



Lime Down

Solar Park

Technical Note on Site Selection Assessment

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1 Introduction

1.1 Structure and purpose of this note

1.1.1 This technical note is supplemental to **ES Volume 1, Chapter 4: Alternatives and Design Evolution [APP-056]**, **ES Volume 3, Appendix 4-1: Site Selection Assessment Report [APP-185]** and the **Planning Statement [REP1-087]**. It has been prepared in response to comments received in Stop Lime Down's Written Representation and sets out the Applicant's further consideration of its site selection assessment. In addition, and in response to general feedback received regarding the Scheme's proximity to the Cotswolds National Landscape (CNL), the Applicant has also considered land within an extended 25 km search area (increased from the original 20km search area) and land within the Bath Green Belt, to determine whether this reveals further alternatives to site the Scheme away from the CNL.

1.1.2 The remainder of this technical note is structured as follows:

- Section 2: increasing the search area to 25 km;
- Section 3: considering land within the Bath Green Belt;
- Section 4: use of the least constrained areas of land identified in other potential development areas as an alternative to the Solar PV Sites;
- Section 5: including further areas of land within the potential development areas already drawn; and
- Section 6: Conclusion.

1.1.3 The further analysis presented in this technical note has been carried out in the context of National Policy Statements EN-1 and EN-3. In particular, the Overarching National Policy Statement for Energy EN-1 (NPS EN-1) (Ref 1) paragraph 4.3.22 provides that:

“Given the level and urgency of need for new energy infrastructure, the Secretary of State should, subject to any relevant legal requirements (e.g. under the Habitats Regulations) which indicate otherwise, be guided by the following principles when deciding what weight should be given to alternatives:

- *The consideration of alternatives in order to comply with policy requirements should be carried out in a proportionate manner; and*
- *Only alternatives that can meet the objectives of the proposed development need to be considered.”*

1.1.4 NPS EN-1 paragraph 4.3.23 states that the Secretary of State should also be guided by whether there is a realistic prospect of the alternative

delivering the same infrastructure capacity (including energy security, climate change and other environmental benefits) in the *same timescale* as the proposed development.

1.1.5 Further, NPS EN-1 paragraph 4.3.24 provides that:

“the Secretary of State should not refuse an application for development on one site simply because fewer adverse impacts would result from developing similar infrastructure on another suitable site, and should have regard as appropriate to the possibility that all suitable sites for energy infrastructure of the type proposed may be needed for future proposals.”

1.1.6 In line with the above, the analysis carried out for this technical note is intended to be a proportionate, high-level review of the site selection process, in order to address queries raised during examination. Accordingly, unlike the approach taken in **ES Volume 3, Appendix 4-1: Site Selection Assessment Report [APP-185]**, the Applicant has not carried out an analysis of the further potential alternative sites against standardised assessment criteria and assigned the sites with a ‘red, amber or green’ rating. Further, it is noted by the Applicant that there is no policy requirement to show that the proposed site for the Scheme has the fewest adverse impacts. In line with NPS 4.3.24, it is possible that other land within the search area could be used for future proposals and potential environmental effects could be avoided or reduced through the process of design evolution. However, that work is unlikely to be deliverable within the same timescales as the Scheme, and it is beyond the scope of this technical note and beyond the requirements of policy to carry out that design evolution for each potential alternative site considered. It is also acknowledged that other sites may be suitable for other solar developments, including smaller developments, to meet the UK’s energy targets.

1.1.7 This technical note concludes that there are no further potential development areas (PDAs) which are suitable for further consideration as part of the Applicant’s site selection assessment for the Scheme. The conclusions of **ES Volume 3, Appendix 4-1: Site Selection Assessment Report [APP-185]** therefore remain unchanged.

2 Increasing the search area to 25 km

2.1.1 This section clarifies the Applicant's rationale behind the 20 km search area adopted for site selection and how this has been chosen with regard to the Cable Route Corridor length. In response to feedback received regarding the proximity of the Scheme to the CNL, it also explores other potential alternative sites within an extended 25 km search radius, to consider whether extending the search area would provide an opportunity to site the Scheme in an area that would further reduce effects on the CNL.

2.2 The proposed Cable Route Corridor

2.2.1 As set out in **ES Volume 3, Appendix 4-1: Site Selection Assessment Report [APP-185]** the Applicant adopted a search area within a 20 km radius of the point of connection at the Existing National Grid Melksham Substation. An initial search area was identified at a 5 km radius from the point of connection, but this was later expanded as no suitable and available sites within 5 km were identified. The search area was enlarged incrementally to a 20 km radius. All sites identified (including ones within a 5 km radius), along with the accompanying assessment, are set out in **ES Volume 3, Appendix 4-1: Site Selection Assessment Report [APP-185]**.

2.2.2 20 km is considered by the Applicant to be a suitable search radius for a solar project of this scale and takes account of the likelihood of the length of cable route required being longer than 20 km. This is because the cable route will likely need to avoid constraints and therefore deviate from a straight path from the Solar PV Sites to the Existing National Grid Melksham Substation.

2.2.3 The Cable Route Corridor for the Scheme is sited within the 20 km search area. However, the actual length of the Cable Route Corridor is 22 km because it is routed to avoid various constraints between the Solar PV Sites and the Existing National Grid Melksham Substation. The rationale behind the route taken is set out in section 4.6 of **ES Volume 1, Chapter 4: Alternatives and Design Evolution [APP-056]**.

2.2.4 Whilst the actual length of the Cable Route Corridor is longer than the 20 km search area, the length of 22 km is considered by the Applicant to be suitable for a project of this type and scale because the electrical connection is viable at this length. This is particularly because the Solar PV Sites are grouped close together. Having a single site, contiguous sites or sites close together allows the Applicant to utilise cables that can carry electricity at higher voltages (i.e. 400 kV cables) from the solar site(s) to the point of connection. Cables with higher voltages reduce the current

and in turn reduce the electrical losses experienced, allowing for efficient bulk transfer of power over greater distances. Further, the use of a single site, contiguous land parcels or sites close together means that the inverters and transformers for the Scheme can be placed efficiently throughout the Solar PV Sites to keep the use of lower and medium voltage cable runs to a minimum, which also reduces electrical losses.

- 2.2.5 Whilst separate land parcels can be joined, single, contiguous, or land parcels close together are generally preferred where this is achievable from a land use and electrical efficiency perspective. Ultimately, each project would be judged on a case-by-case basis and the choice of sites would involve balancing environmental and planning constraints, efficiency of cable connection, energy generation potential and land availability. In some cases, single, contiguous or land parcels close together cannot be achieved or are not desirable, for instance due to environmental and planning constraints or environmental factors, and therefore separate land parcels are utilised, which is also a valid approach.

2.3 A 25 km search area

- 2.3.1 As set out in **ES Volume 3, Appendix 8-6: Assessment of the Effects on the Cotswolds National Landscape and its Special Qualities [APP-197]** and the **Tranquillity Technical Note [PDA-010]**, with the proposed mitigation, the likely significant adverse effects on receptors within or directly adjacent to the CNL are limited to socio-economic, tourism and recreation effects on two unsurfaced highways, Fosse Way, Long Path, Palladian Way, Wiltshire Way and equestrian facilities at Park Farm (with some of these limited to the construction phase only) and significant adverse effects on eight visual receptors (limited to construction phase and operation year 1, and reducing to non-significant by operation year 15). There are no significant effects anticipated on receptors within or directly adjacent to the CNL in relation to landscape, cultural heritage, transport and access or noise and vibration. However, in recognition of the Written Representations received relating to the site selection process and proximity of the Scheme to the CNL, the Applicant has considered whether extending the 20 km search area would identify any other suitable and available sites, which could move the Scheme away from the CNL in order to further reduce the effects on it.
- 2.3.2 Figure 1, Annex A shows an extended 25 km search area from the point of connection at the Existing National Grid Melksham Substation. The same exclusionary and inclusionary criteria have been applied as per stage 6 of the site selection assessment (see **ES Volume 3, Appendix 4-1: Site Selection Assessment Report [APP-185]**) and the land for consideration is shown in green. As can be seen from the figure, extending the search

area to 25 km does not reveal large areas of suitable land for consideration within the 20-25 km radius. In particular:

- Areas immediately to the north of the Solar PV Sites are constrained by the CNL which extends further east to Malmesbury in the extended section of the search area, effectively ‘cutting off’ the area to the north of the Solar PV Sites;
- There is an area of land to the north of Malmesbury (as marked on Figure 1, Annex A). However, the Cable Route Corridor would have to be routed around Malmesbury which presents a constraint, particularly given the areas of heritage assets and Flood Zones 2 and 3 to the north and east of Malmesbury (and the presence of the CNL immediately to the west);
- There is an area to the west of Yate (as marked on Figure 1, Annex A), however the CNL lies between this and the point of connection, therefore the effects on the CNL of routeing the cable route corridor through the CNL are likely to be far greater than the effects of the Scheme as currently proposed. For example, works would be required within the CNL to lay the cable (including construction traffic routes, temporary construction compounds and cable laying activities) which would be more extensive in comparison to the construction traffic routes within the CNL and four associated Highways Improvement Areas (with a total area of 2.16 ha within the CNL) proposed for the Scheme;
- There is an area of land south of Royal Wootton Bassett to the north of the North Wessex Downs National Landscape (as marked on Figure 1, Annex A). This links to another area for potential consideration that was highlighted in the Stage 5 check and balance exercise in **ES Volume 3, Appendix 4-1: Site Selection Assessment Report [APP-185]** (see paragraph 3.3.25). However this area was previously discounted in site selection for reasons including the proximity to the North Wessex Downs National Landscape, heritage assets and areas of Flood Zone 3, which mean it is no better an option than the preferred location for the Scheme (even if landowners were willing to make their land available). An extended area may provide flexibility to avoid some constraints (such as Flood Zones and designated heritage assets). However, similar to the assessment carried out for the Scheme due its proximity to the CNL, the use of this land would require undertaking an assessment of potential effects upon the North Wessex Downs National Landscape and ensuring that development within the setting of the North Wessex Downs National Landscape met with the specific policy tests relating to national landscapes. The actual effects associated with development within this area of land on the setting of

the North Wessex Downs National Landscape versus the actual effects of the Scheme on the CNL would require detailed analysis, which is not proportionate at this stage. However, more generally, this area is not considered to offer a solution to moving the Scheme further from a national landscape (which is the focus of this technical note), given it too is close to a national landscape. In the event that further detailed analysis revealed that this area could accommodate a solar project and avoid effects on the national landscape, it is considered that this could be developed in addition to, rather than instead of, the Scheme, in line with NPS EN-1 paragraph 4.3.24.

- Areas to the south-east of the extended search area are generally constrained by the Salisbury Plain which is designated as a Special Protection Area, Special Area of Conservation and Site of Special Scientific Interest and the areas of additional land revealed by extending the search area are small and lie directly adjacent to the above designations. Therefore no additional areas for consideration were revealed in that area;
- Areas to the south-west beyond Frome (as marked on Figure 1, Annex A) are limited in size and the area has a high concentration of heritage assets. Therefore it is not considered that any of the additional land revealed in this area would be suitable for further consideration; and
- Areas to the west are generally constrained by the Bath Green Belt (areas within the Green Belt have been considered separately in Section 3 below).

2.3.3 Therefore in conclusion, extending the search area to a 25 km radius from the point of connection has not revealed any new PDAs suitable for further consideration as alternatives sites for the Scheme.

3 Consideration of land within the Bath Green Belt

- 3.1.1 In addition to extending the search area to a 25 km search area as outlined above, the Applicant has also considered whether any sites within the Bath Green Belt (between 0 – 25 km from the point of connection) could be used in order to move the Scheme away from the CNL.
- 3.1.2 In its site selection assessment (see **ES Volume 3, Appendix 4-1: Site Selection Assessment Report [APP-185]**), the Applicant excluded all Green Belt land from its area of search. This decision was based in policy and in particular NPS EN-1 paragraph 5.11.36 which states that energy infrastructure projects may comprise ‘inappropriate development’ which, by its definition, is harmful to the Green Belt. It goes on to state that the NPPF makes clear that most new building is inappropriate in Green Belt and should be refused permission unless in very special circumstances. NPS EN-1 paragraph 5.11.37 continues that whilst very special circumstances would need to be judged on a case-by-case basis, the Secretary of State should ensure that substantial weight is given to any harm to the Green Belt when considering any application, while taking account, in relation to renewable infrastructure, the extent to which its physical characteristics are such that it has limited or no impact on the fundamental purposes of the Green Belt designation. It confirms that very special circumstances may include the wider environmental benefits associated with increased production of energy from renewables.
- 3.1.3 Whilst the Applicant has adopted a blanket approach to the exclusion of Green Belt in its site selection assessment, it is acknowledged that there are some circumstances where development of renewable infrastructure within the Green Belt would be considered acceptable, subject to a case-by-case review of the land to be used. It is also acknowledged that, as the Scheme meets the definition of CNP Infrastructure within NPS EN-1 paragraph 4.2.5, the Secretary of State will take as a starting point that the very special circumstances test applying to Green Belt has been met (see NPS EN-1 paragraph 4.2.17). Therefore, given the Scheme’s proximity to the CNL and the policy tests that apply to applications within and outside of National Landscapes, the Applicant has considered whether extending its search to include Green Belt land would have provided an opportunity to site the Scheme away from the CNL.
- 3.1.4 Figure 2, Annex A shows the 25 km search area and applies the same exclusionary and inclusionary criteria as per stage 6 of the site selection assessment (see **ES Volume 3, Appendix 4-1: Site Selection Assessment Report [APP-185]**), with the exception of now including suitable land within the Bath Green Belt. The land for consideration is shown in green.

3.1.5 This exercise revealed the following areas which are marked on Figure 2, Annex A:

- A larger area of land for consideration around Yate. However, connecting that land to the point of connection would still require the cable route corridor to be routed through the CNL. As set out in section 2 above, passing through the CNL is likely to result in more adverse significant effects than the Scheme as currently proposed. For example, works would be required within the CNL to lay the cable (including construction traffic routes, temporary construction compounds and cable laying activities) which would be more extensive in comparison to the construction traffic routes within the CNL and four associated Highways Improvement Areas (2.16 ha within the CNL) proposed for the Scheme. Therefore this is not considered a suitable alternative for the Scheme;
- Areas south of Keysham within the 20-25km search bracket. However, the CNL extends to the south of Bath, and the cable route to connect these sites to the point of connection at Melksham would either have to pass through the CNL (and through the Bath Green Belt) or travel some distance to the south between Trowbridge and Westbury before travelling back north in order to avoid it, which would result in a 'U' shaped cable corridor that would be around twice as long as a direct route. Therefore, for the same reasons as set out above, this is not considered a suitable alternative for the Scheme;
- Additional land to the west of Trowbridge to the north of the A361. This is in close proximity to PDA 12 and could, subject to further assessment, be added to PDA 12. However, the area includes a collection of designated heritage assets which would need to be avoided. There are fewer heritage assets to the north, however, this would bring the development close to the southerly border of the CNL and therefore does not provide the opportunity to site the Scheme further from the CNL. The presence of the CNL, combined with the presence of the Green Belt, means that this area has been discounted from further consideration as it is not considered to be a suitable alternative to the Scheme.
- Additional land to the west of Melksham. This is in close proximity to PDA 6 and could be joined to PDA 6 subject to further assessment. However, this is separated from PDA 6 by the South Wraxall conservation area which would be 'sandwiched' between the two parts of development if the area was added to PDA 6. There is also an existing golf course, areas of ancient woodland, a landfill site, and a small area of traditional orchard that would need to be avoided. Further, the area is bordered to the west by the CNL, and therefore use

of this land would not result in the Scheme being further away from the CNL. This, coupled with the Green Belt designation, means that the area has been discounted from further consideration as it is not considered to be a suitable alternative to the Scheme.

- 3.1.6 Therefore in conclusion, consideration of land within the Bath Green Belt which otherwise meets the exclusionary and inclusionary criteria adopted in the site selection assessment has not revealed any additional parcels of land which are suitable for further consideration as alternatives for the Scheme.

4 Use of the least constrained areas of land identified in other potential development areas as an alternative to the Solar PV Sites

4.1.1 This section responds to feedback received in Stop Lime Down's Relevant Representation and Written Representation regarding the opportunity to 'carve out' and combine parts of the PDAs identified in **ES Volume 3, Appendix 4-1: Site Selection Assessment Report [APP-185]**, so that only the least harmful areas of each PDA are combined. The Applicant has reconsidered the PDAs, removed areas that are affected by identified constraints, combined the remaining areas, and then reassessed those areas at a high level to further consider their suitability as alternative sites for the Scheme.

4.1.2 To complete this exercise, the Applicant has removed the following areas from existing PDAs on the basis that these were identified as constraints in the site selection assessment:

- Any areas subject to planning applications and allocations;
- Areas affected by built development including all buildings, towns and villages;
- Any designated heritage assets, with a 150 m buffer applied around them;
- Grade 1 and 2 agricultural land based on Natural England's 1970's Provisional Agricultural Land Classification dataset (Ref 2), leaving Grade 3 agricultural land within the PDAs;
- Of the remaining Grade 3 agricultural land, removal of any areas of Grade 3a agricultural land as shown on Natural England's ALC Grades - Post 1988 Survey dataset (Ref 3);
- Flood Zones 2 and 3 and areas at high risk from surface water flooding;
- Any woodland (both ancient and non-ancient);
- Mineral safeguarding zones;
- Any local nature reserves;
- Any areas covered by public rights of way, cycle routes etc; and
- Bat impact zones.

4.1.3 The outcome of this additional sifting exercise is presented on Figure 3, Annex A and the size of the redrawn PDAs is set out in Table 4-1 below:

Table 4-1 Areas of the newly drawn PDAs with all constraints removed

Potential Development Area (PDA)	Area remaining when constraints removed (ha)
PDA 1	192.5
PDA 2	120.7
PDA 3	632.0
PDA 4	204.8
PDA 5	29.1
PDA 6	197.8
PDA 7	58.6
PDA 8	161.7
PDA 9	109.5
PDA 10	N/A (not considered for this exercise on the basis that this is the proposed site for the Scheme and this note focuses on alternatives to PDA 10)
PDA 11	175.9
PDA 12	570.9

- 4.1.4 The removal of the above constraints has resulted in PDAs including land parcels that are small and/or awkwardly shaped (for instance, where a public right of way intersects the PDA, or where a buffer has been applied around a heritage assets). It is acknowledged that some of these land parcels may be too small or awkwardly shaped to accommodate solar infrastructure, but in the interests of including as much unconstrained land as possible, they have been retained within the PDA for the purposes of this exercise. Ultimately, if any of the PDAs were developed, further assessment would be required to determine if and how to incorporate the land parcels into the design.
- 4.1.5 The PDAs have then been grouped by considering their size (i.e. seeking to combine PDAs to provide an adequately sized site for the Scheme), their proximity to the point of connection, and their proximity to one another. Consideration was also given to how they might be connected to each other electrically (noting the comments in section 2.2 above relating to the efficiencies in connecting sites that are closer together). This results in three clusters for consideration as follows, which are shown on Figure 3, Annex A with more detailed versions on Figures 4 to 6, Annex A:

Table 4-2 Clusters of PDAs for consideration

Clusters	PDAs within Cluster	Area of Cluster (ha)	Approximate distance from Point of Connection (at nearest and furthest point)
Cluster 1	6, 11, 2, 8 and the northerly part of 3	807	1 km – 16 km
Cluster 2	3 and 8	793.7	7 km – 13 km
Cluster 3	12, 6 and 11	944.6	1 km – 16 km

4.1.6 The following PDAs were not included within clusters:

- PDAs 1, 9 and 4 were not included because of their distance from the point of connection and other PDAs, and their size, which makes them less efficient for connection from an electrical standpoint. PDA 9 is also entirely constrained by landscape effects, given the elevated position of the North Wessex Downs National Landscape to the east of the PDA and the likely views from it over the PDA.
- PDAs 5 and 7, whilst closer to the point of connection, were discounted from an electrical standpoint on the basis that they are small and not contiguous and therefore their inclusion would not be electrically efficient.

4.1.7 The identified three clusters have then been reconsidered, at a high level, to test their suitability to accommodate a project equivalent to the Scheme. This includes a high level review against environmental constraints that still affect the sites despite being outside of the boundary of them. In line with NPS EN-1 paragraph 4.3.22 (which provides that the consideration of alternatives in order to comply with policy requirements should be carried out in a proportionate manner) the Applicant has not assessed the identified clusters to the same level as the PDAs have been assessed in **ES Volume 3, Appendix 4-1: Site Selection Assessment Report [APP-185]** and no RAG rating has been provided. The outcome of that high level review is as follows:

4.2 Cluster 1

4.2.1 The main constraint for Cluster 1 is cultural heritage and in particular the presence of Broughton Gifford conservation area between the distinct sections of PDA 11. This was previously noted in the site selection assessment, however, the combination of PDA 11 and PDA 6 to the north now means that the conservation area would be bordered by the proposed

development on three sides. There are also a number of conservation areas to the west of PDAs 3 and 8 (Marston, Worton, Poulshot), albeit these are not 'sandwiched' between areas for development in the same way as Broughton Gifford conservation area. PDA 3 also has a Grade II Listed building which would be entirely surrounded. Taking a wider view on heritage effects over the whole of Cluster 1, in comparison to the proposed Site for the Scheme, it is considered that this option does not represent a suitable alternative.

4.2.2 In addition to the main heritage constraint identified above, it is also noted that PDA 8 (incorporated into Cluster 1) was discounted during the Applicant's site selection assessment partially because initial approaches to landowners revealed a lack of opportunity to accommodate the Scheme. This constraint is assumed to still apply, despite the PDAs being redrawn to avoid environmental and planning constraints.

4.2.3 On the basis of the above, Cluster 1 is not considered to be a suitable alternative.

4.3 Cluster 2

4.3.1 Cluster 2 is also constrained by cultural heritage. There are a number of conservation areas to the west of PDAs 3 and 8 (Marston, Worton, Poulshot), albeit these are not 'sandwiched' between areas for development. PDA 3 also has a Grade II Listed building which would be entirely surrounded. Taking a wider view on heritage effects over the whole of Cluster 2, in comparison to the proposed Solar PV Sites for the Scheme, it is noted that the heritage assets are closer to Cluster 2 than those identified near the Solar PV Sites. Whilst Cluster 2 could potentially be developed following further design evolution which might allow for mitigation of cultural heritage constraints, it is considered that this option does not represent a more suitable or available alternative than the proposed Solar PV Sites that could be delivered in the same timescale. Further, in line with NPS EN-1 paragraph 4.3.24, the Applicant is not required to show that the Scheme is the only developable site within the search area, and the Secretary of State "*should have regard as appropriate to the possibility that all suitable sites for energy infrastructure of the type proposed may be needed for future proposals*". It is acknowledged that Cluster 2 (or parts of it), might be used for a smaller solar development, but it is not considered to be a more preferable or available alternative for the Scheme.

4.3.2 Again, it is noted that PDA 8 was discounted during the Applicant's site selection assessment partially because initial approaches to landowners revealed a lack of opportunity to accommodate the Scheme. This constraint is assumed to still apply, despite the PDAs being redrawn to avoid environmental and planning constraints.

4.3.3 On the basis of the above, Cluster 2 is not considered to be a suitable alternative for the Scheme.

4.4 Cluster 3

4.4.1 Of the three clusters considered, Cluster 3 has the most cultural heritage constraints. The inclusion of PDAs 6 and 11 within Cluster 3 brings the same heritage constraints as highlighted for Cluster 1 above, with the Broughton Gifford conservation area surrounded by solar development on three sides. Further, PDA 12 remains heavily constrained by heritage receptors, despite these being removed from the PDA boundary. This includes a scheduled monument close to the PDA boundary, a Grade I Listed Building and two Grade II Listed Buildings which would be entirely surrounded by the PDA, and various other Listed Buildings and a conservation area nearby.

4.4.2 On that basis, Cluster 3 is not considered to be a suitable alternative to the Solar PV Sites.

4.4.3 In conclusion, none of the three Clusters considered in this technical note are considered to be suitable for further consideration as alternatives for the Scheme.

5 Including further areas of land within the potential development areas already drawn

- 5.1.1 This section considers whether additional land could be added PDAs 1-4 as identified in **ES Volume 3, Appendix 4-1: Site Selection Assessment Report [APP-185]**, in response to Stop Lime Down's comment that PDAs 1-4 were identified against the tightest set of criteria.
- 5.1.2 As set out in **ES Volume 3, Appendix 4-1: Site Selection Assessment Report [APP-185]**, the Applicant's site selection assessment focussed first on less constrained land at Stage 2, and identified PDAs 1-4 for assessment. PDAs 1-4 were considered unsuitable and therefore the Applicant adjusted its search criteria to include more constrained areas of land within the search area at Stage 5 (namely Grade 3 agricultural land and land within Flood Zones 2 and 3). At stage 6, land at a higher topographic gradient was also considered. The Applicant did not redraw and reassess the original 4 PDAs against the more permissive constraints on the basis that those areas of land had already been assessed and discounted. Instead, the Applicant focussed its assessment on considering new areas of land at Stages 5 and 6. All PDAs, regardless of the stage at which they were identified in the assessment, were RAG rated against the same standard assessment criteria, as set out in **Annexes A and D of ES Volume 3, Appendix 4-1: Site Selection Assessment Report [APP-185]**. Therefore whilst the criteria for identifying the PDAs changes throughout the site selection assessment, the PDAs identified at each stage have been consistently assessed against the same criteria. Further, where PDAs are identified close to each other and there is a possibility that they can be joined, this is acknowledged and taken into the assessment. Further still, as a check and balance exercise, the Applicant considered the entire search area at Stage 6 and sought to identify and consider any land that had not been captured by a PDA. This check and balance exercise was carried out at both Stage 5 and Stage 6 of the assessment.
- 5.1.3 On this basis, it is the Applicant's position that it is not necessary or proportionate to redraw and reassess the PDAs already identified in the earlier stages of the site selection assessment.
- 5.1.4 However, it is acknowledged that there may be other land parcels that could have been added to PDAs 1-4. In response to Stop Lime Down's relevant representation and Written Representation, the Applicant has reconsidered the search area at a high level, based on the inclusionary and exclusionary criteria adopted at Stage 6 of **ES Volume 3, Appendix 4-1: Site Selection Assessment Report [APP-185]**, to identify if any land

could have been added to PDAs in order to improve their suitability as an alternative for the Scheme.

- 5.1.5 It should be noted that this exercise has been carried out as a high level review. It is acknowledged that on further assessment, there are areas that could be developed for other solar projects. In line with NPS EN-1 paragraph 4.3.24, the suitability of another site does not preclude the Secretary of State from granting consent for the Scheme, and on the basis that all suitable sites may be needed for future proposals, it is possible that other sites might be used in addition to, as opposed to instead of, the Scheme.
- 5.1.6 The outcome of this analysis is set out below and represented in pink on Figure 7, Annex A.
- 5.1.7 No additional land was identified for consideration around PDA 1 as, whilst areas of constrained land have been removed from the PDA itself, the area around the PDA is generally constrained by Flood Zones 2 and 3, ancient woodland, built development and heritage assets including various Grade II Listed buildings and a schedule monument to the north.
- 5.1.8 Land between PDAs 3 and 4 has already been considered and discounted in the high level assessment carried out in **ES Volume 3, Appendix 4-1: Site Selection Assessment Report [APP-185]** (see paragraphs 3.4.13-3.4.14). The reasons for discounting that land were flood risk, with large sections within Flood Zone 2 and 3 and areas at high risk of surface water flooding, and the presence of heritage assets across the area. In addition, PDA 3 has been further considered in this technical note in combination with other PDAs, as set out in section 4 above.
- 5.1.9 An area to the south of PDA 2 has been considered, which comprises approximately 391.1 ha, highlighted in pink on Figure 7, Annex A.
- 5.1.10 PDA 2, once all constraints are removed from its boundaries (see section 4 above), comprises 120.7 ha. Adding the land to the south of PDA 2 (391.1 ha) would bring the total size of the PDA to 511.8 ha. This would not be large enough on its own to accommodate a project equivalent to the Scheme and therefore its addition would not make a material difference when PDA 2 is assessed on its own.
- 5.1.11 It is acknowledged that the redrawn PDA 2 could be added to other PDAs and as noted in section 4 above, PDA 2 is incorporated into Cluster 1 which has been re-reviewed against environmental and planning constraints. Including a redrawn (and larger) version of PDA 2 to Cluster 1 is not considered to make a material difference, as the same heritage constraints would apply to Cluster 1 (particularly between PDAs 6 and 11) even if the additional land to the south of PDA 2 was added to it.

- 5.1.12 PDA 2 and the additional land could potentially be added to Cluster 2 (which would then be made up of a redrawn PDA 2, and PDAs 3 and 8) and this would provide some more flexibility in site size to allow the mitigation against heritage constraints. However, extending the boundary of PDA 2 to the south brings the PDA closer to Seend Conservation Area, which would be “sandwiched” between the redrawn PDA 2 and PDA 8. Therefore, joining a redrawn PDA 2 to Cluster 2 may bring further heritage constraints. Whilst these might be overcome through design evolution and mitigation, the same conclusion for Cluster 2 would remain, which is that it is considered that this option does not represent a more desirable or available alternative than the proposed Solar PV Sites. Further, in line with NPS EN-1 paragraph 4.3.24, the Applicant is not required to show that the Scheme is the only developable site within the search area, and the Secretary of State “*should have regard as appropriate to the possibility that all suitable sites for energy infrastructure of the type proposed may be needed for future proposals*”.
- 5.1.13 In conclusion, reconsideration of land around PDAs 1-4 has not revealed further areas of land which, when added to PDAs 1-4, would make any of PDAs 1-4 individually more suitable for development for the Scheme. The conclusions in relation to PDAs 1-4 as set out in **ES Volume 3, Appendix 4-1: Site Selection Assessment Report [APP-185]** therefore remain unchanged.

6 Conclusion

6.1.1 This Technical Note has been drafted to further consider comments raised in relevant and written representations regarding the Applicant's site selection assessment methodology and analysis. It has considered whether further analysis of the following points would alter the conclusions on site selection and alternatives set out in **ES Volume 3, Appendix 4-1: Site Selection Assessment Report [APP-185]**:

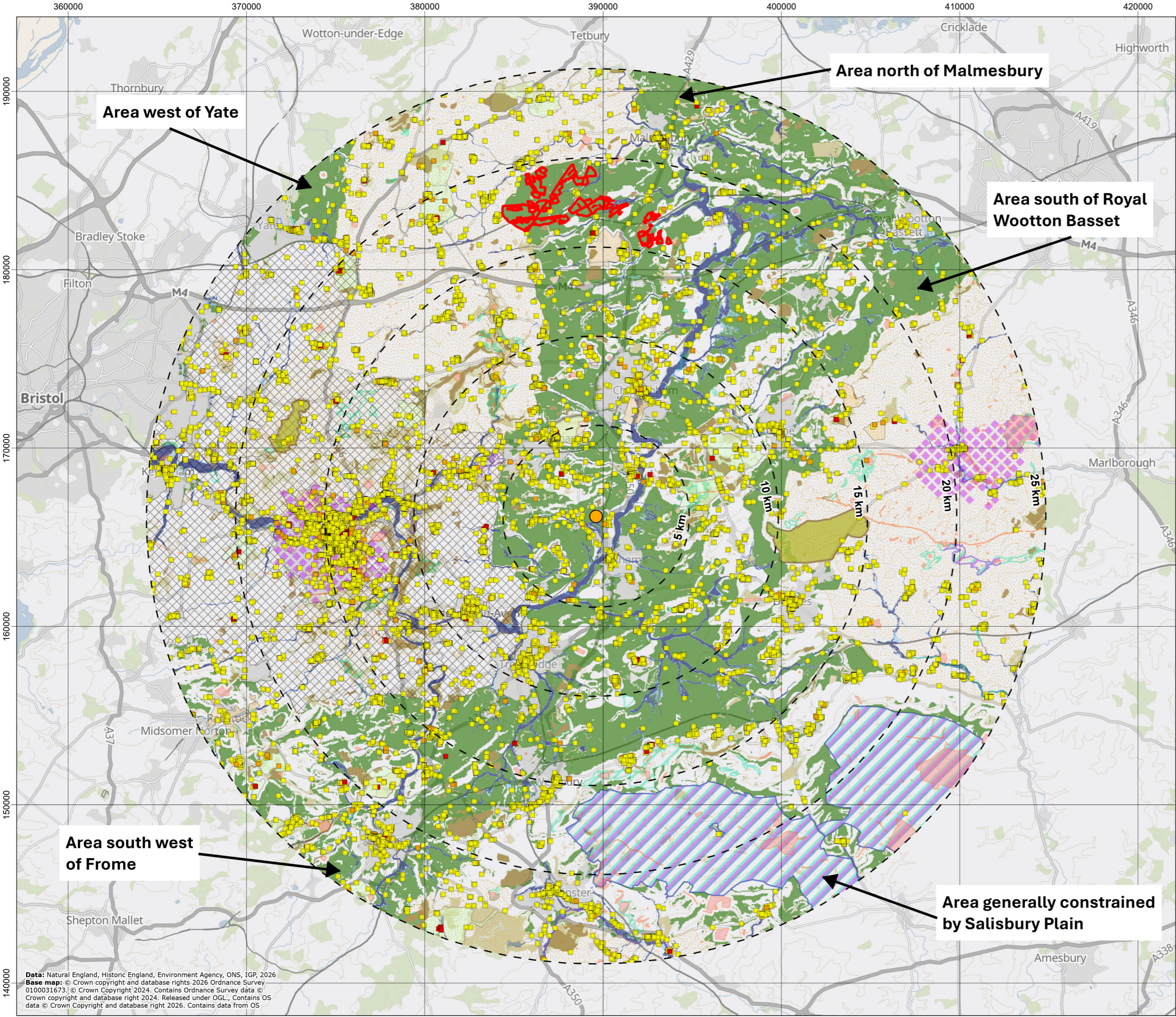
- Increasing the search area to 25 km;
- considering land within the Bath Green Belt;
- combining the unconstrained sections of previously drawn PDAs; and
- considering additional land around PDAs 1-4.

6.1.2 The outcome of this further analysis is that none of the above actions has revealed any additional areas of land suitable for further consideration as alternative sites for the Scheme. On that basis, the conclusions of **ES Volume 3, Appendix 4-1: Site Selection Assessment Report [APP-185]** remain unchanged.

7 References

- Ref 1 Department for Energy Security and Net Zero, Overarching National Policy Statement for Energy (EN-1), published November 2023. Available at <https://www.gov.uk/government/publications/overarching-national-policy-statement-for-energy-en-1> (last accessed 14/05/2026)
- Ref 2 Natural England, Provisional Agricultural Land Classification (ALC) (England). Available at <https://naturalengland-defra.opendata.arcgis.com/datasets/Defra::provisional-agricultural-land-classification-alc-england/about> (last accessed 14/05/2026)
- Ref 3 Natural England, Agricultural Land Classification detailed Post 1988 ALC Survey. Available at <https://publications.naturalengland.org.uk/category/6249382855835648> (last accessed 14/05/2026)

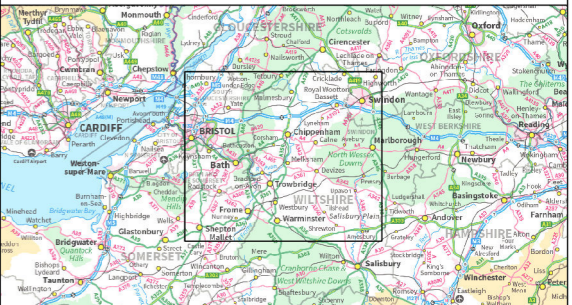
Annex A Figures



Title: Figure 1: Land for consideration within 25km of Melksham Substation

Document: Technical Note on Site Selection Assessment

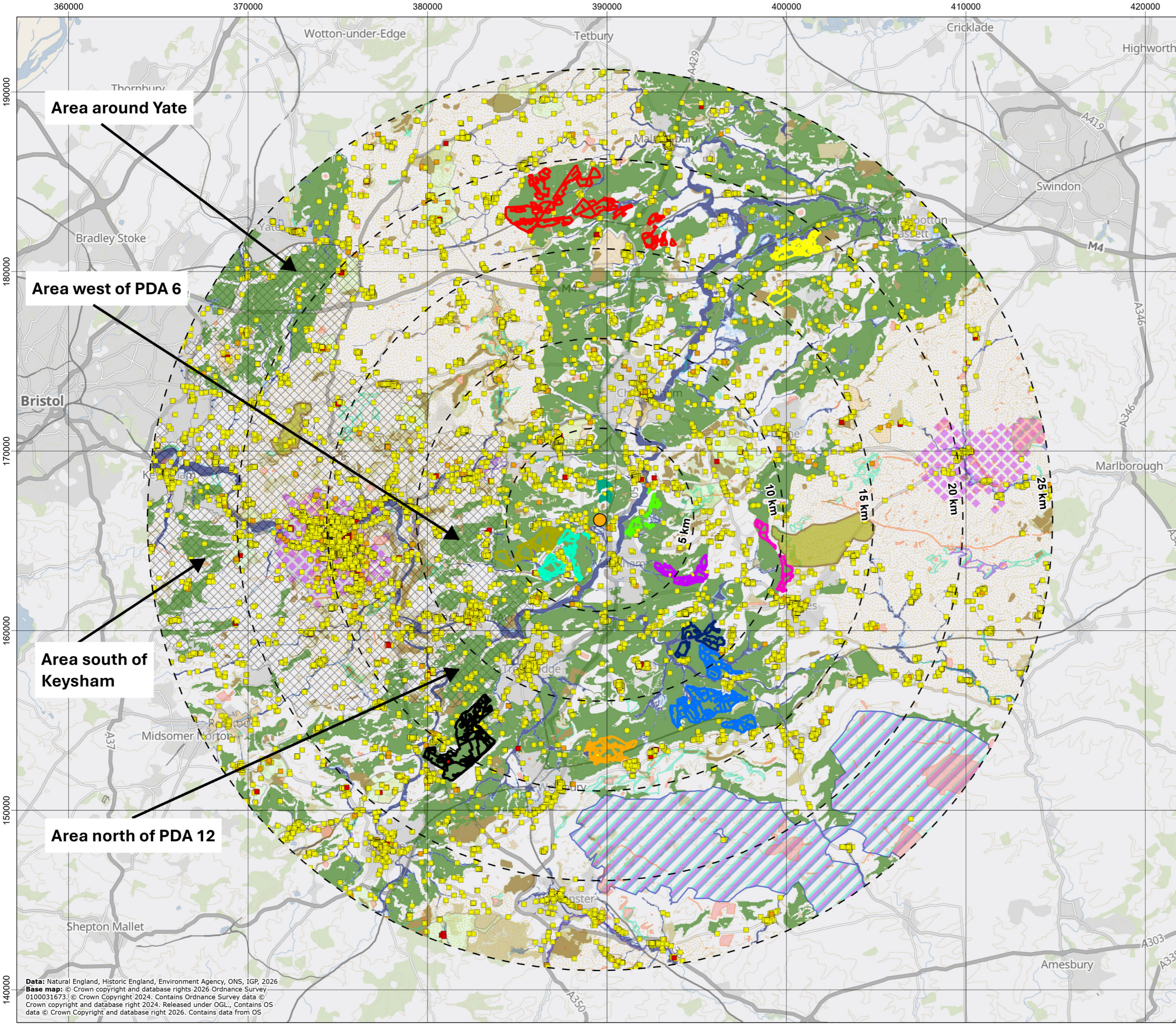
- Legend:**
- Existing National Grid Melksham Substation (PoC)
 - Area of Search
 - Land for consideration
 - Grade I
 - Grade II*
 - Grade II
 - Registered Battlefields
 - Scheduled Monument
 - Green Belt
 - National Landscape
 - Special Protection Areas (SPA)
 - Special Areas of Conservation (SAC)
 - Sites of Special Scientific Interest (SSSI)
 - Ancient Woodland
 - Park and Garden
 - World Heritage Site
 - Conservation Areas
 - Woodland
 - Built-up Area
 - Flood Zone 2
 - Flood Zone 3
 - Solar PV Sites



APFP Regulation: 5(2)(a)
Application Doc No.: EN010168/APP/6.3
Drawing no.: P4443_LPR_ZZ_XX_DR_Z_EXA_0342

Coordinate system: British National Grid
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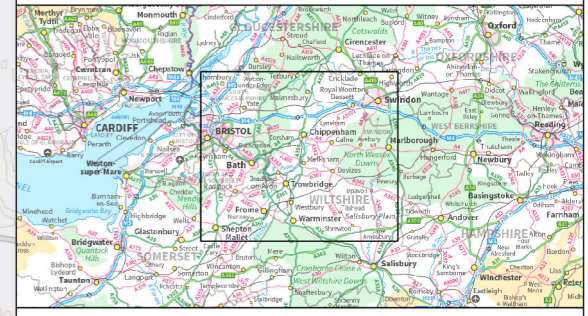


Title: Figure 2: Land for consideration within 25km of Melksham Substation including Green Belt land

Document:
Technical Note on Site Selection Assessment

Legend:

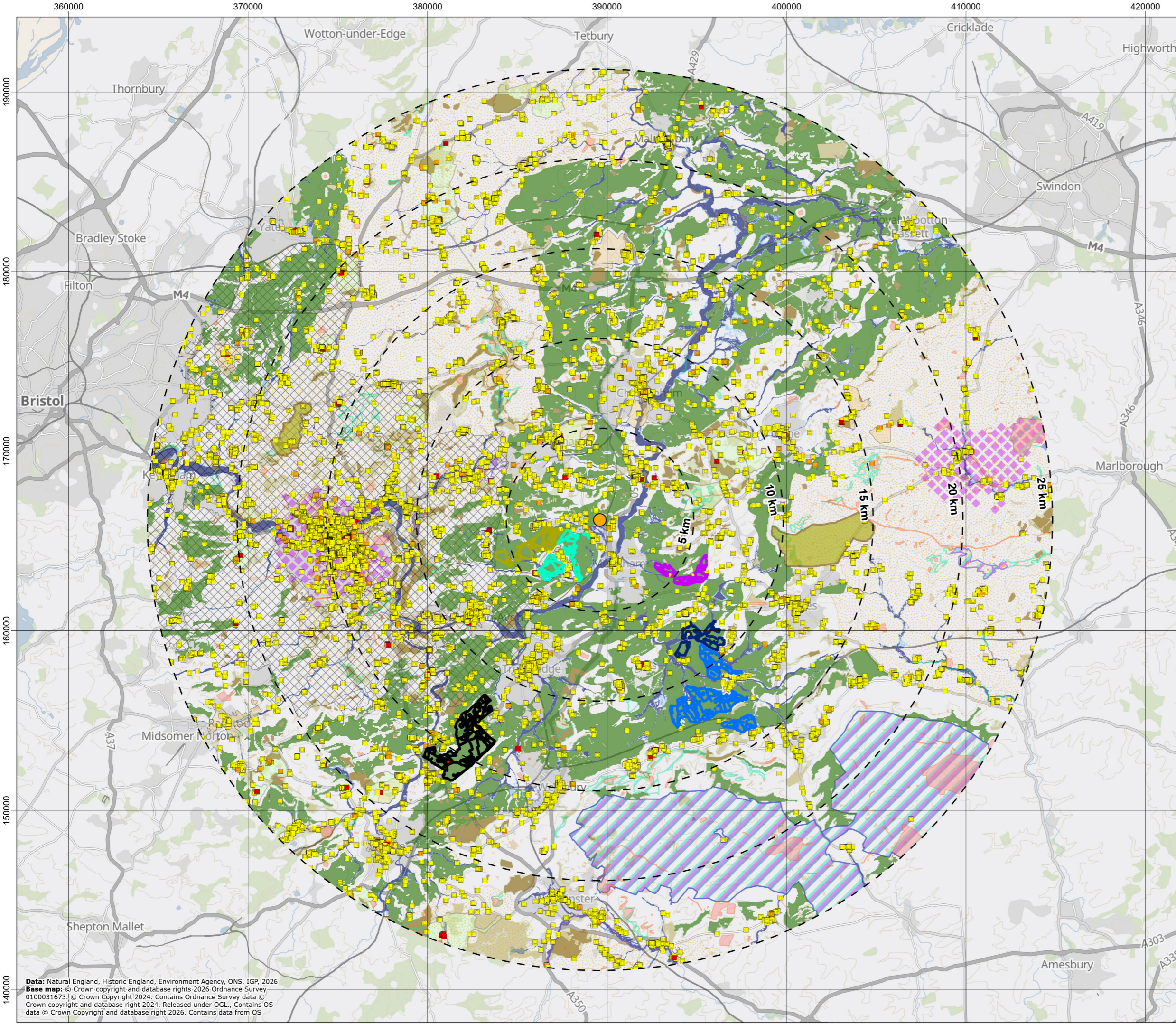
Existing National Grid Melksham Substation (PoC)	World Heritage Site
Area of Search	Conservation Areas
Land for consideration	Woodland
Listed Building	Built-up Area
Grade I	Flood Zone 2
Grade II*	Flood Zone 3
Grade II	Updated Potential Development Area (PDA)
Registered Battlefields	PDA 1
Scheduled Monument	PDA 2
Green Belt	PDA 3
National Landscape	PDA 4
Special Protection Areas (SPA)	PDA 5
Special Areas of Conservation (SAC)	PDA 6
Sites of Special Scientific Interest (SSSI)	PDA 7
Ancient Woodland	PDA 8
Park and Garden	PDA 9
	PDA 10
	PDA 11
	PDA 12



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Application Doc No.: EN010168/APP/6.3
Drawing no.: P4443_LPR_ZZ_XX_DR_Z_XA_0343

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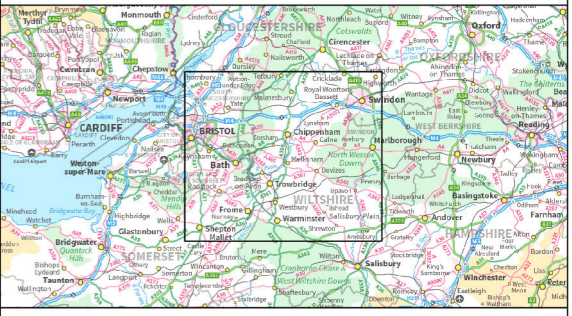


Title: **Figure 3: Clusters of PDAs for further consideration**

Document: **Technical Note on Site Selection Assessment**

- Legend:**
- Existing National Grid Melksham Substation (PoC)
 - Area of Search
 - Land for consideration
 - Listed Building: Grade I, Grade II*, Grade II
 - Registered Battlefields
 - Scheduled Monument
 - Green Belt
 - National Landscape
 - Special Protection Areas (SPA)
 - Special Areas of Conservation (SAC)
 - Sites of Special Scientific Interest (SSSI)
 - Ancient Woodland
 - Park and Garden
 - World Heritage Site
 - Conservation Areas
 - Woodland
 - Built-up Area
 - Flood Zone 2
 - Flood Zone 3

- Updated Potential Development Areas (PDA)**
- Cluster 1: PDA 2, PDA 3 (northerly part), PDA 6, PDA 8, PDA 11
 - Cluster 2: PDA 3, PDA 8
 - Cluster 3: PDA 6, PDA 11, PDA 12



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Drawing no.: P4443_LPR_ZZ_XX_DR_Z_XA_0345

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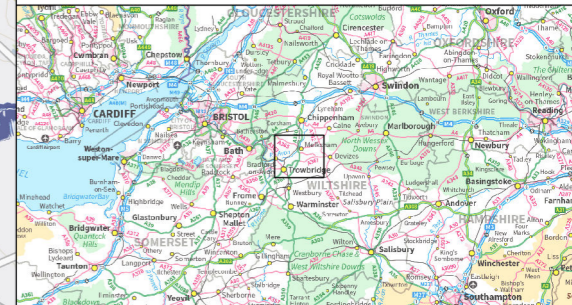
Title: Figure 4: Cluster 1 of PDAs

Document: Technical Note on Site Selection Assessment

Legend:

Existing National Grid Melksham Substation (PoC)	Ancient Woodland
Area of Search	Park and Garden
Listed Building	Conservation Areas
Grade I	Woodland
Grade II*	Built-up Area
Grade II	Flood Zone 2
Scheduled Monument	Flood Zone 3
Green Belt	Cluster 1
National Landscape	PDA 2
Special Areas of Conservation (SAC)	PDA 3
Sites of Special Interest (SSSI)	PDA 6
	PDA 8
	PDA 11

Data: Natural England, Historic England, Environment Agency, ONS, IGP, 2026
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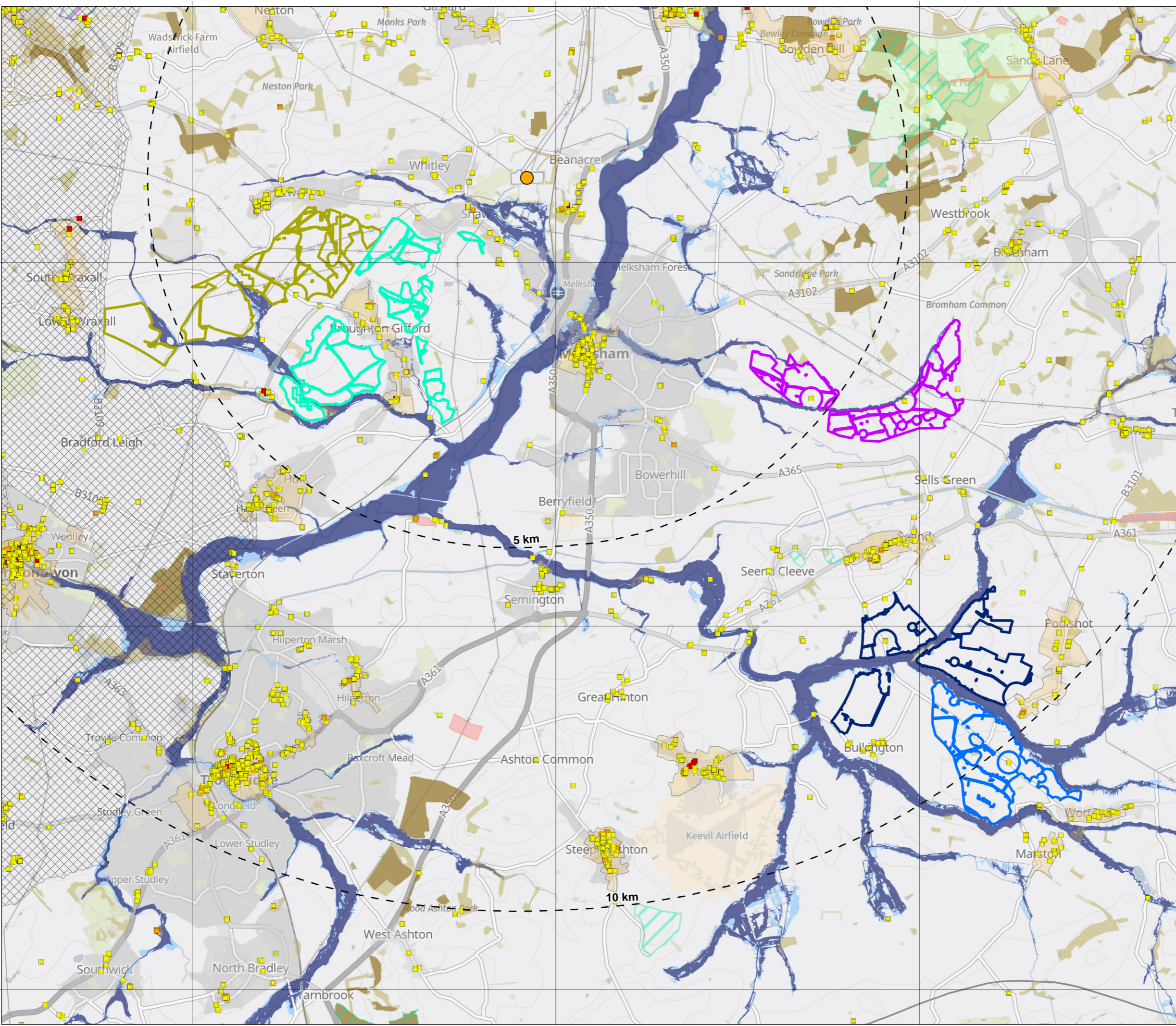
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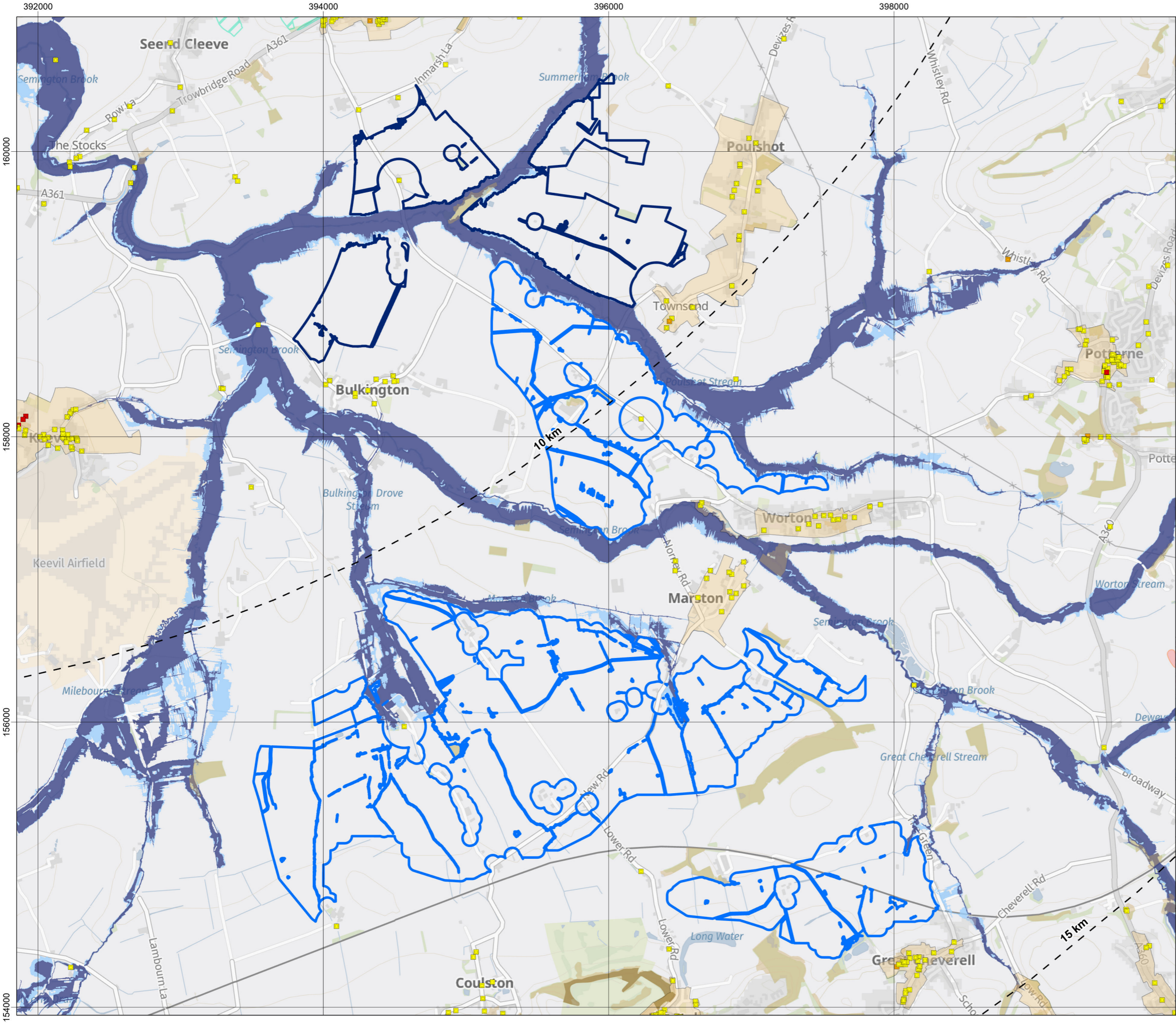
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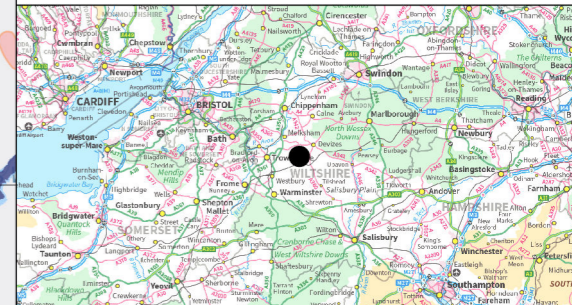


Title: **Figure 5: Cluster 2 of PDAs**

Document: **Technical Note on Site Selection Assessment**

- Legend:**
- Area of Search
 - Listed Building**
 - Grade I
 - Grade II*
 - Grade II
 - Scheduled Monument
 - Sites of Special Scientific Interest (SSSI)
 - Ancient Woodland
 - Conservation Areas
 - Woodland
 - Built-up Area
 - Flood Zone 2
 - Flood Zone 3
 - Cluster 2**
 - PDA 3
 - PDA 8

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Coordinate system: British National Grid

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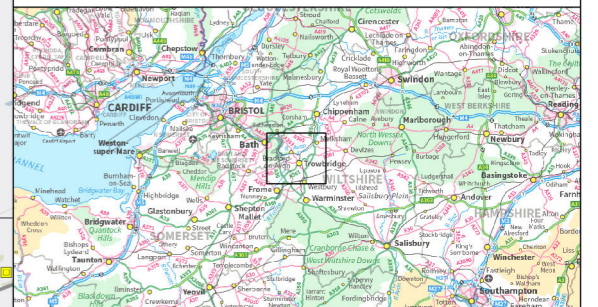
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Title: **Figure 6: Cluster 3 of PDAs**

Document: **Technical Note on Site Selection Assessment**

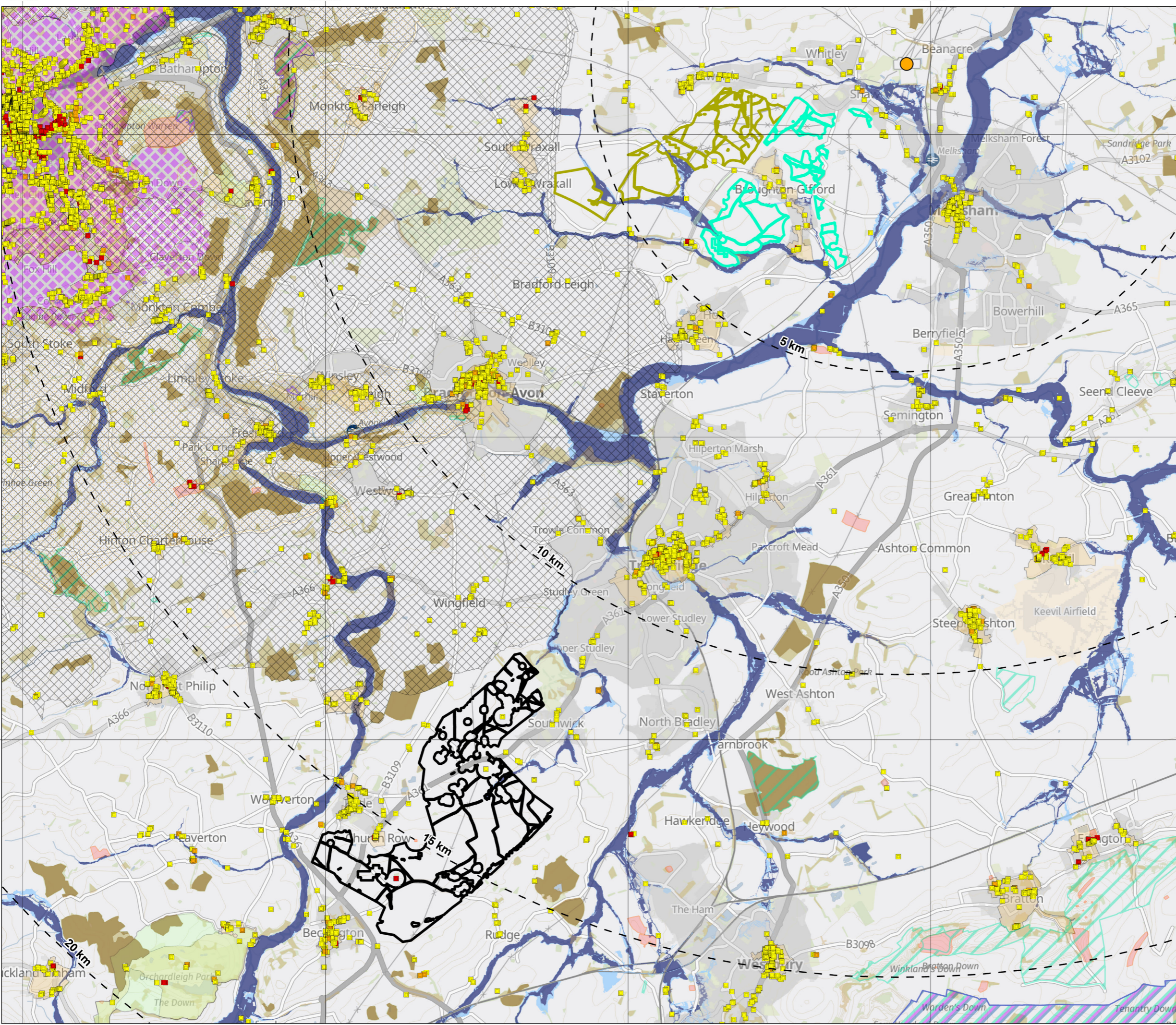
- Legend:**
- Existing National Grid Melksham Substation (PoC)
 - Area of Search
 - Listed Building Grade I
 - Listed Building Grade II*
 - Listed Building Grade II
 - Scheduled Monument
 - Green Belt
 - National Landscape
 - Special Protection Areas (SPA)
 - Special Areas of Conservation (SAC)
 - Sites of Special Scientific Interest (SSSI)
 - Ancient Woodland
 - Park and Garden
 - World Heritage Site
 - Conservation Areas
 - Woodland
 - Built-up Area
 - Flood Zone 2
 - Flood Zone 3
- Cluster 3**
- PDA 6
 - PDA 11
 - PDA 12

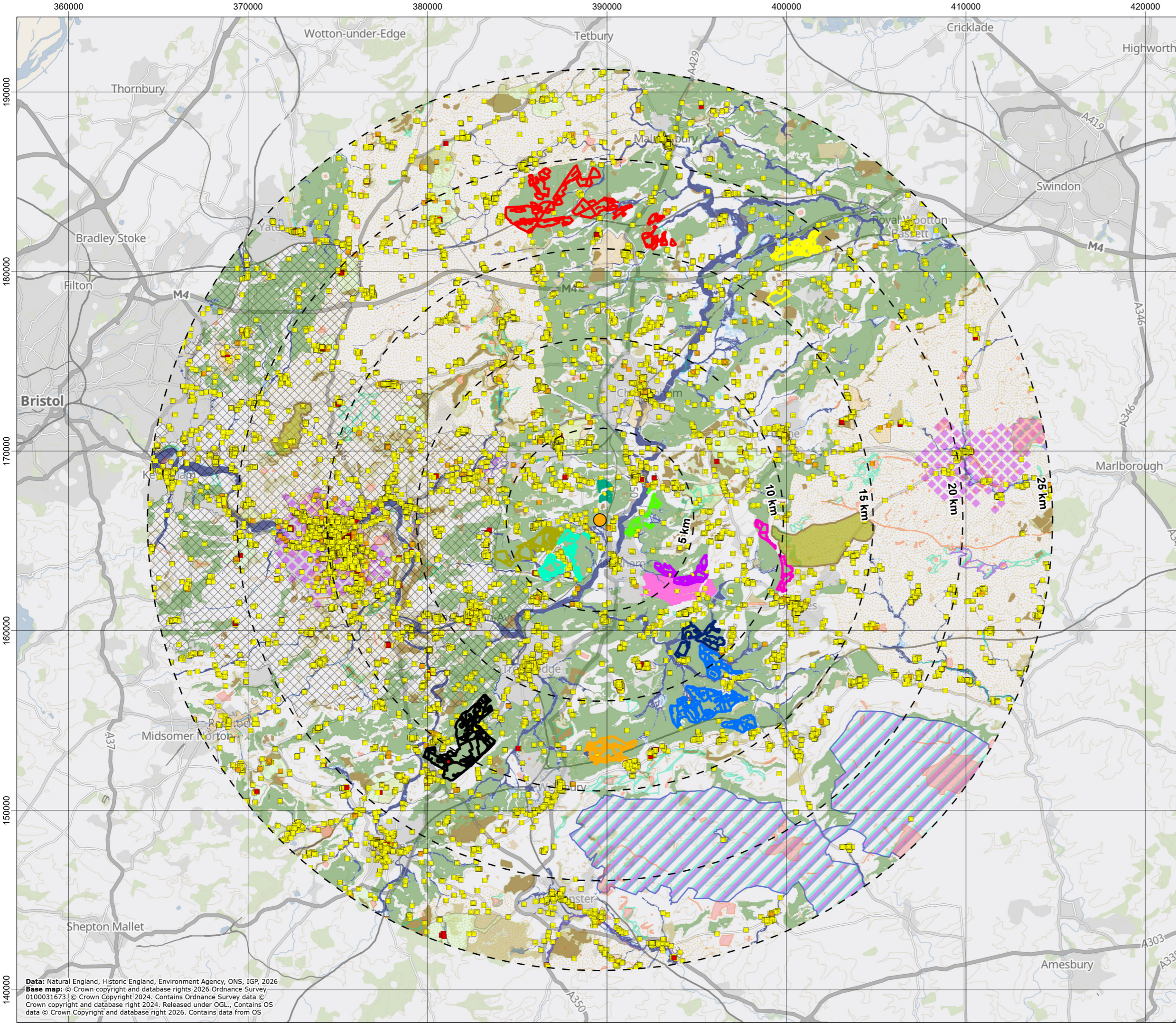
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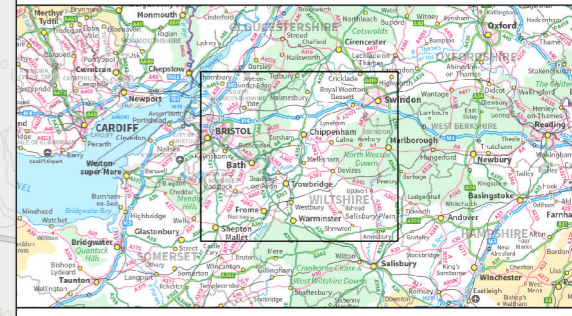


Title: **Figure 7: Additional Areas which could be added to PDAs**

Document: **Technical Note on Site Selection Assessment**

Legend:

Existing National Grid Melksham Substation (PoC)	World Heritage Site
Area of Search	Conservation Areas
Land for consideration	Woodland
Additional Area to PDA	Built-up Area
Grade I	Flood Zone 2
Grade II*	Flood Zone 3
Grade II	Updated Potential Development Area (PDA)
Registered Battlefields	PDA 1
Scheduled Monument	PDA 2
Green Belt	PDA 3
National Landscape	PDA 4
Special Protection Areas (SPA)	PDA 5
Special Areas of Conservation (SAC)	PDA 6
Sites of Special Scientific Interest (SSSI)	PDA 7
Ancient Woodland	PDA 8
Park and Garden	PDA 9
	PDA 10
	PDA 11
	PDA 12



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Drawing no.: P4443_LPR_ZZ_XX_DR_Z_XA_0349

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