearing Submission.</p> <p>The Applicant has provided a response to this additional material in Table 2-16.</p>
REP1A-070	Willa Gibb	<p>The Applicant has addressed all the points raised in Section 2.38 of <b>Written Summary of the Oral Submissions at the Open Floor Hearing 1 and the Applicant's Responses [REP1A-013]</b>.</p>

## 2 Summary of Additional Matters Raised in Post Hearing Summaries and the Applicant's Responses

### 2.1 St Paul Malmesbury Without Parish Council [REP1A-016]

2.1.1 The Applicant has addressed the points raised by St Paul Malmesbury Without Parish Council in their Deadline 1A submission [REP1A-016] relating to flooding, BESS and contamination, visual impact, noise and highways Issues in Section 2.53 of **Written Summary of the Oral Submissions at the Open Floor Hearing 1 and the Applicant's Responses [REP1A-013]**. Table 2-1 provides a response to further information provided.

**Table 2-1: Applicant's Response to Additional Matters Raised in Post Hearing Summaries by St Paul Malmesbury Without Parish Council**

Reference	Comments/Issue Raised	Applicant's Response
SPM-001	<p>Response to Planning Inspector re submission from St Paul Malmesbury without PC 21/4/26, no 59 Madam and Sirs</p> <p>You commented on our submission made about Flooding in Corston.</p> <p>You asked me to send you details of the plans the Council has for returning the Gauzebrook to its pre re-engineered course. The previous meandering course was straightened and thereby abnormal flow is speeded up downstream to Corston.</p> <p>Perhaps "plans" was the wrong word. The Council has the aim of reducing flooding and, with partners, is currently reviewing the most effective means to</p>	<p>The Applicant notes the update from St Paul Malmesbury Without Parish Council that there is not currently a defined scheme, plan or design for re-routing the Gauze Brook or creating flood storage pools. The Applicant also notes that the Parish Council describes this work as being at an early review stage with other local parties.</p> <p>The Scheme does not rely on a third-party natural flood management or channel re-routing proposal in order to demonstrate its acceptability. The relevant assessment question is whether the Scheme itself would increase flood risk. That has been assessed in <b>ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [REP1-017]</b> and <b>ES Appendix 11-1 to</b></p>

Reference	Comments/Issue Raised	Applicant's Response
	<p>achieve this. We are working with Hullavington Parish Council, our neighbours upstream of the Gauzebrook, and the Flood Resilience Officer at Wiltshire Council (Renate Malton, Highways Asset Management &amp; Commissioning and the Drainage Dept. at Wiltshire Council) to partake in the Wiltshire Wildlife Flood Management who are organising walks to determine how to alleviate the flooding of the Gauzebrook.</p> <p>We are registered to partake in the walk of the length of the Gauzebrook with these parties. This will be the important ground work planning. We can then put together a plan to perhaps re route the Gauzebrook to its original meandering course (as seen on old parish boundaries which followed the course) and set up points where flood pools can be created to catch and mitigate abnormal flow.</p> <p>Unfortunately the Lime Down siting of the BESS and surrounding infrastructure would prevent us from carrying through this plan.</p> <p>I presume you have maps of the course of the Gauzebrook and where any proposed flood pools would interact with their infrastructure but if not we are happy to help provide these.</p>	<p><b>11-9: Flood Risk Assessment and Drainage Strategy [REP1-037 to REP1-054]</b>, including the site-specific assessment for Lime Down D in <b>ES Volume 3, Appendix 11-6: Flood Risk Assessment and Drainage Strategy Lime Down D [REP1-047]</b>.</p> <p>The Gauze Brook floodplain has been subject to detailed hydraulic modelling where the Scheme materially interacts with mapped fluvial flood risk. The BESS and substations are located in Flood Zone 1. Drainage from impermeable infrastructure is controlled through Requirement 11 of Schedule 2 of the <b>Draft DCO [REP1-007]</b>. Construction water management, sediment control and pollution prevention measures are detailed in the <b>Outline CEMP [REP1-096]</b> and secured through Requirement 13 of Schedule 2 of the <b>Draft DCO [REP1-007]</b>.</p> <p>At this stage, no defined flood alleviation design, land requirement, hydraulic assessment or consenting route has been provided which demonstrates that the Scheme would prevent a future Gauze Brook flood management proposal. The Applicant would welcome further engagement with the Parish Council, Wiltshire Council and other relevant parties if more detailed proposals are developed.</p>

Reference	Comments/Issue Raised	Applicant's Response
	<p>Naturally we are some way from definitive plans, as I said they are in their infancy but already in collaboration with other parties, but it would be a great shame if this important alleviation to flooding in Corston was to be denied by any Lime Down infrastructure in the immediate zone we determine.</p> <p>Please let us know if you require any further detail and we can keep you updated with results from subsequent research.</p>	<p>The Applicant is also considering whether opportunities for additional flood management or natural flood management can be incorporated where practicable, including in the Gauze Brook area. Any such measures would be additional to the assessed mitigation and would be treated as a potential community benefit, not mitigation required to make the Scheme acceptable.</p>

## 2.2 Wiltshire Council [REP1A-017]

**Table 2-2: Applicant's Response to Additional Matters Raised in Post Hearing Summaries by Wiltshire Council**

Reference	Comments/Issue Raised	Applicant's Response
WC-001	<p><b>Initial Assessment of Principal Issues</b></p> <p>1.1. Wiltshire Council (the Council) indicated its agreement with the ExA's initial assessment of principal issues as contained within Annex C to the Rule 6 Letter [PD-006].</p>	<p>The Applicant notes that Wiltshire Council agrees with the ExA's initial list of principal issues.</p>
WC-002	<p><b>Draft Examination Timetable</b></p> <p>1.2. Wiltshire Council raised concerns regarding the draft examination timetable as contained within Annex D to the Rule 6 letter as part of its Procedural Deadline A response [PDA-013]. The Council considered that insufficient time had been provided for the Council to adequately consider and respond to the ExA written questions and to comment on the Written Representations. The Council were seeking a minimum of 15 days to respond to the ExA questions and 6 weeks to review and comment on the Written Representations.</p>	<p>The Applicant notes the changes to the examination timetable that are set out in the <b>Rule 8 Letter [PD-007 and PD-009]</b>.</p>
WC-003	<p>1.3. Wiltshire Council appreciates the ExA slightly amending the timetable in its Rules 8, 9, 13 and 16 Letter [PD-007] to extend Deadline 2 by two calendar days, and for its direction for the Council to focus its</p>	<p>The Applicant notes the changes to the examination timetable for Deadlines 2 and 3 that are set out in the <b>Rule 8 Letter [PD-007 and PD-009]</b>.</p>

Reference	Comments/Issue Raised	Applicant's Response
	<p>review of Written Representations to those submitted by statutory bodies. Furthermore, the Council welcomes the additional three calendar days for the responses to ExA Questions 1 at Deadline 3.</p>	
<p>WC-004</p>	<p>1.4. The Council also requested that the ExA schedule further provision within the timetable for additional hearings, or to keep the need for additional hearings under review, in order for the evidence to be appropriately considered and examined. The Council was specifically seeking hearings on the following topic areas:</p> <ul style="list-style-type: none"> <li>• Draft DCO – A further ISH is considered likely to be required given the Council's unresolved concerns as set out in Appendix A to its Relevant Representation [RR-4934] and additional Requirements would be set out in its Written Representation and Local Impact Report.</li> <li>• Ecology and Biodiversity – On account of the scale and nature of the scheme across predominantly greenfield land, the potential for significant adverse effects on protected species, the need for the competent authority to conduct a Habitats Regulations Assessment (HRA) and the complex and still evolving nature of the</li> </ul>	<p>The Applicant notes the request for Issue Specific Hearings on specific matters and notes the reserved dates for a further week of hearings week commencing 21 September 2026 as reflected in the examination timetable set out in the <b>Rule 8 Letter [PD-007 and PD-009]</b>.</p> <p>The Applicant notes that Wiltshire Council has made representations on the topic areas identified for further hearings in their Local Impact Report <b>[REP1-137]</b> and Written Representation <b>[REP1-138]</b> and, therefore, the Applicants responses are not repeated in this document. The responses are contained in the following documents:</p> <ul style="list-style-type: none"> <li>• <b>Applicant's Response to the Local Impact Reports [EN010168/EXAM/9.21].</b></li> <li>• <b>Applicant's Response to Written Representations [EN010168/EXAM/9.22].</b></li> </ul> <p>The Applicant continues to engage with Wiltshire Council on the matters stated and the position of each party is reflected in the <b>Statement of Common</b></p>

Reference	Comments/Issue Raised	Applicant's Response
	<p>Biodiversity Net Gain (BNG) submission, the Council considers a dedicated ISH on this topic will be required.</p> <ul style="list-style-type: none"> <li>• Flood Risk and Drainage – The LLFA considers flood risk and drainage to be a principal unresolved issue. Given the scale of the development, the methodological dispute over assessment adequacy, and the reliance on post consent controls, the LLFA considers a dedicated ISH on flood risk and drainage would be appropriate and would materially assist the Examination.</li> <li>• Highways and Transport – The Council considers that an ISH is required on this topic given the number of unresolved issues, including the lack of clarity on enforceable powers, the lack of indemnity provision and acceptable works monitoring, the concern over the adequacy of the network to accommodate the construction traffic proposed, and the concern that the number of HGV movements have been underestimated. The hearing could also explore further mitigation measures to protect vulnerable road users.</li> <li>• Landscape and Visual – The Council considers that an ISH is required due to:</li> </ul>	<p><b>Ground with Wiltshire Council [EN010168/EXAM/8.2].</b></p>

Reference	Comments/Issue Raised	Applicant's Response
	<ul style="list-style-type: none"> <li>○ It is the Council's position that the currently assessed levels of landscape and visual harms and benefits assessed to date are not considered accurate or reliable to be taken form to inform the ExA's wider planning balance exercise. The Council is concerned that the Landscape and Visual Impact Assessment generally underestimate the resulting negative effects and overestimate the positive effects for this project based on incorrect judgements of receptor Value, Susceptibility, Sensitivity and Magnitude used within the assessment. The Council believes that these issues should be further discussed to ensure that the ExA has accurate landscape and visual assessment findings and to inform its wider planning balance considerations.</li> <li>○ The Council does not consider that the project is 'landscape-led' as claimed by the Applicant. The Council believes that what a landscape led project is should be explored.</li> </ul>	

Reference	Comments/Issue Raised	Applicant's Response
	<ul style="list-style-type: none"> <li>○ The Council considers that the DCO submission does not appropriately consider the full potential of the project for significant adverse effects on the Cotswolds National Landscape and its setting, including matters of relative tranquillity. The additionally submitted Tranquillity Technical Note [PDA-010] does not suitably address this matter and therefore the Council considers that this matter should be explored in more detail.</li> <li>○ 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 proposals. This could be on areas reserved for landscape and/or ecological mitigation and embedded mitigation, or close to high value features. The ISH is considered necessary to further understand typically where, and in what form, anticipated waste soils would or could be theoretically stockpiled, without impacting on sensitive receptors or embedded mitigation proposals.</li> </ul>	

Reference	Comments/Issue Raised	Applicant's Response
	<ul style="list-style-type: none"> <li>○ The basis for determining the Zone of Influence for cumulative landscape assessment is based on a 10km radial area of search from LDSP solar panel areas A to E without any project specific topic matter reasoning for this. The cumulative landscape and visual assessment findings do not appropriately include or consider the full potential for cumulative landscape effects or sequential visual effects with existing operational solar farms located within the Limestone Lowland Landscape Character Type.</li> <li>● Noise and Vibration – The Council considers that an ISH on noise and vibration should be scheduled on a precautionary basis due to the outstanding concerns that the Council has. However, it may be possible to address these issues in updated management plans, for example through improved mitigation measures, although there are also concerns with regards to enforcement activity. The Council would request that the ExA keep the need for a noise and vibration hearing under review during the course of the Examination.</li> </ul>	

Reference	Comments/Issue Raised	Applicant's Response
WC-005	1.5. Wiltshire Council welcomes the ExA reserving an additional week for hearings (week commencing 21 September 2026) in its Rules 8, 9, 13 and 16 Letter [PD 007].	The Applicant notes the changes to the examination timetable that are set out in the <b>Rule 8 Letter [PD-007 and PD-009]</b> .
WC-006	1.6. The Council sought an extension to the deadline for the initial submission of the Statement of Common Ground between the Applicant and itself from 1 May (Deadline 1) to 15 May as the initial draft was only received from the Applicant on 15 April, noting that it had been expected to be received during week commencing 23 March. The extension sought would enable council officers to fully review the document to ensure that it was of genuine usefulness to the ExA, rather than a rushed document. The Council was seeking sufficient time to enable it to respond as required in its role as Host Authority.	The Applicant notes the changes to the examination timetable that are set out in the <b>Rule 8 Letter [PD-007 and PD-009]</b> .
WC-007	1.7. Wiltshire Council appreciates the ExA moving the deadline for submission of initial Statement of Common Grounds from Deadline 1 to Deadline 2 (22 May 2026) within its Rules 8, 9, 13 and 16 Letter [PD-007].	The Applicant notes the changes to the examination timetable that are set out in the <b>Rule 8 Letter [PD-007 and PD-009]</b> in relation to Statements of Common Ground.  The <b>Statement of Common Ground with Wiltshire Council [EN010168/EXAM/8.2]</b> is submitted at Deadline 2.

Reference	Comments/Issue Raised	Applicant's Response
WC-008	<p><b>Procedural Decisions Made by the ExA</b></p> <p>1.8. The Council indicated that it was helpful to receive direction that there would be a Statement of Common Ground between the Applicant and Stop Lime Down. It noted that there may be other stakeholders, for example Town and Parish Councils, who may wish to have a Statement of Common Ground as well. The Council requested that the ExA consider any further requests favourably.</p>	<p>The Applicant is preparing a Statement of Common Ground with Stop Lime Down which is expected to be submitted at Deadline 3 of Examination.</p>
WC-009	<p><b>Any Other Matters</b></p> <p>1.9. The Council expressed its support for the matter raised by Stop Lime Down regarding reserving space for the press at future hearings relating to this scheme.</p>	<p>This is a matter for the Examining Authority to respond.</p>
WC-010	<p><b>Issue Specific Hearing 1 – 22 April 2026</b></p> <p><b>The Draft Development Consent Order (dDCO)</b></p> <p>2.1. The Council welcomed the indication from the Applicant that further detail would be provided at Deadline 1 following questioning from the ExA on Requirement 20 Decommissioning and Land Restoration. This is an area that the Council has previously expressed concerns [RR-4934].</p>	<p>The Applicant's response to the question from the ExA on Requirement 20 Decommissioning is set out in from page 12 to page 14 of the <b>Written Summary of the Applicant's Oral Submissions and Responses at Issue Specific Hearing 1 and Responses to Action Points [REP1A-012]</b> where it is explained that an updated version of Requirement 20 was incorporated into the version of the <b>Draft DCO [REP1-007]</b> submitted at Deadline 1.</p>

Reference	Comments/Issue Raised	Applicant's Response
WC-011	<p>2.2. The Council indicated that it had concerns regarding the Book of Reference [APP-020] and associated plans, as it had also found them difficult to interpret and were unclear about the exact rights were being sought over land in which the Council had an interest. A detailed response on this matter would be provided by the Council at Deadline 1 as part of its Written Representation.</p>	<p>The Applicant's response to the comments provided by Wiltshire Council on the <b>Book of Reference [REP1-011]</b> is set out Section 2 of the <b>Applicant's Response to Written Representations [EN010168/EXAM/9.22]</b>.</p>
WC-012	<p>2.3. The Council highlighted that it was engaged in active discussions with the Applicant regarding the Draft DCO. Whilst some progress has been made, with respects of having Protective Provisions for the benefit of the Local Highway Authority for example, the Council has a number of outstanding concerns in relation to the Draft DCO as currently drafted [RR-4934]. The Council will also be seeking additional and/or amended Requirements and these will be set out in the Council's Written Representation and Local Impact Report, which will be submitted at Deadline 1.</p>	<p>The Applicant provided Wiltshire Council with protective provisions for their comment on 8 May 2026, and it is anticipated comments will be provided by 19 May 2026. Therefore, the Applicant will provide an updated version of the <b>Draft DCO [REP1-007]</b> at Deadline 3 that reflects the comments made, where these have been considered acceptable by the Applicant.</p>
WC-013	<p><b>Alternatives</b></p> <p>2.4. In response to the question posed by the ExA to the Council in its role as LLFA, the Council indicated that the Section 19 (Flood and Water Management Act 2010) reports were published on its website. A preliminary review did not identify any published</p>	<p>The Applicant notes Wiltshire Council's position at the hearing and the subsequent clarification provided in the Deadline 1A submission. Wiltshire Council has confirmed that Section 19 flood investigation reports have been prepared for Whitley and Beanacre, but that no Section 19 reports have been prepared for Corston</p>

Reference	Comments/Issue Raised	Applicant's Response
	<p>reports within the Lime Down Solar Park project area, however the Council took an action to clarify this within its post hearing submission to be submitted at Deadline 1A.</p>	<p>or Rodbourne. The Applicant has responded to the Section 19 matters at WC-017, below, including the relevance of the Whitley and Beanacre investigations to the Scheme's flood risk and drainage assessment.</p>
<p>WC-014</p>	<p>2.5. With regards to alternatives, the Council noted the Applicant's submissions with regards to 132kv versus 400kv schemes. However, the Council queried whether if the Applicant had proceeded on the basis of a 132kv scheme, whether that would have resulted in lower impacts, specifically lower environmental harm and lower construction impacts.</p>	<p>The Applicant's response to the point raised about a comparison of 132kV versus 400 kV schemes is set out from page 62 to page 63 of the <b>Written Summary of the Applicant's Oral Submissions and Responses at Issue Specific Hearing 1 and Responses to Action Points [REP1A-012]</b> where an explanation is provided.</p>
<p>WC-015</p>	<p>2.6. The Council also considered that there should be alignment regarding construction phasing and grid connection timeframes, noting that the construction period was said to be approximately 2-years starting in 2027, and the grid connection was expected to take place by late 2030. This alignment would ensure that the scheme had not been constructed but left for a long period without connection to the grid. The Council indicated that this could minimise disruption to residents and perhaps minimise any identified harm.</p>	<p>The Applicant's response to the to the point raised about construction phasing and grid connection is set out on page 64 of the <b>Written Summary of the Applicant's Oral Submissions and Responses at Issue Specific Hearing 1 and Responses to Action Points [REP1A-012]</b> where it is explained that the Applicant seeks to deliver a scheme which maximises lifetime generation through the available grid connection and has therefore proposed a construction program with sufficient flexibility to minimise the elapsed time between the installation of panels and the ability to export their output to the grid. This has been balanced with the opposite consideration, of having a fully available grid connection but nothing connected to</p>

Reference	Comments/Issue Raised	Applicant's Response
		<p>it (i.e. no exports) during construction. The Applicant has included a phasing requirement in the <b>Draft DCO [REP1-007]</b> so that details of the construction programme and proposed date of final commissioning are known prior to construction commencing.</p>
WC-016	<p>2.7. The Council welcomed the ExA questioning and response from the Applicant that an update on outstanding ecological surveys would be provided at Deadline 1A. The Council has also raised this matter as a concern within its Relevant Representation [RR-4934]. The Council would make further representation once it had had a chance to review the Applicant's submission.</p>	<p>The Applicant provided the following at Deadline 1, which provides the outstanding ecological surveys.</p> <ul style="list-style-type: none"> <li>• Updated <b>ES Volume 1, Chapter 9: Ecology and Biodiversity [REP1-015]</b>;</li> <li>• Updated <b>ES Volume 2, Figure 9-1-13 to 9-1-24 Baseline Habitats Map - Cable Route Corridor [REP1-036]</b>; and</li> <li>• Updated <b>ES Volume 3, Appendix 9-1 Ecological Baseline Report [REP1-083]</b>.</li> </ul> <p>The Applicant welcomes Wiltshire Council's comments on the submitted documents.</p>
WC-017	<p><b>Action Point 5 Response</b></p> <p>2.8. Following further review, Wiltshire Council can confirm that it has undertaken Section 19 flooding investigation reports for Whitley and Beanacre, reflecting historical flooding events in these locations. The investigations relate to areas identified for proposed Lime Down Solar Park infrastructure works,</p>	<p>The Applicant notes Wiltshire Council's confirmation that Section 19 flood investigation reports have been prepared for Whitley and Beanacre, and that no Section 19 reports have been prepared for Corston or Rodbourne. The Applicant also notes that the Whitley and Beanacre investigations do not relate to the Gauze Brook catchment.</p>

Reference	Comments/Issue Raised	Applicant's Response
	<p>including battery installations and associated cable-laying activities, which remain forthcoming.</p>	<p>The Section 19 material identifies existing flooding mechanisms associated with an extreme rainfall event, including rapid surface water runoff, exceedance of local drainage systems, overland flow routes, dry valleys, ditch networks and culvert capacity constraints. Those mechanisms are consistent with the baseline flood risk context considered in the Scheme's assessment.</p> <p>The Scheme's flood risk and drainage assessment is set out in <b>ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [REP1-017]</b> and <b>ES Volume 3, Appendix 11-1 to 11-9: Flood Risk Assessment and Drainage Strategy [REP1-037 to REP1-054]</b>. The assessment considers flood risk from all sources, including surface water, ordinary watercourses, Main Rivers, existing drainage features, topography and downstream receptors.</p> <p>The Applicant agrees that established overland flow routes, local drainage constraints and downstream pathways are relevant considerations. These have been addressed through the Scheme design and secured controls. Existing overland flow routes are retained where practicable. Panelled land remains permeable and is not positively drained as hardstanding. Construction-phase runoff, sediment</p>

Reference	Comments/Issue Raised	Applicant's Response
		<p>mobilisation, temporary drainage and soil compaction risks are controlled through the <b>Outline CEMP [REP1-096]</b>, secured by Requirement 13 of Schedule 2 of the <b>Draft DCO [REP1-007]</b>. Soil handling and compaction controls are detailed in the <b>Outline SRMP [APP-280]</b> which is secured by Requirement 18 of Schedule 2 of the <b>Draft DCO [REP1-007]</b>.</p> <p>Formal drainage from impermeable infrastructure is assessed separately and will be managed through the drainage hierarchy, attenuation and controlled discharge where required. This is secured through Requirement 11 of Schedule 2 of the <b>Draft DCO [REP1-007]</b>. The BESS and substations are located in Flood Zone 1. Cable-laying activities are temporary works controlled through the detailed CEMP and relevant construction method statements, including measures for runoff, sediment control, watercourse protection and reinstatement. Operational drainage inspection and maintenance are detailed in the <b>Outline OEMP [REP1-098]</b> and secured by Requirement 14 of Schedule 2 of the <b>Draft DCO [REP1-007]</b>.</p> <p>The Section 19 reports confirm that parts of the wider catchment are already sensitive to intense rainfall and drainage exceedance. They do not demonstrate that the Scheme would materially increase runoff rates,</p>

Reference	Comments/Issue Raised	Applicant's Response
		runoff volumes or downstream flood risk. The submitted assessment concludes that, with the secured controls in place, the Scheme would not materially increase off-site flood risk.
WC-018	2.9. These investigations are not within the Gauze Brook catchment and do not relate to flooding events in Corston or Rodbourne. No Section 19 reports have been undertaken for Corston or Rodbourne.	See the Applicant's response to WC-017.
WC-019	2.10. A summary of the key flood risk considerations and their relevance to the Lime Down Solar Park (LDSP) proposals from the Wiltshire Council Section 19 Flood Investigation (September 2014) is contained below.	See the Applicant's response to WC-017.
WC-020	2.11. The September 2014 event resulted from extreme (>1 in 150-year) rainfall, which generated significant surface water (pluvial) runoff. This led to widespread flooding where drainage systems were exceeded, and flows followed established overland pathways and local catchment routes.	See the Applicant's response to WC-017.
WC-021	<p><b>Hydrological Context and Connectivity:</b></p> <p>2.12. The investigation identifies flooding across several parishes within the Bristol Avon and By Brook catchment systems, including:</p>	See the Applicant's response to WC-017.

Reference	Comments/Issue Raised	Applicant's Response
	<ul style="list-style-type: none"> <li>• Melksham and Melksham Without (Shaw, Atworth, Whitley)</li> <li>• Trowbridge</li> <li>• Corsham</li> <li>• Nettleton &amp; Burton.</li> </ul>	
WC-022	2.13. Applying a strict hydrological connectivity test, the relevant to LDSP is as follows:	See the Applicant's response to WC-017.
WC-023	2.14. Directly connected downstream receptors: <ul style="list-style-type: none"> <li>• Melksham and Melksham Without (Shaw, Atworth, Whitley)</li> <li>• Trowbridge</li> </ul>	See the Applicant's response to WC-017.
WC-024	2.15. These locations lie within the immediate downstream catchment of the site, with runoff conveyed via ordinary watercourses and tributaries to the Bristol Avon system.	See the Applicant's response to WC-017.
WC-025	2.16. Secondary (partial) connectivity: <ul style="list-style-type: none"> <li>• Corsham</li> <li>• Nettleton &amp; Burton</li> </ul>	See the Applicant's response to WC-017.
WC-026	2.17. These areas are located within adjacent headwater sub-catchments (notably the By Brook	See the Applicant's response to WC-017.

Reference	Comments/Issue Raised	Applicant's Response
	system) and may be influenced depending on local flow routing within the wider catchment.	
WC-027	<p><b>Flood Mechanism:</b></p> <p>2.18. The Section 19 findings indicate that flooding was:</p> <ul style="list-style-type: none"> <li>• Generated by rapid runoff from rural and upland areas</li> <li>• Conveyed via overland flow routes, dry valleys and ditch networks</li> <li>• Triggered where local drainage and culvert capacity was exceeded.</li> </ul>	See the Applicant's response to WC-017.
WC-028	2.19. This confirms that flood risk is pathway-driven and catchment-based, rather than limited to mapped fluvial floodplains.	See the Applicant's response to WC-017.
WC-029	<p><b>Implications for LDSP:</b></p> <p>2.20. Within this framework, the LDSP site forms part of the upstream contributing catchment, influencing downstream flood risk through runoff generation and conveyance.</p>	See the Applicant's response to WC-017.
WC-030	2.21. Accordingly, the key sensitivities for the scheme are:	See the Applicant's response to WC-017.

Reference	Comments/Issue Raised	Applicant's Response
	<ul style="list-style-type: none"> <li>• Maintaining established overland flow pathways across the site</li> <li>• Managing runoff rates and volumes to avoid increasing downstream flood risk</li> <li>• Protecting directly connected receptors, particularly within the Melksham and Trowbridge areas</li> <li>• Understanding sub-catchment routing, particularly toward the By Brook and Avon systems</li> <li>• Accounting for local drainage constraints, including culverts, ditches and highway drainage that are susceptible to exceedance.</li> </ul>	
WC-031	<p><b>Summary:</b></p> <p>2.22. The Section 19 evidence demonstrates that flooding in this area is driven by intense rainfall interacting with rural catchment processes and defined surface flow pathways.</p>	See the Applicant's response to WC-017.
WC-032	<p>2.23. For LDSP, the principal consideration is therefore the management of runoff within a hydrologically connected catchment, with potential implications for clearly defined downstream receptors, rather than a wider or diffuse geographic area.</p>	See the Applicant's response to WC-017.

## 2.3 Community Action – Whitley and Shaw [REP1A-019]

**Table 2-3: Applicant's Response to Additional Matters Raised in Post Hearing Summaries by Community Action – Whitley and Shaw**

Reference	Comments/Issue Raised	Applicant's Response
CAWS-01	<p>I write on behalf of Community Action: Whitley &amp; Shaw (CAWS) in response to the Examining Authority's request made at the Lime Down Solar Park public hearing on 21 April 2026.</p> <p>Please find attached a written submission entitled "Clarification of Energy and Enabling Schemes and Their Cumulative Impact in Shaw, Whitley and the Wider Melksham Substation Area."</p> <p>This document provides further information regarding the number of schemes referenced by CAWS and the cumulative impact arising from them.</p> <p>For ease of reference, the scheme data has been incorporated directly within the submission at Annex A. As explained in the document, the information has been compiled from publicly available sources, including NESO connection data, planning records and local knowledge, and reflects the position at the time of CAWS' Relevant Representation. The underlying</p>	<p>The Applicant has reviewed the list of schemes provided. With regard to Annex A, in a number of cases, several rows relate to a single scheme, for example the Wick Farm scheme at Melksham comprises three rows covering the solar, BESS and cable elements. Notwithstanding, the Applicant has reviewed Annex A and provides further information below.</p> <p>Of the 36 rows identified as 'Future NESO Connections', planning applications are identified for two schemes (Gastard BESS and Norrington Gate BESS), both of which are listed within <b>ES Volume 3, Appendix 21-1: Long List of In Combination Effects and Cumulative Developments Cumulative Long List [APP-264]</b> with Gastard BESS (PL/2024/10434) also on the Cumulative short list provided as Table 21-4 in <b>ES Volume 1, Chapter 21 Cumulative and In-Combination Effects [APP-073]</b>.</p> <p>22 of the rows are part of the 'Future Energy Landscapes' community engagement process seeking</p>

Reference	Comments/Issue Raised	Applicant's Response
	<p>analysis is drawn from CAWS' Working Group Body of Knowledge, which is referenced where appropriate.</p> <p>An illustrative map is also included within the submission to assist the Examination in understanding the geographic distribution and clustering of development. This is provided as a visual aid and is not intended to be exhaustive. We trust that this information is helpful to the Examination. Should the Examining Authority require any further clarification, CAWS would be pleased to assist.</p>	<p>to identify potential sites for renewable community energy initiatives. Currently, there are no planning applications for any of the sites listed.</p> <p>7 of the rows are operational schemes and are taken into consideration as part of the baseline.</p> <p>The remaining rows are schemes either under construction, planned or with planning consent. These schemes are taken into consideration as part of the cumulative assessment with the exception of the National Grid and SSEN enabling works. On the basis of limited disturbance and duration, the enabling works activities are not considered likely to give rise to significant cumulative effects. The identification of future proposed or consented schemes for the purposes of the cumulative assessment has been undertaken in accordance with Planning Inspectorate Advice Note 17 on Cumulative Effects. The four stage methodology is described within <b>ES Volume 1, Chapter 6: EIA Methodology [APP-058]</b>. In summary, 358 developments were included in the Long List in <b>ES Volume 3, Appendix 21-1: Long List of In Combination Effects and Cumulative Developments Cumulative Long List [APP-264]</b>. 41 developments are included in the short list including a number of proposed solar and BESS developments.</p>

Reference	Comments/Issue Raised	Applicant's Response
		<p>The location of the short list schemes, including their proximity to Whitley and Shaw is provided in <b>ES Volume 2, Figure 21-1: Location of Short List Cumulative Developments [APP-178]</b> and <b>ES Volume 2, Figure 21-2: Location of Cumulative Solar Infrastructure in Proximity to Lime Down Index [APP-179]</b>. The list of developments included in the cumulative assessment were reviewed and developed in consultation with Wiltshire Council.</p> <p>In terms of effects, the proposed Scheme cable installation activities in proximity to Whitley and Shaw have been considered as part of the cumulative assessment set out within <b>ES Volume 1, Chapter 21: Cumulative and In-Combination Effects [APP-073]</b>. During the construction phase, socio-economic cumulative effects are identified at Corsham Park and on PRow WT CORM 122 located approximately 5 km and 5.5 km respectively to the north of Whitley. No other significant cumulative effects are identified in proximity to Whitley and Shaw.</p>

## 2.4 CPRE Wiltshire [REP1A-020]

2.4.1 The Applicant has addressed all the points raised in Section 2.62 of **Written Summary of the Oral Submissions at the Open Floor Hearing 1 and the Applicant's Responses [REP1A-013]**.

2.4.2 Table 2-4 provides a response to further information provided.

**Table 2-4: Applicant's Response to Additional Matters Raised in Post Hearing Summaries by CPRE Wiltshire**

Reference	Comments/Issue Raised	Applicant's Response
CPRE-001	On energy need Research conducted by University College London for The Campaign to Protect Rural England in 2023 indicates that the UK's 70GW solar target could ultimately be met through urban and brownfield deployment alone. This would allow for the gradual phasing out of greenfield solar after 2030. The real barriers lie not in land availability, but in policy. These could be addressed through stronger planning measures, fiscal incentives, and by accelerating rooftop solar deployment, while also reducing overall energy demand. In addition, data from the National Energy System Operator shows that renewable energy projects totalling around 760GW are currently awaiting grid connection. This is far in excess of the government's 2030 target of 150 to 225GW, suggesting that this proposed development is not only unnecessary, but contributes to an already unsustainable pipeline. While some ground-mounted solar may be required in the short term, there is	<p>The Applicant is supportive of smaller solar schemes (including rooftop schemes) but aligns with the Government's position, for reasons described in the <b>Statement of Need [REP1-085]</b> that such schemes are needed alongside, rather than as an alternative to, large-scale schemes such as this Scheme.</p> <p>National policy and government guidance, as set out in the <b>Statement of Need [REP1-085]</b>, recognises 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.</p> <p>In terms of stronger planning measures, Paragraph 3.2.3 of NPS EN-1 is clear that it is not the role of the</p>

Reference	Comments/Issue Raised	Applicant's Response
	<p>significant untapped potential elsewhere. Installing solar panels on new buildings, existing warehouse rooftops, and car parks could deliver between 40 and 50GW of low-carbon electricity—more than half of the UK's 2035 solar target.</p>	<p>planning system to deliver specific amounts or limit any form of infrastructure covered by the NPS itself.</p> <p>With regard to the National Energy System Operator (NESO) Section 2.7 of the <b>Statement of Need [REP1-085]</b> provides further details about NESO's Connections Action Plan which includes reforms to the connections process which have been designed to enable viable projects to connect in a timely and cost-effective manner. The Applicant confirmed at Issue Specific Hearing 1 that it was informed by NESO in December 2025 that the solar component of the Scheme had been re-prioritised as a 'Gate 2 Phase 1' connection meaning that it has been included within the first phase of NESO's re-prioritised list.</p> <p>In terms of the capacity ranges set out in the Clean Power Action Plan 2030, Section 2.9 of <b>Statement of Need [REP1-085]</b> explains that the capacity range provides a framework for prioritisation of offers for projects which align with NESO's advice on connections which are deliverable by 2030 and can demonstrate that they have the means to deliver. Furthermore, Paragraph 2.9.12 of the <b>Statement of Need [REP1-085]</b> sets out that the government states that NESO's engagement with Distribution Network Operators indicates that an additional 9 to 10 GW of</p>

Reference	Comments/Issue Raised	Applicant's Response
		<p>rooftop solar projects could deploy before 2030. It is therefore possible that the 2030 Clean Power solar capacity range of 45 to 47GW could yield around 54 to 57 GW of installed capacity by 2030, subject to solar PV pipeline of rooftop solar projects, as set out in the Connections Reform Annex, Table 1, Footnote 10 (Ref 1).</p>

## 2.5 Greenergy Renewables UK Limited [REP1A-021]

**Table 2-5: Applicant's Response to Additional Matters Raised in Post Hearing Summaries by Greenergy Renewables UK Limited**

Reference	Comments/Issue Raised	Applicant's Response
GR-001	<p>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 significant number of representations on the scheme but reiterates its request for urgent engagement from the Applicant. Greenergy maintains its objection to the compulsory acquisition of any land in which it has an interest.</p>	<p>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 15-02. The Applicant will update the <b>Book of Reference [REP1-011]</b> at Deadline 3 to include these interests. Furthermore, following a productive meeting between the Applicant and Greenergy representatives on 14 May 2026, it has been agreed that the parties will enter into a Cooperation Agreement to provide Greenergy 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.</p>

## 2.6 Stop Lime Down [REP1A-022]

**Table 2-6: Applicant's Response to Additional Matters Raised in Post Hearing Summaries by Stop Lime Down**

Reference	Comments/Issue Raised	Applicant's Response
SLD-001	1. In line with the deadline for post-hearing submissions set out in the Rule 8 letter, Stop Lime Down (SLD) provides the following post-hearing submissions in relation to the Preliminary Meeting held on 21 April 2026 and ISH 1 on 22 April 2026. This submission is in summary only, and also does not repeat the content of SLD's Procedural Deadline A submission [PDA-012] or the content now included in SLD's Written Representation.	The Applicant notes this comment.
SLD-002	2. While SLD was in attendance at OFH1 on 21 April 2026 to hear submissions, an oral submission on behalf of the group was not made at that stage. At Deadline 1 SLD was registered in its group capacity to speak at OFH2.	The Applicant notes this comment, and that Stop Lime Down has registered to speak at OFH2.
SLD-003	<b>Preliminary Meeting (PM)</b> 3. SLD attended the PM represented by Daniel Kozelko and Celia Reynolds (of Counsel). Mr Kozelko introduced SLD and indicated that the groups formal title is SLD Wiltshire Limited, but that throughout the Examination the group should be referred to as "Stop Lime Down" or "SLD".	The Applicant notes this comment.

Reference	Comments/Issue Raised	Applicant's Response
SLD-004	4. Under Item 3, SLD sought confirmation that those items in the Initial Assessment of Principal Issues would be examined both in relation to the principal solar sites (Lime Down A to E), but also in respect of the 400kV cable corridor.	The Applicant notes that the ExA confirmed that the initial list of principle issues referred to both the Solar PV Sites and the Cable Route Corridor.
SLD-005	5. Under Item 4 SLD made a number of points. The first was to invite the ExA to provide details early of what hearings would be held and when in the w/c 29 June 2026. The second was to align SLD with the position of Wiltshire Council (the Council) in seeking (inter alia) an additional week of hearings (even if only on a precautionary basis). The third was to invite the Council to provide comments on the Written Representation of SLD at Deadline 2 (in light of the Examining Authority's (ExA) guidance to the Council on what it might address in its Deadline 2 comments on Written Representations). The fourth was to invite that final statements of common ground be delayed to Deadline 8. The fifth was to align SLD with the Council's position on what topics might usefully be the subject of ISHs (on which the Council identified highways and transport, landscape and visual impact, ecology and biodiversity, flood risk and drainage), and to add to the list: heritage, noise, greenhouse gas emissions, glint and glare, socioeconomic effects,	<p>The Applicant notes the points raised, and the reserved dates for a further week of hearings week commencing 21 September 2026 as reflected in the examination timetable set out in the <b>Rule 8 Letter [PD-007 and PD-009]</b>. The Applicant also notes the topics that Stop Lime Down has identified for future Issue Specific Hearings.</p> <p>The Applicant notes that final Statements of Common Ground are required to be submitted at Deadline 7 of the examination in accordance with the <b>Rule 8 Letter [PD-007 and PD-009]</b>.</p>

Reference	Comments/Issue Raised	Applicant's Response
	alternatives, and another hearing on the DCO text (in addition to that listed in ISH1).	
SLD-006	6. Post-hearing comment: SLD's Written Representation has now been submitted at Deadline 1, and it is hoped that that document provides the underlying details why SLD considers ISHs on the various topics identified by it and the Council would be useful and appropriate. However, SLD recognises that ISHs are for the purposes of assisting the ExA in considering the Application, and that written submissions have the same weight as oral submissions. As such, SLD will participate in whatever format for receiving submissions is considered appropriate by the ExA.	<p>The Applicant has provided a response to the points raised by Stop Lime Down in their Written Representation in Section 3 of the <b>Applicant's Response to Written Representations [EN010168/EXAM/9.22]</b>.</p> <p>Where indicated in the <b>Applicant's Response to Written Representations [EN010168/EXAM/9.22]</b> the Applicant is preparing technical notes to address specific points raised. These technical notes will be submitted at either Deadline 2 or 3, as confirmed in the <b>Applicant's Response to Written Representations [EN010168/EXAM/9.22]</b>.</p>
SLD-007	7. Under Item 5 SLD noted and agreed with the submissions of the Applicant concerning the utility of a Statement of Common Ground (SoCG) between the Applicant and SLD. SLD noted that it would not be useful to simply repeat matters of disagreement, but rather to look at points of agreement. SLD welcomed the indication from the ExA that such a SoCG should be explored.	The Applicant is preparing a Statement of Common Ground with Stop Lime Down which is expected to be submitted at Deadline 3 of Examination.
SLD-008	8. Under Item 6 SLD noted that there had been difficulty earlier in the morning in the press attending	This is a matter for the Examining Authority to respond.

Reference	Comments/Issue Raised	Applicant's Response
	<p>the hearing (as they had been turned away on the basis that they had not signed up in advance of the hearing). SLD invited a direction that a slot be kept open for attendance by the press as there are matters of transparency and access of the public to information that are assisted by press attendance. SLD welcomed the subsequent submissions from the Council affirming that submission from SLD.</p>	
SLD-009	<p>9. Post-hearing comment: subsequent to the hearing the ExA issued its Rule 8 letter. SLD welcome (inter alia) the changes made to the timetable there, including in the addition of a further week held for possible hearings. SLD also welcome the indication of hearing types in the w/c 29 June 2026, and note that any advanced warning of the content of agendas would allow all parties to ensure that their instructed experts can arrange to be in attendance. SLD also welcome the procedural decision for a SoCG between it and the Applicant.</p>	<p>The Applicant notes the changes to the examination timetable that are set out in the <b>Rule 8 Letter [PD-007 and PD-009]</b>.</p>
SLD-010	<p><b>Issue Specific Hearing 1 (ISH1)</b></p> <p>10. SLD attended ISH1 represented by Daniel Kozelko and Celia Reynolds (of Counsel).</p>	<p>The Applicant notes this comment.</p>
SLD-011	<p>11. Under Item 3, SLD raised two matters arising out of questions asked by the ExA. The first invited a</p>	<p>The point raised on the height of the 13 m structures is addressed from page 60 to page 61 of the <b>Written</b></p>

Reference	Comments/Issue Raised	Applicant's Response
	<p>direction that the design principles document be updated to identify from where the height of the 13 meter structures within the Scheme were measured. The second invited the Applicant to explain how it had distinguished between Grade 3a and 3b land when in the site selection process. This was because the former is identified as best and most versatile agricultural land in policy but the latter is not.</p>	<p><b>Summary of the Applicant's Oral Submissions and Responses at Issue Specific Hearing 1 and Responses to Action Points [REP1A-012]</b> where it is explained that the maximum busbar height of 13 m does mean that the outdoor equipment has some exposure to direct lightning attachment. However, this height alone does not create an automatic requirement for dedicated lightning rods or shielding masts.</p> <p>The point about distinguishing between Grade 3a and Grade 3b ALC land is addressed from page 11 to page 12 of the <b>Written Summary of the Applicant's Oral Submissions and Responses at Issue Specific Hearing 1 and Responses to Action Points [REP1A-012]</b> where the Applicant's approach was explained.</p>
SLD-012	<p>12. Under Item 4, SLD noted that there would be an opportunity to provide detailed comment on the DCO text in the future.</p>	<p>The Applicant notes this comment.</p>
SLD-013	<p>13. Post-hearing comment: SLD notes that in section 16 of its Written Representation it has provided some of that detailed comment on the draft DCO available prior to Deadline 1.</p>	<p>The Applicant has addressed the points raised about the <b>Draft DCO [REP1-007]</b> in the <b>Applicant's Response to Written Representations [EN010168/EXAM/9.22]</b>.</p>
SLD-014	<p>14. However, under Item 4 SLD did also raise concerns about the Applicant's suggested modifications to address staged commencement and</p>	<p>The Applicant has addressed the point about staged commencement and decommissioning from page 14 to page 16 of the <b>Written Summary of the Applicant's</b></p>

Reference	Comments/Issue Raised	Applicant's Response
	<p>decommissioning of different parts of the Scheme. SLD raised the concern that this could result in a Scheme which is in situ far longer than its headline lifetime, and suggested one possible option would be the inclusion of a longstop date in the DCO. SLD noted that the Applicant would be coming forward with an amended wording and will comment upon this when it becomes available. SLD also noted that the Applicant will be coming forwards with a phasing and construction requirement to be overseen by the Council and will comment upon this when it becomes available.</p>	<p><b>Oral Submissions and Responses at Issue Specific Hearing 1 and Responses to Action Points [REP1A-012]</b> where the Applicant's approach was explained.</p>
SLD-015	<p>15. In respect of the compulsory acquisition powers, SLD asked about the relationship between the period within which those powers could be used and the lease agreements for the principal PV sites for the Scheme (Lime Down A E). The Applicant confirmed it did not have 60-year agreements for all of the principal PV sites. The ExA noted that this may raise a question about the period for which the benefits of the Scheme are secured, and queried how this information was captured. The Applicant stated that those agreements are confidential but that it would need to liaise with relevant landowners. SLD also noted and agreed with</p>	<p>The Applicant has addressed the point regarding lease agreements from page 23 to page 25 of the <b>Written Summary of the Applicant's Oral Submissions and Responses at Issue Specific Hearing 1 and Responses to Action Points [REP1A-012]</b>.</p>

Reference	Comments/Issue Raised	Applicant's Response
	<p>the ExA's question that this would go to the weight to be given to the benefits of the Scheme.</p>	
<p>SLD-016</p>	<p>16. Under Item 5, SLD raised three initial points (being conscious of time). The first was to build on a request of the ExA that a figure be provided for transmission losses for electricity generated by the Scheme and sent to the National Grid, asking if a figure for losses could also be provided for a round trip from and to the National Grid (accounting for the fact that the Scheme would sometimes charge the BESS from the Grid). The second was to highlight the concern that the Scheme proposes the use of tracker panels yet fixed south-facing panels (which are likely to have a lower environmental impacts) are currently predicted to generate more electricity for the Scheme. SLD noted that, in such circumstances, it is difficult to understand how the proposal complied with the mitigation hierarchy and particularly the requirement to "avoid" (noting the requirements of para 4.2.14 of NPS EN-1). SLD noted that it may invite the ExA in the future to provide direction limiting the panels which could be used within the Scheme (particularly given the Scheme has significant negative effects in EIA terms). The third was to note SLD's concerns about defects in the site selection process and to set them out in summary.</p>	<p>The Applicant addressed the points raised about transmission losses on page 61 of the <b>Written Summary of the Applicant's Oral Submissions and Responses at Issue Specific Hearing 1 and Responses to Action Points [REP1A-012]</b>.</p> <p>The Applicant has addressed the point regarding panel type from page 36 to page 40 and page 63 to page 64 of the <b>Written Summary of the Applicant's Oral Submissions and Responses at Issue Specific Hearing 1 and Responses to Action Points [REP1A-012]</b>.</p> <p>The Applicant has provided a response to Appendix L of Stop Lime Down's Written Representation in the <b>Technical note on Site Selection Assessment [EN010168/EXAM/9.26]</b>.</p>

Reference	Comments/Issue Raised	Applicant's Response
SLD-017	<p>17. Post-hearing comment: in its Written Representation at para 16.2.2 SLD has noted that a requirement could be imposed in the DCO and Design Principles and Parameters to secure smaller solar panels. That is because smaller fixed panels could make a difference in avoiding and mitigating effects. In respect of SLD's concerns about the site selection process, this is now set out in detail in section 2 of SLD's Written Representation and the paper at Appendix L.</p>	<p>The Applicant has addressed the point regarding panel type from page 36 to page 40 and page 63 to page 64 of the <b>Written Summary of the Applicant's Oral Submissions and Responses at Issue Specific Hearing 1 and Responses to Action Points [REP1A-012]</b>.</p> <p>The Applicant has provided a response to Appendix L of Stop Lime Down's Written Representation in the <b>Technical note on Site Selection Assessment [EN010168/EXAM/9.26]</b>.</p>
SLD-018	<p>18. Also under Item 5, another Interested Party raised a concern once again about the leases secured for the Scheme land. The Applicant commented that such agreements were confidential. SLD responded that the terms of any agreement were voluntarily entered into by the Applicant, and that a decision to rely on such confidentiality in the Examination was a matter for it. However, SLD also noted that it is the Applicant that is positively advancing the Scheme and needs to evidence its position. The Applicant suggested that SLD was inviting it to breach a contractual term. The ExA explained that SLD was not asking for a contractual term to be breached, but that it is pertinent to whether the benefits of the Scheme can be secured for the requisite period. SLD agreed.</p>	<p>The Applicant has addressed the point regarding lease agreements from page 23 to page 25 of the <b>Written Summary of the Applicant's Oral Submissions and Responses at Issue Specific Hearing 1 and Responses to Action Points [REP1A-012]</b>.</p>

Reference	Comments/Issue Raised	Applicant's Response
SLD-019	<p>19. Post-hearing comment: the question of the length of any agreements and the security of the term of the development is dealt with in section 16 of SLD's Written Representation in more detail. Among other things, it explains the difficulty caused by an indeterminate length of Scheme from the perspective of assessing positive and negative effects in EIA terms. For example, if a site which secures certain mitigations is decommissioned early, that will fundamentally change the likely significant environmental effects of the remainder of the Scheme. SLD agrees with the query of the ExA considering how that information might be captured. SLD repeats the point that a party producing an Environmental Statement and inviting findings from a decision maker must provide sufficient information to support that Environmental Statement (and that a contractual confidentiality clause freely entered is not a proper basis for such an Environmental Statement to have key omissions).</p>	<p>The Applicant does not agree that the DCO Application presents an 'indeterminate length' for the purpose of the EIA. This does not rely on the duration of individual agreements but instead likely maximum and, where relevant, minimum durations for each phase of the Scheme set out in Section 3 of <b>ES Volume 1, Chapter 3: The Scheme [APP-054]</b>. These durations have been used to present a worst-case for each environmental topic in the ES to provide a robust assessment. This approach is consistent with established EIA practice for other solar NSIPs.</p> <p>In respect to the potential for the early decommissioning of parts of the Scheme, the DCO Application has secured mitigation measures through relevant outline management plans, such as the <b>Outline LEMP [APP-283]</b>, and associated requirements in the <b>Draft DCO [REP1-007]</b>. These mitigation measures are required to be implemented, managed and maintained for defined durations across the lifetime of the Scheme or as otherwise specified, regardless of changes to underlying arrangements and agreements. Any change that would materially alter the assessed environmental effects, such as the removal of mitigation measures earlier than assessed would require further approvals under the DCO to ensure</p>

Reference	Comments/Issue Raised	Applicant's Response
		<p>environmental effects remain within the assessed envelope.</p> <p>The Applicant confirms that the ES contains all information necessary to assess the likely significant environmental effects of the Scheme. The assessment presented has been based upon the existing baseline conditions and design parameters, mitigation measures, and assumptions for the Scheme set out within the ES [APP-052 to APP-074]. There has been no reliance on withheld information that would be material to the Examination Authority's conclusions on environmental effects.</p>
SLD-020	20. Item 6 of the agenda for ISH1 was not considered at the hearing.	The Applicant notes this comment.
SLD-021	21. Post-hearing comment: SLD would welcome Item 6 from the agenda to ISH1 being addressed at another hearing. Among other things, that item would address the issues of grid connection secured with NESO and the relationship between the BESS and the generating aspect of the Scheme. Both of these matters are addressed in Section 16 of SLD's Written Representation. SLD also would welcome the Applicant providing the information set out in Item 6.2 of the agenda at a subsequent hearing (or in writing).	<p>The Applicant set out the summary that was to be provided for Item 6 from page 54 to page 58 of the <b>Written Summary of the Applicant's Oral Submissions and Responses at Issue Specific Hearing 1 and Responses to Action Points [REP1A-012]</b>.</p> <p>The Applicant has provided a response to Stop Lime Downs Written Representation in the <b>Applicant's Response to Written Representations [EN010168/EXAM/9.22]</b>.</p>

## 2.7 Andrew Calderbank [REP1A-023]

2.7.1 The Applicant has addressed all the points raised in Section 2.15 of **Written Summary of the Oral Submissions at the Open Floor Hearing 1 and the Applicant's Responses [REP1A-013]**.

2.7.2 Table 2-7 provides a response to further information provided.

**Table 2-7: Applicant's Response to Additional Matters Raised in Post Hearing Summaries by Andrew Calderbank**

Reference	Comments/Issue Raised	Applicant's Response
AC-001	<p>In response to your request for additional information relating to Norton Brook flooding following my OFH 1 comments:</p> <p>1) Flood zones:</p> <p>The Environment Agency (EA) flood zones map for Norton Brook can be viewed at: <a href="https://flood-map-for-planning.service.gov.uk/map?cz=388605.4,184234.5,14.628371&amp;seg=fz,fzpd">https://flood-map-for-planning.service.gov.uk/map?cz=388605.4,184234.5,14.628371&amp;seg=fz,fzpd</a> The EA flood zones extend from Lords Wood Cottages and the railway line close to Great Store Barn to the south west, through Norton and Foxley, before joining the Sherston Avon. I note that this official map actually identifies the water course as "Norton Brook" - which is what I've always called it.</p> <p>My OFH 1 comment on the water course being officially an unnamed "Tributary - source to conf Sherston Avon" was based on the Application</p>	<p>The Applicant notes the clarification regarding the naming of Norton Brook and the Environment Agency Flood Map for Planning extent. Whether the watercourse is referred to locally as Norton Brook or identified in <b>2.8 Waterbodies in a River Basin Management Plan [APP-012]</b> as a tributary to the Sherston Avon does not alter the flood risk assessment. The baseline flood risk has been assessed using the relevant mapping, watercourse and catchment information, including Environment Agency flood mapping and site-specific review in <b>ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [REP1-017]</b> and <b>ES Volume 3, Appendix 11-1 to 11-9: Flood Risk Assessment and Drainage Strategy [REP1-037 to REP1-054]</b>.</p>

Reference	Comments/Issue Raised	Applicant's Response
	document APP-012, which appears to be the DEFRA description.	
AC-002	<p>2) Catchment area:</p> <p>The DEFRA map of the Norton Brook catchment area can be viewed at:  <a href="https://environment.data.gov.uk/catchment-planning/WaterBody/GB109053027680">https://environment.data.gov.uk/catchment-planning/WaterBody/GB109053027680</a></p> <p>Naturally this extends well beyond the EA flood zone maps and gives a wider view of relevant catchment area land.</p>	<p>The Applicant notes that the Norton Brook catchment extends beyond the Environment Agency Flood Map for Planning flood extents. This is expected. Catchment boundaries show the wider land area contributing runoff to a watercourse, whereas Flood Zones identify areas at risk of fluvial flooding. Both are relevant, but they serve different purposes. The submitted assessment considers flood risk from all sources, including surface water runoff, ordinary watercourses, Main Rivers, drainage features, topography and downstream receptors, as set out in <b>ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [REP1-017]</b> and <b>ES Volume 3, Appendix 11-1 to 11-9: Flood Risk Assessment and Drainage Strategy [REP1-037 to REP1-054]</b>.</p>
AC-003	<p>3) Proposed Development:</p> <p>A map of the Norton Brook catchment area overlaid with the location of the proposed Development sites can be found in Application document APP-012 - EN010168/APP/2.8 - "Waterbodies in a River Basin Management Plan" on page 3 (labelled as Sheet 1) and highlighted in purple.</p>	<p>The Applicant notes the property location described at Foxley, upstream of the Norton Brook road bridge, and the concern that parts of the Scheme lie within the wider Norton Brook catchment. The assessment does not rely only on mapped Flood Zones. It considers existing drainage routes, topography, surface water flood risk and watercourse connectivity across the Solar PV Sites, including the areas identified in <b>2.8</b></p>

Reference	Comments/Issue Raised	Applicant's Response
	<p>For clarity, I have provided a copy of that sheet below, highlighting the extent of the Norton Brook water courses in dark blue. Our property is located on the eastern edge of Foxley, next to (upstream side of) the Norton Brook road bridge that leads to Malmesbury</p>	<p><b>Waterbodies in a River Basin Management Plan [APP-012]</b>. Panelled land will remain permeable and will not be positively drained as hardstanding. Construction-phase runoff, sediment mobilisation, temporary drainage and soil compaction risks are controlled through the <b>Outline CEMP [REP1-096]</b>, secured by Requirement 13 of Schedule 2 of the <b>Draft DCO [REP1-007]</b>. Soil handling and compaction controls are detailed in the <b>Outline SRMP [APP-280]</b> and secured by Requirement 18 of Schedule 2 of the <b>Draft DCO [REP1-007]</b>. Formal drainage from impermeable infrastructure is assessed separately and will be managed through the drainage hierarchy, attenuation and controlled discharge where required, secured through Requirement 11 of the <b>Draft DCO [REP1-007]</b>. Operational drainage inspection and maintenance are detailed in the <b>Outline OEMP [REP1-098]</b> and secured by Requirement 14 of Schedule 2 of <b>Draft DCO [REP1-007]</b>. The submitted assessment concludes that, with the secured controls in place, the Scheme would not materially increase off-site flood risk.</p>

## 2.8 Anne Skinner [REP1A-024]

2.8.1 The Applicant has addressed the points raised relating to the water environment in Section 2.8 of **Written Summary of the Oral Submissions at the Open Floor Hearing 1 and the Applicant's Responses [REP1A-013]**.

2.8.2 Table 2-8 provides a response to further information provided.

**Table 2-8: Applicant's Response to Additional Matters Raised in Post Hearing Summaries by Anne Skinner**

Reference	Comments/Issue Raised	Applicant's Response
AS-001	If I had had longer than 3 minutes I would also have raised the widespread disruption caused during construction by heavy traffic, mud and dust on roads that are very narrow and already badly potholed. The inevitable loss of important road verges which support the last remaining vestiges of plant communities characteristic of ancient meadows and woodlands has barely been mentioned.	<p><b>Annex J of ES Volume 3, Appendix 13-1: Transport Assessment [REP1-057 and REP1-059]</b> 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 <b>[RR-4934]</b>.</p> <p>The potential effects of construction traffic on the local highway network are assessed in <b>ES Volume 1, Chapter 13: Transport and Access [REP1-019]</b>, 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.</p>

Reference	Comments/Issue Raised	Applicant's Response
		<p>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.</p> <p>The assessment additionally concludes that with appropriate mitigation such as the <b>Outline CTMP [REP1-112]</b> 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.</p> <p>As set out in the <b>Outline CTMP [REP1-112]</b>, 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.</p> <p>The preparation, approval and implementation of the final CTMP, substantially in accordance with the <b>Outline CTMP [REP1-112]</b>, are secured through Requirement 15 of Schedule 2 of the <b>Draft DCO [REP1-007]</b>, ensuring construction traffic impacts are appropriately managed throughout the construction phase of the Scheme.</p>

Reference	Comments/Issue Raised	Applicant's Response
AS-002	Approval would fundamentally change the rural character of the landscape to one that is semi industrialised and enclosed, with a negative impact on the amenity of residents and visitors.	<p>The LVIA in <b>ES Volume 1, Chapter 8: Landscape and Visual Impact [APP-060]</b> 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 Solar PV Sites themselves and their immediate surroundings as they change from an area of arable farmland to solar infrastructure. However, the introduction of the Solar PV Panels and other associated infrastructure would not become a defining feature on the landscape once operational (e.g. at year 1 and year 15).</p> <p>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.</p> <p>Embedded mitigation measures principally comprise a range of offsets and buffers and specific landscape design parameters outlined in Tables 7 and 8 of <b>ES Volume 3, Appendix 8-6: Assessment of Effects on</b></p>

Reference	Comments/Issue Raised	Applicant's Response
		<p><b>the Cotswolds National Landscape and its Special Qualities [APP-197].</b> 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.</p>

## 2.9 Helen Worthey [REP1A-036]

**Table 2-9: Applicant's Response to Additional Matters Raised in Post Hearing Summaries by Helen Worthey**

Reference	Comments/Issue Raised	Applicant's Response
HW-001	As I was unable to attend the 21 April hearing due to ill health, I did not have the opportunity to present my various points to the Planning Inspector in person. Please see attached the transcript of the speech.	The Applicant notes this comment.
HW-002	<p>Lime Down Solar Park - Offshore Gain at Local Cost. The proposed Lime Down Solar Park near Malmesbury is presented as a major contribution to the UK's clean energy transition. However, the question is not simply what a project delivers nationally, but whether the scale, location and impacts are acceptable to this rural and historic landscape and how its benefits and impacts are distributed locally.</p> <p>The developers, Island Green Power and investors, Macquarie Group, emphasise that Lime Down will generate enough electricity to power 115,000 homes. This is a national equivalence figure, presented to suggest a direct local benefit. In reality, the electricity generated here would be exported via Melksham into the national grid network. It will not supply Malmesbury and the surrounding villages. The benefit is therefore nationwide, not local. ... yet the economic impacts are firmly local.</p>	<p>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 (Ref 2) (Section 4.2) and EN-3 (Ref 3). This will therefore benefit the national population rather than just the local population.</p> <p>The benefits of the Scheme are set out in Section 5.3 of the <b>Planning Statement [REP1-087]</b> and comprise both national and local benefits. Nationally, the benefits of the Scheme include the delivery of large amounts of cheap, secure, and low carbon electricity which will help the UK to achieve net zero by 2050. Locally, the Scheme provides ecological and landscape enhancements, biodiversity net gain, 12.8km of new</p>

Reference	Comments/Issue Raised	Applicant's Response
		<p>permissive paths, employment generation, economic benefits and skills training.</p> <p>Furthermore, the Applicant has committed to a Community Benefit Fund (CBF). The CBF does not form part of the DCO Application, and this funding is not required to mitigate the impacts of the Scheme. However, the CBF will be available to fund local projects.</p>
HW-003	<p>This imbalance is reinforced in comparable projects:</p> <p>At Sunnica Energy Farm, it was recognised that there would be a degree of harm through loss of agricultural land and associated economic activity.</p> <p>At Mallard Pass Solar Farm, the long term nature of land use change was acknowledged as altering rural economic patterns over several decades, with associated implications.</p> <p>At Gate Burton Energy Park, it was accepted that construction would lead to temporary but meaningful disruption to local businesses and transport routes.</p> <p>These cases show recurring conclusions: National infrastructure delivers national benefit, but with concentrated local cost.</p>	<p>Please refer to reference ID CB-01 in the <b>Applicant's Response to Relevant Representations (Part 2) [REP1-117]</b> 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 community.</p>

Reference	Comments/Issue Raised	Applicant's Response
HW-004	<p>For Malmesbury and the surrounding area, those costs would be focussed in 3 key sectors:</p> <p>Agriculture &amp; its supply chain, through the long-term diversion of productive land, and reduced demand for contractors and suppliers</p>	<p>The Applicant has aimed to provide a robust assessment of impacts to agricultural employment in <b>ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]</b>. Therein, the Applicant has assessed that there is a likely worst-case long-term loss of up to 20 FTE agricultural jobs as a result of the Scheme, due to direct impacts on agricultural workers, and indirect impacts on supply chains and downstream industries. These impacts are not considered significant, as this loss accounts for less than 0.29% of agricultural employment in Wiltshire (Ref 4).</p> <p>Additional mitigation measures have been secured through the <b>Outline SSCEP [REP1-108]</b>. This document seeks to reduce these losses to employment through focusing on local recruitment, promoting local suppliers where practicable, and through providing retraining opportunities for workers in agriculture. These measures are secured by the Requirement 18 in Schedule 2 to the <b>Draft DCO [REP1-007]</b>.</p>
HW-005	<p>Tourism and hospitality, through thousands of acres of panels, fences and infrastructure fundamentally changing the historic landscape, and altering the visitor perception of the visual and cultural character of one of England's oldest towns and surrounding countryside.</p>	<p>The Applicant has aimed to provide a robust assessment of impacts to tourism and recreation in <b>ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]</b>. Therein, the Applicant has assessed that there is a likely worst case temporary</p>

Reference	Comments/Issue Raised	Applicant's Response
		<p>loss of 50 FTE tourism industry jobs as a result of the Scheme. This is based on likely construction impacts including increased HGV use of the local highway network, visual and amenity impacts, and impacts on the use of PRoW. The likely impact on Malmesbury as a tourism destination has been assessed through individual assessment of the impacts to the Malmesbury Conservation Area as a visitor attraction in <b>ES Volume 3, Appendix 16-2: Tourism and Recreation Receptor Tables [APP-241]</b> which finds no significant adverse effect at any phase of the Scheme.</p> <p>Additional mitigation measures have been secured through the <b>Outline CTMP [REP1-112]</b>, <b>Outline PROWPPMP [REP1-104]</b> and the <b>Outline SSCEP [REP1-108]</b>. Together these seek to reduce these losses to tourism through mitigating traffic impacts, impact to PRoW, and focusing on local recruitment, promoting local suppliers where practicable, and through providing retraining opportunities for workers in tourism-dependent industries. These measures are secured by the relevant requirements in Schedule 2 to the <b>Draft DCO [REP1-007]</b>.</p> <p><b>ES Volume 1, Chapter 12: Cultural Heritage [APP-064]</b>, supported by detailed technical appendices in <b>ES</b></p>

Reference	Comments/Issue Raised	Applicant's Response
		<p><b>Volume 3, Appendices 12-1 to 12-7 [APP-219 to APP-231]</b>, has assessed the potential impact of the scheme on heritage assets and the historical landscape. No direct impacts have been identified to heritage assets. Identified impacts to heritage assets would be indirect and related to elements of their setting that contribute to their significance, including consideration of intervisibility between heritage assets, surrounding landscape and the Scheme.</p> <p>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, concluding that there would be no significant residual effects.</p>
HW-006	Small rural businesses, through disruption during construction, and shifting local economic patterns, resulting in less market activity, reduced turnover and decreased profitability.	The Applicant has aimed to provide a robust assessment of impacts to tourism and recreation-based employment in <b>ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]</b> . Therein, the Applicant has assessed that there is

Reference	Comments/Issue Raised	Applicant's Response
	<p>These are not theoretical risks, they are recurring patterns observed in large-scale solar developments.</p>	<p>a likely worst-case temporary loss of 50 FTE tourism industry jobs as a result of the Scheme's construction phase, reducing to 11 FTE jobs during the operational lifetime of the Scheme. These impacts are not considered significant, accounting for up to approximately 0.17% of tourism employment across Wiltshire (29,000 estimate from Visit Wiltshire, 2021).</p> <p>Additional mitigation measures have been secured through the <b>Outline CTMP [REP1-112]</b>, <b>Outline PProWPPMP [REP1-104]</b> and the <b>Outline SSCEP [REP1-108]</b>. Together these seek to reduce these losses to tourism through mitigating traffic impacts, impact to PProW, and focusing on local recruitment, promoting local suppliers where practicable, and through providing retraining opportunities for workers in tourism-dependent industries. These measures are secured by the relevant requirements in Schedule 2 to the <b>Draft DCO [REP1-007]</b>.</p>
HW-007	<p>IGP highlight community benefit funding as part of the local return. However they consistently fail to quantify what this actually means.</p> <p>UK benchmarks of £1,000 per megawatt, show a project like Lime Down should provide: £500,000 per year of local funding to support community initiatives.</p>	<p>While final contributions will be determined following the grant of Development Consent Order (DCO) consent, the Applicant is committed to meeting UK benchmarks and is closely monitoring the development of forthcoming best practice guidance from the Government and Solar Energy UK (SE UK) regarding community benefits and is committed to incorporating</p>

Reference	Comments/Issue Raised	Applicant's Response
	<p>However, the funds are:</p> <ul style="list-style-type: none"> <li>• Voluntary</li> <li>• Broadly distributed</li> <li>• Not designed to compensate affected businesses or replace economic activity</li> </ul> <p>and, not proportionate to the scale of land use change and economic displacement, but a small, limited indirect local benefit, rather than a direct economic offset.</p> <p>... and significantly, IGP do not detail how the funding will be monitored and by whom.</p>	<p>these national standards into the Scheme's final approach to funding.</p> <p>The CBF 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.</p> <p>Notwithstanding this, the Applicant has committed to the provision of a CBF as stated in Section 5.5 of the <b>Planning Statement [REP1-087]</b>.</p> <p>The Applicant would look to establish the specific mechanisms for implementation in consultation with local authorities, parish councils, and community groups. To ensure that any such initiatives remain community-led, the Applicant is committed to independent, professional administration and monitoring of the fund.</p>
HW-008	<p>There are also long-term stewardship considerations: Solar developments operate for 30 to 40 years, which constitutes a long-term land use change. Ultimately land restoration is required.</p>	<p>The Applicant acknowledges the concerns regarding long-term land stewardship, restoration and the financial mechanisms intended to secure it. The Scheme is proposed as a temporary development with a maximum 60-year operational life, after which it will</p>

Reference	Comments/Issue Raised	Applicant's Response
	<p>However, financial guarantees, such as secured escrow accounts or fully funded decommissioning bonds, have not been mentioned by Macquarie or IGP.</p> <p>How will restoration be delivered in practice, across changing future ownership structures over several decades.</p>	<p>be decommissioned and all land returned to its original use.</p> <p>The Applicant has made clear in responses to Relevant and Written Representations that a requirement to decommission the Scheme is part of the DCO Application and failing to comply with that requirement would be a criminal offence. 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 to ensure the Scheme can be decommissioned and the land restored back to its existing use. Decommissioning is secured through Requirement 20 in Schedule 2 of the <b>Draft DCO [REP1-007]</b>. The Applicant has produced an <b>Outline DS [REP1-100]</b> which was submitted with the DCO Application. A final decommissioning plan will be prepared and agreed with the relevant authorities at that time of decommissioning and will include detailed measures and timescales.</p> <p>At the end of the Scheme's operational life, all Solar PV Sites would be decommissioned and the land</p>

Reference	Comments/Issue Raised	Applicant's Response
		<p>restored to its original use and condition as far as practicable. The Applicant expects that most of the solar equipment, including Solar PV Panels, cabling, inverters, BESS and substations, to be recycled and disposed of, in line with industry practice. The Applicant expects there to be even greater opportunities for recycling at the end of the Scheme's design life. There will be opportunities for the retention 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.</p>
HW-009	<p>Finally, there are many operational considerations:</p> <p>The BESS battery storage located in close proximity to people's homes introduces unacceptable public safety and security risks, including fire risk management and site protection measures, which require significantly different risk mitigation strategies from the existing agricultural use.</p>	<p>An <b>Outline BSMP [REP1-110]</b> 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 <b>Outline BSMP [REP1-110]</b>. The <b>Outline BSMP [REP1-110]</b> has been amended at Deadline 1 to fully accommodate the latest BESS safety requirements contained in NFPA 855 (2026) (Ref 5) ensuring that any credible risks associated with battery storage are either prevented or fully mitigated if a BESS failure occurs.</p>

Reference	Comments/Issue Raised	Applicant's Response
		<p>Section 2.4.2 of the <b>Outline BSMP [REP1-110]</b> 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&amp;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&amp;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&amp;WFRS and be clearly communicated in the Emergency Response Plan (ERP);</i></p> <ul style="list-style-type: none"> <li>• <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></li> <li>• <i>To ensure that firewater run-off is contained and tested before release or, if necessary, removed by tanker and treated offsite.”</i></li> </ul> <p>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</p>

Reference	Comments/Issue Raised	Applicant's Response
		<p>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 <b>Outline BSMP [REP1-110]</b> 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.</p> <p>Section 5 of the <b>Outline BSMP [REP1-110]</b> 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.</p> <p>The Applicant has followed NFCC guidance (Ref 6) and commissioned a BESS fire emissions assessment (as detailed in <b>ES Volume 3, Appendix 15-2: BESS Fire Emissions Modelling [APP-239]</b>) to model toxic gas emissions and visibility impacts from a BESS fire on all sensitive receptors within a 1 km radius of the BESS Area.</p>

Reference	Comments/Issue Raised	Applicant's Response
		<p>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 <b>[RR-4798]</b> 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>.</p>
<p>HW-010</p>	<p><b>Conclusion</b></p> <p>The evidence from comparable projects clearly indicates:</p> <ul style="list-style-type: none"> <li>• The benefits of large-scale solar are national and strategic</li> <li>• The economic impacts are local and sector-specific</li> <li>• Community funding provides limited, indirect and non-binding mitigation</li> <li>• Long-term land use change creates ongoing uncertainty, with no guarantee of necessary financial resources for reinstatement.</li> </ul> <p>For Malmesbury and North Wiltshire, this is not simply an energy project. It is a long term reallocation of land, economic activity, and risk... from a local rural</p>	<p>As set out in HW-002 above, the Scheme provides both national and local benefits. Nationally, the benefits of the Scheme include the delivery of large amounts of cheap, secure, and low carbon electricity which will help the UK to achieve net zero by 2050. Locally, the Scheme provides ecological and landscape enhancements, biodiversity net gain, 12.8 km of new permissive paths, employment generation, economic benefits and skills training.</p> <p>For points relating to economic impacts, refer to HW-005, HW-006 and HW-007 above.</p> <p>As stated above, the CBF does not form part of the DCO Application and this funding is not required to mitigate the impacts of the Scheme. In addition, the CBF is not taken into account in decision making.</p>

Reference	Comments/Issue Raised	Applicant's Response
	<p>economy in a historic landscape to a national energy system, supported by global investment with significant offshore financial returns</p>	<p>Nevertheless, the Applicant reiterates its commit to the provision of a CBF.</p> <p>The <b>Outline DS [REP1-100]</b> demonstrates how the mitigation measures relevant to decommissioning activities included in this Environmental Statement will be implemented. Preparation of a Final Decommissioning Strategy, for approval by Wiltshire Council is secured under Requirement 20 of the <b>Draft DCO [REP1-007]</b>. As set out in Paragraph 2.1.3 of the <b>Outline DS [REP1-100]</b> 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. Furthermore, as also stated in Paragraph 2.1.3, all Solar PV Panels, mounting structures, cabling, inverters, transformers, switchgear, BESS Area, substations and access tracks would be removed from within the Solar PV Sites and recycled or disposed of in accordance with good practice and market conditions at that time.</p>

## 2.10 Jodie Collier [REP1A-040]

- 2.10.1 The Applicant has addressed all the points raised in Section 2.43 of **Written Summary of the Oral Submissions at the Open Floor Hearing 1 and the Applicant's Responses [REP1A-013]**.
- 2.10.2 Table 2-10 provides a response to further information provided.

**Table 2-10: Applicant's Response to Additional Matters Raised in Post Hearing Summaries by Jodie Collier**

Reference	Comments/Issue Raised	Applicant's Response
JC-001	<p>Bird Survey 30.4.26</p> <p>Introduction</p> <p>This letter is to confirm the species either seen or hear during a walk through the area which will be affected by the Lime Down Solar cable route, the east and south-east of the village of Grittleton.</p> <p>The survey was requested to support your speech (No. 46) at Open Floor Hearing 1 on Tuesday 21 April 2026. In your speech you pointed out that hearing and seeing a variety of wild birds on a daily basis in all areas farmed and managed by Hawker Farms was important to your wellbeing and to that of your family.</p> <p>The survey was conducted by Stewart Dobson who has lived in Grittleton for 40 years and observed wild birds throughout that time. He is a graduate in Zoology from Imperial College, London, and a fellow of The British Trust for Ornithology (BTO). For the BTO Bird</p>	<p>The Applicant notes this comment regarding a bird survey of land associated with Hawker Farms, and the competency statement provided for surveyor, Stewart Dobson.</p> <p>The comment refers to British Trust for Ornithology (BTO) Bird Atlas data 2007-2011 for land at Hawker Farms. A desk-based assessment was carried out for the Scheme, including the purchase of species records data from Wiltshire and Swindon Biodiversity Records Centre (WSBRC) and BTO. A BTO Data Report was commissioned for bird species data recorded over 1-10 km squares across the Order Limits, as set out in Paragraph 2.2.11 of <b>ES Volume 3, Appendix 9-1: Ecological Baseline Report [REP1-083]</b>. The BTO Data Report collates 2007-2011 and 2020-2024 bird atlas data; it is assumed, therefore, that the records referenced by the respondent have been considered within baseline ecological conditions across the Order Limits presented in <b>ES Volume 3, Appendix 9-1:</b></p>

Reference	Comments/Issue Raised	Applicant's Response																																	
	<p>Atlas 2007-2011, Dobson submitted summer and winter records for the total area covered by Hawker Farms, which accounted for 65 species and those records are included for reference.</p>	<p><b>Ecological Baseline Report [REP1-083]</b> and within the assessment of potential impacts presented in <b>ES Volume 1, Chapter 9: Ecology and Biodiversity [REP1-015]</b>.</p>																																	
<p>JC-002</p>	<p>Survey Approach</p> <p>The route taken was informal zigzag walking south to north between OS references ST869792 and ST864803. Weather conditions were bright and clear with a strong breeze and the 60 minute walk began at 0845 on April 30<sup>th</sup> 2026. Table 1 shows the time periods in which twenty-six species were first or seen.</p> <table border="1" data-bbox="405 821 1153 1281"> <tbody> <tr> <td>0845-0900</td> <td>0901-0915</td> <td>0916-0945</td> </tr> <tr> <td>Carrion Crow</td> <td>Kestrel</td> <td>Jackdaw</td> </tr> <tr> <td>Red Kite</td> <td>Robin</td> <td><b>Redpoll</b></td> </tr> <tr> <td>Chaffinch</td> <td>Song Thrush</td> <td>Goldfinch</td> </tr> <tr> <td>Wood Pigeon</td> <td>Goldcrest</td> <td><b>Greenfinch</b></td> </tr> <tr> <td>Rook</td> <td>Nuthatch</td> <td><b>Marsh Tit</b></td> </tr> <tr> <td>Wren</td> <td>Great Spotted Woodpecker</td> <td>Whitethroat</td> </tr> <tr> <td>Dunnock</td> <td>Chiffchaff</td> <td></td> </tr> <tr> <td>Blue Tit</td> <td>Pheasant</td> <td></td> </tr> <tr> <td>Buzzard</td> <td>Raven</td> <td></td> </tr> <tr> <td>Blackcap</td> <td>Great Tit</td> <td></td> </tr> </tbody> </table> <p>The species list as a whole indicates a high diversity in the opinion of the observer which is at risk from the</p>	0845-0900	0901-0915	0916-0945	Carrion Crow	Kestrel	Jackdaw	Red Kite	Robin	<b>Redpoll</b>	Chaffinch	Song Thrush	Goldfinch	Wood Pigeon	Goldcrest	<b>Greenfinch</b>	Rook	Nuthatch	<b>Marsh Tit</b>	Wren	Great Spotted Woodpecker	Whitethroat	Dunnock	Chiffchaff		Blue Tit	Pheasant		Buzzard	Raven		Blackcap	Great Tit		<p>The Applicant notes this comment regarding bird survey methodology and species list recorded.</p> <p>It is noted that the survey does not strictly follow BTO breeding bird survey methodology, but the Applicant recognises that this survey was designed to provide an indication of bird assemblage only.</p> <p>Detailed bird survey data are provided in <b>ES Volume 3, Appendix 9-4: Breeding Bird Survey Report [APP-201]</b> and <b>ES Volume 3, Appendix 9-7: Wintering Bird Survey Report [APP-204]</b> for surveys completed at the Solar PV Sites. Surveys recorded a diverse assemblage of breeding and wintering birds at the Solar PV Sites, with both assemblages assessed as being of District level importance, and it has been assumed that a similar diversity of bird species are present within the Cable Route Corridor; these conclusions align with those of Stewart Dobson.</p> <p>All species recorded during the survey by Stewart Dobson were also recorded during bird surveys at the Solar PV Sites, with the exception of redpoll. It is</p>
0845-0900	0901-0915	0916-0945																																	
Carrion Crow	Kestrel	Jackdaw																																	
Red Kite	Robin	<b>Redpoll</b>																																	
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Buzzard	Raven																																		
Blackcap	Great Tit																																		

Reference	Comments/Issue Raised	Applicant's Response
	<p>disruption of the cable route. In particular, three rare species shown in bold type were heard in a small copse at ST865796 which is directly on the cable route.</p>	<p>recognised that certain species may have been missed during surveys owing to either low numbers, transient use of the site, or the cryptic nature of certain species. Survey limitations are set out in Paragraphs 1.2.27 to 1.2.30 of <b>ES Volume 2, Appendix 9-4: Breeding Bird Survey Report [APP-201]</b> and <b>ES Volume 3, Appendix 9-7: Wintering Bird Survey Report [APP-204]</b>. The potential presence of additional species has therefore been considered within the impact assessment provided in <b>ES Volume 1, Chapter 9: Ecology and Biodiversity (Rev 2) [REP1-015]</b>.</p> <p>It is noted that the grid reference provided for records of redpoll, greenfinch and marsh tit lies outside of the Order Limits, although the low resolution of the grid reference is acknowledged. It is noted similar habitat in the form of mature hedgerows are present within the Order Limits to the east of this location, and which lie along the route of the Cable Route Corridor. However, as shown in <b>ES Volume 2, Figure 3-2-1 to 3-2-10: Key Construction Phase Features [APP-082]</b> mature hedgerows lie within 'Avoidance Areas'. As described in <b>ES Volume 3, Appendix 3-2: Cable Route Construction Method Statement [APP-183]</b>, 'Avoidance Areas' are locations where cable installation works will employ trenchless technologies, and as such these habitats will are not anticipated to</p>

Reference	Comments/Issue Raised	Applicant's Response
		<p>be impacted by cable installation works. Nevertheless, hedgerow habitat such as that identified in this particular location is also frequent within the immediately surrounding landscape and elsewhere along the Cable Route Corridor. Temporary loss of hedgerows during cable installation is expected at a number of locations along the Cable Route Corridor, which has the potential to result in adverse impacts on birds as reported within <b>ES Volume 1, Chapter 9: Ecology and Biodiversity [REP1-015]</b>.</p> <p>Potential impacts to breeding and wintering birds are assessed within <b>ES Volume 1, Chapter 9: Ecology and Biodiversity [REP1-015]</b> for the entire Order Limits, including as a result of temporary hedgerow removal along the Cable Route Corridor. The assessment identifies avoidance, mitigation and enhancement measures to address potential impacts on breeding and wintering birds. 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 breeding and wintering birds are anticipated as a result of the Scheme, with the exception of ground-nesting birds of open habitats at the Solar PV</p>

Reference	Comments/Issue Raised	Applicant's Response
		<p>Sites as a result of displacement. Residual significant adverse effects on these receptors are anticipated at a local-level of geographical importance only for skylark, and at site level for other ground-nesting bird species. These effects are transparently reported within <b>ES Volume 1, Chapter 9: Ecology and Biodiversity [REP1-015]</b>.</p> <p>Embedded and additional mitigation measures designed to avoid and reduce impacts on birds associated with hedgerow habitat in the Cable Route Corridor include sensitive timing and methods of vegetation removal, presence of an Ecological Clerk of Works (EcoCow) to oversee certain works potentially affecting birds, and ensuring habitat removed to facilitate cable installation will be re-instated following construction. All such measures are described in the <b>Outline EPMS [REP1-106]</b> and is secured via DCO Requirement.</p>

## 2.11 Councillor Jon Atkey [REP1A-044]

2.11.1 The Applicant has addressed the points raised relating to accumulation of harm, the BESS and the planning balance in Section 2.61 of **Written Summary of the Oral Submissions at the Open Floor Hearing 1 and the Applicant's Responses [REP1A-013]**.

2.11.2 Table 2-11 provides a response to further information provided.

**Table 2-11: Applicant's Response to Additional Matters Raised in Post Hearing Summaries by Councillor Jon Atkey**

Reference	Comments/Issue raised	Applicant's Response
CJA-001	Councillor Jon Atkey has provided carbon break-even analysis to support their open floor hearing submission in the Post Hearing Submission.	The Applicant will provide a separate technical note to address the point relating to carbon break-even at Deadline 3 of the Examination.
CJA-002	Notes and assumptions  This is a "best case" analysis using the Applicant's estimates. The Applicant's Environmental Statement does not set out a clear or explicit carbon break-even analysis. Relevant data are dispersed across multiple tables and paragraphs, and key assumptions are not drawn together in a way that allows the point of cumulative emissions offset to be readily identified. This analysis therefore derives a break-even position using the Applicant's published figures. In the absence of a transparent break-even assessment by the Applicant, uncertainty remains as to whether - under alternative reasonable assumptions relating to panel type, replacement cycles, degradation and grid carbon	The Applicant will provide a separate technical note to address the point relating to carbon break-even at Deadline 3 of the Examination.

Reference	Comments/Issue raised	Applicant's Response
	intensity - the Scheme would achieve carbon break-even within its operational lifetime.	
CJA-003	<p>The Applicant quantifies construction-phase greenhouse gas emissions in Table 7-22 of the Environmental Statement (ES Volume 1, Chapter 7). While these emissions are presented as a small proportion of total UK emissions, national carbon budgets represent finite, legally binding limits. Construction emissions occur upfront and in full, at a time when the UK is required to achieve steep reductions in emissions to remain within current and forthcoming carbon budgets. The Applicant's response does not explain how these emissions are compatible with the increasingly constrained carbon budget framework, nor how they are accounted for alongside other major infrastructure projects drawing on the same limited national allowance</p>	<p>The use of the carbon budget allows for the development to be placed within a context of wider schemes going forward.</p> <p>Industry standard methodology has been applied with regards to the assessment of significance of Greenhouse Gases from development. Part of this guidance recommendation is to include the scheme's context within national carbon budgets. <b>ES Volume 1, Chapter 7: Climate Change [APP-059]</b> also considers other factors for significance such as the requirement for greater energy demand in future.</p>
CJA-004	Assumed that 2 year Construction phase ends during 2029. (Source: Heading before para 7.9.3)	The Applicant confirms that a two year construction phase from 2027 to 2029 has been used for the purpose of the climate change assessment.
CJA-005	This analysis assumes the maximum net saving of 253,839 tCO <sub>2</sub> e for fixed panels. However, the applicant has applied for a mix of tracker panels and fixed	For the purpose of the climate change assessment, only fixed Solar PV Panels were considered. This was a conservative approach, as the information for fixed panels stated that they would be heavier and so would have greater embodied carbon per panel. It is not

Reference	Comments/Issue raised	Applicant's Response
	panels. If approved and using their figures, this would delay break-even by up to a further 2 years.	considered that any change to the breakdown of Solar PV Panels will change the overall findings of <b>ES Volume 1, Chapter 7: Climate Change [APP-059]</b> .
CJA-006	Assumed that Applicant's net savings figures at para 7.10.96 are net of ALL emissions, including those from construction and decommissioning phases. If not, then gross savings would be correspondingly higher and carbon break-even would occur much later.	The Applicant will provide a separate technical note to address the point around carbon break-even at Deadline 3 of Examination.

## 2.12 Matthew Hood [REP1A-048]

**Table 2-12: Applicant's Response to Additional Matters Raised in Post Hearing Summaries by Matthew Hood**

Reference	Comments/Issue Raised	Applicant's Response
MH-001	Mr Hood provided additional references to support the open floor hearing submission, and provided a figure showing "Zones of acceptable risk".	<p>Many BESS fires have involved legacy NMC pouch cell, air cooled systems integrated into BESS enclosures which were not NFPA 855 (Ref 5) compliant and had not undertaken Large Scale Fire Testing (LSFT). The Applicant will not select NMC air cooled systems for the Scheme, therefore Nickel particulates would not be generated in a fire event.</p> <p>The types of NMC pouch cell systems integrated at Moss Landing and Cirencester were involved in approx. a third of BESS failure events listed in the EPRI database</p> <p>The EPRI BESS failure database logs 59 BESS fires since 2021:  <a href="https://storagewiki.epri.com/index.php/BESS_Failure_Incident_Database">https://storagewiki.epri.com/index.php/BESS_Failure_Incident_Database</a>.</p> <p>The EPRI database notes: <i>"The failure rate dropped by 98% from 2018 to 2024 as lessons learned from early failures have been incorporated into the latest designs and best practices."</i></p> <p>It should be noted that the latest BESS safety standards, certifications, risk assessments, testing</p>

Reference	Comments/Issue Raised	Applicant's Response
		<p>requirements and safety guidelines are significantly shaped by lessons learned from real world BESS thermal runaway events and recent full scale burn tests conducted by a variety of BESS manufacturers and system integrators. The EPRI white paper on lessons learned from the Carnegie Road BESS incident concludes: <i>"In hindsight, many contributing factors are apparent—none of which is fundamentally new to the fire protection discipline or particularly difficult to address with engineering controls. This report serves to increase awareness in the industry in applying known mitigations against hazards that are now recognized."</i></p> <p>The significant year-on-year increase in global BESS developments means there has been an increase in the number of failure incidents. However, codes and standards are rapidly evolving to regulate systems more efficiently by establishing safer battery system designs and strategies for hazard mitigation and emergency response. BESS codes and standards are developed and evolved to minimize the severity of failure events and to limit their consequences.</p> <p>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</p>

Reference	Comments/Issue Raised	Applicant's Response
		<p>selected at the detailed design stage. Key safety content requires that all equipment within the BESS area is defined, battery system operating limits and test data are fully defined, and the BESS failure protection system is defined. Incident response tactics require significant test data and rigorous consequence modelling from the specific BESS design to develop safe protocols for incident response.</p> <p>Section 5.4.9 – 5.4.11 of the <b>Outline BSMP [REP1-110]</b> stipulates that the ERP will follow NFCC and NFPA 855 (2026) guidelines (Ref 5) 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></p> <p>The <b>Outline BSMP [REP1-110]</b> specifies that in line with NFPA 855 guidance (Ref 5): ‘A Failure Modes and Effects Analysis (FMEA) of the BESS (BS EN IEC 60812) or Layer of Protection Analysis (LOPA) will be conducted to lay the foundation for predictive maintenance requirements and complement the fault indicator capabilities of the BMS data analytics system. Comprehensive Hazard Mitigation Analysis (HMA) will be conducted by a BESS specialist independent Fire</p>

Reference	Comments/Issue Raised	Applicant's Response
		<p>Protection Engineer following NFPA 855 (2026) (Ref 5) guidelines and recommendations.</p> <p>The HMA considers both BESS system and site-specific safety issues.' This key analysis minimises the probability of a BESS failure in relation to the specific BESS system and site design and analyses key mitigation solutions to minimise the impact of a BESS failure in the unlikely event that this would occur. These types of risk analysis provide confidence to demonstrate that under day-today operation there is a low risk of a BESS failure incident, and in the event of an incident the credible hazards are understood and have been evaluated both at the illustrative and detailed design stages to demonstrate that the risk to site operatives, first responders, and the local population remains very low.</p> <p>New generation battery systems and BESS designs are introduced every 12-18 months and key safety/certification standards are revised on 2 to 5 year cycles, so the probability of a BESS failure is likely to continue to further reduce. Detailed Risk Analysis and consequence modelling of current BESS designs are not likely to truly reflect the reduced failure probability of improved BESS designs available at the detailed design stage.</p>

Reference	Comments/Issue Raised	Applicant's Response
		<p>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 <b>Outline BSMP [REP1-110]</b>. The Applicant is working to ALARP principles throughout the lifecycle of the Scheme.</p> <p>NFPA 855 (2026) (Ref 5) defines a safe BESS exclusion zone as follows: <i>“Potential debris impact radius is defined as 100 ft or 30.5 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.</p> <p>The Applicant has followed National Fire Chiefs Council (NFCC) guidance (Ref 6) and commissioned a BESS fire emissions assessment (as detailed in <b>ES Volume 3, Appendix 15-2: BESS Fire Emissions Modelling [APP-239]</b>) to model toxic gas emissions and visibility impacts from a BESS fire on all sensitive receptors within a 1km radius of the BESS area.</p> <p>The fire emissions modelled in the report were based upon recent UK Health Security Agency (UKHSA)</p>

Reference	Comments/Issue Raised	Applicant's Response
		<p>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 <b>[RR-4798]</b> 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.</p>

## 2.13 Philip Moore [REP1A-057]

2.13.1 The Applicant has addressed the points raised regarding representations from young people about potential environmental and economic impacts in Section 2.47 of **Written Summary of the Oral Submissions at the Open Floor Hearing 1 and the Applicant's Responses [REP1A-013]**.

2.13.2 Table 2-13 provides a response to further information provided.

**Table 2-13: Applicant's Response to Additional Matters Raised in Post Hearing Summaries by Philip Moore**

Reference	Comments/Issue Raised	Applicant's Response
PM-001	<p>Ladies and gentlemen.</p> <p>More people submitted objections to Lime Down than to the Gatwick or Luton airport expansions.</p> <p>More people objected to Lime Down than to the comparably-sized East Park, Botley West, Mallard Pass, Springwell and Fenwick solar NSIPs <i>combined</i>.</p> <p>By some distance, this was the single biggest popular expression of opposition to any NSIP as well as to any solar project in the UK. Ever.</p> <p>I've read through all 5000 comments, 98% of which were objections.</p>	<p>The Applicant acknowledges the scale of public participation in the Scheme. This high level of engagement was actively facilitated by the Applicant's decision to provide an extended Relevant Representation period beyond the minimum statutory timeframe, ensuring that all members of the community had sufficient time to review the application documents and register their views. Regardless of the volume of submissions received, the Applicant has considered and provided responses to the points raised, either individually or through comprehensive thematic summaries for members of the public, to ensure that all parties have been addressed and recorded.</p>

**2.14 Simon Cox [REP1A-062]**

2.14.1 The Applicant has addressed the points regarding BESS safety in Section 2.7 of **Written Summary of the Oral Submissions at the Open Floor Hearing 1 and the Applicant's Responses [REP1A-013]**.

2.14.2 Table 2-14 provides a response to further information provided.

**Table 2-14: Applicant's Response to Additional Matters Raised in Post Hearing Summaries by Simon Cox**

Reference	Comments/Issue Raised	Applicant's Response
SC-001	Simon Cox has provided a research paper 'Safety of Grid Scale Lithium-ion Battery Energy Storage Systems' to support their open floor hearing submission in the Post Hearing Submission.	The Applicant notes this document submission. The Applicant has responded in detail to the points raised in Section 2.18 of the <b>Written Summary of the Oral Submissions at the Open Floor Hearing 1 [REP1A-013]</b> .

**2.15 Stuart Fisher [REP1A-067]**

- 2.15.1 The Applicant has addressed the points raised regarding site selection in Section 2.10 of **Written Summary of the Oral Submissions at the Open Floor Hearing 1 and the Applicant's Responses [REP1A-013]**.
- 2.15.2 Table 2-15 provides a response to further information provided.

**Table 2-15: Applicant's Response to Additional Matters Raised in Post Hearing Summaries by Stuart Fisher**

Reference	Comments/Issue Raised	Applicant's Response
SF-001	Stuart Fisher has provided a comparison of viewpoint photography presented by the Applicant [APP-103 to APP-105] and their own photography to support their open floor hearing submission in the Post Hearing Submission.	<p>The LVIA presented in <b>ES Volume 1, Chapter 8: Landscape and Visual [APP-060]</b> 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 in <b>ES Volume 2, Figure 8-10: Viewpoints [APP-099]</b>.</p> <p>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 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</p>

Reference	Comments/Issue Raised	Applicant's Response
		<p><b>ES Volume 2, Figure 8-14: Baseline Photography and Photomontages [APP-103 to APP-105].</b></p> <p>Locations of the required photomontages and Accurate Visual Representation (AVR) were agreed with the Landscape Officer representatives from Wiltshire Council and the Cotswold National Landscape Board (CNLB).</p> <p>A total of 32 AVR level 3 montages have been produced using summer and winter photography as illustrated in <b>ES Volume 2, Figure 8-14: Baseline Photography and Photomontages [APP-103 to APP-105]</b> and as set out within Table 8-10 of <b>ES Volume 1, Chapter 8: Landscape and Visual [APP-060]</b>. These include the 10 additional Viewpoints which were agreed with the Landscape Officer representatives for Wiltshire Council and CNLB.</p> <p>The Photography and Photomontage Methodology is included within <b>ES Volume 3, Appendix 8-1: Landscape and Visual Impact Assessment Methodology [APP-187]</b>.</p> <p>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</p>

Reference	Comments/Issue Raised	Applicant's Response
		<p>MSEnvision who has led the photography and 3D modelling process.</p> <p>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 have delivered numerous Solar and BESS schemes over the past 10 years using the proposed methodology which have been tested successfully through the DCO process.</p> <p>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 see within the Photography and</p>

Reference	Comments/Issue Raised	Applicant's Response
		<p>Photomontage Methodology included within <b>ES Volume 3, Appendix 8-1: Landscape and Visual Impact Assessment Methodology [APP-187]</b>.</p>

## 2.16 Tracy Worcester [REP1A-069]

- 2.16.1 The Applicant notes that Tracy Worcester has submitted additional material in their Deadline 1A submission [REP1A-069] to support their open floor hearing submission.
- 2.16.2 The Applicant provides a response to further information provided in Table 2-16.

**Table 2-16: Applicant's Response to Additional Matters Raised in Post Hearing Summaries by Tracy Worcester**

Reference	Comments/Issue raised	Applicant's Response
TW-001	<p>ANNEX A</p> <p>Document accessed 5 May 2026 to cite a report on the detrimental effect on bats of the proposed Lime Down Solar Park.</p> <p>'Engineers studying bats near a solar plant in England realized the panels were tricking them into thinking they were water and changing their behavior' by Warren van de Sandt, The Pulse, 17 April 2026.</p> <p>A solar plant in England is affecting a species of bats.</p> <p>As the renewable energy sector gains significant momentum, a few unexpected issues have emerged. When a team of engineers was constructing a solar plant in the UK, they found that bats were being adversely affected by the panels in a number of ways.</p>	<p>The Applicant notes this comment and welcomes the provision of the article reference published by The Pulse in April 2026.</p> <p>Having reviewed the article (<a href="https://www.ecoport.net/en/bats-confuse-solar-panels-with-water/20246/">https://www.ecoport.net/en/bats-confuse-solar-panels-with-water/20246/</a> (Accessed 18 May 2026)), several references are made to a UK-based research study on the effects of solar panels on bats, but no specific reference or link to the research is provided.</p> <p>Given that this article does not provide a source for the research to which it refers, it has not been possible for the Applicant to verify and review the source material.</p>
TW-002	<p>Studies have found that bats often confuse wind farms for roosting sites and are also attracted to the turbines,</p>	<p>The Applicant notes this comment.</p>

Reference	Comments/Issue raised	Applicant's Response
	<p>as insects tend to aggregate around the massive wind towers around the world.</p> <p>Study reveals that bats in the UK are confusing solar panels for water We have learnt how solar panel arrays in the desert have been creating thriving oases for some species, but this development across the pond has explained how solar panels are confusing bats in ways never expected.</p> <p>Bats make their way through the world by echolocation.</p> <p>When they send out an acoustic call towards a smooth surface, like a lake, the sound bounces off the body of water. Think of how a mirror reflects light, and you're halfway there. This study has detailed how bats in the United Kingdom are confusing the smooth surfaces of solar panels for bodies of water.</p> <p>Researchers have found that solar panels act like "sensory traps" for bats as they mimic the echolocation signature of water.</p> <p>The magical illusion leads to altered behavior in bats, like reduced activity as well as habitat avoidance. Solar panel arrays have created a new ecological barrier for bats that need to forage and commute.</p>	<p>Although the precise research referred to has not been identified as described above, the Applicant consider this is in reference to studies which demonstrate that bats use echolocation to detect and recognise water bodies, and that smooth surfaces can be perceived by bats as water bodies using the same cues (Ref 7, Ref 8). This has led to some concern that the presence of solar panels may have adverse impacts on bats when echolocating, for instance by confusing solar panels for waterbodies, from which bats both glean insects and drink.</p> <p>These studies into this potential impact do not make any reference to solar panels or indicate any potential significant ecological impact is presented by this behaviour. Furthermore, these studies have shown how bats are adept at quickly modifying their behaviour to avoid attempting to glean or drink from smooth surfaces. As such it can be inferred that collision risks are unlikely to present a significant issue for bats, or that detrimental impacts on bat populations would arise from mistaking panel surfaces for water.</p>

Reference	Comments/Issue raised	Applicant's Response
TW-003	<p>Document accessed 5 May 2026 to cite a report on the detrimental effect on bats of the proposed Lime Down Solar Park, and on the need for specific bat surveys to accompany any application for solar farms.</p> <p>Do solar farms affect foraging &amp; commuting bats?</p> <p>Tinsley, E.; Froideveaux, J.S.P; Zsebők, S.; Szabadi, K.L.; and Jones, G. (2023). Renewable energies and biodiversity: Impact of ground- mounted solar photovoltaic sites on bat activity. <i>Journal of Applied Ecology</i> 60, 1752–1762.</p> <p>A recent study published by a team led by the University of Bristol (Tinsley et al, 2023) claims to show a strong negative effect of solar farm developments on foraging and commuting bats. Our recent experience is that this has led to nature conservation stakeholders requesting additional survey to support solar planning applications.</p> <p>This viewpoint article sets out our thoughts on the extent to which the study changes the landscape in terms of baseline bat activity survey for solar farms, and the circumstances in which a change in survey methods or effort might be considered.</p> <p>This paper is likely to be invoked in discussions with nature conservation stakeholders regarding bat survey</p>	<p>The Applicant notes this comment, and welcomes the provision of the research paper reference published by Tinsley et al. in 2023. The text provided in the comment appears to originate from an article written by BSG Ecology in January 2024 (Accessed 18 May 2026: <a href="https://bsg-ecology.com/bats-and-solar-farms/">https://bsg-ecology.com/bats-and-solar-farms/</a>), providing a viewpoint article in response to the publication by Tinsley et al. (2023).</p> <p>It is noted that the text provided by the respondent omits several sections of the article by BSG Ecology which provide an overview of the Tinsley study background, methodology, results and potential caveats to the study. In these sections, BSG Ecology recognise that several caveats to the research exist and potentially limit the validity of the conclusions of the study.</p> <p>These caveats are also discussed specifically in Section 4.4 of the UK Bat Mitigation Guidelines Version 1.2, published by the Chartered Institute of Ecology and Environmental Management (CIEEM) in August 2025. The CIEEM Guidelines suggest that the Tinsley paper lacks key data and is not considered sufficiently robust to draw detailed conclusions on the impact of solar development on bats.</p>

Reference	Comments/Issue raised	Applicant's Response
	<p>effort on many future solar developments. We believe that there are a number of situations where applying its conclusions to justify increased survey effort are unlikely to be proportionate or justifiable, but conversely, it indicates that adverse effects on bats could be more common than previously recognised and that a circumspect, site-by-site approach is sensible.</p>	<p>The Applicant acknowledges that despite the limitations of the study, the Tinsley paper highlights the need to fully assess the potential impacts of solar development on bats. Potential impacts to bats are assessed within <b>ES Volume 1, Chapter 9: Ecology and Biodiversity [REP1-015]</b>, and reference is made to the Tinsley paper in the assessment of Operation and Maintenance phase impacts to foraging and commuting bats (Paragraph 9.10.187 refers). The assessment identifies avoidance, mitigation and enhancement measures to address potential impacts on habitats and protected and notable species, including bats. 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 bats are anticipated as a result of the Scheme.</p>
TW-004	<p>Some factors which may indicate the need for survey and mitigation for bats on solar projects include:</p> <ul style="list-style-type: none"> <li>• Sites where the baseline habitat is long-established pasture under low-intensity management.</li> </ul>	<p>Comprehensive baseline information has been gathered in order to inform survey and mitigation requirements in relation to bats at the Scheme. This includes desk studies, and a range of field-based bat surveys, including habitat suitability assessments,</p>

Reference	Comments/Issue raised	Applicant's Response
	<ul style="list-style-type: none"> <li>• The presence of potential for significant roost sites, designated sites for bats or high-quality foraging habitat in the landscape.</li> <li>• Projects proposing battery storage or other significant noise-and light-producing infrastructure.</li> </ul> <p>Early consultation with planning authority ecologists, together with thorough desk studies and habitat surveys as part of Preliminary Ecological Appraisal are likely to be essential.</p>	<p>ground-level tree assessments (GLTAs), building inspections, and automated bat activity surveys, have been undertaken across the Solar PV Sites, and habitat suitability assessments, GLTAs and building inspections have been undertaken within the Cable Route Corridor. Details of survey methodology and findings are provided in <b>ES Volume 3, Appendix 9-3: Bat Survey Report [APP-200]</b>.</p> <p>Consultation on the scope of bat surveys for the Scheme and assessment of potential impacts has been undertaken from an early stage with relevant stakeholders, including Natural England.</p>
TW-005	<p>Some typical mitigation features for bat-sensitive landscape design on solar farms include:</p> <ul style="list-style-type: none"> <li>• Landscape buffers around important foraging and commuting features such as hedgerows, woodland and waterbodies.</li> <li>• Incorporating habitat enhancements within retained areas, designed to enhance commuting connectivity and provide new foraging habitat.</li> <li>• Sensitive siting of infrastructure such as inverters, maintenance compounds and battery</li> </ul>	<p>Potential impacts to bats are assessed within <b>ES Volume 1, Chapter 9: Ecology and Biodiversity [REP1-015]</b>. The assessment identifies avoidance, mitigation and enhancement measures to address potential impacts on habitats and protected and notable species, including bats. 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 bats are anticipated as a result of the Scheme.</p>

Reference	Comments/Issue raised	Applicant's Response
	<p>storage systems away from valuable bat foraging habitat and/or known roosts.</p>	<p>Mitigation measures for bats include the implementation of protective ecological buffers within the Scheme design to protect key foraging habitat and commuting corridors, as well as potential roost sites, during both the construction and operational phases. Embedded and additional mitigation measures for bats are set out within the <b>Outline EPMS [REP1-106]</b>, and detailed prescriptions will be set out within a detailed EPMS and secured via DCO Requirements.</p>

### 3 References

- Ref 1 Department of Energy Security and Net Zero (2025) Clean Power 2030 Action Plan: A New Era of Clean Electricity – Connections Reform Annex (Updated). Available at:  
<https://assets.publishing.service.gov.uk/media/67f3b417d3f1efd2ce2ab8a5/clean-power-2030-action-plan-connections-reform-annex-update.pdf>. [Accessed 21 May 2026].
- Ref 2 Department of Energy Security and Net Zero (2026) Overarching National Policy Statement for Energy (EN-1). Available at:  
<https://assets.publishing.service.gov.uk/media/65bbfbd709fe1000f637052/overarching-nps-for-energy-en1.pdf>. [Accessed 21 May 2026].
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- Ref 5 National Fire Protection Association (NFPA) (2026) NFPA 855: Standard for the Installation of Stationary Energy Storage Systems. Quincy, MA: National Fire Protection Association.
- Ref 6 National Fire Chiefs Council (NFCC) 2026, Grid Scale Battery Energy Storage System planning – Guidance for FRS. Available at:  
<https://nfcc.org.uk/our-services/building-safety/grid-scale-energy-storage-system-planning-guidance-for-fire-and-rescue-services/> [Accessed: 21 May 2026].
- Ref 7 Greif, S., and Siemers, B. M. (2010) Innate recognition of water bodies in echolocating bats. *Nat. Commun.* 2(1):107.
- Ref 8 Russo, D., Cistrone, L., and Jones, G. (2012) Sensory ecology of water detection by bats: a field experiment. *PLoS ONE.* 7(10): e48144.