

LIME DOWN SOLAR PROJECT

**DEADLINE 2 COMMENTS
STOP LIME DOWN**

22 May 2026





TABLE OF CONTENTS

Contents

1. Introduction	3
2. Comments on the Applicant's documents submitted at Deadline 1.....	5
3. Documents submitted by other parties at Deadline 1.....	17
4. The Applicant's documents submitted at Deadline 1A.....	26
5. Conclusion.....	32



1. Introduction

1.1.1. This document and the attached papers comprise Stop Lime Down’s (**SLD(s)**) Deadline 2 submission. In this document SLD considers the documents submitted by the Applicant at Deadline 1 and Deadline 1A, and consider documents submitted by other parties at Deadline 1.

1.1.2. This document has been produced with the input of SLD’s legal and expert advisors. In addition to this document, a number of SLD’s expert advisors have produced papers which appear as Appendices to this document, to which the attention of the Examining Authority (**ExA**) is drawn. These are:

Issue	Author	Report/paper	Appendix
Landscape	Carly Tinkler	Landscape Comments on Deadline 1/1A Material	A
Traffic and Transport	Railton TPC Ltd (Bruce Bamber)	Transport Comments on Deadline 1 Submissions	B
Noise/Vibration Impacts	Ian MacArthur	Deadline 1 Updated Documents	C
Flooding/Hydrology	Professor Richard Skeffington	Comment on Deadline 1 Hydrology Documents	D
Ground Conditions and Contamination	Professor Richard Skeffington	Comment on Ground Conditions, Contamination and HDD Risks	E

1.1.3. In commenting on Written Representations (**WR(s)**) and the Local Impact Report (**LIR**) submitted at Deadline 1, SLD has refrained from extensive repetition of points and/or identification of agreement. Such agreement will be apparent from reading SLD’s WR alongside those submissions. However, where it will assist, SLD has provided comments on such documents. In addition, SLD will



Stop Lime Down Deadline 2

provide relevant further comment as appropriate once the Applicant's own comments on such documents become available.

1.1.4. This written submission uses the document reference for the tracked change version of documents where multiple versions of the document exist in the Document Library.

1.1.5. The structure of this document is as follows:

- Comments on the Applicant's documents submitted at Deadline 1;
- Comments on documents submitted by other parties at Deadline 1; and,
- Comments on the Applicant's documents submitted at Deadline 1A.

1.1.6. SLD welcome any questions that the ExA or any other party (including the Applicant) may have about this submission. SLD will continue to take steps to assist the ExA and advance its case, throughout the remainder of the Examination.

1.1.7. Aside from this submission, SLD is also engaged in producing a draft Statement of Common Ground (**SoCG**) to resubmit to the Applicant for its further consideration. The Applicant and SLD are now expecting that a draft will be submitted to the Examination at Deadline 3. SLD consider that this provides opportunity for it to identify any further common ground arising from the Applicant's comments on its WR (noting the more limited opportunities for the parties to engage so far), which will be of further assistance. SLD welcomes further engagement with the Applicant.

1.1.8. This submission has not been produced with the use of AI. Expert reports address the use of AI where appropriate.

2. Comments on the Applicant's documents submitted at Deadline 1

2.1. DCO Documents

2.1.1. SLD note the following documents which have been provided at Deadline 1

- Draft Development Consent Order **[REP1-008]**.
- Explanatory Memorandum **[REP1-012]**.
- Schedule of Changes to the Draft DCO **[REP1-132]**.

2.1.2. SLD has the following comments in respect of the draft DCO submitted at Deadline 1.

Schedule 2, Req 2(2)

2.1.3. SLD welcomes the introduction of provisions in Schedule 2, Req 2(2) that provides for a written scheme to be submitted to Wiltshire Council (**the Council**) setting out the phasing for the Scheme. However, SLD note that there is no requirement for the Council to approve that written scheme. It is apparent from the Explanatory Memorandum at para 5.2.8 that the Applicant intends this as a mechanism to provide only information to the Council. SLD consider that a wording requiring approval by the Council should be included.

2.1.4. As was explored at ISH1, a concern related to the draft DCO is that the text currently provides considerable flexibility for the Applicant to choose when different parts of the Scheme are brought forward. Given the provisions in the draft DCO securing final commissioning and decommissioning, the ability to bring forward different parts of the Scheme at different times risks the operational phase for the development being well in excess of the 60 years on which the Scheme has been assessed. While SLD accept that some flexibility to bring forwards different parts of the Scheme at different time should be provided (to manage for the normal construction process), this must be properly controlled to manage the lifetime of the Scheme in aggregate. For that reason, SLD consider that the



Stop Lime Down Deadline 2

Council should maintain control through formal approval of the written scheme for timetabling how the Scheme is brought forwards.

2.1.5. This is a point that SLD also addresses in its WR in Section 16.

Schedule 2, Req 20

2.1.6. SLD note the changes that have been made to the draft DCO relating to decommissioning. SLD consider that these changes re-emphasise the point that the draft DCO appears to permit the operational life of the Scheme in aggregate to extend well in excess of the 60 years provided for. This was a concern raised at ISH1. It is noted that the new wording makes clear that the Battery Energy Storage System (**BESS**) and the 400kV substation could be operational and in place for a substantially longer period than 60 years. The reasons provided in the Schedule of Changes appears to envisage this as the purpose for the changes.

2.1.7. SLD remain of the view set out in the table at Section 16.2 of its WR and made at ISH1 that text should be included to ensure that the decommissioning provisions do not result in an operational lifetime of the Scheme materially departing from the 60 years provided for in the application and described as part of the Environmental Statement (**ES**). SLD consider that a mechanism to secure the operational lifetime of the Scheme should be included. That might be achieved through a longstop date for the operational stage of the Scheme, or through a requirement to build out the entire Scheme within a set period of time once development on any part is commenced (which could be managed as part of an approval mechanism adopting the amendment to Schedule 2, Req 2(2) above).

Schedule 16

2.1.8. SLD note the changes introduced in Schedule 16 to modestly increase the amount of time available to the Council to discharge various requirements. SLD note that the Applicant states that this step has been taken “following comments from Wiltshire Council”. SLD will await review of the comments the Council make



Stop Lime Down Deadline 2

in respect of these changes, however SLD remain concerned that insufficient time is given to the Council to address matters given the size and scope of the Scheme (and, as a result, SLD maintains the points it made in respect of Schedule 16 in its WR in Section 16).

2.2. Landscape

2.2.1. SLD note the following documents which have been provided/updated at Deadline 1:

- Technical Note on Landscape Fabric and Landscape Character **[REP1-121]**.
- Technical Note on Intra Project Cumulative Effects **[REP1-122]**.
- Technical Note on Cumulative Sequential Visual Effects **[REP1-123]**.
- Construction Routes in the Cotswold National Landscape Technical Note May 2026 Rev 1 **[REP1-131]**.

2.2.2. Appendix A to this document is a paper prepared by Carly Tinkler which comments on the documents provided by the Applicant at Deadline 1 which addresses landscape issues.

2.3. Ecology

2.3.1. SLD note the following documents which have been provided/updated at Deadline 1:

- ES Volume 1, Chapter 9: Ecology **[REP1-016]**.
- Baseline Habitats Map – CRC **[REP1-036]**.
- Ecological Baseline Report **[REP1-084]**.
- Biodiversity Net Gain Assessment Report **[REP1-090]**.
- Biodiversity Net Gain Assessment Appendix Statutory Biodiversity Metric Calculation **[REP1-092]**.
- Biodiversity Net Gain Assessment Metric Calculation Excel **[REP1-093]**.



- Outline Ecological Protection and Mitigation Strategy **[REP1-107]**.

2.3.2. Among other things, Appendix E of SLD's Written Representation **[REP1-173]** raised concerns in respect of the quality of the baseline evidence which had been submitted by the Applicant. SLD therefore welcomes the completion of additional surveys over the Cable Route Corridor and the surveys completed in respect of aquatic invertebrates and aquatic macrophytes, which have been summarised in the updated Baseline Report and Chapter 9. A detailed review of this additional information will be completed by SLD's ecologist to consider the extent to which these surveys resolve concerns in SLD's paper at Appendix E to its WR and whether any issues can be offered for agreement in the draft SoCG.

2.3.3. Otherwise, the other concerns raised in Appendix E of SLD's Written Representation are not overcome by any of the new information provided.

2.4. Transport

2.4.1. SLD note the following documents which have been provided/updated at Deadline 1:

- ES Volume 1, Chapter 13: Transport and Access **[REP1-020]**.
- ES Volume 3, Appendix 13-1: Transport Assessment (Part 1) **[REP1-058]**.
- ES Volume 3: Appendix 13-1: Transport Assessment (Part 2) **[REP1-060]**.
- Outline Construction Traffic Management Plan **[REP1-113]**.
- Construction Routes in the Cotswolds National Landscape Technical Note **[REP1-131]**.

2.4.2. Appendix B to this document is a paper prepared by Railton TPC Ltd which comments on the documents provided by the Applicant at Deadline 1 which address transport issues.



2.4.3. In summary, Railton TPC Ltd concludes that although more detail has been provided regarding the generation of HGV movements during construction, the additional detail does not overcome the concern that the overall number of HGV movements has been under-estimated.

2.5. Noise and Vibration

2.5.1. SLD note the following documents which have been provided/updated at Deadline 1:

- ES Volume 1, Chapter 14: Noise and Vibration **[REP1-022]**.
- ES Volume 3, Appendix 14-4: Noise Modelling **[REP1-062]**.

2.5.2. Appendix C to this document is a paper prepared by Ian MacArthur of Clarke Saunders Acoustics which comments on the documents provided at Deadline 1 which address noise and vibration issues.

2.6. Hydrology, Flood Risk and Drainage

2.6.1. SLD note the following documents which have been provided/updated at Deadline 1:

- ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage **[REP1-018]**.
- Flood Risk Assessment and Drainage Strategy Covering Report **[REP1-038]**.
- Flood Risk Assessment and Drainage Strategy A **[REP1-040]**.
- Flood Risk Assessment and Drainage Strategy B **[REP1-042]**.
- Flood Risk Assessment and Drainage Strategy C1 **[REP1-044]**.
- Flood Risk Assessment and Drainage Strategy C2 **[REP1-046]**.
- Flood Risk Assessment and Drainage Strategy D **[REP1-048]**.
- Flood Risk Assessment and Drainage Strategy E1 **[REP1-050]**.
- Flood Risk Assessment and Drainage Strategy E2 **[REP1-052]**.
- Flood Risk Assessment and Drainage Strategy CRC **[REP1-054]**.



Stop Lime Down Deadline 2

- Water Framework Directive Assessment **[REP1-095]**.
- Firewater Containment and Drainage Strategy – Lime Down D BESS **[REP1-124]**.
- Firewater Containment and Drainage Strategy – Lime Down Substation **[REP1-125]**.
- Watercourse Crossing Schedule **[REP1-126]**.

2.6.2. Appendix D of this document is a paper prepared by Professor Richard Skeffington which comments on the documents provided by the Applicant at Deadline 1 which address hydrology and flooding issues. In summary, Professor Skeffington observes that:

- 2.6.2.1. Minimal changes have been made to the site-specific FRAs and covering report;
- 2.6.2.2. The Firewater Containment Report does not address the credible worst-case scenario of a BESS fire taking more than 4 hours to extinguish;
- 2.6.2.3. It is unclear whether the Watercourse Crossing Schedule is exhaustive and the Schedule would benefit from an accompanying map; and
- 2.6.2.4. The Water Framework Directive Assessment is lacking in necessary detail.

2.6.3. Ultimately, it is concluded that the additional documents provided by the Applicant do not alter any of the concerns raised and conclusions reached in Appendices F1, F2, and F3 of SLD's Written Representation.

2.7. Soils and Agriculture

2.7.1. SLD note the following documents which have been provided/updated at Deadline 1:

- ES Volume 1, Chapter 17: Soils and Agriculture **[REP1-026]**.
- ES Volume 3, Appendix 17-1: ALC and Soil Resource Survey Report **[REP1-064]**.



2.7.2. SLD notes the changes which have been made to Chapter 17, Soils and Agriculture, at Deadline 1, including the following:

- 2.7.2.1. The criteria for determining receptor sensitivity in Table 17-3 has changed. For example, the sensitivity for Grades 1 and 2 land has gone from “high” to “very high”.
- 2.7.2.2. The criteria for determining magnitude of change in Table 17-4 has also changed, e.g. “high” impact is now defined as loss of 20 ha of agricultural land or more, rather than 50 ha or more previously.
- 2.7.2.3. The effects of those changes are seen in the significance matrix (Table 17-5). For example, Grade 3a land was medium sensitivity with major/moderate significance of effect; now it is high sensitivity with major/moderate significance of effect.
- 2.7.2.4. The land affected by the Scheme has changed. In Table 17.6, the amount of BMV land has declined from 240 to 210 ha in the solar PV sites compared to Revision 1, and the non-BMV has declined from 477 to 446 ha. No explanation has been provided for this change.
- 2.7.2.5. Grade 2 has declined from 30.8 ha to 30.2 ha, but Grade 3a from 209.3 ha to 179.9 ha. These figures derive ultimately from the survey by Reading Agricultural Consultants, whose report has also been amended.
- 2.7.2.6. The ALC Tables in the Reading Report (Appendix 17-1) has been amended, but only to add in null values which were omitted before (Grade 1 and Grade 5 are always zero). So Table 7 in Appendix 17-1 still gives the same values for Grade 2 of 30.8 ha and Grade 3a of 209.3 ha. There is thus a discrepancy with the ES which needs to be addressed.

2.7.3. It is unclear where the values are derived from for the Cable Route, as they do not appear to come from the Reading Report. The percentage of BMV has apparently declined from 75% in Rev1 to 53% in Rev 2. The reason for this reduction appears to be the inclusion of more non-agricultural land to the denominator in Rev 2. The figures in the respective Tables 17-7 are:



Stop Lime Down Deadline 2

	Revision 1 ha /(% agricultural)	Revision 2 ha /(% agricultural)
Grade 1	0.0	0.0
Grade 2	10.2 (5)	10.8 (4)
Grade 3a	144.6 (71)	178.0 (62)
Grade 3b	44.7 (22)	62.8 (22)
Grade 4	3.3 (2)	34.4 (12)
Grade 5	0.0	0.0
Total Agricultural	202.8 (100)	286.0 (100)
Non-Agricultural	-	79.8
Total	202.8	365.8

2.7.4. Accordingly, the land within the CRC has become larger, a significant portion of which is due to the inclusion of the construction compounds (34 ha), which are predominantly on BMV land (3a). Additional Grade 4 and Grade 3b land has been identified.

2.7.5. SLD would welcome clarification on the reason these changes have been made, so that further comment can be provided as appropriate.

2.8. Ground Conditions and Contamination

2.8.1. SLD note the following documents which have been provided/updated at Deadline 1:

- ES Volume 1, Chapter 19: Ground Conditions **[REP1-028]**.
- BESS and Substation – Preliminary Geotechnical Risk Register **[REP1-128]**.
- Cable Route Avoidance Areas – Preliminary Geotechnical Risk Register **[REP1-129]**.
- Cable Route Corridor Mining Risk – Technical Memorandum **[REP1-130]**.



Stop Lime Down Deadline 2

2.8.2. Appendix E to this document is a paper prepared by Professor Richard Skeffington which comments on the documents provided by the Applicant at Deadline 1 which address ground conditions and contamination issues.

2.9. BESS

2.9.1. SLD note the following documents which have been provided/updated at Deadline 1:

- ES Volume 3, Appendix 3-1: Substations and Battery Energy Storage System Description **[REP1-082]**.
- Outline Battery Safety Management Plan **[REP1-111]**.

2.9.2. SLD's experts have reviewed the above updated papers produced by the Applicant. They remain concerned about the content and information provided about large scale fire testing and resultant air emissions (particularly at the micro- and nano-particulate level), and the concerns set out in Appendix I2 of SLD's Written Representation remain. Understanding the validation, emissions, and the effect of those emissions on health is important.

2.9.3. It is noted in the Substation and Battery Energy Storage System Description on p.3 that both a BESS water based fixed suppression system and/or a Thermal Runaway Propagation Prevention system is described as "optional". This issue re-emphasises that the BESS design plans to make such management systems optional, with an alternative being to allow the batteries to simply burn out. This is a point emphasising the importance of the matters identified by SLD in Appendix I2 on fire testing and air emissions. It is also noted that there are various interpretations of "Thermal Runaway Propagation Prevention" system and the Applicant is invited to provide further detail as to what such a system will involve.

2.10. Planning



Stop Lime Down Deadline 2

2.10.1. SLD note the following document which has been provided/updated at Deadline 1:

- Planning Statement **[REP1-088]**.

2.10.2. A number of changes have been made at Deadline 1, including the production of a new Appendix E titled “Cotswolds National Landscape Policy and Guidance Accordance Note”. Given a number of these changes relate to the Cotswolds National Landscape, and the Board have opportunity to comment at the next deadline, SLD will work with its experts to continue reviewing this document. For Deadline 2, and noting much of the dispute turns on the opposing parties’ positions on the underlying effects of the Scheme, to which policy is applied, the following points are made.

2.10.3. From para 8.3.210 the Planning Statement deals with the tests for construction within and close to National Landscapes in paras 5.10.32 and 5.10.33 of NPS EN-1. SLD disagrees with the approach adopted by the Applicant to these tests, primarily because SLD disagrees with the harms identified in the respect of the Scheme, considers that there has been a failure properly to mitigate and avoid, and as a result the policy test is not met. Without rehashing points, Appendix L to SLD’s Written Representation **[REP1-186]** (site selection) is apposite to that limb of the test concerning siting of the Scheme, and Appendix A to SLD’s Written Representation **[REP1-169]** (planning) is apposite to the weighing of the detrimental effects of the Scheme on the environment, landscape and recreational opportunities. It is not considered that the tests for development both in a National Landscape, and in the setting of a National Landscape, have been met.

2.10.4. From para 3.253 the Applicant has updated the Planning Statement text on food security, referring to the new Land Use Framework. As SLD recognised in its Written Representation, development on agricultural land and BMVAL is not prohibited. That accords with the position reflected in the Land Use Framework.



Stop Lime Down Deadline 2

However, that does not change or detract from the importance of a preference for development not to be sited on land that is BMVAL. SLD does not consider the Land Use Framework makes any material difference to the proper approach to the agricultural and soils issues in the context of the value placed on BMVAL.

2.10.5. SLD notes the changes at paras 8.3.404, 8.3.405, and 9.4.16 to explore the further cumulative effects now included in the Planning Statement. While SLD does not accept the Applicant goes close to far enough in recognising such effects, it is a small step in the right direction to recognise the particular flaws of this Scheme.

2.10.6. As to the new Annex E to the Planning Statement, this document primarily pulls together assessments and conclusions from elsewhere in the Applicant's ES and applies them to various publications related to the Cotswolds National Landscape. As a result, SLD has commented upon and criticised much of the underlying evidence produced by and information advanced by the Applicant. Most pertinently, these issues are dealt with in detail in SLD's Appendix B to its Written Representation **[REP1-170]** (landscape) and Appendix D to its Written Representation **[REP1-172]** (traffic). In addition SLD's landscape and visual expert has commented on this new document in Appendix A to these submissions.

2.10.7. As SLD has maintained in its Written Representation, underpinned by the evidence of its experts, it is not considered that the mitigation hierarchy has been properly applied in respect of the Cotswolds National Landscape. There are significant negative effects which apply to that National Landscape. The assertions to the reverse by the Applicant are not accepted, nor is any suggestion that the Climate Change Strategy for the Cotswolds National Landscape (nor the Cotswolds National Landscape Board's Renewable Energy Position Statement) can outweigh the clear and significant conflict with the policies and guidance protecting that most valuable landscape area and its setting.



Stop Lime Down Deadline 2

2.10.8. SLD will provide further comment as appropriate having regard to the comments of the CNLB and its experts' input.

3. Documents submitted by other parties at Deadline 1

3.1.1. In the reports attached to this submission, SLD's experts have commented upon a number of the WRs submitted at Deadline 1. That information is not repeated here. Below SLD first address the Council's submissions, before moving on to a review of some of the other WRs submitted.

3.2. The Local Impact Report [REP1-137]

3.2.1. As will be apparent reviewing the LIR alongside SLD's WR, the Council and SLD share a large number of concerns about the Scheme. To avoid simply repeating the contents of the LIR, SLD does not go through that document identifying all points of agreement. While SLD's Planning Experts in Appendix A to its WR do not focus on the position in respect of local development planning, SLD consider that the extent of the non-compliance identified by the Council with those local development plan documents further contributes to the reasons to refuse development consent in this case.

3.2.2. In its WR in Section 16, SLD also noted that it is likely that the Council will come forward with requirements to be added to the DCO. SLD notes and welcomes those which the Council has included (along with the s.106 contributions which have also been identified). Without going through the full list, SLD draw attention to the following requirements which it considers are particularly important to be added to the draft DCO. In doing so, SLD have not focused on those suggested requirements which appear to overlap substantially with some of the requirements already included in the draft DCO as submitted at Deadline 1. The emphasis is on new additional requirements.

3.2.3. In respect of socio-economics:

3.2.3.1. SLD supports the requirement for a comprehensive business survey (LIR, p. 205) recording the impacts of the Scheme so that targeted business support can be provided to those most affected by the Scheme.

3.2.3.2. SLD consider that a requirement for a “business response plan” (LIR p. 202) to be particularly important to partially mitigate effects of the Scheme. This is because the Scheme, by virtue of its scale and impacts, is likely to have significant effects on the local population and economy, which will be wide-ranging and diffuse in nature.

3.2.4. In respect of public rights of way (**PRoWs**):

3.2.4.1. SLD consider the requirement for a “pre-condition survey” (LIR p.209) an important mechanism to ensure that the requirements in the draft DCO to return (e.g.) PRoWs to their condition prior to temporary closure pursuant to Article 12(7) of the draft DCO are practically enforceable.

3.2.4.2. SLD consider the requirement for “detailed design... showing regular passing bays” on bridleways and unclassified roads to be a key mechanism to mitigate the significant negative effects of the Scheme on highway safety (particularly for active travel users on such routes). For the avoidance of doubt, SLD does not consider this comes close to avoiding the significant adverse effect identified, but considers this a necessary step were the draft DCO to be granted.

3.2.5. SLD also note the payment suggested in respect of improvements of PRoWs outside of the redline area of the Scheme; while such payments should be introduced, SLD consider they can only ever be a partial mitigation of effects on PRoW outside of the redline area, and do not mitigate the significant effects that SLD considers the PRoW within and immediately abutting the redline area for the Scheme will experience.

3.2.6. In respect of landscape and visual requirements:

3.2.6.1. SLD agree with the Council that a condition controlling glint and glare should be included within the draft DCO (LIR p.216). The ExA will be aware that SLD consider there is a significant negative effect from glint and glare

in EIA terms, and such a condition would go some of the way to mitigating that effect.

- 3.2.6.2. SLD consider the requirement for PRow condition checks included in “Community access, interpretation and PRow condition” an important addition to the draft DCO (LIR p.218).
 - 3.2.6.3. SLD consider the requirement for a “Landscape Phasing” plan, extending to advance planting and habitat creation, to be important given the scale of the Scheme (LIR p.219).
 - 3.2.6.4. A lighting requirement in line with “Lighting” (LIR p.220) should be included (among other things, to properly control landscape and ecological impacts).
 - 3.2.6.5. The ExA will be aware that SLD consider a significant issue with the Scheme is the effect of water run-off from panels onto land below. SLD consider that a “Vegetation Management Plan” as suggested by the Council (LIR p.221) would be beneficial in this regard.
 - 3.2.6.6. SLD note that a decommissioning requirement is included. While one is already present in Schedule 2 of the draft DCO, SLD consider that the Council intend to include a more rigorous condition requiring more detail and (important) more rigid requirements on when decommissioning must occur and why. SLD welcome such a change as SLD consider that how and when decommissioning is undertaken is a key concern related to the DCO (and is a point that it has raised previously in Section 16 of its WR).
- 3.2.7. In respect of built heritage, SLD consider the specific condition relating to highway improvements and site access southwest of Rodbourne (LIR p.224) to be a relevant requirement to assist in mitigating the effects identified by the Council and SLD on that heritage asset.
- 3.2.8. In respect of public health, SLD welcome both of the requirements provided by the Council (LIR p.224). There is no doubt that there are significant concerns about the resilience of the community to host the Scheme. While SLD do not



Stop Lime Down Deadline 2

consider that effect can be mitigated (for the reasons set out in its WR), SLD do consider that these requirements are a necessary and appropriate step.

3.2.9. As is apparent from the detailed submissions that SLD has made in respect of flood risk and drainage, SLD has significant concerns that the Scheme will increase the likelihood of flooding for those further downstream well beyond the limits of the Scheme. SLD support the Council as LLFA applying further requirements in the DCO to control flood effects (from LIR p.225), albeit it is noted that such controls remain insufficient to fully mitigate the concerns that SLD have.

3.2.10. In respect of agriculture, SLD agree with the Council that the soils hosting the Scheme require careful monitoring for issues related to compaction (and other effects) (LIR p.233). As such, SLD consider that a monitoring requirement as suggested by the Council should be included within the DCO.

3.2.11. In respect of ecology:

3.2.11.1. SLD agree with the Council that there should be a plan to monitor both habitats and BNG over the life of the scheme (LIR p.238).

3.2.11.2. SLD consider that a firmer requirement in respect of lighting, such as the “Lighting Strategy” requirement included in the LIR (LIR p.239) is appropriate. That is in particular in respect of the effects on bats. This pairs with the other requirement on lighting already referred to above.

3.2.12. In respect of s.106 contributions, SLD agree that it is important that payments to secure monitoring by the Council are included, and welcomes those payments suggested in respect of ecology (LIR p.243-4).

3.3. The Council’s WR [REP1-138]



Stop Lime Down Deadline 2

3.3.1. As set out above, SLD has refrained from extensive repetition and identification of agreement with the Council's position, which broadly aligns with SLD. Such agreement will be apparent from reading SLD's WR alongside the Council's WR.

3.3.2. On Landscape and Visual Impact:

3.3.2.1. The Council recommend (p. 12, para 5.7) that all proposed solar development be removed from the area between the Fosse Way and the CNL boundary to maintain its high value and the relationship between the unspoilt landscapes of the CNL through which the Fosse Way passes. SLD agrees that this is necessary, at a minimum, to reduce the longer-term impacts on the CNL.

3.3.2.2. The distance of Lime Down Solar Park Sites B and D from Norton means that the Scheme will "effectively dominate" the village to the north, south, and west. SLD agrees that the sites proposed should be reconsidered in light of the potential dominance of solar panels on the village setting (pp. 13-14, paras 5.10-5.11)

3.3.3. On Ecology and Biodiversity, the Council note that under the current draft of the DCO, the Applicant has total flexibility to remove every listed hedgerow within the Order Limits as the Applicant has identified every such hedgerow within the Hedgerow Plan [APP-011]. While Article 40 requires hedgerow removal to be in accordance with that set out in the Landscape and Ecological Management Plan, it would be possible for the Applicant to include additional hedgerow removal within the Final LEMP, relying on such flexibility. SLD agrees that the Applicant could have, and ought to specify minimum and maximum extents of hedgerow removal (p. 20, para 6.11) for the assessment of the reasonable worst case scenario.

3.3.4. On Highways, the Council calls for a s.59 Highways Act 1980 agreement to be included as a DCO requirement to cover highway damage liability, as a consequence of likely damage to the narrow roads within and around the Scheme



Stop Lime Down Deadline 2

(p. 44, para 9.3). SLD agrees that the Applicant should be required to repair and reinstate any damage which will be caused to the local road network during the construction phase.

3.3.5. The Council's concerns in respect of the carbon footprint of the Scheme echo concerns raised in SLD's WR on climate change considerations. In particular, the independent review commissioned by the University of Exeter Centre for Energy and the Environment observes that the Applicant's Chapter 7 on Climate Change of the Environmental Statement [APP-059] likely underestimates the scheme's embodied and lifecycle carbon emissions and relies on unrealistic assumptions about future grid decarbonisation. It shows that, even over its full lifetime, the project does not save enough carbon through the electricity it generates to make up for the carbon emissions created during its construction and operation, when compared against expected future electricity grid emissions (p. 51, para 11.14). This mirrors conclusions reached by the University of Derby in Appendix J2 to SLD's WR which observed that the Scheme does not offset its whole-life carbon within the 60-year operational lifespan (applying the future grid emissions scenario).

3.4. Other Written Representations

3.4.1. To be proportionate, SLD does not here provide comments on all of the written representations which have been provided by public bodies and members of the public. However, the following are underscored as evidence of the diffuse effects of the scheme on local businesses (a point of importance raised in SLD's WR at pp. 92-96, at para 11.3):

Ref	Person/ Body	Comment
REP 1-162	Foxley Road Nurseries	The WR notes that the number of customers will be greatly reduced as a consequence of excessive traffic on local narrow roads nearby and likely impact on staff.

<p>REP 1-163</p>	<p>Grittleton Sevington and Leigh Delamere Village Hall and Recreation Ground</p>	<p>The WR considers that even with the mitigations proposed by the Applicant, the financial viability of the village hall will be threatened.</p>
<p>REP 1-195</p>	<p>Alicia Hawker</p>	<p>Ms. Hawker's WR notes the likely impact of the Scheme on her equine business, particularly relating to hacking routes. There is concern that her livelihood will be lost, alongside the 2 fulltime staff and 4 part-time staff she employs.</p>
<p>REP1-196</p>	<p>Andrew Pivars</p>	<p>Mr. Pivars WR notes the likely impact of the Scheme on his business as a farrier. It notes that there are strict practicing standards set out for the protection of equine animals and owners which requires a safe working area, free of distractions. Any increase in traffic congestion raises animal welfare concerns.</p>
<p>REP 1-197</p>	<p>Dr. Annemarie Farrington</p>	<p>Dr. Farrington outlines particular risks to horses as a consequence of the Scheme. It is noted that the Scheme presents a material risk of clinically significant respiratory compromise in horses bred and managed for elite thoroughbred performance, and likely effects on pregnant mares.</p>
<p>REP1-202, REP 1-203, REP 1-204</p>	<p>Dermot Farrington</p>	<p>Mr. Farrington's detailed WR discusses the likely impact of the Scheme on his equine bloodstock company. It is noted that the Company can no longer guarantee long-term positions as a consequence of the development of this scale. The young foals which are reared at Mr.</p>

		Farrington's farm are more likely to be spooked by unexpected noises and movements, which will increase as a consequence of the Scheme.
REP 1-198	Ashton Hawker	Representing a long-established family farming business. The Scheme proposes to purchase land which Mr. Hawkers owns and a hundred acres which he rents. The business will be affected by the reduction in local availability of grain and straw. This increases the farm's carbon footprint, as well jeopardising the business' ability to fulfil its supply contracts.
REP 1-158	B&W Equine Vets	Outlines the likely impacts on B&W's clientele within the vicinity of Lime Down which includes stud clients, professional competition yards, hunting yards, and private yards. It is noted that noise generated by HGVs and infrastructure creates risks to the horses near the Scheme and increases their propensity to act unpredictably. The likely impacts of dust and toxic gas are also noted.
REP 1-165	KMT Farming and Consulting on behalf of Mr. and Mrs. Eavis	Amongst the detailed representations made, the WR notes that the proposed Scheme would disrupt farming operations across multiple seasons and introduce uncertainty affecting cropping and land-management decisions.
REP1-228	Michael Llewellyn Palmer	Identifies detrimental impact on farming business. The Scheme will lead to the limited availability of cattle farms in the area which will mean less availability of cow manure – a complete fertiliser which Mr. Palmer relies upon for his land. Likewise, Mr. Palmer has a holiday let



Stop Lime Down Deadline 2

		business and a caravan site which will be affected by the harm caused to historic villages, footpaths, and views.
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4. The Applicant's documents submitted at Deadline 1A

4.1. Written Summary of the Applicant's Oral Submissions and Responses at ISH1 and Responses to Action Points [REP1A-012]

4.1.1. In addressing this document SLD focuses on the post hearing submissions made by the Applicant. SLD's comments on what the Applicant said at the time were either made in the hearing or are responded to in its submissions at Deadline 1 and Deadline 1A.

4.1.2. **Internal page 24:** SLD note that the Applicant has now provided an example of the length of an Option Agreement in respect of Site E. (SLD's position in relation to the confidentiality of agreements is set out in Section 16 of its WR). That Option Agreement is said to run for 40 years, with any extension to 60 years requiring further agreement. The Applicant goes on to say that Requirement 20 provides a maximum time during which the Scheme can operate and that there is no obligation to continue the development for a prescribed or minimum amount of time and that this is consistent with other DCOs to date.

4.1.3. The Applicant then explains that a 60-year period represents a reasonable worst case for the development in GHG terms. That is because, the Applicant states, "the total GHG emissions are predicted to be lower as it is assumed that full replacement of the panels would not take place during the operational phase". However, the Applicant notes this would also reduce the amount of renewable energy generated.

4.1.4. SLD considers this is an insufficient answer to this issue. In the first place, the Applicant's response is speculative and does not address when such option agreements will be renewed to secure a further 20 years of development. The Applicant's own assessment provides for a reset and replacement at the 30-year mark. At least currently, there is no proper basis for the ExA to conclude that the Applicant will have obtained extensions by then. Indeed, it may be in the commercial interest of landowners to wait until late into the lifetime of the initial

leases to explore extension. It may be that the contracts provide for the decision to extend the Option Agreements to be made at a specific point in time; that is information the Applicant could provide if it is the case. However, the ExA cannot assume this, and the ES is not assessed on that basis.

4.1.5. Critically, however, this response is no answer to the problem identified by SLD in its Written Representation in Section 16.3. The current position (using Site E as an example) is that Site E but not the rest of the Scheme may require to be decommissioned at the 40-year mark. In circumstances where mitigation and enhancement measures are not spread evenly across the Scheme, it is feasible (and indeed a realistic prospect) that part of the Scheme which provides a disproportionate amount of mitigation and enhancement would be decommissioned before the remainder of the Scheme. A failure to assess this scenario is a failure to assess the reasonable worst case.

4.1.6. Indeed, the Applicant's position raises another difficult point on the face of the current DCO. Requirement 20 as drafted attaches the decommissioning date the associated development (e.g. contained in Works No.2, which is the BESS) to the date of decommissioning of the last part of Works No.1 to which the associated development relates. That would mean, for example, that only one of the five Lime Down sites (or, indeed, only part of one site) would be required to remain operational for the BESS and the 400kV substation to remain in place. Given specifically the environmental effects of the BESS (and, among other things, the GHG emissions concerned with its maintenance), the Scheme could result in a far worse emissions position than that reported in the ES.

4.1.7. **Page 54:** As was explained in SLD's Written Representation from para 16.3.12, the Applicant helpfully informed SLD and the Council that the solar element of the Scheme benefits from a Gate 2 Phase 1 prioritisation under the NESO connection reforms, and the BESS element of the Scheme benefits from a Gate 1 prioritisation. As the Applicant notes, this means the BESS has an "as yet unconfirmed indicative connection date". The Applicant goes on to say that it "is



not aware of any specific impediments to connection, or the timing of delivery / completion of the scheme”.

4.1.8. For the reasons set out in SLD’s Written Representation from para 16.3.12, SLD consider the mismatch between Gate prioritisation to be a specific impediment, and that this engages the policy in NPS EN-1 para 4.11.12. As SLD go on to explain, if such Gate prioritisation is acceptable to the operation of the Scheme, it also indicates that such development may not be associated development within the requisite guidance.

4.1.9. **Page 55:** it is noted that the Applicant has not provided the “aggregate installed capacity (DC)” for the Scheme. SLD consider that it is open to the Applicant to calculate that figure on a reasonable worst-case basis applying the outlines that are proposed to be secured in the Scheme documents. Indeed, given many of the other assessments required as part of the ES, the Applicant will necessarily have had to assess some indicative figure for the number of PV cells and associated infrastructure to define the DC capacity to be installed. That must also be the case for the Applicant to conclude (as it does on the following page), that it would be within the 2-4 acres per MW described in para 2.10.17 of NPS EN-3. This is necessary to assess the likely significant effects of the Scheme.

4.1.10. **Page 56:** it is noted that the Applicant “does not propose significant overplanting”, but then does not go on to provide a reasonable worst-case assessment of that planting. SLD consider such figures (which should be possible to derive in tandem with the “aggregate installed capacity (DC)” discussed in the previous paragraph) are required to be provided to assess the likely significant effects of the Scheme. It is correct that para 2.10.55 and fn 92 of NPS EN-3 envisages overplanting. However, per *Ross v SSHCLG* [2025] EWHC 1183 (Admin), such overplanting must be justified. To provide that justification, and indeed to identify the likely significant effects of the Scheme, it is necessary to provide such information by reference to the amount of overplanting proposed assessed on a reasonable worst-case basis.

4.1.11. **Page 57:** the Applicant explains the role of the BESS in the Scheme. However, SLD considers it is incumbent on the Applicant to provide more details as to its justification, in light of the BESS portion of the Scheme having only Gate 1 prioritisation. Among other things:

4.1.11.1. As the Applicant's position is that the Scheme will not itself provide for significant overplanting, there should in principle be no "waste" in the form of 'clipping' (that is, where the peak output of the Scheme exceeds the grid capacity). Rather, the Scheme could at all times maximise its generation by outputting to the National Grid.

4.1.11.2. The Applicant itself explains that the National Electricity Transmission Network (**NETS**) at Melksham has "sufficient capacity" and provides "defence-in-depth for system security" concluding "[s]ignificant network constraints in the transmission grid around Melksham are not foreseen during normal conditions".

4.1.11.3. The Scheme has Gate 1 for its BESS and DESNZ/Ofgem has indicated that there is an oversupply of grid-scale storage (see Appendix F). Even if, which is not accepted, electricity generated by the Scheme requires to be stored, there is ample capacity on the NETS.

4.1.11.4. It should be noted that the BESS is being considered within the framework of the NPSs as a result of its inclusion in the Scheme; s.15 of the Planning Act 2008 excludes "exempt electricity storage". That is distinct to the solar generation itself which is the s.15(2) project which brings the Scheme within the scope of the NPS and the policy position on need therein established.

4.1.11.5. As a result, the reasoning under "Role of storage capacity of the BESS and its relationship with the generating station" should be reconsidered, or at least clarified, with this key context in mind.

4.1.12. As to "Importation of electricity from the grid to the BESS", again further reasoning is required in light of the oversupply or "surplus" of BESS on the National Grid. It is noted that the Statement of Need itself envisages a scheme



Stop Lime Down Deadline 2

whereby BESS only has an export connection (para 6.9.6). Given the adverse environmental effects from the perspective of GHG emissions as a result of maintenance of the BESS (given the relatively fixed number of cycles that such BESS can complete before requiring replacement), further justification for the BESS is required. In any event, this justification does not constitute an explanation of why the BESS is associated development.

4.1.13. **Page 61 (action point 4):** SLD notes that a transmission losses figure of 0.1% has been provided in respect of the 400kV cable. It is explained that such losses will arise on both import and export. However, losses related to transmitting to and from the BESS in particular (including the action of storage) is not provided; SLD consider this should be provided. When stored from the National Grid or from the PV (assuming inversion prior to transmission over the 132kV cables) the electricity requires to be rectified for storing as DC, and then requires to be inverted for transmission to the National Grid. The Applicant is requested to provide those figures also.

4.1.14. **Page 62 (action point 5):** SLD note the explanation for tracking panels. However, the case remains that such tracking panels overall have a more significant environmental effect than fixed panels (due to height but also inherent design). As the ExA indicated in its questions, waiting for improved tracker panels is inherently speculative, when the Scheme has already been assessed as acceptable to the Applicant (and is considered by it to be policy compliant) at the time of submission to PINS). As such, the justification that trackers may improve matters in the future is inherently speculative compared to the likely adverse effects currently identified. For that reason, SLD consider (as indicated in Section 16 of its Written Representation) that proper avoidance indicates in favour of requiring 3.5m fixed panels. As to Glint and Glare, SLD has significant concerns about the Applicant's assessment overall in any event as is set out in Appendix G to its Written Representation **[REP1-178]**.



Stop Lime Down Deadline 2

4.1.15. As to the suggestion of flexibility in the construction scheme, SLD has responded to this above and in its Written Representation. The approach described requires to be clarified for the reasons identified.

4.1.16. In respect of the comments related to Mark Judge, SLD has significant concerns about the Applicant's approach to flood, which is described in its Written Representation and Appendixes F1-4 ([REP1-174] to [RP1-177]).

4.2. Visualisations

4.2.1. The Applicant has now provided visualisations from Bradfield Manor in response to Historic England's latest request on 9 January 2026. The two visualisations provided identify the land which would be used for the panels of the Scheme however do not show the profile of the panels. This has been raised with SLD's heritage consultant.

4.2.2. The visuals demonstrate that the Scheme will be visible in the views from the Parlour of the Manor when looking north-west and north-east. However, as the visual do not show the profile of the panels, SLD's expert noted they do not provide the full detail needed to understand the degree of visual impact. For example, due to the height of the panels, it is anticipated that the hedgerows may not be discernible from the Parlour.

4.2.3. SLD note also that these views are not provided in the winter context and draw the Examiners' attention to the comment of Historic England (in their letter dated 9 April 2026) that states that winter views may reveal more visibility of the development. SLD also note that no methodology which reports the accuracy of the visualisations is provided.



5. Conclusion

5.1.1. This submission has reviewed the documents submitted by the Applicant at other parties at Deadlines 1 and 1A. SLD's review of that material confirms that, in most cases, the additional information has not resolved the concerns raised by SLD in its Written Representation. SLD will continue to engage constructively throughout the Examination. For all the reasons set out in this submission, and the documents prepared by SLD so far, SLD maintains that development consent should not be granted for the Scheme.



APPENDIX A

LANDSCAPE COMMENTS ON DEADLINE 1 DOCUMENTS



Lime Down Solar

Landscape Comments on Deadline 1 / 1A Material for Submission at Deadline 2 on 22nd May 2026

Carly Tinkler

1. Introduction

These comments deal with landscape and visual matters raised in material submitted by the Applicant and other parties at Deadlines 1 and 1A. I have reviewed what I consider to be the most important landscape-related documents, but have only commented on matters which in my opinion are relevant to the Examination at this stage.

2. Wiltshire Council LIR [REP1-137]

- i) Broadly, I **agree** with Wiltshire Council's conclusions in the Local Impact Report (LIR).
- ii) For example, in the Table of *Summary of main impacts identified by Wiltshire Council* on page 52, I **agree** that for landscape character and visual amenity, during construction, operation, and decommissioning, there would be a) **no positive impacts**, b) **no neutral impacts**; and c) **negative impacts**.
- iii) I also **agree** that during operation, there is likely to be a **slight positive** impact for some landscape 'fabric' components (but only where the 'fabric' is confirmed as landscape / visual enhancement, not landscape / visual mitigation).
- iv) In addition, I **agree** that post-decommissioning, impacts are subject to factors such a) whether the operational mitigation and enhancement 'fabric' planting measures are retained (currently unsecured, so no certainty the 'fabric' would remain post-decommissioning), and b) if retained, whether operational hedge heights would be reduced (to avoid the continuation of negative operational landscape / visual impacts).

3. Wiltshire Council WR [REP1-138]

Broadly, I **agree** with Wiltshire Council's comments, conclusions, and recommendations in their Written Representation (WR) Section 5 *Landscape and Visual Considerations*.

4. Natural England WR [REP1-156]

Re Section 2.5 *Impacts to nationally designated landscapes*

- i) Natural England (NE)'s Relevant Representation (RR) [RR-3427] asked the Applicant for an assessment of inter-project cumulative effects on the National Landscape.
- ii) In [PDA-009] Applicant's Responses to RRs Part 1, Section 3.3, NE Table 3-3 [RR-3427], the Applicant says, '*there are **no inter-project cumulative developments within the CNL**. Castle Combe Circuit Solar Farm is an existing solar farm development that is located within the CNL, approximately 6km from the nearest Lime Down Solar Site...*'.

- a) Apart from Castle Combe, is it correct to say that *'there are no inter-project cumulative developments within the CNL'*? Or, within the 10km Cumulative Study Area?
- b) Also, do the criteria for projects selected for assessment include **all** relevant similar projects? See para. 12.6 of the *Landscape and Visual Impact Report* that I produced for SLD [REP1-170].
- iii) NE's WR para. 2.5.2 states, *'Following the further information provided in The Applicant's Response to Relevant Representations (Part 1) (Document Ref EXAM/9.1), **providing that there are no proposed developments within the area of the setting of the Cotswolds National Landscape within the 10km Cumulative Study Area**, Natural England have no further comments to make on this point'*.

Note that in the above statement, NE's WR says *'no proposed developments **within the area of the setting** of the Cotswolds National Landscape within the 10km Cumulative Study Area*, whereas the Applicant's response says *within the CNL*. **Clarification** of this point would be helpful.

- iv) At para. 13b (and similarly at para. 36h) NE's RR [RR-3427] concludes that *'... **the submitted information indicates that the project is unlikely to result in significant adverse landscape impacts when considered alone** [but] an assessment of inter project cumulative effects on the National Landscape should be provided'*.
 - a) However, firstly, the above appears to be contradicted by NE's WR para. 28: *'Natural England is **not satisfied that sufficient evidence has been provided** to demonstrate that the project will **not** result in **significant adverse** effects to the Cotswolds National Landscape'* (in the RR, para. 36, the topic is categorised as Amber).
 - b) Secondly, in fact, the Applicant's LVIA [APP-060] concludes (and I **agree**) that during construction and operation, the proposed development would result in a) **significant adverse indirect** effects on landscapes (and villages / communities) within the CNL, and its setting; and b) **significant adverse direct** effects on the CNL's setting.

Also, the proposed primary construction route runs through the CNL for a considerable distance (the driving distance between M4 J18 and access into Lime Down A is c. 20km). Expert assessments have concluded that the increase in traffic along these routes is likely to result in **significant adverse direct** effects on landscapes (and villages / communities) within the CNL.

The CNLB's RR [RR-0944] states, *'we still consider it likely that construction traffic would have **a significant adverse impact** upon the tranquillity of the National Landscape, one of its special qualities, and this would conflict with Policy CE5 of the CNL Management Plan. It would also not seek to further the purposes of CNL designation. Therefore, at this stage our position in terms of PMIE 4 is that **construction traffic should be routed outside of the CNL to avoid significant adverse impacts upon its tranquillity and landscape and scenic beauty**'* (emphasis added).

At para. 7.3, SLD's highways expert concludes that *'the applicant has not properly assessed the potential for the development to lead to **unacceptable impacts on vulnerable highway users**, contrary to the requirements of EN-1'* (emphasis added). Para. 2.2 explains that *'Paragraph 5.14.21 of EN-1 identifies an unacceptable impact on highway safety as a **reason to consider refusal of an application**'* (emphasis added).

- c) Re cumulative effects, see previous points.
- v) NE's WR focusses mainly on visual effects, but note comments in SLD's *Landscape and Visual Impact Report* about a) the problems with relying on vegetation to screen views in the longer

term (Section 7.5), and b) effects on the non-visual aspects of character (see for example paras. 8.5.17 – 8.5.22).

5. Applicant Planning Statement Revision 2 [REP1-087]

- i) The Cotswolds National Landscape Board (CNLB)'s WR [REP1-160] sets out the four outstanding Potential Main Issues for Examination (PMIEs). The first two are:

*'1. Whether the Scheme has the potential to give rise to **significant adverse environmental effects upon the Cotswolds National Landscape ('CNL') designation and its setting**. In addition, whether the Scheme would **seek to further the purpose of CNL designation** in respect of the statutory duty outlined at s.85 of the Countryside and Rights of Way Act 2000 (as amended); and*

'4. Routing of construction traffic for sites A, B and C and the potential impact upon the tranquillity and landscape and scenic beauty of the CNL.'
- ii) Revision 2 of the Applicant's Planning Statement contains various annexes. Annex E is a paper produced by the Applicant called *Cotswolds National Landscape Policy and Guidance Accordance Note* (it starts on page 1010 of the PDF). The Annex *'provides an overview of the [CNLB]'s publications and demonstrates where the relevant policies have been considered within the design of the Scheme'*. It was produced to address the CNLB's RR [RR-0944], which, Annex E explains, *'outlines a number of publications, including policies which are recommended for consideration by the Secretary of State in reaching their decision on the Application'*.
- iii) Under the heading *Conservation and enhancement of the Cotswolds National Landscape*, Planning Statement Annex E summarises the conclusions of the Applicant's Landscape and Visual Impact Assessment (LVIA) [APP-060].
- iv) I **agree** that *'that due to the Scheme having no physical overlap within the CNL, there are no **direct** impacts on the CNL'* (Planning Statement Annex E para. 2.2.4, emphasis added); however, that is within the Order Limits. As noted in the comments on NE's WR above, experts conclude that along the construction route there are likely to be **significant adverse direct** effects on landscapes (and villages / communities) within the CNL.
- v) Para. 2.2.4 states that *'The landscape assessment recorded... **Moderate Significant Adverse [indirect] effects within the 1km Local Study Area of the Scheme'*** (emphasis added). I **agree** that the effects would be **significant** adverse, but my assessment concluded that the level of adverse effect would be higher than the LVIA predicts (see SLD's *Landscape and Visual Impact Report* Section 8.7).
- vi) Note the CNLB's RR states that *'Notwithstanding the proposed mitigation and enhancement measures, the Board notes that Section 2.4 of Appendix 8-6 identifies that the proposal may give rise to **several significant adverse landscape and visual effects** relating to the CNL and its setting'* (emphasis added).
- vii) Para. 2.2.4 of the Applicant's Planning Statement goes on to say that the Applicant's landscape assessment recorded *'**Moderate Significant Beneficial** effects on the Landscape Fabric of the Site'* (emphasis added), these being *'derived from the implementation of extensive **mitigation** measures embedded in the Scheme design'* (emphasis added).
- viii) In summary (as explained in SLD's *Landscape and Visual Impact Report* paras. 8.7.12 – 8.7.17), I do **not agree** with this conclusion. That is because the new / restored 'fabric' is proposed as mitigation, and therefore **cannot be double counted as enhancement** (see SLD's *Landscape and Visual Impact Report* Section 7.2). An example of the double-counting error can be found in Planning Statement Annex E para. 2.2.9: *'Positive **Enhancements**'* include

*'Maintaining hedgerows at their current height of c1.5m', which of course is a **mitigation** measure.*

ix) The CNLB's RR states (with emphasis added):

*'The Board considers that maintaining hedgerows at their current height should **not be considered as an enhancement** to the CNL and its setting. This results in the enhancements proposed consisting of the creation of wildflower meadows in a few fields and creation of wildflower meadow verges in three fields, which **arguably could also be considered mitigation** given their purpose to 'provide attractive buffers [to the proposed solar development] in views from public roads on the edge of the CNL.*

*'Moreover, in several places within the submission, mitigation measures and enhancement (considered to be measures which demonstrably add value to the host landscape, creating a positive change above its baseline condition) measures appear to be **conflated**.'*

x) This matter is important because it underpins the Applicant's justification for the conclusion that the benefits would **further the purposes of the CNL designation** – see below.

xi) Regarding visual effects on receptors within the CNL and its setting, para. 2.2.7 of Planning Statement Annex E says that *'**significant visual effects** would be experienced by 2 private receptors, 1 public receptor and 5 transport receptors during construction and at Year 1 Operation. All of these significant effects would fall away in Operation Year 15 and at decommissioning once landscaping has become established'* (emphasis added).

xii) In my opinion, the above statement is **not an accurate reflection** of the **extensive** significant adverse visual effects that would arise due to the Scheme's large size and scale (see SLD's *Landscape and Visual Impact Report* paras. 8.2.10 – 8.2.17: if consented, Lime Down would be one of the largest solar NSIPs in the UK).

xiii) Visual effects on public receptors as assessed in the Applicant's LVIA are summarised in SLD's *Landscape and Visual Impact Report* paras. 10.3.1 – 10.3.35, further summarised below:

a) Many of the affected visual receptors are either a) **within the CNL** looking over the Scheme towards its setting, or b) **within the CNL's setting**, looking towards it.

b) During **construction and Years 1 – 15 of operation**, people travelling along **twenty-seven** of the PRoWs selected for assessment, and **eleven** of the transport routes (roads and lanes), would experience **significant adverse** visual effects.

c) Between **Years 15 and 60 of operation**, the number of PRoWs along which people would experience **significant** adverse visual effects would reduce, but the majority would remain **significant adverse**. However, the LVIA concludes that **none** of the adverse visual effects along transport routes would remain significant.

d) Whilst I **agree** that **numerous** visual receptors would experience significant adverse effects during construction and Years 1 – 15 of operation, in my opinion, levels of visual effects at all stages of the development have been **underestimated**, for reasons explained in my report.

xiv) Planning Statement Annex E concludes (para. 2.7.1) that *'the Scheme is in accordance with the CNLMP [Cotswolds National Landscape Management Plan] with its design seeking to conserve and enhance the natural beauty of the CNL and its Special Qualities'*.

xv) For the above and other reasons set out in SLD's *Landscape and Visual Impact Report*, I do not agree with the above statement, nor the conclusion at LVIA para. 8.10.140, which is that *'**beneficial landscape effects within the setting of the CNL in the long term which would further the purposes of the designation**'* (emphasis added).

6. Applicant 9.5 Technical Note on Landscape Fabric and Landscape Character May 2026 Rev 1 [REP1-121]

- i) This Technical Note was produced in response to Wiltshire Council's RR request [RR-4934] for the Applicant to 'set out the approach undertaken to the assessment of Landscape Fabric and Landscape Character used in the LVIA as presented in ES Volume 1 Chapter 8 [APP-060]'.
- ii) The matter is covered in SLD's *Landscape and Visual Impact Report* – see introduction to 'fabric' in Section 3.3; landscape effects in Section 8.3; and effects on the CNL in Section 8.7.
- iii) In summary, the LVIA is not clear about how it treats 'fabric' and overall character, and effects upon them. This is an important matter because it underpins the Applicant's justification for the conclusion that the benefits would **further the purposes of the CNL designation** (see comments on the Applicant's Planning Statement above).
- iv) Notwithstanding this, para. 3.1.11 of the Technical Note says '*At no point in the assessment of effects on Landscape Character, does the LVIA conclude that there are Beneficial Effects on Landscape Character. The assessment of landscape effects within the 1km Study Area recognises that there are Moderate Adverse (Significant) effects to Landscape Character as a result of the Lime Down Scheme*'.
- v) An example of where it is not clear whether the LVIA is assessing effects on 'fabric' or overall character is in [APP-191] Appendix 8-3-2-2-1 *Landscape Assessment Sheets*, Section 3 *Lime Down Site Assessment*, 3.1 *Landscape Fabric*, Table 6 *Lime Down A, Landscape Character - Landscape Fabric*.
- vi) The conclusion on page 54 is a **Moderate Beneficial (significant)** effect. If that is just 'fabric', a) it is the result of double-counting, and b) the mitigation measures would in themselves give rise to adverse landscape and visual effects (for example loss of characteristic openness / total loss of view). If it is 'overall character', that is contradicted in both the Technical Note and the Applicant's response to item ref. **SLD-024 [PDA-009]**, which states, '*It is fully acknowledged that at the Site level, the character of the Site itself (where there is infrastructure) would be Significantly Adversely affected with the land now presenting as a large scale solar scheme, as with the development of any green field Site*' (emphasis added).
- vii) The above matters could be discussed in detail at a future hearing. Before that, perhaps a meeting between the Applicant's, Council's, and SLD's landscape experts should be arranged, to clarify certain technical points, and establish where there is common ground.

7. Applicant 9.6 Technical Note on Intra Project Cumulative Visual Effects May 2026 Rev 1 [REP1-122]

- i) This Technical Note was produced in response to Wiltshire Council's RR request [RR-4934] for the Applicant 'to set out the approach used to assess [intra-project cumulative visual] effects used in the LVIA presented in **ES Volume 1 Chapter 8 [APP-060]** and to provide a summary of the identified visual effects'.
- ii) See also SLD's *Landscape and Visual Impact Report* Section 12.
- iii) At para. 2.2.5, the Technical Note concludes that there is '*no identified inter visibility between any of the 5 Lime Down Sites and the Included Cumulative Developments*'. Para. 4.1.3 states, '*In all cases, the effect of the secondary site is less than the effects of the primary Site, and **does not increase the level of intra cumulative effect on the receptors**. This is predominantly due to the distance to the secondary Site, intervening vegetation. and screening related to*

topography. As such, this would not increase the level of effects above those described for the primary Site'.

- iv) In my opinion, it is not logical to conclude that the other developments would not increase levels of adverse visual effects arising from the Scheme, **unless** fully screened by topography, buildings, and dense vegetation likely to remain in place for decades (as the assessment assumes).
- v) Also, a) the criteria for projects selected for assessment may not include all relevant projects – see SLD's *Landscape and Visual Impact Report* para. 12.6; and b) presumably the assessment did not consider the cumulative adverse effects arising from inappropriate mitigating measures, for example screen planting that results in loss of openness / views.
- vi) In addition, **the Applicant's Glint and Glare Study (GGS) does not refer to cumulative glint and glare effects**, so I assume they were not considered. SLD has asked for clarification about this (see SLD's *Landscape and Visual Impact Report* para. 12.14), and if not assessed, has suggested that the GGS should be updated accordingly.

8. Applicant 9.7 Technical Note on Cumulative Sequential Visual Effects May 2026 Rev 1 [REP1-123]

- i) This Technical Note was produced in response to Wiltshire Council's RR request [**RR-4934**] for the Applicant '*to assess the sequential visual effects on the Fosse Way, the A429 and the A350 routes*' (In my opinion, cumulative sequential visual effects throughout the study area should be assessed, not just on these routes).
- ii) SLD's *Landscape and Visual Impact Report* paras. 12.8 and 12.9 deals with sequential visual effects.
- iii) Note the criteria for projects selected for assessment may not include all relevant projects – see SLD's *Landscape and Visual Impact Report* para. 12.6.
- iv) The Applicant's LVIA concludes that levels of adverse cumulative sequential visual effects along these routes would be Low. I **do not agree**. That is mainly because my assessment concluded that the levels of adverse cumulative sequential visual effects arising from the Scheme would be **significant adverse**, and the cumulative effects with other schemes would only **increase** the level of adverse effect.

9. Applicant 9.15 Construction Routes in the Cotswold National Landscape Technical Note May 2026 Rev 1 [REP1-131]

- i) This Technical Note was produced by the Applicant in response to 'ongoing engagement' with the CNLB. It '*seeks to provide further clarity regarding the justification for selecting the proposed construction routes through the Cotswold National Landscape (CNL) to access Lime Down A, B and C, as well as access locations 101 to 108 serving the Cable Route Corridor*'.
- ii) SLD's highways expert deals with this matter in detail, but see also Section 8.6 of SLD's *Landscape and Visual Impact Report*.

10. Applicant Appendix 3-3 Illustrative Drawings (Revision 2) [REP1A-004]

- i) It appears that the only change to this drawing is the addition of a plan showing a side view of tracker panels.

- ii) As noted in para. 10.2.6 of SLD's *Landscape and Visual Impact Report*, the adverse effects of the Scheme are amplified by the Scheme Design Parameters providing for the general use of tracker solar panels which would be **up to 4.5m above ground level**. This is equivalent to the height as a double-decker bus, and the average height of a bungalow.
- iii) The report suggested that in order to get an idea of scale, the Applicant might provide images of the proposed panels in situ at their maximum height with a person of average height in the image.
- iv) Perhaps images of people could be added to the plan showing the side view of tracker panels.



APPENDIX B

TRANSPORT COMMENTS ON DEADLINE 1 DOCUMENTS



Lime Down Solar Farm

**TRANSPORT: Comments on
Deadline 1 Submissions on behalf
of Stop Lime Down (SLD)**

Railton TPC Ltd

**41 York Road
Newbury
Berkshire RG14 7NJ
T. [REDACTED]**

Railton TPC Ltd ref: Lime Down 02A
Planning Inspectorate Ref: EN010168
Planning Authority Ref: N/A
Date: May 2026
Author: Bruce Bamber BSc MA MSc MCIHT

Table of Contents

1 Introduction.....	1
2 Comments on Transport Matters.....	2
REP1-020 6.1 ES Volume 1 Chapter 13 Transport and Access (Rev 2) (Tracked).....	2
REP1-058 6.3 ES Volume 3 Appendix 13-1 Transport Assessment (Part 1) (Rev 2) (Tracked) and REP1-060 6.3 ES Volume 3 Appendix 13-1 Transport Assessment (Part 2) (Rev 2) (Tracked).....	2
REP1-113 7.22 Outline Construction Traffic Management Plan (Rev 2) (Tracked).....	6
REP1-131 9.15 Construction Routes in the Cotswold National Landscape Technical Note	7
REP1-137 Local impact reports from local authorities.....	8
3 Summary and Conclusion.....	9

1 INTRODUCTION

- 1.1 Railton TPC Ltd has been commissioned by Stop Lime Down (SLD) to prepare a report for submission to the Examining Authority with regard to the transport and highways impacts during construction of the proposed development of five solar sites (Lime Down A, B, C, D and E), a battery energy storage system (BESS) and a 22km cable connection to the electricity substation at Melksham.
- 1.2 The author is Director of Railton TPC Ltd who has worked for 35 years in the transport planning industry. He is a member of the Chartered Institution of Highways and Transportation (MCIHT). He has dealt with highways and transport matters for a wide range of development types from local to strategic scale. He has given evidence at informal hearings and public inquiries, participated in Local Plan Inquiries and examinations of Nationally Significant Infrastructure Projects (NSIPs).
- 1.3 The opinions expressed are the author's true and professional opinions. In providing expert evidence to the Examination, he is fully aware that his duty is to provide his honestly held professional view, irrespective of by whom he is employed.
- 1.4 This report provides comments on the following Deadline 1 submissions:
- REP1-020 6.1 ES Volume 1 Chapter 13 Transport and Access (Rev 2) (Tracked);
 - REP1-058 6.3 ES Volume 3 Appendix 13-1 Transport Assessment (Part 1) (Rev 2) (Tracked);
 - REP1-060 6.3 ES Volume 3 Appendix 13-1 Transport Assessment (Part 2) (Rev 2) (Tracked);
 - REP1-113 7.22 Outline Construction Traffic Management Plan (Rev 2) (Tracked);
 - REP1-131 9.15 Construction Routes in the Cotswold National Landscape Technical Note;
 - REP1-137 Local impact reports from local authorities.
- 1.5 The points raised in this report should be read in conjunction with the content of the Railton TPC Report (Transport: Report on behalf of Stop Lime Down (SLD), attached as Appendix D to SLD's Written Representations). Where the Deadline 1 submissions alter, in any significant way, the conclusions drawn in the Deadline 1 Railton Report, these are considered below.

2 COMMENTS ON TRANSPORT MATTERS

REP1-020 6.1 ES Volume 1 Chapter 13 Transport and Access (Rev 2) (Tracked)

- 2.1 Overall HGV trip generation during the construction phase is shown to be unaltered from the applicant's original submissions but more detail is provided regarding the elements of the construction activities that generate HGV movements (Table 13-20). Commentary on the more detailed information is provided below in relation to the Transport Assessment (TA) (REP1-058 and REP1-060) since Annex E of the TA includes HGV trip generation details.
- 2.2 The HGV trip generation for Lime Down D has been split between the western part of Lime Down D accessed via the lane east of Hullavington and Bradfield Cottages and the eastern part of Lime Down D accessed via the A429. The table suggests that HGV movements are split 78%/22% between west and east. This is discussed further below in relation to the revised TA.
- 2.3 Table 13-42 provides information on HGV movements associated with replacement (operational) activities. It is noted that the number of HGV movements has roughly doubled since the original assessments. The reason for this is that previously allowance was only made for the delivery of new components. The updated information also allows for HGV movements associated with the removal of those components that are being replaced.
- 2.4 No material changes to the assessments of the sensitivity of receptors, the magnitude of impact or the significance of impacts are identified. The concerns raised in the Deadline 1 SLD Transport Report regarding these issues remain unchanged.

REP1-058 6.3 ES Volume 3 Appendix 13-1 Transport Assessment (Part 1) (Rev 2) (Tracked) and REP1-060 6.3 ES Volume 3 Appendix 13-1 Transport Assessment (Part 2) (Rev 2) (Tracked)

- 2.5 Part 1 of the revised TA comprises the text of the document and Annex A. Part 2 comprises the remaining Annexes.
- 2.6 New paragraphs are added to the text to explain the approach to derive HGV trip generation (paras. 1.5.3 to 1.5.8). It is stated that a *'first principles' approach has been adopted. Paragraph 1.5.7 states that the calculations 'allow for a comfortable*

buffer for general construction activities, including the removal of spoil, other construction waste and the installation and removal of construction compounds'.

- 2.7 This statement contradicts the applicant's response to relevant representations that states, '*There will be no site wide reprofiling required. It has been assumed that any excavated material will be reused on site. In the event of any spoil being taken off site, this will be undertaken by the same tippers used for incoming supply of aggregate*' (Response WC-178, page 243 of Applicant's Response to Relevant Representation (Part 1), EXAM/9.1).
- 2.8 Paragraph 1.5.8 states that HGV movements have been proportionately split between the western and eastern sections of Lime Down D. The split is based on the number of modules predicted for each area. It does not make allowance for the fact that the western part of Lime Down D includes the 400kv substation and the BESS, both very large structures generating significant numbers of HGVs. This suggests that the applicant has under-estimated the impact of construction vehicles on the lane east of Hullavington and Bradfield Cottages.
- 2.9 Scrutiny of the additional information that has been provided in Annex E of the TA raises the following questions and concerns:
- Whereas the number of HGVs associated with the transport of solar modules is based on an assumption of 500 per HGV, the calculation of the number of HGVs associated with the transport of mounting structures is based on an assumption of 21 tonne loads. Given the nature of the mounting structures (tubular, prefabricated), it appears unlikely that loads could be as high as 21 tonnes. The applicant needs to provide justification for this assumed vehicle loading;
 - The calculations assume that there would be 18kg of mounting structure per solar panel. These appears to be low given the need for the mounting structures to be of sufficient strength of support large areas of panels and the need to employ piles of significant length to achieve sufficient stability. This is a further matter that required clarification;
 - The revised information does not address the issue raised in the original SLD Transport Report regarding the low level of solar panel coverage within the Works No. 1 areas;
 - It is assumed that packaging fro solar panels and mounting structures would be transported in 10 tonne loads. As has been described in the Deadline 1 SLD Transport Report, it is highly unlikely that it would be possible to compress packaging materials sufficiently to achieve 10 tonne loads;

- It is suggested that BESS units can be transported on 16.5m articulated vehicles. It appears likely that each BESS unit would weight around 42 tonnes. This would constitute an abnormal load since the total weight of the vehicle plus load would be far in excess of the maximum permitted conventional load of 44 tonnes;
- The calculation assume that the depth of foundations for the substations and BESS would be 0.3m. This is likely to be an underestimate, given the need for stable structures and the mass of the components involved;
- No allowance has been made for the main electrical components of the substations;
- The allowance for 'skids/power stations' that do not constitute a part of the scheme description and which was assumed in the Deadline 1 SLD Transport Report to refer to conversion units (166 in total) both fails to account for the number of conversion units and fails to account for the construction of foundations;
- No allowance has been made for the delivery and movements of machinery and equipment;
- The allowance that has been made for the construction and removal of compounds would imply that the compounds were less than 50m x 50m. This is very unlikely to be feasible;
- Although there is an '*allowance for spoil and building compound areas*' it appears that the allowance falls short of that associated with the compounds. It does not appear reasonable to assume that there has been any allowance for the removal or transport of spoil;
- No allowance is made for any off-site highways works.

2.10 It is concluded that although more detail has been provided regarding the generation of HGV movements during construction, the additional detail does not overcome the concern that the overall number of HGV movements has been under-estimated.

2.11 The applicant provides new information about the proportion of construction HGVs that would be 16.5m articulated vehicles and the proportion that would be 10m tipper or rigid vehicles (para. 1.5.9). The distinction between 16.5m articulated vehicles and 10m rigid vehicles does not overcome the highway safety concerns arising from the use of rural lanes that are of insufficient width to accommodate passing HGVs and the impacts on vulnerable highway users (pedestrians, cyclists and equestrians).

- 2.12 The construction programme (Table 13-9) has been amended to show the construction of the 400kV substation. This was not identified in the original TA. It is suggested that the 400kV substation would be constructed in the first 6 months of the construction programme. This appears to be an extremely tight timescale and one that is unlikely to be achievable. It is suggested that the 400kV substation will be fully constructed before work starts on Lime Down E. The effect of this change is to lead to lower peak HGV trip generation on the Junction 17 route.
- 2.13 The construction programme has also been amended to alter some of the assumed duration of works at the various sites and to separate the works for the two parts of Lime Down D, the BESS and the 400kV substation. These changes also have the effect of reducing maximum HGV flows on the most sensitive route on the lane east of Hullavington and Bradfield Cottages. It should be noted that the overall number of HGV movements has not altered from the initial assessments. This means that if the peak level of HGV movements has reduced, the period over which a certain level of HGV movement occurs is increased.
- 2.14 A new Annex F is included showing flow diagrams of HGV movements for every hour of the working day in the 50% uplift situation and the average HGV flow situation. New paragraph 1.5.16 of Part 1 of the TA states that this, '*confirms the low probability of two HGVs meeting on the construction routes*'. In the 50% uplift situation the number of construction HGVs on the lane east of Hullavington and on the Fosse Way are shown to be between 2 and 4 HGVs in each direction over the 09:00-17:00hrs period. Existing HGV flows on these roads are shown to be between 0 and 7 in each direction over the same period. The numbers do not confirm the 'low probability' of two HGVs meeting on the construction routes. On the contrary, given the time that HGVs will be travelling along the constrained sections of the access routes, the numbers indicate there to be a high probability of HGVs meeting.
- 2.15 Paragraph 1.8.6 now refers to 'passing points' rather than 'passing bays'. A new Annex I is included that shows the extent of the proposed road widening in the Highway Improvement Areas. No road widening is shown on the Fosse Way, on the road to Sherston or on the lane east of Hullavington/Bradfield Cottages. None of the areas of road widening constitute formal passing bays. Annex J shows the swept paths of HGVs passing cars within the Highway Improvement Areas. It is impossible to assess from the drawings whether the vehicles are able to safely pass within the available carriageway.

- 2.16 It appears that the details on the swept path drawings have been revised. Additional swept paths are provided showing two HGVs passing on the construction routes (Annex K). SLD reserves the right to comment on these changes once the drawings have been assessed.

REP1-113 7.22 Outline Construction Traffic Management Plan (Rev 2) (Tracked)

- 2.17 The additional information regarding the timetable for construction of the 400kV substation and the additional detail regarding construction HGV trip generation as described in relation to the TA is included in the OCTMP.
- 2.18 The applicant proposes no alteration to the level of use of banksmen to facilitate site access (para. 2.1.5).
- 2.19 Para. 5.2.7 provides some additional information about the number of AIL deliveries (cable drums) that would use each of the cable route AIL access points (12 deliveries for each of the 11 access points).
- 2.20 Section 6.3 states that highway works within the Cotswold National Landscape (CNL) would utilise '*appropriate materials*'.
- 2.21 Section 6.4 refers to possible additional measures that could be implemented in relation to events at Castle Combe Race Circuit, WOMAD etc.
- 2.22 Section 6.6, last bullet point states that, '*Once deliveries have been made to the compound in Lime Down E, Solar PV equipment will be distributed around Lime Down E via tractor and trailer. No Articulated HGV vehicles will route beyond the proposed compound areas*'. This suggests that larger vehicles would not be used on the highly constrained lanes and tracks south of the railway. However, a compound is proposed south of the railway. The applicant needs to provide clarity about how construction vehicles will operate in relation to the two compounds, north and south of the railway and construction areas around these compounds.
- 2.23 Section 6.7 deals with the proposed HGV online booking system intended to avoid the risk of HGVs meeting on constrained rural lanes. Suppliers and subcontractors are expected to have appropriate technology to allow '*real-time tracking*'. It is not clear how such an obligation can be imposed on suppliers and subcontractors and how this would avoid conflicts arising if and when vehicles are delayed or arrive early.
- 2.24 Section 6.14 (Monitoring) has been expanded to include timescales for responding to complaints and communicating with stakeholders.

REP1-131 9.15 Construction Routes in the Cotswold National Landscape Technical Note

- 2.25 This is a new document.
- 2.26 Alternative construction access routes are described and the reasons for them being discounted set out. The criteria used to assess alternative routes comprise the following:
- *'Extensive limited forward visibility;*
 - *Accident Hotspots;*
 - *Schools;*
 - *Village/residential centres;*
 - *Extensive lengths of single lane carriageway;*
 - *The requirement for extensive highway mitigation and engineering works;*
 - *The requirement for extensive vegetation removal; and*
 - *Narrow or weak bridge structure'. (para. 2.2.2)*
- 2.27 Although these criteria are used to exclude the possibility of using the alternative routes, they also apply to many of the routes that have been adopted. The following list provides examples of where the criteria apply to adopted routes:
- Extensive limited forward visibility: **road east of Hullavington, Bradfield Cottages**
 - Accident Hotspots: **Junction of Fowlswick Lane and B4039 (cable route compound access), Junction of Sheldon Corner with A420 (cable route access).**
 - Schools: **Acton Turville**
 - Village/residential centres: **Grittleton, Acton Turville, Burton, Gastard**
 - Extensive lengths of single lane carriageway: **Fosse Way, road east of Hullavington, Bradfield Cottages (HGVs), Neeld Court, Road to Sevington**

- The requirement for extensive highway mitigation and engineering works: **Alderton Road (applicant argues against the need for extensive highway mitigation measures because of proposed HGV management strategy)**
- The requirement for extensive vegetation removal: **Applicant seeks to avoid the need for extensive vegetation removal through the use of banksmen in numerous location**
- Narrow or weak bridge structure: **ALL vehicles forced to use A429 route due to low railway bridge, lane east of Hullavington and Bradfield Cottages route necessary because no bridge crossing of Gauze Brook**

2.28 It is concluded that although there are reasons for not adopting the alternative construction routes, the criteria for excluding them also apply to many of the routes that have been adopted.

2.29 It is noted that the CNL Board reserves its right to respond to the additional information that has been submitted.

REP1-137 Local impact reports from local authorities

2.30 Wiltshire Council (WC) raises concerns over impacts on narrow sections of rural lanes. These mirror those raised in the SLD Deadline 1 submission (p.34).

2.31 Concerns are raised regarding amenity impacts on properties close to the highway edge (p.34). This would be applicable in many locations including Burton and Grittleton.

2.32 Concerns are raised over the required temporary traffic management on the A4 and A420. These concerns were also raised in the SLD Deadline 1 Report.

2.33 A number of queries are raised in relation to the construction trip generation predictions. Specific concerns relate to the assumptions made about the numbers of solar panels and mounting structures, details of how the quantities relate to the type of mounting structures used and the potential removal of spoil. WC stresses the importance of undertaking a worst case assessment (p. 35).

3 SUMMARY AND CONCLUSION

- 3.1 This report has been prepared on behalf of Stop Lime Down (SLD). It deals with the key Deadline 1 submissions from the applicant and Wiltshire Council.
- 3.2 The applicant has provided a more detailed breakdown of HGV trip generation during construction (REP1-058 and REP1-060). However, scrutiny of the additional information confirms that the level of construction HGV trip generation is likely to be underestimated. Many of the concerns raised in the SLD Deadline 1 Transport Report remain. The concern about trip generation predictions is shared with Wiltshire Council (Local Impact Report).
- 3.3 Although the applicant is now suggesting that the maximum level of HGV trip generation at any one time will be lower than previously predicted, the overall number of HGV movements, as predicted by the applicant, remains unchanged. A lower peak must therefore lead to a longer duration of impact.
- 3.4 The applicant states that the 400kV substation will be constructed within the first 6 months of the scheme (REP1-058 and REP1-060). This timescale appears extremely unlikely to be achievable. If the construction period is longer than 6 months the associated HGV movements will lead to cumulative impacts with works at Lime Down D and E and at the BESS site, thus leading to greater levels of impact on the road east of Hullavington and Bradfield Cottages.
- 3.5 The applicant is likely to be over-estimating the amount of Lime Down D HGVs that would use the A429 route (Lime Down D east) since HGVs are split between Lime Down D east and west in proportion to the relative number of solar panels in each area (REP1-058 and REP1-060). This overlooks the fact that the 400kV substation and the BESS are located within Lime Down D west whereas only a 132kV substation is located in Lime Down D east.
- 3.6 Traffic flow diagrams have been provided for each hour of the construction day (REP1-058 and REP1-060). Despite the applicant suggesting that this '*confirms the low probability of two HGVs meeting on the construction routes*', it confirms that construction HGVs will regularly meet either other construction HGVs or other existing HGVs.
- 3.7 Some further information is provided on works within the Highway Improvement Areas and the swept paths of vehicles elsewhere. Some of the swept path diagrams are very unclear. SLD reserves the right to comment on these plans once they have been assessed.

- 3.8 The approach to managing HGV movements around the sensitive lanes used to access Lime Down E requires clarification (REP1-113).
- 3.9 The proposed method for managing the timing of HGV movements so as to avoid HGVs meeting on narrow lanes requires real time tracking of all HGVs, including those operated by suppliers and sub-contractors (REP1-113). The system does not appear to be robust or practical.
- 3.10 Although the applicant has produced a Technical Note (REP1-131) setting out the reasons that alternative construction routes to those through the Cotswolds National Landscape have been discounted, many of these reasons also define the constraints that apply to the routes that have been adopted (e.g. narrow lanes, limited forward visibility, impact on vegetation, impact on schools and villages, need for extensive highways mitigation).
- 3.11 Overall it is concluded that the concerns that were raised in SLD's Deadline 1 Transport Report are not overcome by the further submissions from the applicant.



APPENDIX C

NOISE/VIBRATION COMMENTS ON DEADLINE 1 DOCUMENTS



REF: AS13804.260330.L2

19 May 2026

SLD Wiltshire Ltd

Dear Sirs

AS13804 LIME DOWN SOLAR: DEADLINE 1 UPDATED DOCUMENTSES Noise Chapter Updates

Table 14-15 in the ES noise chapter has been updated to correct mistakes made by the applicant in transposing their derived background levels correctly. (Tables 8 and 9 in the Noise Modelling appendix has also been updated due to the same errors.). These are not described by the applicant as corrections to errors contained within the assessment, but are said to have been updated "to accurately relate to the typical background sound levels".

Operational and maintenance phase LOAEL and SOAEL thresholds have therefore changed for a number of receptors, albeit not significantly changing the applicants' overall conclusions. This would not change the analysis or conclusions of my report.

Para 14.10.45 has been updated to read: *"All embedded mitigation has been included as defined in Section 14.9 with a +3 dB acoustic feature correction applied as defined in Paragraph 14.6.34. The acoustic feature correction is an acknowledgement of the fact that the noise from the Scheme would introduce a new sound source to the area, altering the existing soundscape. However, noise levels, inclusive of the +3 dB correction, that remain below the SOAEL are not expected to have a significant effect on the health and quality of life of residents."*

The statement is problematic in the way it conflates concepts from different assessment frameworks and oversimplifies the purpose of BS 4142 character corrections. It is not clear why the applicant has chosen to update the paragraph.

Under BS 4142:2014+A1:2019, the acoustic character correction is not intended to simply be an "acknowledgement" that a new sound source is introduced into an area. The correction is specifically intended to account for acoustic features that increase the perceived prominence or potential annoyance of the sound, such as tonality, impulsivity, intermittency, or other distinctive characteristics.

A character correction is required at the initial numerical stage of a BS4142 assessment to reflect the noticeable characteristics of a sound, after which BS4142 requires the context in which this noticeable sound will be heard, to be included. This contextual part of the assessment is where consideration of whether a noise is fundamentally alien to the existing soundscape would be factored into the assessment, and whether or not it would alter the initial numerical assessment outcomes.

As described within my evidence, by adopting a fixed background level, the applicants' assessment methodology has dispensed with the BS4142 method of comparing the rating sound levels with the actual background level which occur. The perceived prominence of sound from the development and resultant potential for significant adverse impacts/ annoyance to residents

following the BS4142 standard, is therefore negated by the applicants proposed targeting of a fixed threshold SOAEL as an acceptable net result.

Para 14.10.52 of the ES chapter has been updated to read: *“The night-time rating level at the worst-case receptors (R10, R20) is 35 dB L_{Ar,Tr}, which although is equal to the SOAEL, considering Paragraphs 14.6.27 to 14.6.28, can be defined as being a low rating level.”*

As per my evidence [ref paras 6.28.6.33] targeting the SOAEL as an acceptable outcome is not in line with national policy framework, in that significant adverse effects should be **avoided**, and other adverse effects minimised as far as reasonably practical.

Further referencing my evidence [para 6.29]: *When the rating level of 35dB L_{Ar,Tr} is compared to a more representative evening or night-time background level of 20dB L_{A90}, the exceedance would be +15dB above the background level, which BS4142 identifies as a “significant adverse impact, depending on the context” Similarly, in EIA terms and applying the Applicant’s methodology, that would be a major adverse effect (as it would be a high sensitivity receptor experiencing a high magnitude of impact).*

The predicted noise from the BESS container area would be clearly distinguishable and perceptible in the grounds of Bradfield Manor as a continuous industrial sound (described as a hum by the Applicant).

Application of a +3dB character correction by the applicant as an acknowledgement of the fact that the noise from the Scheme would be *“altering the existing soundscape”* reinforces, rather than diminishes, the conclusion that the operational noise *would be likely to give rise to a significant adverse impact in BS4142 terms.*

The Applicant’s reliance on compliance with SOAEL as evidence of acceptability within policy terms fails to address the materially different policy requirement that significant adverse effects should be avoided and that adverse effects should be minimised as far as reasonably practicable.

The Outline Operational Environmental Management Plan:

Updates to Table 8: Noise and Vibration have been made, reading as follows.

“the Applicant commits that noise at sensitive receptors will be no higher than the levels presented in Section 14.10 of Chapter 14: Noise and Vibration of the ES [EN010168/APP/6.1] and these levels will be set out in the detailed OEMP. The Applicant will remodel operational noise from the Scheme with respect to the final design, including required plant mitigation, to demonstrate that there would be no significant operational noise effects arising from the scheme as built. The results of this remodelling, including details of the final plant mitigation measures, will be submitted to the relevant local authority.”

It will be within the Local Authorities remit to review and approve such final models or mitigation schemes, and the detailed OEMP. It remains my opinion that targeting the levels presented within the applicant’s assessment, however, is likely to lead to significant adverse noise effects.

The Outline Construction Environmental Management Plan:

The OCEMP has been updated to include description of a scheme of advising residents of noisy works, specifically at silver street, where a significant adverse impact has been identified.

The OCEMP does not contain sufficient detail regarding the management, mitigation, justification, or need for night-time HDD works to be able to consider the balance against the potential significant adverse noise effects..

With reference to section 3 of my report, there is a clear inconsistency between the Environmental Statement and the Outline CEMP in respect of night-time HDD works;

‘[3The EIA identifies that night-time Horizontal Directional Drilling (HDD) activities have the potential to generate significant adverse effects (i.e. above SOAEL) at a number of sensitive

receptors (see ES at para 14.10.14). While such impacts are transient and could be mitigated through temporary measures, the Outline Construction Environmental Management Plan (OCEMP) does not mandate such avoidance and mitigation. The occurrence of significant adverse effects nonetheless engages the requirement under national policy to avoid significant adverse effects on health and quality of life. Paragraph 14.10.19 of the ES describes the identification of the likely significant effects from night-time HDD as “precautionary as it is expected that HDD activities outside of the daytime period would only be required if there is clear and obvious benefit, such as for safety reasons or to avoid daytime disruption to many people”

This statement is conflicted with by the OCEMP, which does not commit to the avoidance of night-time HDD works where possible, or identify the exact circumstances where it may be required. On the contrary, the Construction Method Statement at 1.5.4 states that continuous working (typically 1-2 days) may be required at HDD sites [APP-183]. This implies that night-time HDD operation may be likely to occur at a substantial number of HDD sites.

The applicant should be able identify at this stage within the CEMP; the specific HDD locations where night-time working is required, the justification for such working and the committed mitigation measures to avoid significant adverse noise impacts.

Yours Sincerely
for CLARKE SAUNDERS ASSOCIATES





APPENDIX D

FLOODING/HYDROLOGY COMMENTS ON DEADLINE 1 DOCUMENTS



Comment on Deadline 1 Hydrology Documents

Richard Skeffington

Introduction

1. I am an Emeritus Professor of Geography and Environmental Science at the University of Reading. I have been involved in hydrological research since 1977, first as an environmental scientist in the electrical generation industry working on the effects of acid rain on freshwaters. I returned to academic life in 1999, working on modelling and monitoring freshwaters, and hydrology and climate change. I am a co-author of the standard paper on climate change and the water environment in England and Wales, and co-led the modelling work packages of two large EU-funded projects, EUROLIMPACS and REFRESH, which investigated the predicted effects of climate change on waters across Europe. My publications on hydrological topics have been referenced more than 1000 times. I live adjacent to the Lime Down area. The evidence I have produced is based upon my professional expertise, and is my true and professional opinion.
2. This paper provides my comments on the hydrology documentation provided by the Applicant at Deadline 1.

Appendix 11-1 Flood Risk Assessment Covering Report

3. There have been minimal changes to the FRA Covering Report, save to add the statement that they have had “*regard to*” Wiltshire’s Flood Risk Assessment and SuDS plans. I also note that they have added and subtracted some watercourse crossings.

Appendices 11-2 to 11-8 Individual Site Flood Risk Assessments

4. Minimal changes have been made to the site specific FRAs. Appendix 11-2 (Site A), 11-4 (Site C1), and 11-7 (E1) have a paragraph added referring to the drainage arrangements for substations (qv). Appendix 11-3 (Site B) has a sentence removed that appears to have been accidentally included. There are no significant alterations to 11-5 (Site C2).
5. Appendix 11-6 (Site D) and Appendix 11-8 (Site E2) have more changes, reflecting interactions with the EA. Site D has the largest area of Flood Zones 2 and 3 on the site, in the area upstream of Corston. Paragraphs 2.3.2 to 2.3.28 purport to demonstrate that the equipment would be

safe from flooding and would not decrease floodplain water storage, and would not trap or produce floating debris. However, the statements made are not supported by evidence. While the amendments made in respect of the BESS now provide more detail in respect of the SuDS features which might be used to reduce runoff peaks and ameliorate water quality impacts, their effectiveness will depend on the details of their size and arrangement on the ground. Until this information is available, it is not possible to assess whether they will be adequately functional, especially as they are also vital to the containment of firefighting water in the event of a fire (see Paragraphs 7 to 13 below). Site E2 (11-8) contains identical arguments to Site D about flood safety for equipment and floating debris.

Cable Route Flood Risk Assessment

6. The Cable Route FRA has been updated to address the use of horizontal direct drilling (HDD) to pass underneath watercourses. The detail of the actual techniques used is delegated to the upcoming Construction Environment Management Plan. The flood risks are different from the panel areas as there are no permanent surface structures. The major risk is probably disruption of existing small-scale drainage, e.g. field drains, which are not mentioned but a recognized problem. The updates also do not address possible disturbance of groundwater flow paths.

Firewater Containment Reports

7. There are two new reports on containment of firefighting water after fire incidents: one for the BESS [[REP-1-124](#)] and one for electricity substations [[REP-1-125](#)]. These have been provided to “*provide a single, definitive point of reference for the approach to firewater containment*” for each situation, which is welcome. The BESS report establishes a set of design principles which must be followed. These are (Paragraph 4.2.1):
 - All firefighting water and incident runoff is retained on site during an incident with no uncontrolled discharge.
 - The drainage system transitions automatically to containment mode through isolation of outfalls on activation of the fire alarm, either at a site-wide level or within defined drainage zones, depending on the detailed design.

- Containment is achieved within engineered drainage and storage features designed to provide full containment forming part of the BESS drainage design.
 - The system accommodates firefighting water volumes together with rainfall during the incident.
 - The design does not rely on infiltration or uncontrolled overflow during incident conditions.
 - Retained water is subject to inspection and testing prior to disposal.
 - Provision is made for active management of retained water, including tanker removal where required.
8. While the document purports to address a credible “worst-case scenario”, it once more fails to do so by only modelling a fire within a single container. Such is confirmed by paragraph 3.2.1, *“The credible design scenario adopted for the BESS is a localised fire affecting a single BESS unit or enclosure, requiring emergency service attendance and the application of firefighting water for cooling and fire control.”*
9. The amount of firefighting water calculated is 1900 litres per minute for two hours, which amounts to 228 m³. This is based on the flowrate recommended in the National Fire Chiefs Council Guidance on BESS systems, since reduced to 1500 l min⁻¹ in the 2026 version (Ref 1).
10. The NFCC Guidance provides that the design of the Scheme must be considered in calculating the necessary amount of firefighting water to contain a fire and if it is not possible to have fire hydrants on site (as in this case) then at least 2 hours’ worth of water storage at a flow rate of 25 l s⁻¹ should be supplied. The Applicant has doubled the planned amount of stored water on site to 456 m³ (i.e. 4 hours at the NFCC rate) which they claim is precautionary.
11. The used firefighting water would be stored in the BESS drainage system, which Chapter 11 implies is a lined gravel base under the BESS containers. In the event of a fire, an automatically-activated valve will shut and store the potentially contaminated water until it can be tested, and if necessary be tankered off site for treatment. A new feature is that the storage *“may comprise either a single isolatable drainage system or a zoned system with multiple independently isolatable areas, depending on the final layout and design optimisation”* (Paragraph 4.1.2). The issue then is whether this storage is adequate to retain all the water

from firefighting, but also from rainfall at the time. The design allows for a 1 in 10 year rainfall event. The water storage below the BESS has been sized to accommodate a 1 in 100 AEP + 45% climate change event, so it should comfortably accommodate a 1 in 10 year rainfall event. However, a lot depends on the duration of the 1 in 10 year event, not only of the rainfall itself but for the length of time which it is necessary to store the contaminated water, and how long it takes to contain the fire. Using the value for the impermeable area under the BESS from Chapter 11, Table 2, of 63,715 m², and assuming a 24-hour 1 in 10 year rainfall event of about 40 mm, the total water to be stored from rain would be 2549 m³. If the fire could be contained in 4 hours that would add 456 m³, a total of 3005 m³, a little less than half the available storage of 6494 m³. However, if the fire took 24 hours to contain, the storage volume required would be 5285 m³, which is becoming uncomfortably close to the maximum volume, and if it took 48 hours, then the storage needed would be 8021 m³, more than 1500 m³ greater than the storage available, or even more if it continued to rain. Notably, the BESS fire at Carnegie Rd., Liverpool, in September 2020 took 59 hours to control (3) with only 4 containers at risk.

12. The time taken to tanker contaminated water off site, should it be necessary, should not be underestimated either. The full storage volume of 6494 m³ would require at least 325 trips by 20-tonne lorries to remove. Meanwhile, rain would continue to fill the storage volume. It appears that a storage of 6494 m³ is not very precautionary, and the Applicant needs to supply more details of the assumptions round the duration of the rain event and the time to contain the fire to enable the risks to be assessed.
13. The substation document [\[REP-1-125\]](#) is very similar, except that electricity substations are established technology, and emergency procedures are well-developed. The design scenarios (Paragraph 3.2.1) are: *“a localised fire affecting a single main transformer unit, requiring emergency service attendance and the application of targeted firefighting water or foam, occurring concurrently with a 1 in 10 year rainfall event; and failure of transformer oil containment without fire, where oil detection or equivalent alarm/control arrangements within the bunded enclosure trigger isolation so that released oil is retained at source.”* There are no detailed designs, but essentially the substation components at risk will be surrounded by bunds to retain leaking oil and firefighting fluids. The bunds will normally allow water to escape, but be capable of isolation in the event of an incident. There may be other arrangements such as sumps to retain polluted water. The volume of firefighting fluid is less

of an issue, because transformer fires are normally fought with foam rather than water. However, the composition of the foam is an issue, because they are a major source of PFAS and other “forever chemicals” which can pollute the surface water or groundwater. SLD seek clarity as to the composition of firefighting foam which will be used to fight fires at transformers.

Watercourse Crossing Schedule

14. The Watercourse Crossing Schedule is a new document, Appendix 9-9 [[REP-1-126](#)], which consists of a list of watercourse crossings by cables. The introduction claims that access tracks are also included, but all listed crossings involve cables. There are thirty-five listed in all, four on Main Rivers regulated by the EA and thirty-one on ordinary watercourses regulated by the LLFA. Some are on the main cable route and others in the solar PV sites. The table stipulates whether the crossing will be by HDD or use open cut methods, and there is a poor-quality photograph of each site. The Cable Route cuts across the West-East trend of the Cotswold dip slope which the watercourses mostly follow, hence there are a large number of crossings, but most of the route is near the top of the catchment areas so the watercourses are small.

15. It is regrettable that no map has been completed, as this would enable the ExA and statutory consultees to evaluate the nature of each crossing and whether any have been omitted. I note, for example, that the cable(s) from the 132kV substations for Areas E and D to the main 400 kV substation at Hullavington will need to cross the Gauze Brook somewhere, and no such crossing appears on the list (OW9 is the main cable crossing of the Gauze Brook near Surrendell Farm). The Gauze Brook crossing is the largest river crossing and probably most problematic. It is possible that the Applicant relies on the crossing of a small Gauze Brook tributary listed as SM3, but a look at the map show that this leads to a dead end and that it will not be possible to reach the 400 kV substation without also crossing the Gauze Brook itself.

Water Framework Directive Assessment

16. The Water Framework Directive Assessment [[REP1-095](#)] considers whether the Scheme could lead to deterioration in the Water Framework Directive (WFD) status of surface or groundwater bodies, or hinder the achievement of WFD objectives. The changes proposed are

in response to comments received from the Environment Agency. Though most of the Applicant’s arguments are copied from elsewhere in the ES, there is more detail on some issues. There are however some questionable statements and omissions, noted below.

17. There are six surface water bodies to be considered (Table 1). The Table also shows the approximate percentage of each site which will discharge into each watercourse.

Water Body	Ecological Status	% Site A	% Site B	% Site C	% Site D	% Site E	Cable Route
Luckington Brook	Good	0	0	0	0	0	No
Sherston Avon	Poor	60	70	0	0	0	No
Norton Brook	Good	40	30	90	5	0	No
Gauze Brook	Moderate	0	0	10	95	10	Yes
Rodbourne Brook	Moderate	0	0	0	0	80	Yes
Sutton Benger Brook	Good	0	0	0	0	10	Yes

Table 1: WFD Water Bodies in the Lime Down Area

18. There are 5 Status classifications in the WFD: High, Good, Moderate, Poor, and Bad. The aim is for all bodies to be at least “Good” by 2027, an aim unlikely to be achieved. The Sherston Avon is “Poor” because of excessive macrophyte growth, which is in turn due to excess phosphate and to a lesser extent nitrate. The Applicant claims that nitrate concentrations will reduce because of the elimination of arable farming, but in fact most of the nitrate originates in groundwater and is a legacy of high fertiliser use in the late 20th century. As fertiliser has become more expensive, farmers have become more frugal with it and abandoning arable farming is unlikely to make much difference. Indeed, soil disturbance during site construction is likely to generate a spike in nitrate in rivers and also to increase phosphate input via sediment, which is the main route of import of agricultural phosphate into streams. The remainder of the phosphate comes from sewage works and septic tanks. The Applicant claims that there will be adequate mitigation to prevent sediment transfer into rivers and hence a deterioration in WFD status, but this is based on assertion rather than evidence. In the updated Outline Construction Management Plan [REP1-097], there are now two sentences (in Table 5) listing possible silt-trapping measures, but no detailed plans or recognition that the whole site including the panel areas may be a source of sediment.

19. All the water bodies in the Lime Down area fail on chemical status (2). This is a standard for potentially toxic substances, particularly organic compounds. All six water bodies fail for polybrominated diphenyl ethers, which are flame retardants, and for mercury, derived from largely historic coal combustion. Luckington Brook additionally fails for perfluorooctane sulphonate (PFOS), which was used for firefighting foam and to make fabrics more stain resistant. PFOS is an example of a per- and poly-fluoroalkyl substance (PFAS), a group of substances causing concern over their toxicity, persistence, and effects on humans via drinking water and on aquatic species in rivers. Though all water bodies in England fail for one or other of these substances, the presence of these toxic compounds is putting stress on the local rivers. It is important therefore to obtain commitments from the Applicant that materials used for construction, the solar panels themselves, and materials used during operation such as cleaning fluids are free of these substances, to avoid increasing the environmental burdens.
20. As well as surface water, the WFD covers groundwater. There are two WFD groundwater bodies in the Lime Down area, the one on the western side is the Bristol Avon Forest Marble, and the body on the eastern side is unimaginatively called “South of Malmesbury”. Groundwater has a different classification method to surface water, the Bristol Avon Forest Marble being Good and South of Malmesbury being Poor. The need to meet groundwater objectives generates some discussion of the effects of piling and HDD on groundwater in the document. In Table 7, the Applicant states *“It is acknowledged that trenching, horizontal directional drilling, piling and other construction methods may use contaminants of potential concern which could impact groundwater and GWDTE. However, the use of such (if any) chemicals will be managed through the Outline CEMP [EN010168/APP/7.12] and Outline SRMP [EN010168/APP/7.15] and therefore the embedded mitigation reduces the risk to receptors including the GWDTE and Principal Aquifers. While GWDTE and the underlying Principal Aquifers are regarded as highly sensitive receptors, embedded mitigation reduces the risk of harm to those receptors to low, leading to a potential impact which is not regarded as significant”*. The outline CEMP and SRMP referred to do not contain enough detail to support the statement that “embedded mitigation reduces the risk of harm to low”. In particular, there is no discussion of chemical migration into groundwater and how this is to be mitigated. The limited mitigation described (in Table 5 of the CEMP) concerns the control of silt on the surface. Given the importance of the Principal Aquifer in supplying drinking water to the local

area, and both the Principal and Secondary A aquifers in supporting local river water quality, and that most of the Lime Down area consists of groundwater Source Protection Zones this is a serious omission.

Conclusion

21. Ultimately, the additional documents provided by the Applicant do not alter any of the concerns raised and conclusions reached in the reports I prepared for Deadline 1 (SLD Appendices F1, F2, and F3).

18.05.2026

References

(1) <https://nfcc.org.uk/our-services/building-safety/grid-scale-energy-storage-system-planning-guidance-for-fire-and-rescue-services/>

(2) <https://environment.data.gov.uk/catchment-planning/WaterBody/GB109053027665>

(3) Merseyside Fire and Rescue Service Fire Investigation Report 132-20 Incident Number 018965 Orsted Bess, Carnegie Road 2 February 2022



APPENDIX E

GROUND CONDITIONS AND CONTAMINATION COMMENTS ON DEADLINE 1 DOCUMENTS



Ground Conditions and Contamination and HDD Risks

Richard Skeffington

Introduction

1. I am an Emeritus Professor of Geography and Environmental Science at the University of Reading. I have been involved in hydrological research since 1977, first as an environmental scientist in the electrical generation industry working on the effects of acid rain on freshwaters. I returned to academic life in 1999, working on modelling and monitoring freshwaters, and hydrology and climate change. I am a co-author of the standard paper on climate change and the water environment in England and Wales, and co-led the modelling work packages of two large EU-funded projects, EUROLIMPACS and REFRESH, which investigated the predicted effects of climate change on waters across Europe. My publications on hydrological topics have been referenced more than 1000 times. I live adjacent to the Lime Down area. The evidence I have produced is based upon my professional expertise, and is my true and professional opinion.
2. This paper provides my comments on the ground conditions and contamination documentation provided by the Applicant at Deadline 1.

BESS and Substation Risk Register

3. The Preliminary Geotechnical Risk Register [REP1-128] deals with the geotechnical risks of the BESS and 400 kV substation construction. The biggest risk (labelled “severe”) identified is that the ground is not strong enough to take the weight of the BESS/Substation. A host of other risks are identified, mostly on the basis that nothing is known about the ground conditions, and a site-specific survey is required to assess these risks. On groundwater contamination they identify risks to:

“Contamination of Secondary A and Principal Aquifers. Faulting between the Principal Aquifer and the underlying bedrock could provide a contamination pathway. [presumably this means bedrock underlying the surface but overlying the aquifer]. Pathways could exist through swallow holes if present. Piles will require a piling risk assessment if penetrating into the Chalfield Oolite Formation, the shallowest encounter is 7.5m BGL.”

4. The last phrase means that in a borehole some distance away, the Chalfield Oolite, which is the principal aquifer, was found 7.5 m below ground level, and would thus be penetrated by a 12 m pile. This risk is identified as “minor” without clear explanation. It is noted that a full risk assessment will be provided at a later date.

Cable Route Avoidance Areas

5. The Cable Route Avoidance Areas – Preliminary Geotechnical Risk Register [REP1-129] is written by the same consultants and considers the risks associated with HDD in places where it is planned to be used along the cable route, termed “avoidance areas”. It provides a list of HDD crossings with reference numbers taken from a GIS database which is not publicly available. I have correlated these carefully with the list of watercourse crossings with HDD in Appendix 9-9 [REP-1-126]. In total there are 13 HDD crossings, two of railways, six of watercourses, three purely of roads, and two of roads and watercourses combined. No. 9 is a watercourse crossing which does not feature as an HDD in the watercourse crossing list. The HDD crossings are listed in Table 1 together with the closest distances to residential receptors up to 500 m (from Google Earth). Some of the avoidance areas are quite large, and in this case the closest distance is used.

Avoidance Area Reference Number	Name	Watercourse Crossing No.	Watercourse Crossing Name	Residential Receptors
1	Northern Railway (ELR:SWB)	-	-	Bradfield Manor 450 m. Townlease Farm 250 m.
2	Gauze Brook A	SM3	Tributary of Gauze Brook	West Park Farm 400 m
3	The Street	-	-	Grittleton Village Hall 100m. Most of Grittleton within 100-500m. Grittleton House 450m.
4	Neeld Court	-	-	Foscote House 400m. A number of houses in Foscote, 400-500m

5	M4	-	-	Sevington Village 300-500m.
6	A420	OW6	-	Ivy House, 20m. Residence to SE, 100m. 2 farms to NE 350m
7	Pudding Brook	OW4	Tributary of the Pudding Brook	Stowell Farm Shop 500m
8	A4 and Pudding Brook	SM2	Pudding Brook	Large farm and 3 residences within 250 m
9	Tributary to Avon at Easton	-	-	Thingley Court Farm 50 m, Thingley Farm 100m, several residences in Easton within 400m
10	Southern Railway (ELR:MLN1)	-	-	As above + Ladbroke Lane Cemetery 500 m.
11	Tributary to Avon at Corston	SM1	Byde Mill Brook	Corsham housing estate 450m
12	Rodbourne Brook	SM4	Gabriel's Well	Farm buildings c. 500 m
13	Gauze Brook B	OW9	Gauze Brook	Surrendell Farm 250m, Surrendell Cottage 500m

Table 1: List of HDD crossings from the Risk Register and Watercourse Crossing Register

6. The closest residences are at the A420 crossing (No. 6) and Thingley (Nos 9 and 10), the most people within 500 m affected are in Grittleton. As I pointed out in my Deadline 2 hydrology/flooding comments, Crossing 2 in the watercourse crossing list does not actually cross the Gauze Brook, but the avoidance area in the database is quite large and does include the Gauze Brook.

7. The document goes on to list the geotechnical risks. The highest risks are associated with drilling in the Gauze Brook and A4 Pudding Brook crossings, where the ground may not be strong enough to resist drilling fluid pressure. It is not acknowledged that this could potentially lead to contamination of the watercourses with drilling fluid. The railways, M4, Gauze Brook and Rodbourne Brook crossings are listed as potentially modifying groundwater regimes leading to slippage and ground instability.

8. Some of the boreholes close to the avoidance areas show the principal aquifer, the Chalfield Oolite, close enough to the surface to be intercepted by HDD. The borehole sections appear in Appendix A. One borehole at The Street, Grittleton, shows the aquifer only 3m from the surface, another at Neeld Court is 8 m from the surface, and another at Crossing 9, 3 m from the surface. In all these cases the overlying rock is the Forest Marble, which may have fissures. Most of the avoidance areas do not have adjacent boreholes, so the distance to the aquifer is unknown. All this indicates a high risk of HDD contamination of the principal aquifer

Mining Risk Technical Memorandum

9. The Cable Route Corridor Mining Risk – Technical Memorandum [REP1-130] is also written by Geosyntech Consultants. It is a follow-up to the Mining Risk Assessment [APP-257], and focusses on an extensive area of freestone mining between Gastard and Whitley, where the Cable Route approaches the Melksham substation. The workings are shallow and quite extensive.
10. The identified risks focus on those to the Applicant's equipment and materials (as opposed to the environment). For example, a risk is identified of catastrophic collapse of the surface under the cable during or after construction. It ought to be acknowledged that this could also have an impact on nearby houses. The consultant's advice is to route the cable round known mining features where possible, and where it is not then investigation will be needed, possibly followed by remediation. From the maps supplied, it seems unlikely that the cable will be able to avoid known mines completely.

Note on Heat Generated from Cables

11. Stop Lime Down raised the issue of heat generated from the cables in our RR. The Applicant's response was [PDA-009], SLD088: *"The agricultural soil profile is considered to extend to approximately 1.2 metres, and therefore the cables would be installed beneath the root zone of common agricultural crops. As a result, no additional drought stress to crops from cable heat is anticipated."* This is incorrect. Heat generated by the cables will disperse down a temperature gradient facilitated by the cable being surrounded by cement-bound sand provided for the purpose. Unless there is a strong groundwater flow, the overwhelming direction of heat dispersal will be upwards into the atmosphere. Downward dispersal is poor, which is why National Grid avoid burying cables too deeply. The heat will therefore pass

through the root zone of anything growing on the surface and into the atmosphere. The issue is not so much that the root zone will get hot, but that the heat will evaporate water and dry the soil out. In a dry summer, the ground above the cable will dry first due to this additional heat flux. Under drought conditions, any crop above the cable may not survive.

12. The problem with predicting these effects is that there is not much experience with the cross-linked polyethylene (XLPE) cables which are to be used, at least at very high voltages in the UK. The vast majority of National Grid's high voltage underground cables are fluid-filled cables, in which a coolant is pumped along the cable and about every kilometre there is a heat exchanger which disperses the heat to the atmosphere. The XLPE cables have to disperse the heat underground along the cable length, and hence they are certain to warm the ground more than fluid-filled cables. They have the environmental advantage that there is no risk to groundwater of leakage of coolant fluid. The cable can be conceived as a large, but not very hot, underground electric fire. The cables are normally rated to run at 90°C, but this is a maximum and the actual temperature will be determined by power flows and the choice of cable size. Hence effects are very difficult to predict, but could be substantial.



APPENDIX F

OPEN LETTER FROM DESNZ AND OFGEM ON CONNECTIONS REFORM DELIVERY





Department for
Energy Security
& Net Zero

Ofgem

Correspondence

Open letter from DESNZ and Ofgem on connections reform delivery

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Dear colleagues,

Thank you for your continued engagement as we progress connections reform. Connections reform is a critical enabler for our clean power by 2030 ambition which is expected to bring forward £200 billion of investment in network and project build by 2030.

Under the new process, 221 gigawatts (GW) of projects that applied for firm connection agreements but were not needed for 2035, or were no longer progressing, have been moved out of the main queue. Alongside this, many projects self-selected into Gate 1, meaning the total capacity filtered out is even higher. This has created a clearer and more credible pipeline for clean power delivery. Current queue outcomes indicate that most technologies have sufficient capacity in the prioritised (Gate 2 / Phase 1) queue to meet 2030 ranges.

The programme has, however, faced significant delays due to data errors in historic connection agreements, and the need for NESO and network companies to rework network studies and planning. We have been clear that further slippage is not acceptable and have set expectations for a firm, coordinated response. This includes regular public reporting against the revised timetable so industry can track progress. We continue to work closely with NESO and the network companies to oversee delivery, using refreshed and enhanced governance. At this pivotal stage in the reform process, as projects begin receiving connection offers, proactive and timely communication between network companies, NESO and developers is essential to identify and escalate any issues.

The queue formation outcomes also highlight emerging risks for certain technologies, in particular, a high volume of battery storage projects advancing to Gate 2 relative to the capacity ranges set out in the Clean Power 2030 Action Plan. The government and Ofgem strongly support the deployment of electricity storage, which plays a crucial role in allowing the clean, low-cost energy generated by renewables to be used more efficiently over time, thereby reducing the reliance of the power system on unabated gas. We remain committed, as set out in the 2025 Clean Flexibility Roadmap, to maintaining a market environment that supports the deployment of 23-27 GW of grid-scale batteries by 2030, and welcome the sector's work to bring forward so many mature projects. Although the reform process removed many non-viable battery projects and significantly reduced the queue, there is still 14.8 GW above the top of the Action Plan battery capacity range for 2030 and 61.7 GW above the projected battery system need in 2035.

This outcome has been driven by the number of 'protection' measures in the connections methodologies for well-advanced projects, such as those with planning consent, Capacity Market agreements, or near-term connection expectations. The protection measures included in the reforms were introduced to provide fairness for developers and to seek to maintain

investability of near-term projects. But we recognise that the effect of these protections, coupled with the speed with which battery technologies can typically secure planning consents relative to other technologies, has resulted in a materially higher level of battery progression to Gate 2 than anticipated.

We are working closely with NESO and the network companies, as well as engaging with project developers, to understand the effects of the battery surplus, as part of our broader commitment to ensuring the reforms minimise costs for consumers and support the timely issuance of high-quality, robust connection offers for all technologies in delivering our clean power and growth missions.

Our shared objective is to ensure that the connections process remains fair, robust and aligned to strategic needs, while safeguarding investor confidence and protecting the interests of consumers. We will continue to monitor the impact of the battery connection surplus on this objective and are considering options to safeguard the delivery of the connections process should significant risks be uncovered. As a first step, we have been engaging with network companies on practical mitigations, such as expanding the use of bay-sharing, and are supportive of steps that can help manage the effects of the surplus while maintaining a fair and efficient process.

Given battery projects operate under a merchant business model without a dedicated support scheme, we recognise that some projects will likely leave the queue, and we note that some industry parties are already proposing measures via the code modification process to encourage this “attrition” through an additional financial measure, and that this modification proposal has now been granted urgency. It will be important to ensure that non-viable projects leave the queue before the network companies have committed significant capital expenditure, both for their connection and for any wider network reinforcement, and in good time to allow their capacity to be reallocated at the next connections window. The later non-viable projects leave the queue, the greater the risk of driving unnecessary network redesign, risking knock-on impacts for other projects, and increasing costs for bill-payers. We therefore encourage project developers to review the viability of their project’s business case and to respond to their offer accordingly in a timely fashion.

We equally wish to reiterate our expectation that Gate 2 offers will be issued accurately, enabling developers to reach final investment decisions swiftly and supporting a credible pipeline for 2030 and beyond. Once offers are issued, we expect network companies to take a pragmatic approach to network build in delivering connections, reflecting the current surplus and likely attrition, and to assess funding commitments accordingly.

We note that NESO’s annual consultation on its connections methodologies sets out the possibility for the disapplication of protections under clauses 3a

and 3b, such that only battery projects that have secured a revenue support scheme would be eligible in the next window. This would address further oversupply in future windows, as it is expected that an additional 8 to 20 GW of battery projects currently in Gate 1 could qualify for a Gate 2 offer. We also recognise that some Gate 1 battery projects may secure LDES Cap and Floor agreements, which would make them priorities for connection by 2030 to support delivery of Clean Power 2030 ambitions.

The consultation invites wider views on whether further steps should be taken to address the surplus of battery projects. We encourage all stakeholders to respond with their perspectives.

Both government and Ofgem remain committed to ensuring that the connections process is delivered efficiently and in a way that supports strategic priorities and maintains investor confidence. We will continue to work closely with all parties to monitor the impacts of the current battery connection surplus and to consider potential actions needed to support this process.

Thank you once again for your continued collaboration and commitment as we work together to ensure the connections process remains aligned with our collective ambition to deliver Clean Power 2030.

Minister Shanks

Akshay Kaul



OGI

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