



Application by Lime Down Solar Park Limited for the Lime Down Solar Project

The Examining Authority's first written questions and requests for information (ExQ1) - Issued on Friday 29 May 2026

This document sets out the Examining Authority's (ExA's) First Written Questions and requests for information (ExQ1). If necessary, the examination timetable enables the ExA to issue a further round of written questions. If this is done, the further round of questions will be referred to as ExQ2.

Questions are set out using an issues-based framework derived from the initial assessment of principal issues provided at **Annex C** to the Rule 6 Letter, dated 9 February 2026. Questions have been informed by the relevant policies, the application documents, interested party and affected persons written and oral submissions, and the ExA's unaccompanied site inspections.

Each question has a unique reference number which starts with an alphabetical code and then has an issue number and a question number. For example, the first question on Air Quality is identified as AQ1.1. When you are answering a question, please start your answer by quoting the unique reference number, for example 'ExQ1 AQ1.1'.

Column 2 of the table indicates which interested parties (IPs) or other persons each question is directed to. The ExA would be grateful if all persons named could answer all questions directed to them, providing a substantive response, or indicating that the question is not relevant to them for a reason. This does not prevent any person or organisation from answering a question which is not directed to them if the question is relevant to their interests.

You should respond to the questions by using the [Have your say](#) function on the project page of the National Infrastructure website and selecting 'Responses to Examining Authority's First Written Questions (ExQ1)' when asked. If you are responding to a small number of questions, you can submit your answers by choosing 'Make a comment' and inputting your answers into the 'Your comments' box. If you are answering a larger number of questions, you should download a copy of the [Microsoft Word](#) version of the document, enter your answers into the Word version and save the document using an appropriate file name. You can then submit the completed document by selecting 'Upload files'.

Responses are due by Deadline 3, Monday 15 June 2026



ABBREVIATIONS USED

AEP	Annual Exceedance Probability	FLL	functionally linked land
BESS	battery energy storage system	FTE	full time equivalent
BMV	best and most versatile	GHG	greenhouse gas
BNG	biodiversity net gain	ha	hectare
BoR	Book of Reference	HER	Historic Environment Record
CA	compulsory acquisition	HGV	Heavy Goods Vehicle
CAWS	Community Action: Whitley and Shaw	HIA	Highway Improvement Area
CNL	Cotswold National Landscape	HRA	Habitats Regulation Assessment
CNLB	Cotswold National Landscape Board	IP/ IPs	Interested Party/ Interested Parties
CRC	cable route corridor	ISEP	Institute of Sustainability and Environment Professionals
D1/D1A	deadline 1/ deadline 1A (etc)	km	kilometre
dB	Decibel	kV	kilovolt
DCO	Development Consent Order	kWh	kilowatt hour
dDCO	draft Development Consent Order	LCA	Landscape Character Area
DEFRA	Department for Environment and Rural Affairs	LCT	Landscape Character Type
EA	Environment Agency	LFP	Lithium Iron Phosphate
ECoW	Ecological Clerk of Works	LIR	Local Impact Report
EIA	Environmental Impact Assessment	LLFA	lead local flood authority
EM	Explanatory Memorandum	LOAEL	Lowest Observable Adverse Effect Level
ES	Environmental Statement	m	metre
EU	European Union	MW	megawatt
ExA	Examining Authority	MWh	megawatt hour



NESO	National Energy System Operator	RR/ RRs	Relevant Representation/ Relevant Representations
NMU	non-motorised user	RVAA	Residential Visual Amenity Assessment
NPA 2017	Neighbourhood Planning Act 2017	SAC	Special Area of Conservation
NPS	National Policy Statement	SLD	Stop Lime Down
NSIP	Nationally Significant Infrastructure Project	SOAEL	Significant Observed Adverse Effect Level
oBSMP	outline Battery Safety Management Plan	SoCG	statement of common ground
oCEMP	outline Construction Environment Management Plan	SoR	Statement of Reasons
oCTMP	outline Construction Traffic Management Plan	SoS	Secretary of State
oDS	outline Decommissioning Strategy	SUDS	sustainable drainage systems
oEPMS	outline Ecological Protection and Mitigation Strategy	TP	temporary possession
oLEMP	outline Landscape and Ecological Mitigation Plan	TPO	tree preservation order
oOEMP	outline Operational Environmental Management Plan	UK	United Kingdom
oSRMP	outline Soil Resources Management Plan	USI1	Unaccompanied Site Inspection 1
oSSCEP	outline Skills Supply Chain and Employment Plan	USI2	Unaccompanied Site Inspection 2
PMIE	Potential Main Issues for Examination	VAT	Value Added Tax
PPW	permitted preliminary works	WR	written representation
PRoW	Public Rights of Way	yr	Year

Any reference to NPSs in these questions refer to the suite of NPS dated November 2023, and which came into force in January 2024, unless stated otherwise.

The Examination Library

References in these questions set out in square brackets (for example [APP-010]) are to documents catalogued in the [Examination Library](#). The Examination Library will be updated regularly as the Examination progresses.



INDEX

Air Quality and Emissions (AQ)	5
Assessment of Alternatives (ALT)	6
Compulsory Acquisition and Land Rights (CA)	6
Climate Change (CC)	13
Cultural Heritage (CH)	14
Cumulative Effects (CE)	16
Draft Development Consent Order (dDCO)	16
Ecology and Biodiversity (EB)	24
Flood Risk, Hydrology and Water Resources (FHW)	27
General and Cross-Topic Questions (GCT)	32
Habitats Regulations Assessment (HRA)	34
Health and Wellbeing (HW)	34
Landscape and Visual (LV)	35
Land Use, Soils and Food Security (LSF)	40
Noise and Vibration (NV)	43
Resources and Waste Management (RWM)	45
Socio-Economics (SE)	45
Transportation, Traffic and Highway Safety (TT)	47
Other Environmental Matters (OEM)	51

ExQ1	Question to:	Question:
Air Quality and Emissions (AQ)		
AQ1.1	The Applicant Wiltshire Council	<p>Battery Energy Storage System (BESS) Worst Case Scenario and Plume Modelling</p> <p><u>The Applicant:</u></p> <ol style="list-style-type: none"> 1) The applicant is asked to advise how you have determined the worst-case scenario with respect to a single battery energy storage system (BESS) container catching fire. You are asked to detail how this has been informed and what makes it the worst-case scenario, especially as evidence submitted by IPs (too many to list) would suggest that this underplays the worst-case scenario. Your reply should go beyond that set out in ES Appendix 15-2 [APP-239] 2) What assessments has the applicant carried out to ensure common mode failures do not occur which could lead to multiple containers catching fire simultaneously? Common mode failures could include, but are not limited to, external factors outside the control of the applicant. 3) Can the applicant list all the layers of protection the BESS would have in place to prevent a fire of a single container (and spread to other containers). From a quantitative risk assessment perspective, what assurances and/or numerical evidence can the applicant provide that the likelihood of such a scenario and that of multiple containers catching fire are both at a level low enough that would generally be considered acceptable. 4) Provide further explanation as to why the Lithium Iron Phosphate (LiFePO₄) (known as 'LFP') technology is considered to be a reasonable worst case scenario for the purposes of the plume assessment and outline Battery Safety Management Plan (oBSMP) [REP1-110]. Explain whether, and if so how, the approach to battery safety would differ if a different lithium-ion battery technology was used (such as Lithium-Nickel-Manganese-Cobalt-Oxide). <p><u>Wiltshire Council:</u></p> <ol style="list-style-type: none"> 5) With respect to fire emissions and plume modelling, what is the Council's position regarding acceptance of the applicant's assessment methodology and conclusions, as detailed in [APP-239].
AQ1.2	The Applicant Dorset and Wiltshire Fire and Rescue Service	<p>BESS oBSMP</p> <p><u>The Applicant:</u></p> <ol style="list-style-type: none"> 1) In paragraph 4.1.2 of the oBSMP [REP1-110], it states UL 9540A heat flux data will establish safe distances between BESS enclosures and Energy Storage System equipment, following large scale fire testing, however this is followed by the statement '<i>but will not be conclusive if full propagation of the battery system does not occur in the test</i>'. The applicant is asked to clarify what they mean by this. 2) The oBSMP also sets out the approach to BESS enclosure suppression systems. The applicant is asked to confirm that each enclosure would have its own fire suppression system in place to reduce the potential for fire risk. If not, why not. 3) Given the expected advances in battery technology over the lifespan of the proposed development please confirm that this document would be updated at each phase of battery replacement for review and agreement by all relevant regulatory bodies at the time of the replacement. <p><u>Dorset and Wiltshire Fire and Rescue Service:</u></p> <ol style="list-style-type: none"> 4) The ExA asks the Fire and Rescue service to review the applicant's oBSMP [REP1-110] and confirm it is content with the applicant's approach and the means of managing a thermal runaway event. Additionally, also provide specific comment on the applicant's proposed suppression system approach. Please also confirm whether this document should be updated at each phase of battery replacement to reflect advancements in battery technology.
AQ1.3	The Applicant Dorset and Wiltshire Fire and Rescue Service	<p>BESS Thermal Runaway</p> <p><u>The Applicant:</u></p> <p>The oBSMP [REP1-110] states that the BESS area will contain a minimum of two firefighting water storage units of no less than 228,000 litres in capacity, capable of delivering 1900 litres per minute for 4 hours. Can the applicant advise if the 4 hours of water capacity is modelled on containing a thermal runaway event at a single container or thermal runaway spreading to other, or all 270 containers?</p> <p><u>Dorset and Wiltshire Fire and Rescue Service:</u></p> <ol style="list-style-type: none"> 1) Notwithstanding the applicant's response to the question above, can the Fire and Rescue Service advise where its secondary water source would come from once the on-site water storage units are empty? 2) The Fire and Rescue Service is also asked to provide detail on how many fire appliances it would have available to it at any one time in the likely event of a fire at either a single or multiple containers, and whether it has had any discussions with the applicant and/or local highway authority about emergency access routes to the BESS enclosure.

ExQ1	Question to:	Question:
AQ1.4	The Applicant	<p>BESS - Capacity</p> <p>The Environmental Statement (ES) Chapter 3 Appendix 3-1 [REP1-081] states that the BESS would consist of approximately 270 containers each with a capacity of 5,015 kWh. This would provide a total BESS capacity of 1,354 MWh.</p> <ol style="list-style-type: none"> 1) With the expected advances in technology, provide an estimate of the likely increases in capacity resulting from the replacement of the batteries over the lifetime of the proposed development and what this might mean for the layout of the BESS and the firefighting water storage requirements. 2) As a result of any increased capacity, also confirm that the infrastructure, including substations and cabling, would be sufficient to handle this increase.
AQ1.5	The Applicant Wiltshire Council Natural England	<p>BESS Impacts on Wildlife, Livestock and Pets</p> <p>In the case of a thermal runaway event at the BESS, what effect is this likely to have on animals, including wildlife, livestock and pets? The applicant is specifically asked to include an assessment on horses in its response to take account of the potential effects on equine businesses.</p>
Assessment of Alternatives (ALT)		
ALT1.1	The Applicant	<p>Site Selection Criteria</p> <p>The applicant's Site Selection Assessment Report [APP-185] details a range of initial sites that were considered for a solar farm with a specific search criteria. However, having not identified a suitable and available site within the parameters identified in Stages 1 - 4 the applicant widened the criteria at Stage 5 to include Grade 3 best and most versatile (BMV) agricultural land and land within flood zones 2 and 3 and Stage 6 to include land with a higher gradient. However, it is not clear if these criteria were re-applied to those areas previously considered to ensure a consistent approach.</p> <p>You are asked to explain this apparent lack of consistency in approach to site selection. If necessary, re-apply a consistent approach to all considered sites and update the Site Selection Assessment Report [APP-185], the Planning Statement [APP-267] including Annex C – Sequential and Exception Test, and relevant parts of the ES as appropriate.</p>
ALT1.2	The Applicant	<p>Site Selection – Order Limits</p> <p>In considering the selection of the specific Order limits at Lime Down, it has not been explained how this land was determined – other than a potential landowner willingness. For example, areas of Grade 3a BMV land and land within flood zones 2 and 3 have been included but it is not clear if this is necessary considering the potential land available adjacent to the Order limits.</p> <p>You are asked to explain why areas identified as constraints are included within the Order limits and provide a justification. Could land elsewhere in the immediate vicinity of the Order limits have been used to avoid BMV, areas of flood risk and ecologically sensitive habitats?</p>
ALT1.3	The Applicant	<p>Alternative Battery Technology</p> <p>It is not clear that the applicant has considered alternative battery technology. You are asked to explain why alternative battery technology has not been considered, including those developed and manufactured in the United Kingdom (UK)/European Union (EU) which would have potential benefits such as lowering carbon emissions through transport.</p>
ALT1.4	The Applicant	<p>Panel Array Efficiency</p> <p>Paragraph 2.10.55 of NPS EN-3 states '<i>The installed generating capacity of a solar farm will decline over time in correlation with the reduction in panel array efficiency. There is a range of sources of degradation that developers need to consider when deciding on a solar panel technology to be used. Applicants may account for this by overplanting solar panel arrays.</i>'</p> <p>You are asked:</p> <ol style="list-style-type: none"> 1) How has the reduction in panel array efficiency been considered in the decision of the solar technology to be used? 2) Was overplanting a consideration in relation to alternative site layouts and technologies? If so, provide further details.
Compulsory Acquisition and Land Rights (CA)		
CA1.1	The Applicant	<p>Extent of Order Limits</p> <p>Confirm that all the land within the Order limits is needed for the construction, operation or maintenance of the proposed development and that the Order land only relates to the land or interests required to be compulsorily acquired or temporarily possessed to implement the development. The ExA seeks to be assured that the Order limits are tightly drawn and do not include more land than is necessary for the development, or if such land is identified that is not required, the applicant should seek to remove it from the Order limits.</p>

ExQ1	Question to:	Question:
CA1.2	The Applicant	<p>Funding Statement Q1</p> <p>The funding statement [APP-019] estimates that the cost for the proposed development is approximately £900-950 million, yet it provides no breakdown of costs for the various components, no information on what has informed that estimate, when that estimate was made, and whether and to what extent inflation and other project contingencies have been factored in.</p> <p>The applicant is required to explain further:</p> <ol style="list-style-type: none"> 1) The nature of the expert advice taken in that respect. 2) The basis for and reliability of that estimate. 3) When that estimate was made (cost base). 4) What inflation assumptions have been made (noting construction price inflation is higher than general inflation). <p>Please also confirm that the costs estimate covers all aspects of the project, including preparation costs, construction costs, supervision costs, equipment purchase, installation, commissioning, decommissioning, restoration of land, Value Added Tax (VAT), and land acquisition costs (including potential compensation and blight claims), whilst also specifically identifying the amount that has been ringfenced for land acquisition related costs.</p>
CA1.3	The Applicant	<p>Funding Statement Q2</p> <p>The funding statement [APP-019] notes the applicant's ability to procure the necessary financial resources through its parent company Island Green Power to fund the works. Regulation 3(2) of the Infrastructure Planning (Miscellaneous Prescribed Provisions) Regulations 2010 allows for five years within which any notice to treat must be served, beginning on the date on which the order granting development consent is made. The ExA needs to be satisfied that adequate funding is likely to be available to enable the compulsory acquisition (CA) within the statutory period following the order being made, and that the resource implications of a possible acquisition resulting from a blight notice have been taken account of.</p> <p>The applicant is asked to provide the latest audited accounts or financial statements from the parent company to show that they can fund the scheme and all potential CA costs including potential compensation and/ or blight claims. If not, explain why not and how the ExA can be assured that sufficient funding would be available.</p>
CA1.4	The Applicant	<p>Reasonable Alternatives to Compulsory Acquisition</p> <p>Paragraph 25 of the Department of Communities and Local Government Compulsory Acquisition Guidance¹, states that applicants should seek to acquire land by negotiation wherever practicable. As a general rule, authority to acquire land compulsorily should only be sought as part of an order granting development consent if attempts to acquire by agreement fail.</p> <ol style="list-style-type: none"> 1) How can the ExA be assured that all reasonable alternatives to CA (including modifications to the scheme) have been explored? 2) Set out in summary form, with document references where appropriate, what assessment/comparison has been made of the alternatives to the proposed acquisition of land or interests in each case. 3) Has the applicant offered full access to alternative dispute resolution techniques for those with concerns about the CA of their land or considered other means of involving those affected?
CA1.5	The Applicant	<p>Scope and Purpose of Rights and Powers sought Q1</p> <p>Paragraph 5.6.2 of the Statement of Reasons (SoR) [APP-018] states that Article 20 of the draft Development Consent Order (dDCO) (authority to survey and investigate land) would give the applicant power to enter 'certain land' for the purpose of surveying and testing, yet the article appears to enable the applicant (or any subsequent undertaker) to enter onto <u>any</u> land within or outwith the Order limits. This is quite a broad power, which is seemingly not justified in the SoR, nor the Explanatory Memorandum (EM) [REP1-009].</p> <ol style="list-style-type: none"> 1) While the ExA note that this provision has been included in other made DCOs, why is this broad power specifically required here? 2) In addition, 14 days' notice to landowners who are not regarded as Affected Persons for the purpose of this application does not seem like a reasonable period of time. Provide justification for this short notice period and consider whether this should be extended to 28 days.
CA1.6	The Applicant	<p>Scope and Purpose of Rights and Powers sought Q2</p> <p>Article 20(1) of the draft Development Consent Order (dDCO) [REP1-007] gives the applicant the authority to survey and investigate land including 'archaeological investigations on such land, including the digging of trenches'.</p>

¹ [Planning Act 2008, Guidance related to procedures for the compulsory acquisition of land, DCLG, September 2013](#)

ExQ1	Question to:	Question:
		<p>While the power for the Secretary of State (SoS) to designate, and the requirement to have regard to the Infrastructure Planning (Model Provisions) (England and Wales) Order 2009, have both been removed by the Localism Act 2011, the applicant's EM [REP1-009] states that it is still relevant to note and explain variations made in the dDCO compared to the model provisions. However, the digging of trenches goes beyond the model provisions but this has not been justified.</p> <ol style="list-style-type: none"> 1) The applicant is asked to provide justification for requiring 'the digging of trenches'? 2) Explain what control measures would be in place? 3) Explain whether reinstatement of the land to its previous condition and state is secured, and if so, how is it secured? 4) Clarify whether a time limit applies to 'leaving apparatus on the land' (Article 20(1)(d))?
CA1.7	The Applicant	<p>Scope and Purpose of Rights and Powers sought Q3</p> <p>Articles 20(6), 31(12) and 32(10) of the dDCO [REP1-007] include reference to Section 13 of the Compulsory Purchase Act 1965, which provides an enforcement mechanism (by way of a warrant) where entry onto land is refused. Paragraphs 4.4.8 and 4.5.23 of the EM [REP1-009] states in relation to Articles 20(6) and 31(12), that this is considered necessary so that there is no delay in the implementation of the authorised development, and has precedent in recent solar decisions.</p> <p>Section 13 of the Compulsory Purchase Act 1965 reads as follows:</p> <p><i>'(1) If the acquiring authority are under this Act authorised to enter on and take possession of any land, and the owner or occupier of any of that land, or any other person, refuses to give up possession of it, or hinders the acquiring authority from entering or taking possession of it, the acquiring authority may issue their warrant to</i></p> <p><i>(a) the sheriff, or</i></p> <p><i>(b) the enforcement officer,</i></p> <p><i>to deliver possession of it to the person appointed in the warrant to receive it.</i></p> <p><i>(2) On receipt of the warrant [the person to whom it is issued] shall deliver possession of any such land accordingly.</i></p> <p><i>(3) The costs accruing by reason of the issue and execution of the warrant, to be settled by [the person executing the warrant], shall be paid by the person refusing to give possession, and the amount of those costs shall be deducted and retained by the acquiring authority from the compensation, if any, payable by them to that person.'</i></p> <p>The ExA note that this power is normally exercised by local authorities or statutory undertakers. Therefore, the power to issue a warrant directly to an enforcement officer and then charge the recipient for this, should be justified in more detail, particularly where in the case of Article 20 it might apply to land outwith the Order limits.</p>
CA1.8	The Applicant	<p>Scope and Purpose of Rights and Powers sought Q4</p> <p>Section 5 of the SoR [APP-018] considers the source and scope of the powers set out in the dDCO [REP1-007]. It is stated that land within the Order limits would be subject to a statutory authority to override easements and other rights, and to extinguish private rights upon the appropriation of the land for the purposes of the DCO. This was briefly discussed at Issue Specific Hearing 1, particularly in relation to Article 25 of the dDCO, and the applicant explained that interference would occur only where a private right is incompatible with delivery of the authorised development, in which case compensation would be payable to any person who suffers loss as a result. The applicant added that it is not seeking to extinguish or remove private rights as a matter of course and would not seek to interfere with any right that can coexist with the development.</p> <p>The ExA note that Article 25 was amended at deadline 1 (D1) to include sub-clause 4, as follows:</p> <p><i>'(4) The undertaker may by notice extinguish private rights and restrictive covenants over land subject to compulsory acquisition under this Order—</i></p> <p><i>(a) from the date of acquisition of the land, or of the right, or of the benefit of the restrictive covenant by the undertaker, whether compulsorily or by agreement; or</i></p> <p><i>(b) on the date of entry on the land by the undertaker under section 11(1) (power of entry) of the 1965 Act.'</i></p>

ExQ1	Question to:	Question:
		<p>A justification for this inclusion has not been provided in the EM [REP1-009] and the power seems broader than those sought in Article 25, sub-clauses (1) to (3), which are qualified by whether the private rights or restrictive covenants are inconsistent with powers authorised by other DCO articles. The applicant should explain:</p> <ol style="list-style-type: none"> 1) what sub-clause (4) seeks to achieve; and 2) how it differs from the powers contained in sub clauses (1) to (3), and thus why it is needed.
CA1.9	The Applicant	<p>Scope and Purpose of Rights and Powers sought Q5</p> <p>Article 29 in the dDCO [REP1-007] relates to acquisition of subsoil only.</p> <ol style="list-style-type: none"> 1) What are the conditions/ criteria for identifying acquisition of sub soil only? 2) Should this power be restricted to specific land and identified in a schedule? 3) Is any compensation available to an affected landowner? If not, why not?
CA1.10	The Applicant	<p>Scope and Purpose of Rights and Powers sought Q6</p> <p>Provide detail of what would happen to rights acquired if and when the project, or elements of the project, are decommissioned, and how is this captured in the dDCO?</p>
CA1.11	The Applicant	<p>Temporary Possession Q1</p> <p>Given the parliamentary approval to the temporary possession (TP) regime under the Neighbourhood Planning Act 2017 ('NPA 2017'), which was subject to consultation and debate before being enacted (and which, by virtue of dDCO Article 6(1)(g), the applicant is seeking to disapply), should any provisions relating to notices/counter notices which do not reflect the NPA 2017 proposed regime (not yet in force) be modified to more closely reflect the incoming statutory regime where possible?</p> <p>As examples:</p> <ol style="list-style-type: none"> 1) The notice period that would be required under the NPA 2017 Act is 3 months, substantially longer than the 14 and 28 days required under dDCO Articles 31(3) and 32(3) respectively. Other than prior precedent, what is the justification for only requiring 14 days' and 28 days' notice in this case? 2) Under the NPA 2017, the notice would also have to state the period for which the acquiring authority is to take possession. Should such a requirement be included in this case? If not, why not? 3) Powers of TP are sometimes said to be justified because they are in the interests of landowners, whose land would not then need to be acquired permanently. The NPA 2017 Act provisions include the ability to serve a counter-notice objecting to the proposed TP so that the landowner would have the option to choose whether TP or permanent acquisition was desirable. Should this dDCO make some such provision – whether or not in the form in the NPA 2017?
CA1.12	The Applicant	<p>Temporary Possession Q2</p> <p>Article 31 of the dDCO [REP1-007] allows land specified in Schedule 11 to be temporarily used for the carrying out of the authorised development (under Article 31(1)(a)(i)). It also allows TP of any land in respect of which no notice of entry has been served under section 11 of the 1965 Act² (powers of entry) and no declaration has been made under section 4 of the 1981 Act³ (execution of declaration) (under Article 31(1)(a)(ii)).</p> <p>Pursuant to Article 31(4) the undertaker must return land that it temporarily possesses, no later than one year beginning with the date of final commissioning (unless it has an alternative agreement with the landowner), or in the case of land referred to in Article 31(1)(a)(ii) it has served a notice of entry under section 11 of the 1965 Act or made a declaration under section 4 of the 1981 Act in relation to that land.</p> <p>The ExA is concerned that there is potential for the land to be temporarily possessed for a considerable period of time, noting that many of the purposes for possession listed in Article 31(1)(b) to (f) cover both preliminary works⁴ and construction. In addition, and as discussed at Issue Specific Hearing 1, works could commence but then be delayed due to many factors, such as supply chain issues, meaning that the date of final commissioning could be several years after the land was first possessed. Therefore, what more certainty could be drafted into Article 31 to prevent lengthy TP periods?</p>

² "The 1965 Act" means the Compulsory Purchase Act 1965

³ "The 1981 Act" means the Compulsory Purchase (Vesting Declarations) Act 1981

⁴ See definition of 'permitted preliminary works' in Article 2 (Interpretation) of the dDCO [\[REP1-007\]](#)

ExQ1	Question to:	Question:
CA1.13	The Applicant	<p>Temporary Possession Q3</p> <p>Article 31(1)(b)) of the dDCO [REP1-007] allows the applicant to remove any buildings, structures, agricultural plant and apparatus, electric lines, drainage, fences, debris and vegetation from that land without the requirement to reinstate them when possession of the land is given up (Article 31(5)(a)). The EM [REP1-009] has not provided justification for this power, other than to say that Article 31 has recent precedent in other made solar DCOs.</p> <ol style="list-style-type: none"> 1) Justification should be provided as to why the power is appropriate and proportionate having regard to the potential impacts on Affected Persons. 2) Can the applicant clarify if it has already identified any buildings or drainage infrastructure which requires removal to facilitate construction on land which is subject to TP, and whether the respective Affected Persons have been made aware?
CA1.14	The Applicant	<p>Temporary Possession Q4</p> <p>Article 32 of the dDCO [REP1-007] allows TP of land to be taken of the land at any time during the 'maintenance period', which is a 5 year period after the date of final commissioning, phased for each part of the development or another period to be specified in the landscape and ecological management plan.</p> <ol style="list-style-type: none"> 1) Provide justification for why all the Order land is covered by this article. 2) Article 32(4) states the undertaker may only remain in possession of land under this article for as long as reasonably necessary. Who defines what is 'reasonably necessary'?
CA1.15	The Applicant	<p>Effects upon Individual Affected Persons</p> <p>Section 7.4 of the SoR [APP-018] sets out the applicant's consideration of private loss as a result of CA powers, and states in paragraphs 7.4.6 and 7.4.7 that there is a compelling case in the public interest for the power to compulsorily acquire land and rights over land (together with the imposition of restrictions) and for the power to extinguish, suspend or interfere with private rights to the extent necessary to deliver the development.</p> <ol style="list-style-type: none"> 1) What assessment, if any, has been made of the effect upon individual Affected Persons (including agricultural lessees and tenants) and their private loss that would result from the exercise of CA powers in each case? 2) Explain the level of engagement with individual Affected Persons and how (if at all) that engagement has helped to shape the proposals or enabled the applicant to make changes to designs and layouts to minimise the private loss? 3) How can the ExA be satisfied that any interference with individual private rights is proportionate and necessary?
CA1.16	The Applicant	<p>Accuracy of the Book of Reference, Land Plans and Points of Clarification Q1</p> <p>What assurance and evidence can the applicant provide of the accuracy of the land interests identified as submitted? Also, the applicant should set out what further steps it will be taking to investigate any unknown ownership and rights during the Examination.</p>
CA1.17	Any Affected Person Interested Parties	<p>Accuracy of the Book of Reference, Land Plans and Points of Clarification Q2</p> <p>The Book of Reference (BoR) [REP1-011] identifies on a plot by plot basis, all parties who own or occupy land and/or have an interest in or right over the land affected by the proposal, and/or who may be entitled to make a 'relevant claim', as defined in section 57 of the Planning Act 2008. Are any Affected Persons or Interested Parties aware of any inaccuracies in the BoR, in the SoR [APP-018] or Land Plans [REP1-004]? If so, please set out what these are and provide the correct details.</p>
CA1.18	The Applicant	<p>Land Rights Tracker</p> <p>The ExA note that Category 1 occupiers, lessees and tenants identified within the BoR [REP1-011] have not been included within the Land Rights Tracker [REP1-013] (PDF) and [REP1-246] (spreadsheet)]. The introduction section of the Tracker states that the applicant is requesting such interests are signatories to voluntary agreements being sought with Category 1 owners where required.</p> <p>The ExA is concerned about the lack of information on voluntary agreements with occupiers, lessees and tenants of land plots, as the Tracker seems only to report on the applicant's negotiations with the landowner(s). In addition, for some of the plots where the tracker identifies that an option agreement has been signed with the landowner (and shaded green in column N), agricultural lessees and tenants associated with those plots have submitted objections to the ExA about the project.</p> <ol style="list-style-type: none"> 1) The Land Rights Tracker should therefore be updated to include a Part 3 that identifies all Category 1 occupiers, lessees and tenants and plot numbers and the status of any voluntary agreements with those parties. 2) The ExA requests that the applicant produces a 'contact log' as part of the status of negotiations column in the Land Rights Tracker to enable the ExA to understand the extent and remit for engagement with affected persons. The latter could be provided in a separate status of negotiations schedule if preferred. A useful example can be found in the examination library of London Luton Airport Expansion DCO (REP11-041).

ExQ1	Question to:	Question:																																																												
		<p>3) The applicant should also include a Part 4 to the Land Rights Tracker comprising the information in the table below. This 'overview' table should be updated at each deadline if any changes arise.</p> <table border="1"> <thead> <tr> <th rowspan="2">Land Type</th> <th rowspan="2">Total Area (ha)</th> <th rowspan="2">Total No. of Plots</th> <th colspan="4">Total No. of APs</th> </tr> <tr> <th>Cat 1</th> <th>Cat 2</th> <th>Cat 3</th> <th>Total</th> </tr> </thead> <tbody> <tr> <td>CA of land</td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>CA of rights</td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>Temporary Possession</td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>Crown Land</td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>Stat Undertaker Land</td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>Agricultural Tenancies</td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>Entire Order limits</td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> </tbody> </table>	Land Type	Total Area (ha)	Total No. of Plots	Total No. of APs				Cat 1	Cat 2	Cat 3	Total	CA of land							CA of rights							Temporary Possession							Crown Land							Stat Undertaker Land							Agricultural Tenancies							Entire Order limits						
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CA1.19	The Applicant	<p>Land Parcel 10-006</p> <p>The ExA note that Mrs Susan Hunt has a Category 2 interest in land parcel 10-006 in the BoR [REP1-011].</p> <p>As set out in Mrs Hunt's submissions [RR-4457] and [REP1-241], she is concerned about the lack of engagement from the applicant, particularly with regard to the sensitive topic of the location and potential impact on her deceased husband's ashes.</p> <p>The ExA note that the applicant provided a response to the representations at deadline 2 (D2) in its 'Response to Written Representations' on page 1268 of 1914 [REP2-039], however, it has not clarified that it has directly engaged with Mrs Hunt over her concerns. The ExA requires an update from the applicant with regard to the discussions had and any reassurances given to Mrs Hunt over land parcel 10-006.</p>																																																												
CA1.20	The Applicant	<p>Application Changes and Compulsory Acquisition</p> <p>Does the applicant envisage any changes to the application during the examination which might engage The Infrastructure Planning (Compulsory Acquisition) Regulations 2010?</p>																																																												
CA1.21	Statutory Undertakers	<p>Planning Act 2008</p> <p>If you have not already done so in a relevant representation (RR) or written representation (WR) to date, please set out your position with regards to the tests under s127 and s138 of the Planning Act 2008, as applicable to your respective interests.</p>																																																												
CA1.22	Hawker Farms Ashton Hawker	<p>Plan of Agricultural Landholdings/ Agricultural Tenancies Q1</p> <p>The ExA note your RRs [RR-0431] and [RR-1793] whereby you state that the proposed CA of land that you own, plus an additional approximately 100 acres that you rent, would critically undermine your business model. The ExA would find it helpful if you could submit a plan showing your agricultural landholdings/ tenancies in the context of the local Order limits and indicating the land where the applicant is seeking permanent acquisition, permanent rights or TP. Any other information on how each of the land parcels are used (pastoral, grazing, arable, mixed, agri-environment scheme) and their agricultural land classification, would also be considered a useful submission, along with a summary of negotiations with the applicant to date.</p>																																																												
CA1.23	Richard Tanner Isabel Ross	<p>Plan of Agricultural Landholdings/ Agricultural Tenancies Q2</p> <p>The ExA note your RR [RR-3970] whereby you state that your farm is surrounded by the cable route and eliminates your home pastures during construction, meaning that your rare breed sheep flock would need to be sold due to the loss in grassland, and the equestrian business closed down during construction. The ExA would find it helpful if you could submit a plan showing your agricultural landholdings/ tenancies in the context of the local Order limits and indicating the land where the applicant is seeking permanent acquisition, permanent rights or TP. Any other information on how each of the land parcels are used (pastoral, grazing, arable, mixed, agri-environment scheme) and their agricultural land classification, would also be considered a useful submission, along with a summary of negotiations with the applicant to date.</p>																																																												
CA1.24	Roberts Berry Farm / Cole Family	<p>Plan of Agricultural Landholdings/ Agricultural Tenancies Q3</p> <p>The ExA note your RRs [RR-2028], [RR-3732] and [RR-4027] whereby you collectively state that the proposed cable route bisects your pasture land causing access and grazing issues, and entailing the destruction of historic pasture land and established biomass crop, and the removal of mature trees. The ExA would find it helpful if you could submit a plan showing your agricultural landholdings/ tenancies in the context of the local Order limits and indicating the land</p>																																																												

ExQ1	Question to:	Question:
		where the applicant is seeking permanent acquisition, permanent rights or TP. Any other information on how each of the land parcels are used (pastoral, grazing, arable, mixed, agri-environment scheme) and their agricultural land classification, would also be considered a useful submission, along with a summary of negotiations with the applicant to date.
CA1.25	Manor Farm / Brunt Family:	<p>Plan of Agricultural Landholdings/ Agricultural Tenancies Q4</p> <p>The ExA note your RRs [RR-2517], [RR-2611], [RR-2845] and [RR-2921] whereby you state that your family are deeply concerned about the impact the solar park would have on the future of your farm. The ExA would find it helpful if you could submit a plan showing your agricultural landholdings/ tenancies in the context of the local Order limits and indicating the land where the applicant is seeking permanent acquisition, permanent rights or TP. Any other information on how each of the land parcels are used (pastoral, grazing, arable, mixed, agri-environment scheme) and their agricultural land classification, would also be considered a useful submission, along with a summary of negotiations with the applicant to date.</p>
CA1.26	Matthew Gerard Newman	<p>Plan of Agricultural Landholdings/ Agricultural Tenancies Q5</p> <p>The ExA note your RR [RR-3090] and WR [REP1-228] whereby you state that you will be directly affected by the cable route, it would cut your modest holding in two, leaving you with no access to one half of the farm, thus ending your business and 5 generations of farming. The ExA would find it helpful if you could submit a plan showing your agricultural landholdings/ tenancies in the context of the local Order limits and indicating the land where the applicant is seeking permanent acquisition, permanent rights or TP. Any other information on how each of the land parcels are used (pastoral, grazing, arable, mixed, agri-environment scheme) and their agricultural land classification, would also be considered a useful submission, along with a summary of negotiations with the applicant to date.</p>
CA1.27	Jackie Greenhill Andrew Greenhill	<p>Plan of Agricultural Landholdings/ Agricultural Tenancies Q6</p> <p>The ExA note your RRs [RR-0252] and [RR-1978] whereby you state that you will be losing Grade 2 agricultural fields, which would make it impossible for you to keep farming. The ExA would find it helpful if you could submit a plan showing your agricultural landholdings/ tenancies in the context of the local Order limits and indicating the land where the applicant is seeking permanent acquisition, permanent rights or TP. Any other information on how each of the land parcels are used (pastoral, grazing, arable, mixed, agri-environment scheme) and their agricultural land classification, would also be considered a useful submission, along with a summary of negotiations with the applicant to date.</p>
CA1.28	Bridget Marie Gregory	<p>Plan of Agricultural Landholdings/ Agricultural Tenancies Q7</p> <p>The ExA note your RR [RR-0542] whereby you state that the cable route will pass directly through several fields of your farm, including one only metres from a farm building and slurry lagoon due to be built this spring, which would considerably disrupt your business regarding crops and livestock grazing. The ExA would find it helpful if you could submit a plan showing your agricultural landholdings/ tenancies in the context of the local Order limits (as well as the location of the proposed farm building and slurry lagoon referred to in your representation) and indicating the land where the applicant is seeking permanent acquisition, permanent rights or TP. Any other information on how each of the land parcels are used (pastoral, grazing, arable, mixed, agri-environment scheme) and their agricultural land classification, would also be considered a useful submission, along with a summary of negotiations with the applicant to date.</p>
CA1.29	Clyde Stanley Burgess Claire Burgess	<p>Plan of Agricultural Landholdings/ Agricultural Tenancies Q8</p> <p>The ExA note your RRs [RR-0853] and [RR-0916] whereby you state your concerns about the project directly impacting your ability to grow crops, feed livestock, and earn a living from your land. The ExA would find it helpful if you could submit a plan showing your agricultural landholdings/ tenancies in the context of the local Order limits and indicating the land where the applicant is seeking permanent acquisition, permanent rights or TP. Any other information on how each of the land parcels are used (pastoral, grazing, arable, mixed, agri-environment scheme) and their agricultural land classification, would also be considered a useful submission, along with a summary of negotiations with the applicant to date.</p>
CA1.30	John Baillie	<p>Plan of Agricultural Landholdings/ Agricultural Tenancies Q9</p> <p>The ExA note your RR [RR-2342] whereby you state your concerns about the project impacting upon your field drains, which cross one of the solar fields, and the lack of assurance about how this is going to be addressed. The ExA would find it helpful if you could submit a plan showing your agricultural landholdings/ tenancies in the context of the local Order limits, indicating the location of the field drain(s) in question, and any land where the applicant is seeking permanent acquisition, permanent rights or TP. Any other information on how each of the land parcels are used (pastoral, grazing, arable, mixed, agri-environment scheme) and their agricultural land classification, would also be considered a useful submission, along with a summary of negotiations with the applicant to date.</p>
CA1.31	KMT Farming and Consultancy on behalf of Mr and Mrs Eavis	<p>Agricultural Land Parcel Use and Engagement with the Applicant</p> <p>The ExA note your RR [RR-1963] and your subsequent WR at D1 [REP1-164] which highlights the potential impacts on Mr and Mrs Eavis' farming enterprise as a result of the proposed cable route corridor (CRC). Within your WR you attach a plan showing the extent of the Eavis' farm and the proposed affected</p>

ExQ1	Question to:	Question:
		area. Can you also provide additional information on how each of the land parcels for the whole farm are used (pastoral, grazing, arable, mixed, agri-environment scheme) and a summary of the attempts to engage with the applicant and the current status of negotiations.
CA1.32	Andrew Rowell	<p>Plan of Land/ Property</p> <p>Within your RR [RR-0282] you ask ‘<i>what damage will be done to my land for cable laying. Can I request additional remedial work to be done as part of any agreements.</i>’ The ExA has been unable to identify your name or property within the applicant’s Book of Reference [REP1-011]. The ExA would therefore find it helpful if you could submit a plan showing the location of the land which you refer to, to determine if you are specifically affected by CA of land and/or rights, or TP.</p>
CA1.33	Carter Jonas for Messrs Nicholas The Applicant	<p>Land Use Clarification and Book of Reference Update</p> <p>The ExA note Carter Jonas’ RR [RR-3146] whereby it refers to the applicant’s excessive land requirement over its clients’ land near Melksham Substation. The ExA also notes the comments regarding the applicant’s omission from the BoR of your clients’ Category 1 interest in Plot 16-014.</p> <p><u>Carter Jonas:</u></p> <p>The ExA would find it helpful if Carter Jonas could submit a plan showing its clients’ landholdings/ tenancies in the context of the local Order limits and indicating the land where the applicant is seeking permanent acquisition, permanent rights or TP. Any other information on how each of the land parcels are used (pastoral, grazing, arable, mixed, agri-environment scheme, other) would also be considered a useful submission, along with a summary of negotiations with the applicant to date.</p> <p><u>The Applicant:</u></p> <p>The applicant responded to the RR in [PDA-009] acknowledging the BoR omission, advising it would update the BoR at D1. The ExA has reviewed the updated BoR submitted at D1 [REP1-011] (clean) and [REP1-012] (tracked)] and notes that it has not been amended to include Messrs Nicholas’ land interest in Plot 16-014. The applicant should revisit and rectify this omission, update the Land Rights Tracker accordingly and provide summary of negotiations with Messrs Nicholas or their representatives to date.</p>
Climate Change (CC)		
CC1.1	The Applicant	<p>Carbon Calculation</p> <p>Appendix B of Wiltshire Council’s WR [REP1-138] provides a copy of their commissioned greenhouse gas (GHG) emissions report by the University of Exeter titled ‘GHG emissions at Lime Down Solar Park: Methodology Review by University of Exeter Centre for Energy and the Environment’. Stop Lime Down (SLD) also submitted a review of ES chapter 7 [REP1-182]. These documents raise question marks over the applicant’s own GHG assessment included in [APP-059]. The ExA note that discussions with the Council are underway in relation to climate change as shown in the Statement of Common Ground (SoCG) [REP2-025]. However, the applicant is asked to respond to these reports and the concerns raised by Wiltshire Council in section 11 (pages 48 – 52) of [REP1-138].</p> <p>The applicant is also asked to ensure and confirm that there is no double counting in the assessment and to pay attention to and address the wording of section 5.3 of the NPS EN1 to ensure policy compliance.</p>
CC1.2	The Applicant	<p>Carbon Calculation – Operation, Maintenance and Decommissioning</p> <p>The applicant is asked to confirm that the assessment of GHG emissions contained in ES Chapter 7 [APP-059] considers the manufacture and transportation of replacement parts from China to the site during the operation/maintenance period in addition to the initial construction phase. This should also include details of replacement parts to cater for damage/failure during operation. The applicant is asked to confirm that the figures include the recycling of all relevant parts during replacement and decommissioning.</p> <p>If not, these figures should be updated accordingly or provide a justification for this exclusion.</p>
CC1.3	The Applicant	<p>Carbon Calculation – Panel Types</p> <p>The applicant is asked to confirm that the use of tracker panels has been considered as part of the carbon calculation in ES Chapter 7 [APP-059] as the worst-case scenario.</p> <p>If not, update your figures accordingly.</p>
CC1.4	The Applicant, Wiltshire County Council	<p>Carbon Cost of Subsequent Food Imports</p> <p>Wiltshire Council’s Local Impact Report (LIR) [REP1-137] details that the loss of Best and Most Versatile (BMV) agricultural land associated with the site equates to approximately 5,000 tonnes of crops/year. Over a period of 60 years this equates to some 300,000 tonnes during the operation of the proposed development. This does not include construction, decommissioning or other periods where the land is left fallow because of the development.</p>

ExQ1	Question to:	Question:
		<p><u>The Applicant:</u> You are asked whether replacement food importation should be considered in ES Chapter 7 [APP-059] as it would appear to be additional carbon emissions as a direct result of the development. If so, please provide these additional details. If not, provide an explanation.</p> <p><u>Wiltshire Council:</u> You are asked whether this should be considered in ES Chapter 7 [APP-059]. Please explain your answer and provide reasoning.</p>
CC1.5	The Applicant	<p>Carbon Sequestration You are asked to provide details in the ES where carbon sequestration has been considered and calculated.</p>
CC1.6	The Applicant	<p>Carbon Emissions – Mitigation In consideration of the outline Construction Environment Management Plan (oCEMP) [REP1-096], outline Operational Environmental Management Plan (oOEMP) [REP1-098] and the outline Decommissioning Strategy (oDS) [REP1-100] you are asked to commit to definite measures to reduce carbon emissions resulting from construction, maintenance and decommissioning. For example, using ultralow and/or zero emission vehicles and plant and providing the necessary infrastructure to support their use. The current language is considered too vague in that it only seeks to include measures ‘encouraging’ lower carbon modes of transport, for example. If this is not possible, you should explain why and reference how their approach meets the terms of NPS EN-1 section 5.3.</p>
Cultural Heritage (CH)		
CH1.1	The Applicant	<p>Embedded Mitigation Section 12.9 of ES Chapter 12 [APP-064] describes the embedded mitigation measures that aim to, as far as reasonably practicable, avoid and reduce impact and effects on cultural heritage. Those measures include partial and entire removal of solar PV panels from multiple field parcels. No comprehensive plan of those field parcels is seemingly provided with the cultural heritage assessment (although this would be highly useful), but the ExA assumes that the field parcels shown in ES Figure 4-4 [APP-088] correspond with the field parcels referred to in section 12.9 of ES Chapter 12. Please confirm or provide a relevant plan. Can the applicant explain why the full extent of those panel-free parcels are being retained in the Order limits and for what purpose those fields would be used? For the avoidance of doubt, this question relates to the stated partial removal of proposed solar PV Panels from fields A1, A4, B6, B11, C9, C10, C15, C21, C23, C31, D4, D6, D11 and E1, and entire removal of solar PV panels from fields A8, A11, A12, B1, B12, C1, C2, C3, C4, C6, C8, C13, C16, C20, C24, C25, C26, C27, C28, C35, D9, D10, E5, E7, E8, E9, E10, E16, E22 and E30 as a result of heritage or archaeological sensitivities.</p>
CH1.2	The Applicant Historic England Wiltshire Council	<p>Heritage Visualisations 1 Paragraph 4.5.1 of ES Appendix 12-1 (Heritage Statement) [APP-219] states that heritage visualisations were agreed with Wiltshire Council on January 2024 (Annex E). However, Annex E only provides a list of heritage viewpoints. Can the applicant please direct the ExA to where the visualisations for these viewpoints are provided? If they have not been provided with the application material, then these are to be provided in response to this ExQ. Historic England and Wiltshire Council are also invited to suggest additional visualisations which they consider should be provided by the applicant to assist the examination, and may find the following documents helpful to inform their consideration – ES Figure 8-10 [APP-099] and ES Figure 12-1 [APP-143]. The applicant is subsequently requested to provide the additional visualisations or justification as to why not.</p>
CH1.3	The Applicant	<p>Bradfield Manor Visualisations At D1A the applicant submitted visualisations showing the view of the proposed development from Bradfield Manor [REP1A-014]. The visualisations appear to just highlight the footprint of where solar development would be located. Given the height of the solar PV panels, the applicant is asked whether, at both year 1 and year 15, the existing field pattern would be legible from these views or would the collection of fields where solar PV panels are proposed appear as a single mass of solar development?</p>
CH1.4	The Applicant	<p>Heritage Mitigations Plan Paragraphs 12.9.6 and 12.9.7 of ES Chapter 12 [APP-064] refer to enhanced visual screening and landscaping (including planting of shelter belts and scattered trees for example) to mitigate potential adverse effects upon heritage assets. The applicant refers to these mitigations as Code OFF and LM in Tables 5 to 9 in ES Appendix 12-8 (Cultural Heritage Impact Assessment Tables) [APP-232]. The applicant is requested to provide a set of plans to accompany ES Appendix 12-8 to show where Codes OFF and LM would be applied. The plans should show numbered field parcels to align with the commitments drafted in the oCEMP [REP1-096].</p>

ExQ1	Question to:	Question:
CH1.5	The Applicant	<p>Sensitivity of Receptor</p> <p>Table 12-3 of ES Chapter 12 [APP-064] sets out the sensitivity level for types of heritage assets. In the medium sensitivity category, should the fourth bullet point say '<i>Regionally important archaeological features, sites and areas (as defined in the HER)</i>'? In addition, in the low sensitivity category, should the second bullet say '<i>Non-designated archaeological features and sites of local value, and/ or potential to contribute to local research objectives?</i>' (Bold text is ExA's emphasis)</p>
CH1.6	Historic England Wiltshire Council	<p>Magnitude of Effects</p> <p>Can Historic England and Wiltshire Council confirm if they are satisfied with the applicant's methodology for assessing the impact of the proposed development on heritage assets, particularly the criteria for determining the magnitude of effects, as set out in Table 12-4 of ES Chapter 12 [APP-064]?</p>
CH1.7	The Applicant	<p>Less than Substantial Harm</p> <p>The applicant acknowledges that there is no direct correlation between the level of harm caused to a heritage asset (in NPS terms) and the significance of effects (in EIA terms). In that regard it considers negligible, minor and moderate/minor effects as not significant in Environmental Impact Assessment (EIA) terms. However, the applicant is explicitly asked to confirm if it regards negligible, minor and moderate/minor effects as less than substantial harm in policy terms?</p> <p>The ExA note that caselaw (<i>R.(oao James Hall and Company Limited) v City of Bradford Metropolitan District Council and Co-Operative Group Limited [2019] EWHC 2899 (Admin)</i>) has established that even limited or negligible harm to a heritage asset is enough to fall within the remit of 'less than substantial harm'. The ExA therefore seeks clarification as to how many (if any) heritage assets (and which ones) were scoped out of the heritage assessment because of a judgement that they would only experience negligible, minor and moderate/minor effects.</p>
CH1.8	The Applicant	<p>Impact</p> <p>Paragraph 5.4.2 of ES Appendix 12-1 (Heritage Statement) [APP-219] states that impact is assessed according to different levels, from neutral to beneficial with a range of degrees of harm, from slight to substantial. As detailed in caselaw (<i>R.(oao James Hall and Company Limited) v City of Bradford Metropolitan District Council and Co-Operative Group Limited [2019] EWHC 2899 (Admin)</i>), there are only three gradations of harm in heritage terms. Her Honour Judge Belcher found that there is substantial harm, less than substantial harm and no harm, and that there are no other grades or categories of harm. The ExA therefore requires clarification on the reference to 'slight' harm in paragraph 5.4.2 of ES Appendix 12-1.</p>
CH1.9	The Applicant Historic England Wiltshire Council	<p>Duration of Harm</p> <p>The applicant states that the proposed development has the potential to indirectly impact heritage assets, but any such effects would be reversible following decommissioning of the proposal. The ExA is concerned about the inference that because the proposal has a capped 60 year duration, the ensuing harm to heritage assets is somehow nullified. The issue around whether a 60 year use is 'temporary' cuts across most topic areas, however, specifically for heritage, the ExA requires a clear position from the applicant on the weight they have ascribed to a time capped DCO when assessing the level of harm to heritage assets.</p> <p>Historic England and Wiltshire Council may also wish to comment on this matter.</p>
CH1.10	The Applicant	<p>Heritage Scoping Tables</p> <p>Paragraph 12.7.3 of ES Chapter 12 [APP-064] states that numerous heritage assets and Conservation Areas within the study area were scoped out either due to lack of intervisibility or historical association between the assets and land within the Order limits. The paragraph cross refers the reader to the scoping tables in Appendix 1 of ES Appendix 12-1 (Heritage Statement) [APP-219], however, there is no Appendix 1 within that document. The ExA assumes that the reference in paragraph 12.7.3 of ES Chapter 12 should be to Annexes C and D of ES Appendix 12-1; please confirm and correct the cross referencing error in paragraph 12.7.3.</p>
CH1.11	The Applicant	<p>Construction Phase and Direct Physical Impacts</p> <p>Paragraph 12.8.2 of ES Chapter 12 [APP-064] states that there is potential for swipes, strikes, or vibration from Heavy Goods Vehicle (HGV) and construction traffic to cause direct physical impacts to heritage assets. The applicant is asked to clarify which heritage assets have the potential to be affected by construction traffic on construction traffic routes.</p>
CH1.12	The Applicant	<p>Groundborne Vibration</p> <p>Paragraph 3.5.18 of ES Appendix 12-1 (Heritage Statement) [APP-219] states that groundborne vibration impacts have been scoped out on the basis that the resurfacing of the roadway as part of the scheme would result in a smoother running surface and would therefore reduce any existing vibration impact that may already exist. Can the applicant advise whether this means that vibration impacts on heritage assets from other groundborne activities, such as pile driving, have not been assessed?</p>

ExQ1	Question to:	Question:
CH1.13	The Applicant	<p>Cable Route Corridor Geophysical Survey Update</p> <p>The heritage assessment submitted with the application notes that a complete geophysical survey had not been completed on the entire CRC at the time of submission but that it was expected to be completed in the autumn of 2025. The applicant is required to provide the results in an updated ES Chapter 12 and an updated archaeological mitigation strategy to the ExA, Historic England and Wiltshire Council without further delay.</p>
CH1.14	Wiltshire Council The Applicant	<p>Non-intrusive Construction Methodology</p> <p>Paragraph 12.9.10 of ES Chapter 12 [APP-064] identifies the field parcels where non-intrusive construction methodology is proposed to protect identified buried archaeological remains. However, the paragraph seemingly reserves the right to employ strip, map and sample in those fields instead. This is repeated in paragraph 4.1.1 of ES Appendix 12-6 (Outline Archaeological Mitigation Strategy) [APP-230].</p> <p><u>Wiltshire Council:</u> Wiltshire Council is asked whether their agreement to this potential alternative method should be sought and secured through the Outline Archaeological Mitigation Strategy or the DCO.</p> <p><u>The applicant:</u> If the applicant considers that consultation with and consent of the Local Authority to this potential alternative method is already secured, please direct the ExA to the particular control document or dDCO provision(s) in question.</p>
CH1.15	The Applicant	<p>Draft Development Consent Order - Requirement 12</p> <p>The applicant is asked to explain, with reference to the wording of Requirement 12 in the dDCO [REP1-007], how the relevant planning authority and Historic England would be involved in determining the scope for any subsequent archaeological work and additional mitigation measures in the detailed design, as a result of the archaeological investigation referenced in Requirement 12(1).</p>
CH1.16	Wiltshire Council	<p>Grittleton House</p> <p>The SoCG between the applicant and Wiltshire Council [REP2-025] records that Wiltshire Council considers there may be a need for additional mitigation for Grittleton House in relation to the temporary construction compound and cable route works within its setting. Wiltshire Council is asked to expand on what additional mitigation measures it considers would be necessary.</p>
Cumulative Effects (CE)		
CE1.2	All Local Authorities	<p>List of Cumulative Projects</p> <p>The applicant considered a long list of projects when assessing cumulative effects. Are there any updates or comments regarding any of those applications identified, or have any new applications come to light that are significant enough to require consideration cumulatively with the proposed development?</p> <p>Your response should consider the D1A submission by Community Action: Whitley and Shaw (CAWS) Annex A Energy and Enabling Schemes in Shaw, Whitley and the Wider Melksham Substation Area [REP1A-019]</p>
Draft Development Consent Order (dDCO)		
Questions within this section refer to the dDCO updated at Deadline 1 [REP1-007] (clean version)/ [REP1-008] (tracked version)		
Articles		
DCO1.1	The Applicant	<p>Article 2(1) (Interpretation) Q1</p> <p>Article 2(1) of the dDCO states that 'In this Order -- "the 1980 Act" means the Highways Act 1980(o)'. The footnote (o) does not appear on same page as the citation (page no. 4), rather has fallen onto page no. 5. Please ensure that all footnotes within the dDCO are included on the pages on which they are cited.</p>
DCO1.2	The Applicant	<p>Article 2(1) (Interpretation) Q2</p> <p>A definition of "commercial use" is included within the Interpretations in Article 2, however, there is no subsequent use of the term in the dDCO. Please review and delete from Article 2 if no longer required.</p>
DCO1.3	The Applicant	<p>Article 2(1) (Interpretation) Q3</p> <p>The definition of "maintain" is very broad, such that removal, reconstruction or replacement of the whole of the authorised development could be possible without review of the environmental consequences of those activities. The ExA suggests that the definition is amended as follows with the inserted bold text in subsequent versions of the dDCO:</p>

ExQ1	Question to:	Question:
		<p><i>“maintain” includes inspect, repair, adjust, alter, remove, refurbish, reconstruct, replace and improve any part of, but not remove, reconstruct or replace the whole of the authorised development, and “maintenance” and “maintaining” are to be construed accordingly;</i></p> <p>If the applicant disagrees with this recommended revised definition, it is required to explain why.</p>
DCO1.4	The Applicant	<p>Article 2(1) (Interpretation) Q4</p> <p>The definition provided of “Order land” within Article 2 states <i>‘the land shown coloured pink or blue on the land plan which is required for or is required to facilitate or is incidental to the authorised development and which is within the limits of land to be acquired or used and described in the book of reference.’</i></p> <ol style="list-style-type: none"> 1) Should this definition include land also coloured yellow on the land plan, which relates to temporary use of land and in relation to which it is proposed to temporarily suspend easements, servitudes and other private rights? 2) Could the definition also be simplified as follows (if not, why not): <i>“Order land” means the land shown coloured pink, blue or yellow on the land plans which is within the limits of land to be acquired or used and described in the book of reference;</i>
DCO1.5	The Applicant Wiltshire Council	<p>Article 2(1) (Interpretation) Q6</p> <p>The definition of “permitted preliminary works” (PPW) is a broad list. The ExA understands that PPW sit outside the scope of commencement and could be carried out prior to the discharge of the requirements contained in Schedule 2 of the DCO and the approvals required therein. However, there is no associated control document(s) or DCO requirement to govern the scale and extent of PPW, or how the applicant should report any environmental impacts or potential environmental impacts encountered while carrying out PPW.</p> <p><u>The Applicant:</u></p> <ol style="list-style-type: none"> 1) The ExA refers the applicant to Requirement 4(1) of the A122 (Lower Thames Crossing) DCO 2025, which required preliminary works to be carried out in accordance with a preliminary works environment management plan. [REP9-190] in the Lower Thames Crossing DCO Examination Library provides the final draft version of the preliminary works environment management plan that fed into Requirement 4(1). The ExA asks the applicant whether it would consider taking a similar approach to the Lower Thames Crossing DCO? 2) If not, the applicant is required to explain and justify why PPW seem to be uncontrolled, particularly when they are able to occur anywhere within the Order limits, at any time after the DCO comes into effect, and without any reporting mechanisms to or oversight from a consenting authority, such as Wiltshire Council, the Environment Agency, Natural England or similar. <p><u>Wiltshire Council:</u></p> <p>The Council is asked:</p> <ol style="list-style-type: none"> 1) If the definition of PPW is too widely drawn; 2) Whether greater control over PPW should be included within the dDCO; and if so 3) What information the Council requires to be provided and when (for example during the examination and in a dDCO Requirement or just in a dDCO Requirement for their approval post consent, but prior to any PPW taking place)?
DCO1.6	The Applicant	<p>Article 2(1) (Interpretation) Q7</p> <p>The ExA queries the definition of “public right of way” in Article 2(1), and whether it should be broadened to include any public right of way which is already on the definitive map and which is not extinguished by the Order? The ExA is unclear why the definition as drafted only refers to public rights of way that are added to the definitive map and statement after the making of the Order, particularly when Article 12 for example, relates to temporary closure, restriction or prohibition of use of streets and [existing] public rights of way. In that light, the definition of public right of way in Article 2(1) seems incorrect.</p> <p>The applicant is required to review.</p>
DCO1.7	The Applicant	<p>Article 2(1) (Interpretation) Q8</p> <p>The ExA seeks clarification from the applicant on whether the following terms should be defined in Article 2(1):</p> <ul style="list-style-type: none"> • Boundary treatment (appears in Article 3 and Work Nos. 6, 9, 10, and Schedule 9) • Electrical cables/cabling (appears in Work Nos. 2, 3, 5) • Limits of deviation (appears in Schedule 15, Part 9 - for the protection of drainage authorities, page 202) • Battery energy storage system (Work No. 2)
DCO1.8	The Applicant	<p>Article 5 – Power to Maintain</p> <p>Article 5(3) does not follow best practice. It should be modified to include the underlined words as follows:</p>

ExQ1	Question to:	Question:
		<i>(3) This article does not authorise the carrying out of any works which are likely to give rise to any materially new or materially different effects <u>that have not been assessed</u> in the environmental statement.</i>
DCO1.9	The Applicant	<p>Article 6 – Disapplication and Modification of Legislation Q1</p> <p>The applicant is asked to review the placement and style of the bracketed alphabetised footnotes within the body of the text of Article 6. For example, Article 6(1)(b) states ‘<i>Section 32 (variation of awards)(b) of the Land Drainage Act 1991;</i>’</p> <p>The ExA queries whether the bracketed (b) should be in bold text to indicate it is a footnote, and whether it should be placed after ‘...1991’ instead of after ‘...awards’. There are other occasions where this approach is repeated. The ExA requests that the applicant reviews all footnotes within the entire dDCO to ensure that they are in the correct location and that they are in bold text so that they are distinguishable and not confused with subsections of the various legislative provisions cited.</p>
DCO1.10	The Applicant	<p>Article 6 – Disapplication and Modification of Legislation Q2</p> <p>Paragraphs 4.2.12 to 4.2.19 of the EM [REP1-009] explains that Article 6 disapplies a number of statutory provisions and refers to previous DCOs as precedent justifications for the inclusion of similar powers in the Lime Down dDCO. Nevertheless, the EM provides limited information regarding the reasons for disapplying any of the provisions specified in Article 6(1)(a) to (f) (notably, the Land Drainage Act 1991, the Water Resources Act 1991, the Environmental Permitting (England and Wales) Regulations 2016, and the legislation listed in Schedule 3) or the implications of disapplication.</p> <ol style="list-style-type: none"> 1) The applicant is required to explain and update the EM with the following information: <ul style="list-style-type: none"> • the purpose of the disappplied legislation/statutory provision • the body responsible for the disappplied legislation/statutory provision • an explanation as to the effect of disapplication and whether any protective provisions or requirements are required to prevent any adverse impact arising as a result of disapplying the legislative controls • (by reference to section 120 of and Schedule 5 to the Planning Act 2008) how each disappplied provision constitutes a matter for which provision may be made in the DCO. 2) Can the applicant advise if any (and if so which) of the provisions that it is seeking to disapply would be to facilitate PPW, rather than just construction of the proposed development? 3) Pursuant to s150 of the Planning Act 2008, a DCO may include disapplication provisions only if the relevant body has consented to the inclusion of the provision. You state in paragraph 4.2.16 of the EM that consents are being sought under this section and that this process is detailed in the Consents and Agreements Position Statement. You are requested to refer to such evidence in the Consents and Agreements Position Statement [APP-272] and update the Land Rights Tracker accordingly when consents are confirmed. A final Consents and Agreements Position Statement is required at Deadline 7 of the examination timetable. 4) Where consent is not obtained from relevant body having the power disappplied, what are the implications for the proposed development?
DCO1.11	The Applicant	<p>Article 7 – Defence to proceedings in respect of statutory nuisance Q1</p> <p>Article 7 provides that no person is able to bring statutory nuisance proceedings under the Environmental Protection Act 1990 in respect of noise. Paragraph 4.2.21 of the EM [REP1-009] sets out that there is no statutory nuisance expected as a result of the authorised development.</p> <ol style="list-style-type: none"> 1) Given that statement, can Article 7 be deleted from the dDCO? If not, explain why not. 2) If the applicant considers that Article 7 is still needed, should noise coming from the site be managed through the Requirements?
DCO1.12	The Applicant	<p>Article 7 – Defence to proceedings in respect of statutory nuisance Q2</p> <p>If Article 7 is to be retained, the applicant is requested to review some of the wording in this article, as follows:</p> <ol style="list-style-type: none"> 1) Article 7(1)(a) refers to ‘... <i>the Control of Pollution Act 1974(a).</i>’ Footnote (a) states: ‘1974 c. 40. Sections 61(9) and 65(8) were amended by section 162 of, and paragraph 15 of Schedule 3 to, the Environmental Protection Act 1990 (c. 25). There are other amendments to the 1974 Act which are not relevant to the Order.’ The ExA note that s65 of the Control of Pollution Act 1974 has been repealed. The applicant should refer to extant legislation only. Please review the footnote. 2) Article 7(1)(c) states that ‘<u>the nuisance</u> is a consequence of the use of the authorised development and that it cannot be reasonably avoided.’ The ExA suggests deletion of the underlined words, as they are a repeat of the leading words in the primary paragraph of Article 7(1). 3) Article 7(2) contains superfluous words. The ExA suggests simplified revised drafting as follows:

ExQ1	Question to:	Question:
		- <i>Section 61(9) (prior consent for work on construction sites) of the Control of Pollution Act 1974 does not apply where the consent relates to the use of the premises by the undertaker for purposes of, or in connection with, the construction, maintenance or decommissioning of the authorised development.</i>
DCO1.13	The Applicant Wiltshire Council South Gloucestershire Council	<p>Article 9 – Application of Highway Authority Permit Schemes</p> <p>Article 9(2)(a) provides that conditions attached to a permit cannot amount to a moratoria. A moratoria under sections 58 and 58A of the New Roads and Street Works Act 1991 is where the highways authority can prohibit further road works to the street following ‘substantial road works’ by providing notice to stakeholders. The EM sets out that the intention of this is ‘ensuring that the permit schemes are not an impediment to the delivery of the authorised development’.</p> <p><u>The Applicant:</u> Explain</p> <ol style="list-style-type: none"> 1) What precedent(s) exist for this type of power benefitting the undertaker. 2) If this aim could still be achieved if the powers were limited to use only on certain roads / prior to the date of final commissioning / during decommissioning. 3) Why the applicant needs to apply the appeal process in Schedule 16 of the dDCO, given the imposition of Article 9(2)(b), which already states that a permit may not be granted subject to conditions where compliance with those conditions would constitute a breach of this Order or where the undertaker would be unable to comply with those conditions pursuant to the powers conferred by this Order. <p><u>The Councils:</u> The ExA would welcome the views of the Councils with regard to how they think this Article would work in practice in its currently drafted form, and whether the ExA’s alternative suggestion of restricting the power to use only on certain roads / prior to the date of final commissioning / during decommissioning would be a more suitable outcome.</p>
DCO1.14	The Applicant	<p>Article 10 - Power to alter layout, etc., of streets</p> <p>The power in Article 10 authorises alteration etc. of any street within and beyond the Order limits. The EM [REP1-009] does not explain why both the specific and the general power are needed, and reliance on the use of the same provisions in other DCOs is not sufficient justification.</p> <ol style="list-style-type: none"> 1) The applicant is required to explain why it requires power to alter <u>any</u> street, including ones outside the Order limits, rather than just those streets identified in the relevant schedules (for example Schedule 4 (streets subject to street works)/ Article 8; Schedule 5 (alteration of streets) / Articles 10 and 11; and Schedule 7 (access to works) / Article 14)? 2) Although there is a requirement to obtain the street authority’s consent in Article 10(4), the ExA note that this is subject to the provisions in Article 47 (Procedure in relation to certain approvals etc.), and the deemed consent provision if the consent application is not determined in 6 weeks. The applicant is required to justify the applicability of a deemed consent provision in this instance.
DCO1.15	The Applicant Wiltshire Council South Gloucestershire Council	<p>Article 11 - Construction and maintenance of altered streets</p> <p><u>The Applicant:</u> As construction is set to last at least 2 years, does Article 11(1)(b)(ii) mean that a street altered in the early construction phase would need to be maintained at the Council’s expense for the second year of the construction period and thereafter? On the basis that some (if not all) of the altered streets would continue to be used by construction vehicles for the duration of the construction period (and indeed during the maintenance period), is it not feasible that there is potential for damage or degradation of those streets to occur as a result of construction vehicle usage beyond the period of 12 months from the date the alteration of that street is completed? In that regard the timing of the Council becoming liable for the maintenance and expense of such streets as imposed by Article 11(1)(b)(ii) is required to be justified.</p> <p><u>The Councils:</u> Please comment on whether it would be more reasonable to amend Article 11(1)(b)(i) to require the undertaker to maintain the streets it alters for the entire duration of the construction period and for a subsequent 12 months before the Council becomes responsible for ongoing maintenance.</p>
DCO1.16	The Applicant	<p>Article 12 - Temporary closure, restriction or prohibition of use of streets and public rights of way Q1</p> <p>Article 12(1)(b) authorises the use of motor vehicles on public rights of way (PRoW) and Article 12(1)(c) authorises excluding all pedestrians ‘for any reasonable time’. The ExA note that the EM [REP1-009] at paragraph 4.3.8 explains the need for motor vehicles on PRoW, but it does not cover 12(1)(c).</p> <ol style="list-style-type: none"> 1) The applicant is requested to update the EM to justify the inclusion of Article 12(1)(c).

ExQ1	Question to:	Question:
		2) The applicant is also requested to explain what it means by the words 'for any reasonable time' in Article 12(1), as those words are not defined or qualified. Should the drafting be changed to limit this power?
DCO1.17	The Applicant	<p>Article 12 - Temporary closure, restriction or prohibition of use of streets and public rights of way Q2</p> <p>Article 12(2) provides that the undertaker must 'provide reasonable access for pedestrians going to or from premises abutting a street or public right of way affected by the temporary alteration, diversion, prohibition or, restriction, of a street or public right of way under this article if there would otherwise be no such access.'</p> <p>1) The ExA queries why this provision (where it relates to PRow) is confined to pedestrians only and not other users of PRow, noting that some PRow are also open to cyclists and horse riders?</p> <p>2) The ExA also queries what provisions are in place for people who require vehicular access to/ from a street where there would otherwise be no such access?</p>
DCO1.18	The Applicant	<p>Article 12 - Temporary closure, restriction or prohibition of use of streets and public rights of way Q3</p> <p>Notwithstanding any other precedents, provide justification to demonstrate why the power in Article 12(6) is appropriate and proportionate having regard to the impacts on pedestrians and others of authorising temporary working sites in these streets and PRow.</p>
DCO1.19	The Applicant	<p>Article 13 - Use of private roads</p> <p>The ExA is concerned about the broad power to use any private road within the Order limits (and not just those parcels of land known to be subject to CA where landowners have been informed in advance of the rights to be acquired). The EM [REP1-009] at paragraph 4.3.10 states that the Article creates a power to 'use' a private road for a temporary period that is proportionate to the limited nature of the use. However, there is no explanation of why the private roads cannot be identified and controlled by a Schedule, and nothing restricts the time period of use.</p> <p>1) Can the applicant identify the locations of where this Article may apply?</p> <p>2) Does the Article also need to include an advance notice period to private road owners and users?</p> <p>3) Article 13(3) seems only to cover compensation for road damage, and not disruption to private use. Why is that?</p>
DCO1.20	Wiltshire Council South Gloucestershire Council	<p>Article 16 - Traffic regulation measures</p> <p><u>The Applicant:</u> Can the applicant explain why this Article appears to apply to any road within and outwith the Order limits?</p> <p><u>The Councils:</u> Before exercising the power of Article 16(1), which relates to matters such as varying traffic speed, stopping/ waiting/ loading restrictions, restricting the use of a road and so on, Article 16(5)(b) requires the undertaker to publish its intention to make the provision not less than 7 days beforehand in one or more newspapers circulating in the area in which any road to which the provision relates is situated. The Councils are asked to advise whether the minimum notice publication period of 7 days is sufficient, and whether the notice needs to be extended to digital publication and/or on-site notification?</p>
DCO1.21	The Applicant	<p>Article 17 – Discharge of water</p> <p>Please advise if there is a need to insert an additional provision into this Article to refer to the Schedule 15 (protective provisions) and Part 9 of that Schedule (drainage authorities)? The ExA refers the applicant to Article 18(5) of the Springwell Solar Farm Order 2026 by way of example of the additional provision that is seemingly missing from Article 17 of the dDCO.</p>
DCO1.22	The Applicant	<p>Article 18 – Removal of human remains</p> <p>The applicant's EM [REP1-009] has referred to precedent for this Article in the A303 (Amesbury to Berwick Down) Development Consent Order 2023 and the Cottam Solar Project Order 2024. Nonetheless, in more recent Orders, for example the Mona Offshore Wind Farm Order 2025 and the Springwell Solar Farm Order 2026, the SoS has removed similar articles which would have allowed the Applicant to remove and rebury modern (<100-year-old) remains, on the basis that this provision is to be used only for, and limited to, known and named burial grounds and which contain human remains that are identifiable. The applicant is therefore required to confirm if there are any burial grounds on the site that are known to have been used in the past 100 years, that would justify retention of Article 18?</p>
DCO1.23	The Applicant	<p>Article 19 - Protective works to buildings</p> <p>1) Have any (and how many if so) properties been identified that might fall into the remit of this Article?</p> <p>2) Can the applicant define the term 'emergency' in Article 19(5)?</p>

ExQ1	Question to:	Question:
		<p>3) Does a definition of emergency need to be included in Article 2(1) (Interpretation)?</p> <p>4) Would anything in this Article give a defence to offences committed against the provisions of the Planning (Listed Buildings and Conservation Areas) Act 1990?</p> <p>5) Are the notice periods in Article 19(5) (14 days to serve on owners and occupiers) and Article 19(6) (10 days for owners to serve counter-notice) acceptable? Please justify these time limits.</p>
DCO1.24	The Applicant	<p>Article 37 - Consent to transfer the benefit of the Order</p> <p>1) Because Article 37 is drafted so as to allow any transfer of benefit by the applicant (undertaker) to any other named person or category of person without the need for the SoS's consent, the applicant should provide full justification as to why a transfer to such persons is appropriate. Article 37(2) requires such approval but 37(3) provides narrow circumstances where this approval is not needed.</p> <p>2) Confirm if Article 37 seeks to permit transfer of CA powers and if so, what provisions are required to ensure that the transferee has sufficient funds to meet the compensation costs of acquisition? Should the Article be amended so that such evidence is required under articles 37(3) and (4)?</p> <p>3) Confirm why Work No. 9 is carved out in Article 37(3)(b) where the transfer is to a holding company or subsidiary of the undertaker.</p>
DCO1.25	The Applicant	<p>Article 39 - Planning permission, etc</p> <p>The ExA note the applicant's update to the EM [REP1-009] at D1, which provides further information to justify the inclusion of this Article in the dDCO and notes reference to precedent in London Luton Airport Expansion Development Consent Order 2025 and the A122 (Lower Thames Crossing) Development Consent Order 2025. Nonetheless, equivalent provisions are not included in The Mallard Pass Solar Farm Order 2024, The Longfield Solar Farm Order 2023, The Gate Burton Energy Park Order 2024, The Cottam Solar Project Order 2024, The East Yorkshire Solar Farm Order 2025 or The Heckington Fen Solar Park Order 2025. The SoS also removed similar provisions from The Byers Gill Solar Order 2025, The Mona Offshore Wind Farm Order 2025, The Rampion 2 Offshore Wind Farm Order 2026, and The Springwell Solar Farm Order 2026 in order to ensure compliance with the Supreme Court's judgment in Hillside Parks Ltd v Snowdonia National Park.</p> <p>The Applicant is therefore required to explain how the situation for Lime Down Solar Park is different to those other Orders to justify retention of Article 39 in its current drafting, or in modified drafting.</p>
DCO1.26	The Applicant	<p>Article 40 - Felling or lopping of trees and removal of hedgerows Q1</p> <p>Article 40 includes broad provisions to lop trees and shrubs anywhere 'near' the authorised development, and not just within the order limits or encroaching the order limits.</p> <p>1) Explain what is meant by 'near'.</p> <p>2) Should Article 40(1) be updated to include the following words in bold '...near any part of the authorised development within the Order limits or encroaching upon the Order limits, or cut back its roots'?</p> <p>3) Should Article 40(1) include a requirement to consult/seek agreement from Wiltshire Council for felling, lopping or removing, before it invokes the power?</p>
DCO1.27	The Applicant	<p>Article 40 - Felling or lopping of trees and removal of hedgerows Q2</p> <p>Article 40(4) states that 'the undertaker may, for the purposes of the authorised development or in connection with the authorised development and subject to paragraph (2), remove the hedgerows specified in the table in Part 1 and the table in Part 2 of Schedule 12 (hedgerows to be removed) to the extent set out in the ecological protection and mitigation strategy approved pursuant to requirement 8 in Schedule 2 (requirements).' However, when describing the extent and location of hedgerow removal in Schedule 12, the applicant refers instead to the 'hedgerows plan'.</p> <p>The ExA assumes that this reference should actually be to the Tree Protection Order (TPO) and Hedgerow Plan [APP-011], but in any event, the ExA questions why the extent of hedgerow removal set out in figures within Annex A of the ecological protection and mitigation strategy [REP1-106] cannot simply be shown on the TPO and Hedgerow Plan [APP-011] instead.</p> <p>The ExA considers that there is unnecessary confusion built into the drafting of Article 40(4) and its corresponding Schedule 12, which should be resolved and simplified.</p> <p>In addition, in relation to updating Schedule 12 with the correct plan name, please also re-order the hedgerow ID column into numerical order.</p>
DCO1.28	The Applicant Wiltshire Council	<p>Article 41 - Trees subject to tree preservation orders (TPOs)</p> <p>Article 41 gives deemed consent for the applicant to fell or lop or cut back the roots of any tree that is subject to a tree preservation order in Part 4 of Schedule 12 and shown on the TPO and hedgerow plan, or that is within or overhanging land within the Order limits and the relevant tree preservation order was made after the date of the Lime Down Order.</p> <p><u>The Applicant:</u></p>

ExQ1	Question to:	Question:
		<p>1) There is no Part 4 in Schedule 12. The ExA believes the reference in Article 41 should be to Part 3. Please review and amend accordingly.</p> <p>2) The ExA note that only two TPOs are included in Part 3 – N/TPO8 and N/TPO42. In the TPO and hedgerow plan [APP-011], N/TPO8 is shown as a considerable area covering most of Grittleton. The applicant is requested to confirm that this is correct and provide a copy of the Council's TPO record(s)/ plan(s) for the trees in question. With regard to N/TP042, there are 9 separate areas shown with this reference number in the TPO and hedgerow plan; again the applicant is requested to confirm that this is correct and provide a copy of the Council's TPO record(s)/ plan(s) for the trees in question.</p> <p><u>Wiltshire Council:</u></p> <p>Given the importance of trees subject to TPOs, should the applicant be required to consult/ seek agreement from the Council to fell or lop or cut back the roots of any tree that is subject to a TPO during the maintenance, operation or decommissioning stages?</p> <p>Further, following the submission from the applicant of the relevant TPO records/ plans referred to in Part 3 of Schedule 12 and required by EXQ1 DCO1.28 (2) above, the Council may wish to comment further at D4 on the appropriateness of the deemed consent provisions over these trees/ groups of trees.</p>
DCO1.29	The Applicant	<p>Article 46 - Service of Notices</p> <p>The applicant is requested to justify its approach to Article 46. Service of notices as currently drafted does not require notices to be served through the postal recorded delivery service. Given that some articles within this order require only 14 days' notice to be served and could result in significant human rights implications (such as temporary possession notices), the ExA consider that a more reliable service for the serving of notices should be considered.</p>
Schedule 1 – Authorised Development		
DCO1.30	The Applicant	<p>Work No. 2</p> <p>For the purpose of Work No. 2(h), should the location for the water storage facility for the purposes of firefighting water supply, be identified as above ground or below ground?</p>
DCO1.31	The Applicant	<p>Work No. 3A and No. 3B</p> <p>For these Work Nos. is there a need to include wording, such as concrete piles/ concrete foundation slabs?</p>
DCO1.32	The Applicant	<p>Work No. 6</p> <p>Can the applicant explain what the difference is between 'secondary temporary construction and decommissioning' (Work No. 6(k)) and 'temporary construction and decommissioning' noted in Work No 7?</p>
DCO1.33	The Applicant	<p>Work No. 8A and No. 8B</p> <p>This Work No. relates to creation of accesses for the public highways, visibility splays and works associated with movement of abnormal indivisible loads. Can the applicant clarify if 'remedial work' would also be instigated post construction, during maintenance and post-decommissioning, and whether it needs to be added to the list of works?</p>
DCO1.34	The Applicant	<p>Associated Development</p> <p>A number of the works identified as associated development on page 41 of the dDCO [REP1-007] (clean version) appear to duplicate works already included within the individual Work Nos. For example:</p> <ul style="list-style-type: none"> (a) <i>fencing, gates, boundary treatment and other means of enclosure;</i> (b) <i>bunds, embankments, trenching and swales;</i> (d) <i>surface water drainage systems, storm water attenuation systems including storage basins, oil water separators, including channelling and culverting and works to existing drainage networks;</i> (h) <i>works for the provision of security and monitoring measures such as CCTV columns, lighting columns and lighting, cameras, lightning protection masts, weather stations, storage containers, communication infrastructure, and perimeter fencing;</i> (g) <i>ramps, bridges and other means of access;</i> <p>1) Provide clarification why that is the case.</p> <p>2) Explain why the following words in bold text should not be added to the final paragraph of the associated development section: '...and do not give rise to any materially new or materially different environmental effects to those identified in the environmental statement'.</p>
Schedule 2 – Requirements		

ExQ1	Question to:	Question:
DCO1.35	The Applicant	<p>The use of the word ‘substantially’</p> <p>The ExA note that Requirements 6 to 20 which require approval of detailed documents, employ the phrase ‘<i>must be substantially in accordance with...</i>’ [the outline version of the said document]. The ExA is concerned that inclusion of the word ‘substantially’ provides flexibility that is not justified. The ExA also notes that the Environment Agency has also commented on this issue [REP1-151] in relation to Requirements 6, 11 13, 14 and 20, stating that the inclusion of the word may erode the environmental protections put in place, that the overarching plans provide a large scope for the detail to come later, and the Rochdale envelope applies, such that flexibility is built into the process.</p> <p>Delete the word ‘substantially’ in the wording of Requirements 6 to 20 or provide reason and justification for its inclusion in each of the Requirements.</p>
DCO1.36	The Applicant	<p>Approvals process</p> <p>The ExA note that a large number of Requirements which require submission of documents for approval by the planning authority do not specify that approval is to be provided in writing. Schedule 16 also does not confirm that approvals or refusals are to be provided in writing. The ExA note that Article 47 includes an obligation that any consent, agreement or approval to be validly given, must be given in writing, but specifically excludes this obligation for Requirements. The applicant is asked to explain that exclusion in Article 47.</p> <p>The applicant is also asked to consider making changes to the Requirements and Schedule 16 to specify that all decisions relating to the discharge of Requirements are required to be made in writing, or explain why that is not necessary.</p>
DCO1.37	The Applicant Wiltshire Council	<p>Requirement 5 - Detailed design approval</p> <p><u>The Applicant:</u> Requirement 5 is missing a ‘— (1)’. Please insert at next iteration of the dDCO.</p> <p><u>Both Parties:</u> On the basis that Work Nos 1, 2 and 3 would include some form of fencing, gates, boundary treatment, other means of enclosure, signs, and CCTV and lighting columns, the ExA considers that this detail may need to form part of the detailed design approval, and thus may need to be included as a new sub point 5(1)(h). Both parties are asked to comment on that suggestion.</p> <p>In addition, both parties are asked to comment on whether the following tailpiece in bold text should be added to Requirement 5(2):</p> <p><i>(2) The details submitted must accord with Table 2-1, Table 2-2 and Table 2-3 (as applicable) of the design principles and parameters, and the relevant planning authority must be satisfied that there would be no materially new or materially different environmental effects to those identified in the environmental statement.</i></p>
DCO1.38	The Applicant Wiltshire Council Dorset and Wiltshire Fire and Rescue Service	<p>Requirement 6 - Battery safety management</p> <p>The ExA seeks comment from all parties on whether it is necessary to introduce a review and re-approval mechanism into Requirement 6, so that as technology advances and as batteries are periodically replaced, the Battery Safety Management Plan is updated.</p>
DCO1.39	The Applicant	<p>Requirement 7 - Landscape and ecological management plan</p> <p>The ExA seeks comment on whether it is necessary to include reference to PPW in Requirement 7(1) as noted in bold text as follows:</p> <p><i>7.—(1) No part of the authorised development may commence and no permitted preliminary works comprising site clearance may take place until a written landscape and ecological management plan has been submitted to and approved by the relevant planning authority for that part in consultation with the relevant statutory nature conservation body.</i></p>
DCO1.40	The Applicant	<p>Requirement 8 - Ecological protection and mitigation strategy</p> <p>The ExA seeks comment on whether it is necessary to include reference to PPW in Requirement 8(1) as noted in bold text as follows:</p> <p><i>8.—(1) No part of the authorised development may commence, and no permitted preliminary works comprising site clearance may take place until a written ecological protection and mitigation strategy has been submitted to and approved by the relevant planning authority in consultation with the relevant statutory nature conservation body.</i></p>
DCO1.41	The Applicant	<p>Requirement 9 - Biodiversity net gain</p> <p>The ExA seeks comment on whether it is necessary to include reference to PPW in Requirement 9(1) as noted in bold text as follows:</p>

ExQ1	Question to:	Question:
		<i>9.—(1) No part of the authorised development may commence and no permitted preliminary works comprising site clearance may take place until a biodiversity net gain strategy has been submitted to and approved by the relevant planning authority, in consultation with the relevant statutory nature conservation body</i>
DCO1.42	The Applicant	Requirement 10 - Fencing and other means of enclosure The ExA seeks clarity on whether any permanent fencing would be maintained in good condition and appearance (and at the undertaker's expense) during the operation of the authorised development? If so, wording to that effect should be included in the Requirement. If not, provide clarity and justification on who would be responsible for maintaining the fencing in good condition and appearance?
DCO1.43	The Applicant	Requirement 12 - Archaeology 1) Delete the following symbols [...] around Requirement 12(1). 2) Also, the ExA seeks comment on whether it is necessary to include reference to PPW in Requirement 12(2) as noted in bold text as follows: <i>12 (2) No part of the authorised development may be commenced and no permitted preliminary works comprising intrusive archaeological surveys may take place until a written scheme of investigation for that part has been submitted to and approved by the relevant planning authority.</i>
DCO1.44	The Applicant National Highways	Requirement 15 - Construction traffic management plan Should Requirement 15(3), which requires the relevant planning authority to consult with South Gloucestershire Council and the relevant highway authority before approving the Construction Traffic Management Plan, also include the requirement to consult with National Highways?
DCO1.45	The Applicant	Requirement 16 - Public rights of way and permissive paths The ExA seeks comment on whether it is necessary to include reference to PPW in Requirement 16(1) as noted in bold text as follows: <i>16.—(1) No part of the authorised development may commence and no permitted preliminary works which may affect existing public rights of way may take place until a public rights of way and permissive paths management plan for that part has been submitted to and approved by the relevant planning authority.</i>
DCO1.46	The Applicant	Requirement 17 - Soil management The ExA seeks comment on whether it is necessary to include reference to PPW in Requirement 17(1) as noted in bold text as follows: <i>17.—(1) No part of the authorised development may commence and no permitted preliminary works comprising environmental surveys, geotechnical surveys, intrusive archaeological surveys and other investigations for the purpose of assessing ground conditions, site clearance, remedial work in respect of any contamination or other adverse ground conditions, or diversion and laying of apparatus may take place until a soil resources management plan for that part has been submitted to and approved by the relevant planning authority.</i> The ExA also seeks comment on whether the Requirement needs to be extended to add provision for the submission of a remediation strategy and verification plan prior to commencement of the development or PPW?
DCO1.47	The Applicant Wiltshire Council	Requirement 20 - Decommissioning and restoration NPS EN-3 paragraph 2.10.146 states that <i>'The Secretary of State should ensure that the applicant has put forward outline plans for decommissioning the generating station when no longer in use and restoring the land to a suitable use (taking into account paragraphs 2.10.68 and 2.10.69).'</i> The ExA seeks comment on whether it is necessary for the outline Decommissioning Strategy [REP1-100] to include an outline Restoration Plan.
Ecology and Biodiversity (EB)		
EB1.1	Natural England	Environmental Impact (Agricultural) Regulations Would the land within the solar PV panel areas (Lime Down A – E inclusive), be subject to the EIA (Agricultural) (England) (No. 2) Regulations 2006 post-decommissioning given it would be out of agricultural use for a period of at least 60 years? Should this be the case, you are asked to provide a commentary as to the requirements of the above Regulations and the process the landowners would need to go through to return the land to agricultural use. Furthermore, if the land under the panels is to be grazed by sheep during the operation phase, what might that mean under the terms of the above Regulations should the intention be to return the land to arable farming instead of grazing.
EB1.2	The Applicant Natural England The Environment Agency	Mitigation Hierarchy – CRC ES Chapter 9 [REP1-015] sets out the approach to survey work undertaken in the CRC. The role of the Ecological Clerk of Works (ECoW) is set out in the outline Ecological Protection and Mitigation Strategy (oEPMS) [REP1-106] in terms of construction of both solar PV sites and the CRC. Given the lack of survey work it is not clear what options would be available to the ECoW to re-route the cable route to avoid protected habitats and species.

ExQ1	Question to:	Question:
		<p><u>The applicant:</u> You are asked to set out how, without specific species and habitat surveys, the construction of the cable route would follow the mitigation hierarchy at set out in NPS EN-1. Specifically, you are asked to demonstrate how the cable route would avoid sensitive habitats and species, as opposed to just mitigate any harms.</p> <p><u>Natural England and the Environment Agency:</u> Do either of you have any comment to make on the applicant's approach.</p>
EB1.3	The Applicant	<p>Biodiversity Net Gain Draft DCO [REP1-007] Requirement 9 secures a minimum of 10% Biodiversity Net Gain (BNG), whereas the BNG Assessment [REP1-089] demonstrates 36.10% BNG in respect of habitat units, 12.74% in respect of hedgerow units and 19.89% of watercourse units.</p> <ol style="list-style-type: none"> 1) Explain the reason for the difference between the % figure in Requirement 9 and the BNG assessment. 2) Which of the above figures are relied upon in the assessment of beneficial effects in ES Chapter 9 [APP-061] and the wider planning balance within the Planning Statement [REP1-087]? 3) What weight should the ExA afford to the delivery of a minimum of 10% BNG if that is all that is secured in Requirement 9? 4) What is the highest % BNG that the Applicant is willing to commit to within Requirement 9 of the dDCO? <p>You are also asked to respond to the concerns regarding your BNG metric raised by Wiltshire Council in their D2 submission [REP2-048].</p>
EB1.4	The Applicant Any Affected Person	<p>Agri-Environment Schemes Is the applicant or any Affected Person aware of any agri-environment schemes which may be underway on any land parcel within or adjacent to the Order limits, such as Countryside Stewardship, Landscape Recovery Fund, England Woodland Creation Grant, or other agri-environment schemes, which may be affected by the proposed development? If so, please provide details including a map and commentary on the type of scheme(s), as well as information on whether the farmer would either lose the funding or be in breach of the terms of such funding as a result of the proposed development taking place?</p>
EB1.5	Wiltshire Council Natural England	<p>Bat Surveys In considering the contents of [REP1-218] can each party confirm, or otherwise, that you are content with the applicant's approach to bat surveys. If you are not satisfied, please provide details. If parties are satisfied, please provide comment on how it meets the requirements of the mitigation hierarchy.</p>
EB1.6	The Applicant Wiltshire Wildlife Trust	<p>Bat Behaviour [REP1A-069] suggests that bats are confusing solar PV panels for water and that the panels are acting as sensory traps. You are both asked to comment on this submission.</p>
EB1.7	The Applicant Natural England	<p>Great Crested Newts ES Chapter 9 [REP1-015] states that the District Level Licencing scheme would be entered into to mitigate effects on Great Crested Newts. Both parties are asked to provide an update on this process and submit a copy of the granted license into the examination. Furthermore, both parties are asked to respond to specific concerns raised by Wiltshire Council in their D2 response paragraph 14.5 [REP2-048].</p>
EB1.8	The Applicant Wiltshire Wildlife Trust	<p>Bird Surveys In its LIR [REP1-137] Wiltshire Council comment that given the lack of breeding and wintering bird surveys in the CRC the impact of the cable route construction on birds cannot be fully known.</p> <p><u>The applicant:</u> Explain beyond what has already been submitted how the applicant has have fully considered the potential impact on breeding and wintering birds taking the mitigation hierarchy into account and how this has informed the CRC.</p> <p><u>Wiltshire Wildlife Trust:</u> You are requested to comment on the suitability of the applicant's approach to breeding and wintering birds in the CRC.</p>
EB1.9	The Applicant	<p>American Mink ES Chapter 9 [REP1-015] identifies American Mink in Lime Down E. You are asked to detail the measures you intend to use to prevent/discourage the spread of American Mink.</p>

ExQ1	Question to:	Question:
EB1.10	The Applicant Wiltshire Council	<p>Beavers</p> <p>ES Chapter 9 [REP1-015] comments that beavers are not presently affected by the proposed development but are known to be present in the River Avon catchment area and thus could be affected during the operation, maintenance and decommissioning phases.</p> <p>Both parties are asked to consider whether the presence of beaver in the River Avon catchment means that they could spread towards the site during the 60-year period. If it is feasible or likely, then both parties are asked what this might mean for the proposal and the ecological enhancement measures such as the riparian habitat planting over the lifetime of the development.</p>
EB1.11	The Applicant Natural England	<p>White-Clawed Crayfish</p> <p>Wiltshire Council raise specific concerns over the applicant's approach to white-clawed crayfish in their D2 submission [REP2-048]. In ES Chapter 9 Appendix 9-1 [REP1-083] the applicant has identified suitable habitat for this species at Gauze Brook and Gabriel's Well as well as a number of wet ditches directly connected to these watercourses, thus have assumed their presence.</p> <p><u>The Applicant:</u> You are asked to set out how your approach is consistent with Natural England's standing advice relating to white-clawed crayfish.</p> <p><u>Natural England:</u> Please comment on the applicant's approach, citing the mitigation hierarchy and having consideration for the three new circa 6m wide permanent accesses for culverts proposed across 'wet' ditches at Lime Down D. You are also asked to comment on whether a license would be required.</p>
EB1.12	The Applicant	<p>Security Fencing – Large Mammals</p> <p>ES Chapter 9 [REP1-015] confirms that the security fencing would not include badger gates. Furthermore, the fencing could potentially exclude larger mammals, including brown hare.</p> <p>Has the possibility of badgers digging under fences been considered?</p> <p>Furthermore, the fencing would potentially exclude larger mammals, despite the wording of ES Chapter 9 saying otherwise [REP1-015]. You are asked to detail what measures are proposed to ensure the fencing would allow for the movement of larger mammals and include details of the type of fencing to be employed.</p>
EB1.13	The Applicant Wiltshire Council	<p>Security Fencing – Deer</p> <p>Given that the security fencing would exclude deer species both parties are asked to comment on the effect this is likely to have on unfenced areas of the proposed development, such as ecology mitigation areas. You are both also asked to comment on the potential for an increase in grazing pressures and damage to planting, and if this approach would increase the likelihood of funnelling deer into the PRow and road networks, thereby increasing interaction with users and possibly injury or death.</p>
EB1.14	The Applicant	<p>Field Margins</p> <p>ES Chapter 9 [REP1-015] commits to avoiding works in field margins. However, you also seek to install cabling with inspection chambers in field boundaries as per ES Chapter 3 [APP-055]. You are asked to explain this potential contradiction and how field margins would be protected during construction and decommissioning.</p> <p>Works in field margins would also have the potential to adversely impact on pole cat, dormice and hedgehogs amongst other species. You are asked to explain your approach to avoiding harm and applying the mitigation hierarchy.</p>
EB1.15	The Applicant	<p>Retention of Buildings in the Order Limits</p> <p>ES Chapter 9 [REP1-015] details that buildings with the potential to house bats and/ or birds in the Order limits would be retained. The ExA note, however, that the demolition of buildings and structures as part of site clearance is included in the definition of PPW in Article 2(1) of the dDCO, while Article 31(1)(b) also allows removal of buildings in connection with the construction of the development. Therefore, how can the ExA be confident that buildings with the potential to house bats and/ or birds in the Order limits would be retained, when there is no provision within the dDCO to do so?</p>
EB1.16	The Applicant	<p>Arboriculture – Bincombe Wood</p> <p>During the ExA's Unaccompanied Site Inspection 1 (USI1) [EV4-001] the existing single-track road adjacent Bincombe Wood was observed to be in poor condition. You are asked to detail the full extent of the works you intend to undertake to bring the track to a standard necessary to support the construction, maintenance and decommissioning phases.</p>

ExQ1	Question to:	Question:
		In addition to the above provide a more detailed account of the works to Bincombe Wood to accommodate the construction, maintenance and decommissioning stages including the justification of the necessity of these works and the potential effects these could have. You should also provide details of any alternatives and avoidance measures you considered to entirely avoid adverse effects.
EB1.17	The Applicant	<p>Approach to Hedgerow Removal</p> <p>The ExA asks that the applicant responds to the concerns of Wiltshire Council relating to hedgerows as detailed in its LIR [REP1-137], section 16, pages 135 – 136 inclusive.</p> <p>In responding you are asked to consider the potential for the use of trenchless cable laying techniques to reduce the removal of hedgerows to those strictly necessary. If you cannot commit to the use of trenchless techniques to avoid or reduce harm to hedgerows then the reasoning should be explained with reference to the mitigation hierarchy.</p>
EB1.18	The Applicant Wiltshire Council	<p>Hedgerow Heights and Density</p> <p>ES Chapter 8 [APP-060] details that the applicant intends to allow hedgerows to grow up to 4.5m.</p> <p><u>Both parties:</u> Does this have any potential adverse impact on biodiversity? If so, please provide details.</p> <p><u>Wiltshire Council:</u> Should replacement and new hedgerow planting have a specific density? If so, you are asked to provide details and justification.</p>
EB1.19	The Applicant	<p>Hedgerows – Worst Case Scenario</p> <p>You are asked to provide details of the maximum volume of hedgerows to be lost in a worst-case scenario, this should include the effects of any road widening/ highway improvement works. If this is not possible, please explain why not.</p>
EB1.20	The Applicant	<p>Access Points – Mitigation Measures</p> <p>Works Plan Sheet 9 [REP1-005] shows an access into Works Number 5A(v) via access number 102 [APP-010]. Although this is an existing access it needs to be improved to cater for construction traffic, which would result in the removal of hedgerows, dry stone walling and a mature tree.</p> <p>You are asked to detail what design alternatives were considered to avoid and reduce damage to ecologically important features at this access, for example could access 101 have been used to allow for a turning area into 102 to avoid damage to ecological features? Furthermore, you are asked to detail your approach, with reference to the mitigation hierarchy and providing evidence, to selecting areas for construction compounds and access points generally, including widening and other works, to avoid and minimise damage at these locations to ecologically sensitive features.</p>
Flood Risk, Hydrology and Water Resources (FHW)		
FHW1.1	The Applicant Wiltshire Lead Local Flood Authority (The LLFA)	<p>Policy Compliance - Larger PV Panels</p> <p>Paragraph 2.10.84 of NPS EN-3 (2023) states: <i>'Where a Flood Risk Assessment has been carried out this must be submitted alongside the applicant's ES. This will need to consider the impact of drainage. As solar PV panels will drain to the existing ground, the impact will not, in general, be significant.'</i></p> <p>The ExA note the applicant's need for flexibility leading to the lack of confirmation regarding the type of PV panels to be used. However, the use of larger PV panels, never used in the UK before, introduces uncertainties to their hydrological impact which cannot currently be supported one way or another with evidence on the ground. The applicant's assessment of Hydrology, Flood Risk and Drainage (Chapter 11 of the ES [APP-063] and supporting appendices seem to assume that the hydrological effects of different PV panels would be the same, regardless of panel dimensions. SLD submitted detailed analysis and research regarding surface water redistribution and concentration along the panels, the creation of drip lines, increased kinetic energy of water falling from the panels, potential soil erosion, significant reduction of evaporation and increase of soil moisture [REP1-174], [REP1-175], [REP1-177] and [REP1-183]. This highlights potentially different impacts of larger PV panels which, coupled with the soil's sensitivity to compaction and low permeability, could lead to faster displacement of surface water runoff and potential increase of flood risk on and off site.</p> <p><u>The Applicant:</u> As the ES does not include site specific analysis of the impact of different types of PV panels, the applicant is asked to explain their potential effect to demonstrate that they would not have significant impacts.</p> <p><u>The LLFA:</u> The LLFA is asked to submit comments on the documentation provided by SLD (referenced above).</p>

ExQ1	Question to:	Question:
FHW1.2	The applicant	<p>Policy Compliance - Signposting</p> <p>The ExA note the contents of ES Volume 3, Appendix 5-1 National Policy Statement Requirements [APP-186]. However, SLD's submission [REP1-174] includes a list of flood risk assessment requirements in pages 20-23. The applicant is asked to provide a detailed response to this table, but if the information is already contained within the application documents, please signpost the ExA to the specific relevant part of the documents, rather than just cite the document reference.</p>
FHW1.3	The Applicant The LLFA	<p>Flood Risk Assessment – Quantification of surface water and SUDS</p> <p>The outline drainage strategies [APP-210 to APP-218] provide no or little quantification of the impact of the proposed development on surface water runoff. This has been consistently raised as a concern by SLD and it is included in the SoCG as under discussion with Wiltshire Council [REP2-025]. The LLFA includes in [REP1A-017] information regarding Section 19 investigations for Whitley and Beanacre. Its conclusions are that flood risk is pathway-driven and catchment-based (rather than limited to mapped fluvial floodplains) and that ditch networks and overland flow routes act as conveyors. The outline drainage strategies do not include mapping of ditch networks or overland flow routes. Furthermore, the proposed development would introduce many impermeable elements (PV panel supports, smaller electrical infrastructure associated with PV panels, substations, BESS area, etc) which could potentially have important cumulative impact if not addressed on each site. The ExA note that the access tracks would be permeable but, due to soil compaction, they could also become impermeable. The applicant proposes to use sustainable drainage systems (SUDS) and current site drainage to reduce surface water runoff to agreed rates. However, NPS EN-1 (paragraph 5.8.15, page 129) clearly requires the Applicant to 'set out (approximately) the existing rates and volumes of surface water run-off generated by the site'.</p> <p>The lack of quantification of the volume of water to be attenuated and lack of information regarding the SUDS to be implemented do not demonstrate that flood risk would not be increased and can be managed.</p> <p>We note the applicant's response to the LIR [REP2-038] and Response to D1A Submissions [REP2-040] which state that existing topography, drainage features, overland flow routes, surface water flood risk and watercourse connectivity across solar PV sites have informed the assessment. However, as outline drainage layouts or mapping of existing drainage features have not been submitted, it remains unclear how SUDS would interact with existing drainage features and other proposed mitigation measures.</p> <p><u>The Applicant is asked to:</u></p> <ol style="list-style-type: none"> 1) Provide a high level calculation of the effect of all impermeable areas for each site, setting out the existing rates and volumes of surface water run-off generated by the site and to provide information regarding the type of SUDS and/or any other drainage features that could be used to drain the site. 2) Provide outline drainage layouts for each site showing potential SUDS connections with existing drainage features and exceedance routing. 3) Include any other information required by NPS EN-1, paragraph 5.8.15, bullet point 11 (i to x). 4) Add all SUDS features to the figures within the Landscape and Ecology Mitigation plans [REP1-029 to REP1-032] and provide an explanation of the multi-use purpose of each SUDS feature and how they contribute to water management and ecology. <p><u>The LLFA:</u></p> <p>The ExA note the LLFA request for further hydraulic modelling in the Council's LIR [REP2-025].</p> <ol style="list-style-type: none"> 5) The LLFA is asked to confirm if the information requested by questions 1 to 4 above would address the key sensitivities listed in paragraph 2.21 of [REP1A-017] and negate the need for further modelling in principle. 6) If the answer is negative, the LLFA is asked to explain why not and what further information is needed considering the need for proportionality. 7) If the answer is affirmative, the LLFA is asked to confirm if this information could be included in the outline management plans secured through the dDCO. If so, the LLFA is asked to explain which management plans and provide the proposed wording changes.
FHW1.4	The Environment Agency The Applicant	<p>Flood Risk Assessment – Flood Zone 3b and Floodplain Impacts.</p> <p>The LLFA considers in Wiltshire Council's LIR [REP1-137] that Flood Zone 3b needs to be defined for effective planning, design and operation of site. The applicant explains in its D2 submission [REP2-045] and response to the LIR [REP2-038] that detailed hydraulic modelling for the Gauze Brook and the Unnamed river has been undertaken at Lime Down D, and that at Lime Down E2 further hydraulic modelling is being progressed in relation to Gabriel's Well to define local flood behaviour, including Flood Zone 3b where relevant. We understand that the details of the modelling are currently with the Environment Agency (EA) for review.</p> <p><u>The Environment Agency:</u></p> <ol style="list-style-type: none"> 1) The EA is asked to explain if there are any concerns regarding the parameters and outputs of the modelling done so far and the modelling being progressed by the applicant for Lime Down D and E2.

ExQ1	Question to:	Question:
		<p>2) The EA is asked to explain if the information submitted by SLD, specifically in document [REP1-176] could support an extension to Flood Zone 3b in Lime Down D and if so, to which fields.</p> <p><u>The Applicant:</u></p> <p>3) The applicant is asked to confirm the freeboard allowances requested by the EA in their document [REP2-049]</p>
FHW1.5	The LLFA The Environment Agency The Applicant	<p>Flood Risk Assessment – Manning Calculations Results</p> <p>Figure 1 (page 10) of SLD’s representation [REP1-174] shows the flows calculated using Manning’s open channel flow formula. It is in section ‘Fluvial Flooding’ which discusses in detail the information submitted in the flood risk assessments submitted by the applicant.</p> <p><u>All Parties:</u></p> <p>1) The LLFA, the EA and the applicant are asked to submit a response to the analysis done by SLD and its conclusions. In your response, please set out the implications for the interaction with surface water flood risk and the potential impact to on site and off site flood risk.</p> <p><u>The Applicant:</u></p> <p>2) Paragraph 25 of the SLD representation refers to inconsistencies/mistakes between references to the 0.1% Annual Exceedance Probability (AEP) and the 1% AEP events in the flood risk assessments. The applicant is asked to review, confirm and address any inconsistencies in the flood risk assessments.</p>
FHW1.6	The LLFA The Environment Agency	<p>Flood Risk Assessment – Cable Route Corridor</p> <p>SLD notes in its submission at D2 [REP2-051] that the main risks regarding disruption to existing small scale drainage and potential disturbances to groundwater flow paths are not addressed. Considering this and the information included in the outline management plans, the LLFA and EA are asked to confirm if they think these issues are sufficiently addressed and if not, explain why not and where it should be addressed.</p>
FHW1.7	The Applicant	<p>Flood Risk Assessment – BESS and substation Fire Scenario</p> <p>The firewater containment and drainage strategies for the BESS [REP1-124] and substation [REP1-125] explain that a design scenario comprising a localised fire combined with a 1 in 10yr rainfall event has been used as a credible basis for defining containment requirements. However, the 1 in 100yr event plus climate change can also be considered credible given the lifetime of the proposed development and to align with the flood risk analysis undertaken. The applicant is asked to set out the different containment requirements using the 1 in 100yr event plus climate change scenario for the BESS and substation. In your response explain the volume of water to be contained, potential impact with drainage or other infrastructure onsite, and other relevant considerations.</p>
FHW1.8	The Applicant	<p>Sequential and Exception Test</p> <p>To pass the Exception Test the applicant should demonstrate that <i>‘the development would provide wider sustainability benefits to the community that outweigh the flood risk;’</i> as per National Planning Policy Framework, paragraph 178.</p> <p>Paragraph 5.2.1 of Annex C included in the Planning Statement [APP-267] refers to examples of wider sustainability benefits including, <i>‘an overall reduction in flood risk to the wider community through the provision of, or financial contribution to, flood risk management infrastructure’</i>. The overall reduction in flood risk is explained in paragraphs 5.2.4 to 5.2.8.</p> <p>1) The applicant is asked to confirm if any provisions of or financial contributions to flood risk management infrastructure have been considered or agreed with Wiltshire Council or Parish Councils (separate from the community benefit scheme mentioned in paragraph 5.2.12 (noting the latter cannot be taken into account in the planning balance)).</p> <p>2) If so, the applicant is asked to provide further information.</p> <p>3) The applicant is asked to revise section ‘An overall reduction in flood risk’ to clarify this point.</p>
FHW1.9	The Applicant	<p>Construction</p> <p>The EA has raised concerns in [REP2-049] regarding the assessment of the flood risk impacts during the construction phase. The EA considers that further assessment is needed to understand and address the impact that the construction phase may have on the floodplain capacity and flow routes. The LLFA highlights in Wiltshire Council’s LIR [REP1-137] the lack of demonstrated pre- and post-construction exceedance flow routing for 1 in 100yr plus climate change event as one of the most significant risks during construction and requests a new requirement (‘Pre-and post-construction exceedance flow routing plan’). The ExA note the applicant’s responses to the LIR [REP2-038].</p> <p>1) The applicant is asked to provide an update on the discussions with the EA and the LLFA on these points.</p> <p>2) If further assessment is needed, the applicant is asked to provide timescales for the assessment.</p>

ExQ1	Question to:	Question:
		3) If no further assessment is required at this stage but would be required before construction starts, the applicant is asked to explain how it would be secured in the dDCO and outline management plans.
FHW1.10	The LLFA The Environment Agency	<p>Operation – Surface Water Run-off Discharge to Watercourses</p> <p>The applicant explains in the outline drainage strategies [APP-210 to APP-218] that surface water would be generally discharged into SUDS and local drainage features which would eventually discharge into local watercourses and main rivers.</p> <p>Given that quantification of the surface water run-off volumes to be discharged is not available at this point, the LLFA and the EA are asked to provide information regarding the ability of the receiving watercourses to receive these discharges without increasing flood risk in the wider catchment.</p>
FHW1.11	The Applicant	<p>Decommissioning</p> <p>There is no information regarding what would happen to the installed SUDS at the end of the proposed development's life. The applicant is asked to confirm if all SUDS would be removed during decommissioning and what would be the measures in place to ensure that flood risk is not increased as a result.</p>
FHW1.12	The Applicant	<p>Flood Risk to Infrastructure – Sites C1 and D</p> <p>Figure 11-3.2 Lime Down C1 Fluvial Flood Risk Map [APP-137] shows the 132kV substation at high risk of surface water flooding in the south area of field C33. The ExA note the need for the substation to be in a central location within the site.</p> <p><u>The Applicant:</u></p> <ol style="list-style-type: none"> 1) The applicant is asked to explain why the substation is located there and not in the north of field C33 or in other field at lower risk of all types of flooding within site C such as C19 which is also close to the cable route corridor. 2) The first bullet point of paragraph 2.4.13 of [APP-213] states '<i>The substation will be sequentially located within Field C33 to avoid obstructing the mapped surface water flow route where feasible (...)</i>'. The applicant is asked to explain the need for the words '<i>where feasible</i>'. If the substation is located where it does not obstruct a surface water flow route, the substation platform would not need to be elevated to allow for freeboard. In your response, please consider the EA's comment 073 in document [REP2-049] regarding the potential need for further assessment and compensatory storage. Please provide an update on the discussions with the EA regarding this point. <p><u>The LLFA:</u></p> <ol style="list-style-type: none"> 3) An ordinary watercourse between fields D22 and D1 is mapped in the flood risk assessment [APP-215] but the analysis suggests low risk of flooding. As this watercourse runs between the potential location of the 400kV substation and the BESS area, the LLFA is asked to confirm the findings of [APP-215] and submit any further relevant information available if not already included in the document.
FHW1.13	The LLFA	<p>Interaction with Future Plans for Gauze Brook Restoration</p> <p>St Paul Malmesbury Without Parish Council in their post hearing submission [REP1A-016] refer to work with Hullavington Partish Council and Wiltshire Council's Flood Resilience officer to alleviate flooding in the Gauze Brook. The ExA note the applicant's response in [REP1A-013] (SS-002, pages 348-349) which explains that the proposed development does not include in-channel works or permanent structures that would prevent future interventions and restoration.</p> <ol style="list-style-type: none"> 1) The LLFA is asked to provide further information regarding the plan's timescales and any other relevant details (outline business plan, design, impact, funding, etc). 2) The LLFA is asked to confirm agreement or otherwise with the applicant's conclusions.
FHW1.14	The Applicant Easton Grey Parish Council	<p>Impact on Existing Water Infrastructure</p> <p>Easton Grey Parish's post hearing submission [REP1A-018] refers to impact from the scheme on the community sewage plant.</p> <p><u>The Applicant:</u></p> <ol style="list-style-type: none"> 1) The applicant is asked to explain if the proposed development could impact on the community sewage plan and if so, how it would be mitigated. <p><u>Easton Grey Parish Council:</u></p> <ol style="list-style-type: none"> 2) Easton Grey Parish Council is asked to explain if there has been any communication with Wessex Water regarding the impact of the development on the sewage plan and if so, to submit the relevant information and correspondence.
FHW1.15	The Applicant	<p>Water Quality</p> <p>The EA raises in its D2 submission [REP2-049] a number of currently unresolved water quality concerns: piling (EA-023), BESS foundation solution (EA-024), suitable mitigation where groundwater may be encountered (EA-027), thermal implications of cables (EA-030), reference to breakout contingency procedure</p>

ExQ1	Question to:	Question:
		<p>in the cable route construction method statement (EA-038), reference to firewater management information in the oOEMP (EZ-046), insufficient water mitigation measures in the oCEMP (EA-070).</p> <p>Wiltshire Council in its LIR [REP1-137] highlights water quality impacts during construction and decommissioning. Several IPs have also raised concerns regarding the potential for pollutants from damaged panels, substations and BESS area (under fire and non-fire conditions) to enter surface water and groundwater, especially in Source Protection Zones.</p> <ol style="list-style-type: none"> 1) The applicant is asked to provide an update on the discussions with the EA and Wiltshire Council and the likelihood of their resolution. 2) The applicant is also asked to set out the mitigation measures secured through the environmental management plans (including the Water Management Plan, referred to in the oCEMP) to ensure effecting monitoring and management of water quality for all sites.
FHW1.16	The Applicant	<p>Water Supply</p> <ol style="list-style-type: none"> 1) From the information submitted, it is not clear if Bristol Water or Wessex Water would supply the water needed for the development. The applicant is requested to provide an update on the proposed water supply during construction, operation/maintenance and decommissioning, including who would supply the water and confirmation that an agreement has been reached. Should this agreement also be referenced in the Consents and Agreements Position Statement [APP-272]? 2) Wiltshire Council in its D2 submission [REP2-048] requests that rainwater harvesting for non-potable uses be explored when feasible. The ExA note that surface water runoff harvesting is not considered a priority as stated in the outline Water Resources Strategy [APP-290]. However, the applicant is asked to consider the potential water and carbon benefits of reusing water on-site and comment on its feasibility.
FHW1.17	The Applicant	<p>Water Framework Directive</p> <p>The EA explains in [REP2-049] that it is waiting for a groundwater bodies plan and proportionate signposting to ES Chapter 11. The applicant is asked to confirm if this has been now provided to the EA and if the issue is likely to be resolved (as explained in the document).</p>
FHW1.18	The Applicant	<p>Draft DCO - Article 2(1) (Interpretation)</p> <p>Article 2(1) of the dDCO [REP1-007] refers to an 'outline drainage strategy' and cross refers to a document of the same name to be certified in Schedule 13. Schedule 13 cites the document as: 'Outline drainage strategy, [EN010168/APP/6.3], September 2025.' Schedule 2, Requirement 11(2) also refers to an outline drainage strategy.</p> <p>The ExA note that examination library documents [APP-210] to [APP-218] are called 'Flood Risk Assessment and Drainage Strategy'. Having reviewed those documents, it is not sufficiently clear that there is a definite and obvious drainage strategy component within them. The applicant is therefore requested to either clearly signpost in their contents page where the details of the drainage strategy can be found, or submit a stand-alone outline drainage strategy (or one for each site A to E and the CRC if that is the preferred approach) so that it/ they can form the basis of a certified document(s) in Schedule 13.</p>
FHW1.19	The LLFA	<p>Draft DCO – Ordinary Watercourse Consent and Environmental Permitting</p> <p>Article 6 of the dDCO [REP1-007] disapplies section 23 (prohibition of obstructions, etc. in watercourses) of the Land Drainage Act 1991 and regulation 12 (requirement for environmental permit) of the Environmental Permitting (England and Wales) Regulations 2016. Article 17 of the dDCO controls the discharge of surface water and requests consent from the relevant undertaker. Part 9 of the dDCO ('For the protection of drainage authorities') includes provisions in relation to work around watercourses.</p> <p>The LLFA raised concerns in Wiltshire Council's LIR [REP1-137] about risk of pollution and flow disruption due to horizontal directional drilling and temporary crossings near ordinary watercourses works without Ordinary Watercourse Consent do not include and apply agreed LLFA principles. The LLFA requested a specific requirement in page 97 of the LIR ('Horizontal Directional Drilling Method Statement and Frac-Out Contingency')</p> <ol style="list-style-type: none"> 1) The LLFA is asked to confirm agreement or otherwise with the wording of articles 6 and 17 of the dDCO regarding ordinary watercourse consent. 2) The LLFA is requested to explain if Article 17 and the provisions in Part 9 of the dDCO provide enough protection to ensure that the LLFA principles would be actioned or if further wording within the dDCO is needed instead of the addition of another requirement. 3) If the response is negative, the LLFA is requested to submit the proposed changes to the wording of the dDCO. 4) The LLFA is asked to consider if specification of the consents needed for decommissioning is needed, as all stages of the development are already covered in Article 6 of the dDCO.
FHW1.20	The LLFA The Applicant	<p>Draft DCO – Requirements 11 (Surface and foul water drainage) and 20 (Decommissioning and restoration)</p> <p>The LLFA in Wiltshire Council's LIR [REP1-137] highlighted few issues regarding SUDS, including the need for verification of SUDS before operation, SUDS retirement and decommissioning plan, decommissioning run-off management, and soil reinstatement performance target. The LIR proposes new requirements to manage surface water including: Operational Drainage Inspection, Testing and Maintenance Plan, Detailed Construction Environmental</p>

ExQ1	Question to:	Question:
		<p>Management Plan, Pre- and Post-Construction Exceedance Flow Routing Plan, SUDS Retirement and Decommissioning Drainage Plan and Soil Reinstatement Targets and Verification. This number of new requirements and level of detail may not be needed if appropriate reference is made to the information required in the outline drainage strategy(s) and relevant outline management plans. However, the ExA note the need for a phasing approach for design, implementation and decommissioning of SUDS and considers that it may be possible to embed this into Requirement 11. Taking this into consideration the ExA requests the following:</p> <p><u>The LLFA:</u></p> <ol style="list-style-type: none"> 1) Comments regarding the introduction of a phasing approach in Requirement 11 and, if appropriate, proposed revised wording. 2) Any information that should be included in the outline drainage strategies [APP-210 to APP-218] and relevant outline management plans to support the preparation of the final documents and a timely discharge of the relevant requirements. 3) Confirmation regarding the need for the LLFA to be included as a consultee for the discharge of Requirement 20 under 20(5) <p><u>The Applicant:</u></p> <ol style="list-style-type: none"> 4) The applicant is asked to provide comments regarding the need to introduce phasing in the wording of Requirement 11. 5) The applicant is asked to consider if a checklist showing all the information to be covered in the final drainage strategy should be included in documents [APP-210 to APP-218] (or any subsequent strategy, noting ExQ1 FHW1.18 above) to support timely discharge of the Requirement.
General and Cross-Topic Questions (GCT)		
GCT1.1	The Applicant	<p>Outline Construction Environmental Management Plan</p> <p>A set of plans is required to be attached to the oCEMP [REP1-096] which shows the field parcels referred to in the various mitigation and monitoring commitments (for example glint and glare and cultural heritage).</p>
GCT1.2	The Applicant Wiltshire Council	<p>Section 106 Contributions</p> <p>In paragraph 9.101 of its RR [RR-4934] Wiltshire Council requests a developer monitoring contribution (amount to be agreed) to support its monitoring of the Ecological Protection and Mitigation Strategy, amongst other things. The ExA note the applicant's silence on this request in its response to RRs [PDA-009]. The ExA requires an update from both parties with respect to discussions on developer monitoring contributions for both the construction and operational and maintenance periods. Those discussions should also include consideration of index linking. Signed s106 agreements are required to be submitted prior to the close of the Examination in order for the SoS to be able to take them into account. If the applicant considers that monitoring would not be required by the Council, how can the SoS be assured that the mitigation measures would be implemented and maintained for the life of the development?</p> <p>The ExA also notes Wiltshire Council's request for £20,000 pa for the improvement and enhancement of PRoW, and the applicant's response [PDA-009] that it is only able to commit to improvements and/ or enhancements to PRoW within the Order Limits, such that financial contributions to PRoW network maintenance and upgrades beyond the Order limits would need to be agreed through the Community Benefit Fund which operates and is to be agreed outside of the DCO process.</p> <p>The ExA considers the applicant's position on this matter ignores the potential displacement of users to PRoW outside of the Order limits and the benefit of creating new PRoW routes to help to link up to PRoW within the Order limits. The applicant is requested to discuss this matter further with the Council and include and provide updates in the SoCG [REP2-025].</p>
GCT1.3	The Applicant	<p>Replacement of Panels and Batteries</p> <p>During the operational period you intend to replace the solar PV panels after the initial 30-years and the batteries up to 5 times [APP-055].</p> <ol style="list-style-type: none"> 1) Would the frames of the solar PV panels need to be replaced? 2) What guarantees are there the frames/ panels would be the same size as those being replaced, especially considering the advancements in technology? 3) If there are no guarantees, would this mean that there may be a need to replace the frames and for additional piling to be carried out at that time? 4) Would the connection agreement have to be reviewed or revised as part of the operational phase planned replacement on the basis that as the technology advances panels become more efficient and more productive, or is the proposed development designed with future proofing in mind (such as the capacity of the substations and cabling)? 5) If the output of the solar farm is to remain restricted as per the current connection agreement for the life of the Order, would using more efficient, or more productive panels when they are replaced result in the need for less panels and thus more waste, and what would this mean for the overall layout of the solar PV sites?

ExQ1	Question to:	Question:
GCT1.4	The Applicant National Grid Electricity Transmission Plc	<p>Works at Melksham Substation</p> <p><u>The applicant:</u></p> <ol style="list-style-type: none"> 1) You are asked to detail how the proposal ties in with the necessary works at Melksham substation to facilitate the grid connection. 2) Does the ES consider these works and if so please signpost where this has been considered? If not, please provide these details. 3) To secure these works should the dDCO include a Grampian style requirement? <p><u>National Grid Electricity Transmission Plc:</u></p> <p>You are asked to provide an update on discussions regarding the grid connection and the works required at Melksham substation</p>
GCT1.5	The Applicant	<p>Transmission Losses</p> <p>You are requested to provide details on the expected transmission losses from the solar PV sites to Melksham substation and from import and export to and from the BESS.</p>
GCT1.6	The Applicant	<p>Mitigation Route Map</p> <p>The applicant is required to provide a single document containing a mitigation route map of the controls and mitigation measures that have been identified across a number of documents, which the Environmental Statement and related control documents rely on to avoid, reduce and/ or offset significant impacts of the development. The route map should set out the specific impact requiring mitigation and the effect to be achieved (purpose of the mitigation), and the way in which the mitigation measures have been, or would be, translated into clear and enforceable controls, either via DCO Requirements, protective provisions, s106 obligations, other consent regimes, or side agreements between the Applicant and a third party.</p> <p>The ExA note that the applicant has submitted a Commitments Register [REP1-114]; however, this is not expansive enough to provide an audit trail of the controls and mitigation measures on which the ES relies to avoid, reduce and where possible offset significant impacts of the development. The Applicant is advised that there are many examples of mitigation route maps provided in other NSIP applications, but Sizewell C Project and Byers Gill Solar Project libraries contain good examples of the format sought.</p> <p>The ExA considers that the current commitments register could be expanded to capture the additional information sought, or a separate document could be produced. Either way, the document should be updated as necessary throughout the examination and the final version should be included as a certified document in the dDCO. There is precedent for certification of such a document in the Lower Thames Crossing Development Consent Order.</p>
GCT1.7	The Applicant	<p>National Energy System Operator (NESO) Connection Dates</p> <p>It is understood from SLD's WR [REP1-167] and confirmed by the Applicant in [REP1A-012], that a Gate 1 connection offer is available for the BESS. Given the wording of NPS EN-1 paragraph 4.11.12, the applicant is asked to provide an explanation as to how the ExA can be satisfied that appropriate network connections are in place for both the solar PV sites and the BESS.</p> <p>Given this apparent disconnect between delivery of both the solar PV sites and the BESS, would the applicant agree that the BESS is therefore not associated development in considering the Department for Communities and Local Government 'Guidance on associated development application for major infrastructure projects', April 2013?</p>
GCT1.8	The Applicant	<p>Environmental Impact Assessment Methodology</p> <p>ES Chapter 6 paragraph 6.7.7 [APP-058] states that, as a general rule, effects categorised as moderate or greater are considered significant, whereas those classified as moderate/minor or below are not. Table 6.5 further explains that moderate adverse effects are likely to be important at a local level and on their own or in combination of other effects, and could materially influence the decision-making process. In contrast, minor effects are described as unlikely to be critical in the decision-making process. Table 6.5 does not provide a definition of dual category classifications.</p> <p>This overlapping classification raises questions as to whether the distinction between significance categories is sufficiently clear or whether it introduces a degree of subjectivity that leaves the assessment open to the discretion of the assessor to downplay the effects. Against this backdrop, the ExA seeks clarification as to how an effect described as moderate/minor can simultaneously be considered both significant and not significant.</p>
GCT1.9	The Applicant	<p>BESS Units – Operation</p> <p>A number of IPs, for example [REP1A-063], state that the BESS would charge overnight using electricity generated by gas turbines supplying the National Grid. The Grid Connection Agreement referred to in the Grid Connection Statement [APP-270] allows for the import of up to 250 MW of electrical energy to be stored in the BESS and to be exported at a different time, back to the grid. This implies that half of the BESS capacity is installed to service the existing grid and is not therefore associated development. Would the applicant agree with this suggestion?</p>

ExQ1	Question to:	Question:
		In addition, as the BESS element of the Scheme has been re-prioritised as part of NESO's connection reform activities as Gate 1 (as yet unconfirmed indicative connection date), how can its inclusion and retention in the project and at the proposed size be justified?
GCT1.10	The Applicant	<p>BESS – Import/ Export Allowance</p> <p>The ExA is seeking to understand how the contractual caps on the proposed development are controlled (export of the electricity produced at the Solar PV Sites not to exceed 500 MW and import from the grid and subsequent export back to the grid of 250 MW). Does this mean that the agreement is for 750 MW export?</p> <p>Please explain how the grid import/export allowance works in practice.</p>
GCT1.11	The Applicant	<p>Land Availability and GHG Assessment</p> <p>Paragraph 5.1.2 of the SoR [APP-018] states that option agreements have been entered into with each of the owners of 8 landholdings that make up the 5 solar PV sites. The length of those option agreements was discussed briefly at Issue Specific Hearing 1, and it was identified that the applicant cannot confirm that it has secured options over all of the solar PV sites to cover the 60-year lifetime of the project.</p> <ol style="list-style-type: none"> 1) You are asked to provide a breakdown of land parcels within the solar PV sites which have not been secured in option agreements for the lifetime of the project, along with the timeframe that has been secured. 2) While the ExA appreciates that you are seeking the fallback of CA over all of the solar PV land parcels, which means you could secure a 60 year operating period over them, it was made clear to the ExA at Issue Specific Hearing 1 that in circumstances where you are unable to extend the term of a lease by agreement, the relevant part of the scheme would be required to be decommissioned earlier than the maximum 60-year lifespan (because by then it would be time barred from employing CA powers). Based upon that, the ExA would like you to explain whether a reduced operating capacity on those affected land parcels has been factored into the lifetime GHG assessment. 3) Please also explain what implications may arise when those affected land parcels are required to be decommissioned but contain supporting infrastructure for other parts of the project, which remain in operation.
Habitats Regulations Assessment (HRA)		
HRA1.1	Natural England	<p>Survey Work</p> <p>Given the original HRA [APP-275] submitted into the examination did not have the benefit of 17ha worth of survey work (the ExA note the missing survey work has now been submitted into the examination), does not provide specific details contained in the BNG Assessment Report [REP1-089] regarding hedgerow removal, and lacks specific surveys to fully inform functionally linked land (FLL) to the Bath and Bradford-on-Avon Bats Special Area of Conservation (SAC), is Natural England confident a positive assessment of the HRA can be made?</p> <p>The ExA asks that you justify your response.</p>
HRA1.2	The Applicant Natural England	<p>Bath and Bradford-on-Avon SAC</p> <p>Following Natural England's WR [REP1-156] regarding their position on bats and the ability for Lime Down C to provide FLL for lesser horseshoe bats associated with the Bath and Bradford-on-Avon Bats SAC, the applicant and Natural England should provide an update on their discussions.</p> <p>It is also noted that Natural England and the applicant have agreed mitigation measures to reduce the harm on bats.</p> <p><u>Both Parties:</u> Both parties should comment on what discussions took place with regard to avoiding any impacts on the SAC, before discussing and agreeing mitigation measures.</p> <p><u>The applicant:</u> In addition to the above, the applicant is asked to provide details as to how the mitigation measures would be secured through the dDCO.</p>
Health and Wellbeing (HW)		
HW1.1	Wiltshire Council	<p>Mental Health and Wellbeing</p> <p>The ExA note that in your submission at Procedural Deadline A [PDA-014] there is reference to a good practice Supplementary Planning Document by Suffolk County Council relating to community engagement and wellbeing. Please submit this document into the examination and advise if any discussions have been had with the applicant on producing something similar and securing it within the dDCO.</p>

ExQ1	Question to:	Question:
HW1.2	The Applicant	<p>Alternative Access to Public Rights of Way Network</p> <p>Further to the assessment of the impacts on health and wellbeing in ES Chapter 18 [APP-070], have you considered the prospect of displacement and alternative points of access to the PRow network for those users who do not wish to experience the construction, operation, maintenance or decommissioning aspects of the proposed development without losing the benefit of being outdoors.?</p> <p>If not, the applicant is asked to undertake this assessment to demonstrate how adverse impacts resulting from the proposed development could be minimised on existing users of the PRow network by signposting and improving routes away from the solar PV panels. This question should be considered with ExQ1 GCT1.2 regarding Wiltshire Council's request for s106 contributions to address displacement and PRow linkages.</p>
HW1.3	Wiltshire Council The Applicant	<p>Mental Health</p> <p>ES Chapter 18 table 18-7 [APP-070] states that emergency hospital submissions resulting from self-harm in the study area are higher than the UK average.</p> <p><u>Wiltshire Council:</u> Given the level of public concern and interest generated by the proposed development, the Council is asked to comment on whether the applicant's proposed mitigation of signposting those with concerns to existing mental health services is sufficient?</p> <p><u>The applicant:</u> You are asked to detail any discussions you have had with the existing services referenced in ES Chapter 18 that have informed the approach.</p>
Landscape and Visual (LV)		
LV1.1	The Applicant	<p>Landscape Fabric – Quantifying Loss and Provision</p> <p>Wiltshire Council raises concern in its LIR [REP1-137] that effects to landscape fabric are under-assessed. SLD also raises concern in its D1 submission [REP1-170] that mitigation measures have been double counted as enhancement. Table 8-15 and 8-16 in the ES [APP-060] present the proposed planting as landscape enhancements but the same overall figures for each planting typology in Table 8-16 are identified as mitigation measures in Table 8-18.</p> <p>To provide clarity surrounding the effects to landscape fabric and the extent to which proposed planting is for the purposes of mitigation or enhancement, the applicant is asked to quantify the following by planting typology:</p> <ol style="list-style-type: none"> 1) Loss of landscape fabric components. 2) Additional landscape fabric components, including both mitigation and enhancement measures. 3) Extent of proposed planting under point 2) above that would be required for the purpose of mitigating adverse landscape or visual effects. 4) Extent of proposed planting under point 2) above that would be for enhancement only.
LV1.2	Wiltshire Council	<p>Landscape Fabric – Technical Note</p> <p>Wiltshire Council states in its LIR [REP1-137] that the very large-scale land use change combined with the discordant industrialising nature of new introduced development would significantly and adversely impact upon the receiving landscape fabric baseline condition at a site and local level.</p> <p>The applicant provided a technical note on landscape fabric and landscape character [REP1-121] at D1 with the intention of clarifying its approach to the assessment of landscape fabric and landscape character. The technical note explains that the applicant has separated the assessment of landscape fabric as the assessment of the physical elements and features within the Order limits from the assessment of effects on landscape character. Wiltshire Council is asked:</p> <ol style="list-style-type: none"> 1) Whether it agrees with the application of the applicant's methodology set out in the technical note? 2) If so, do Wiltshire Council agree with the applicant's assessment of landscape fabric effects in the ES [APP-060] or do Wiltshire Council maintain that the effects to landscape fabric have been under-assessed by the applicant?
LV1.3	The Applicant	<p>Landscape Fabric - Hedgerow Heights</p> <p>It is not currently clear which hedgerows, either existing or proposed, would be managed to a height of 4.5m. It is also not clear what would happen to these hedgerows at decommissioning. For example, the oDS [APP-279] states that it is likely that established habitats such as hedgerows and woodland would be retained by the landowner, whereas in response to Wiltshire Council's RR [PDA-009] the applicant states that any adverse impact of hedgerow height on landscape or visual receptors would not be significant or permanent as hedgerows could be clipped low again following decommissioning. The applicant is asked:</p> <ol style="list-style-type: none"> 1) To provide a plan showing the location and length of hedgerows which would be managed to a height of 4.5m or alternatively annotate the Tree Protection Order and Hedgerow plan [APP-011] with this detail.

ExQ1	Question to:	Question:
		2) If the proposal is to reduce the height of hedgerows at decommissioning to ensure that resultant adverse visual and landscape impacts would not be significant or permanent, to confirm how that would be secured in the control documents.
LV1.4	The Applicant	<p>Landscape Fabric – Beneficial Effects</p> <p>The ES [APP-060] states there would be moderate beneficial effects to landscape fabric from year 15 of the operational phase and in the decommissioning phase as a result of proposed planting measures. The applicant is asked:</p> <ol style="list-style-type: none"> 1) Can this be considered a benefit of the proposed development in relation to landscape effects if it would only be there to provide mitigation screening for a large-scale solar development which itself would have significant adverse effects on landscape and visual receptors? 2) If proposed planting measures are deemed inappropriate to the character of the receiving landscape due to size or species mix proposed, can it be considered to be a landscape fabric benefit?
LV1.5	Wiltshire Council	<p>Landscape Fabric – Enhancement Opportunities</p> <p>Do Wiltshire Council consider that the applicant's proposed planting measures would contribute to the enhancement opportunities as identified in the Broad Management Objectives for Landscape Character Type (LCT) 16: Limestone Lowland Landscape Character Area (LCA) (16A: Malmesbury-Corsham Limestone Lowlands) and the management guidelines and strategy actions for LCA8: Hullavington Rolling Lowland?</p>
LV1.6	Wiltshire Council Stop Lime Down The Applicant	<p>Landscape Character – Assessment Methodology</p> <p>In the ES [APP-060] the applicant has assessed effects to landscape character relative to each study area (1km, 2km, 5km) as a single receptor rather than each of the separate landscape receptors (LCTs, LCAs) that make up each study area. The ExA understands that the intention of this approach is to look at the effects of the proposed development on the holistic patchwork of landscape character within each study area. However, it is not clear to the ExA that this approach captures the impacts on the different landscape receptors and the individual characteristics identified in the relevant landscape character assessments.</p> <p><u>Wiltshire Council and SLD:</u> Wiltshire Council and SLD are asked if they consider that the applicant's approach is acceptable?</p> <p><u>The applicant:</u> The applicant is asked to either:</p> <ol style="list-style-type: none"> 1) Provide further justification for its approach including reference to relevant guidance and precedent from other Nationally Significant Infrastructure Project (NSIP) scale solar projects; or 2) Provide an updated assessment defining the effects relative to the separate landscape receptors rather than to each study area as a whole.
LV1.7	The Applicant	<p>Landscape Character – Local 1km Study Area</p> <p>The applicant is asked to confirm whether the assessment of landscape character effects within the local 1km study area included the land within the boundary of Lime Down A to E? and:</p> <ol style="list-style-type: none"> 1) If so, the applicant is asked to justify the reduction in the significance of effect at year 15 of operation given the scale of land-use change within the boundary of Lime Down A to E? 2) If not, the applicant is asked to explain why the landscape character effects within the boundary of Lime Down A to E have not been assessed?
LV1.8	The Applicant	<p>Landscape Character – Setting of Norton Village</p> <p>SLD states in its WR [REP1-167] that a person in Norton leaving by any of the principal routes out of that village would always come into contact with the proposed development and would experience a surrounding effect. Wiltshire Council states in its WR [REP1-138] that it considers the proposed development has not been adequately assessed against the landscape setting of Norton. Given the way in which the applicant has concluded on effects to landscape character relative to the different study areas, it is not clear to the ExA that the setting of individual villages such as Norton have been properly assessed.</p> <p>The applicant is asked to demonstrate how it has considered the landscape setting of Norton in its assessment, including:</p> <ol style="list-style-type: none"> 1) How the landscape character on the approach to and from the village contributes to its setting; and 2) How the adverse effects on the surrounding landscape adversely effect the character of the village itself.
LV1.9	The Applicant Wiltshire Council	<p>Cotswold National Landscape – Setting</p> <p>The parties are asked to define in spatial terms the extent of the area outside of the boundary of the Cotswolds National Landscape (CNL) that is considered to form the setting of the CNL.</p>

ExQ1	Question to:	Question:
	Cotswolds National Landscape Board Stop Lime Down	
LV1.10	The Applicant	<p>Cotswold National Landscape - Furthering the Purpose of the CNL</p> <p>In the Assessment of Effects on the Cotswolds National Landscape and its Special Qualities [APP-197], the applicant concludes that the proposed development would further the purposes of the CNL as a result of beneficial landscape effects within the setting of the CNL including:</p> <ul style="list-style-type: none"> • The creation of wildflower meadows within fields A1, C1, C6, C8, C9 and B12. • The creation of wildflower meadow verges in A11, A12 and C10. • Maintaining hedgerows at their current height of c1.5m bordering the CNL within Site C. <p>On the other hand, in its RR, the Cotswold National Landscape Board (CNLB) [RR-0944] states that the proposed development would fail to further the purpose of the CNL designation in respect of the statutory duty outlined at section 85 of the Countryside and Rights of Way Act 2000.</p> <p>It is not clear to the ExA whether wildflower meadows and meadow verges would be visible to visual receptors within the CNL. It is also not clear to the ExA how maintaining the current height of existing hedgerows can be considered to be a positive enhancement to the landscape.</p> <ol style="list-style-type: none"> 1) Can these measures really be considered to be positive enhancements that further the purpose of the CNL? If so, provide further justification to support this position. 2) Provide further evidence to demonstrate that all reasonable steps have been taken to ensure that the proposed development would further the purpose of the CNL or provide evidence to demonstrate that this is not feasible.
LV1.11	The Applicant Cotswolds National Landscape Board	<p>Cotswolds National Landscape – Potential Main Issues for Examination</p> <p>In its RR, the CNLB [RR-0944] refers to 8 Potential Main Issues for Examination (PMIE) agreed with the applicant (also set out by the applicant in [APP-289]). The CNLB state that PMIEs 2, 3 and 5 have been resolved.</p> <ol style="list-style-type: none"> 1) With Regards to PMIE 3, the applicant and the CNLB are asked to clarify how its recommendation that consideration should also be given to removing the southern part of Field A1 was dealt with and whether the CNLB still consider that panels should be removed in this location? 2) The RR from the CNLB refers to the production of a series of sections to illustrate the degree of potential visibility of Solar PV Panels in Field C7 from publicly accessible viewpoints within the CNL. The applicant is asked to submit these sections into the examination or identify where they are already provided.
LV1.12	Cotswolds National Landscape Board	<p>Cotswold National Landscape – Special Qualities</p> <p>In its RR, the CNLB states [RR-0944] that it considers it likely that construction traffic would have a significant adverse impact upon the tranquillity of the National Landscape (one of its special qualities). Other than disagreeing with the applicant's assessment of the impact on the special quality of tranquillity, do the CNLB agree with the applicant's conclusions on the assessment of effects on the CNL's other special qualities as summarised in table 18 of the applicant's ES Appendix 8-6 [APP-197]?</p>
LV1.13	The Applicant	<p>Visual Impact – Public Rights of Way</p> <p>SLD raises concern in its Landscape and Visual Impact Report [REP1-170] that only one of the photomontages illustrates the changes in views that would be experienced by people travelling along PRowS crossing sites A – E, and no solar PV panels or infrastructure are proposed in the field through which the footpath runs. The ExA note that there are fields where the existing PRow passes through the middle of the field and there would be solar PV panels proposed either side of the PRow, including fields A7, C21, C18 and D11. There are also fields where existing PRow run adjacent to the field boundary next to areas of solar PV panels with no visual screening. The applicant is asked to provide the following:</p> <ol style="list-style-type: none"> 1) A representative photomontage and a typical section showing the view from a PRow crossing a field with Solar PV panels either side (for example field D11). 2) A representative photomontage and a typical section showing the view from a PRow following the boundary of a field with Solar PV panels to one side (for example field D3).

ExQ1	Question to:	Question:
LV1.14	Wiltshire Council Cotswolds National Landscape Board	Visual Impact – Photomontages Wiltshire Council and the CNLB are asked to confirm if they are satisfied with the viewpoint and photomontage locations? If not, provide reasoning and a marked-up plan showing any additional viewpoint or photomontages that are considered necessary to assess the impact of the proposed development on landscape and visual receptors.
LV1.15	The Applicant	Visual Impact – Viewing Angle Does the assessment of visual impact in the ES [APP-060] account for the angle at which receptors would be viewing the panels (eg. face on, side on or the underside of the panels) and how has this been taken into account in the selection of whether to use fixed south facing panels or single access tracker panels?
LV1.16	The Applicant	Visual Impact – Lighting The ES [APP-060] states that lighting is not required within the solar arrays for the operational phase. It also states that motion sensing security lighting would be provided within substations and within the BESS area. The applicant is asked: <ol style="list-style-type: none"> 1) Whether operational maintenance might need to be undertaken within the solar arrays at night? If so, how would any visual impact of lighting be managed? 2) To submit an outline lighting strategy covering the construction and operational phases. 3) To update the design principles and parameters document to be clear on where there would be no lighting installations. Or else explain how the ExA can be satisfied that no lighting installations would be installed within the solar arrays. 4) Whether details of lighting should be added to the list of details to be approved by the LPA under requirement 5 of the dDCO [REP1-007]?
LV1.17	The Applicant	Visual Impact – Security Measures Work No. 6(b) in the dDCO [REP1-007] includes ‘works for the provision of security and monitoring measures including CCTV columns, lighting columns and lighting, cameras, weather stations, communication infrastructure, and perimeter fencing’. Work No. 6 appears on the Works Plans [REP1-005] to cover all the solar PV, BESS and substation areas. The applicant is asked to provide details of where CCTV columns, lighting columns and lighting, cameras, weather stations and communication infrastructure would be located and to explain how the visual impact of these components has been taken into account?
LV1.18	The Applicant	Visual Impact - Identifying Residential Receptors for the Cable Route Corridor On the Unaccompanied Site Inspection 2 (USI2) [EV4-002] , the ExA noted that there appeared to be some residential receptors in close proximity to the CRC works that have not been identified as individual receptors. For example, at the following approximate grid references on the private receptor plans [APP-100] : <ul style="list-style-type: none"> • 387300, 174800 (Ivy House and Kendon, Lanhill) • 389100, 170000 (The Roebuck, Thingley) • 388400, 168000 (Residential dwelling west of the B3353 on the private road to Boyd’s Farm) • 388750, 166600 (Whitley House, Whitley) The ExA identified that these receptors appeared to be both separate to the nearest settlement or group of residential receptors and/ or could potentially be more sensitive to change as a result of the proposed development relative to the nearest settlement or group of residential receptors. For example, the ExA would expect that the adverse effects of the residential dwelling just west of the B3353 on the private road to Boyd’s Farm would be more similar to RI136 and RI137 (moderate adverse, significant) than for RS020 (minor adverse, not significant). The applicant is asked: <ol style="list-style-type: none"> 1) To explain why these receptors were not identified as individual receptors? 2) If they were treated as distinct receptors, whether the assessment of adverse effects would be greater for these receptors than that of the nearest group or settlement? Include reasoning to support conclusions.
LV1.19	Wiltshire Council Stop Lime Down	Visual Impact - Residential Visual Amenity Assessment SLD explains in its Landscape and Visual Impact Report [REP1-170] that it disagrees with the applicant’s approach that a residential visual amenity assessment (RVAA) is not required and states that the level of effect that would be experienced by receptors at Grain Store Barn does cross the threshold for ‘full’ RVAA. SLD also states that may also be the case for other residential receptors. <u>Wiltshire Council:</u>

ExQ1	Question to:	Question:
		<p>1) Do Wiltshire Council agree with the applicant's approach that a RVAA is not required? If it does not, provide reasoning and identify the residential receptors that you consider should be scoped into a RVAA and why?</p> <p><u>Stop Lime Down:</u></p> <p>2) SLD are asked to identify any other receptors they consider should be subject to a full RVAA.</p>
LV1.20	The Applicant	<p>Visual Impact – Sequential Views</p> <p>The applicant's assessment of sequential effects in the ES [APP-060] only identified recreational walking routes for assessment. The applicant is asked:</p> <p>1) To provide an assessment of the sequential effects on the Wiltshire Cycleway.</p> <p>2) To comment on whether cyclists may be differently susceptible to sequential visual effects due to the speed and therefore reduced time between views of different parts of the proposed development.</p> <p>3) Whether the applicant has identified the commonly used routes for horse riders and considered the sequential visual effects on these routes taking into account the more elevated position of a person on horseback?</p>
LV1.21	The Applicant	<p>Mitigation – Planting Density</p> <p>The outline Landscape and Ecological Mitigation Plan (oLEMP) [APP-283] states that gaps in existing hedgerows will be 'gapped up' (infilled) wherever practicable. Further detail is requested on how it would be determined whether a section of hedgerow would need to be infilled, would it just be where there is a complete break in hedgerows or would existing sparse/thin hedgerows also be enhanced to provide a higher density of hedgerow?</p>
LV1.22	The Applicant	<p>Mitigation – Planting Performance Criteria</p> <p>Further information is requested on the performance criteria for the successful establishment of planting for visual screening. The ExA note that the oLEMP [APP-283] states that the shrubby element of hedgerows will be maintained to an optimum height of 4.5m tall but the applicant is asked to explain how the density of planting would be monitored and managed to ensure that visual screening is achieved? For example, a 4.5m tall hedgerow which is very sparse might provide very little screening.</p>
LV1.23	The Applicant Wiltshire Council Stop Lime Down	<p>Cumulative and Combined Effects - Cumulative Sequential Visual Effects</p> <p>Both Wiltshire Council [REP1-137] and SLD [REP1-170] raise concern that the applicant's assessment of cumulative landscape and visual effects does not consider sequential visual effects. Wiltshire Council identified [REP1-137] routes that the sequential assessment should include and the applicant provided a Technical Note on Cumulative Sequential Visual Effects [REP1-123].</p> <p><u>The Applicant:</u></p> <p>1) The applicant is asked to provide an assessment of the sequential visual effects from cumulative developments on users of the Wiltshire Cycleway within the 10km study area.</p> <p><u>Wiltshire Council:</u></p> <p>2) Wiltshire Council is asked to confirm if it agrees with the applicant's methodology and conclusions in its Technical Note on Cumulative Sequential Visual Effects [REP1-123] that there would not be any additional significant adverse sequential visual effects on users of the Fosse Way or A429/A350.</p> <p><u>Stop Lime Down:</u></p> <p>3) SLD is asked to identify any other routes that it considers should be included in an assessment of sequential visual effects.</p>
LV1.24	The Applicant Wiltshire Council Stop Lime Down	<p>Cumulative and Combined Effects – Cumulative Effects on Landscape Character</p> <p>The ES [APP-060] assesses cumulative effects to landscape character relative to study area distances offset from the boundary of Lime Down sites A to E. The ExA note from Figure 8-15-7 of the ES [APP-106] that the percentage of the area of LCA8 (Hullavington Rolling Lowlands) that is currently taken up with solar development is 0.57%. The proposed development and other solar applications would increase that to 5.15% with the proposed development forming the largest share at 3.41%. The ExA seek to understand the different parties views on the scale at which cumulative landscape character effects should be assessed and have the following questions:</p> <p><u>The Applicant:</u></p> <p>1) Can the applicant explain why cumulative effects to landscape character were not defined in relation to the scoped in landscape receptors eg. LCAs/ LCTs?</p> <p><u>Wiltshire Council:</u></p> <p>2) Can Wiltshire Council and SLD provide their position on the correct scale of area to assess the cumulative effects to landscape character?</p> <p><u>All Parties:</u></p>

ExQ1	Question to:	Question:
		3) The applicant, Wiltshire Council and SLD are asked whether, and to what extent, they consider that the percentage cumulative land-use change within LCA8 should be used as an indicator of the significance of cumulative adverse effect to the landscape character of the receptor?
LV1.25	The Applicant	<p>Cumulative and Combined Effects - Not Significant Effects</p> <p>Paragraph 3.34 of the Guidelines for Landscape and Visual Impact Assessment (3rd Edition) states that it should be made clear that effects not considered to be significant will not be completely disregarded. Explain how this has been taken into consideration, including in relation to the assessment of cumulative and combined effects, socio-economic effects and the wider 'planning balance' within the Planning Statement [APP-267].</p>
LV1.26	The Applicant	<p>Design – Access Points</p> <p>The applicant is asked to explain how the proposed access points from the public highway would be designed to be appropriate to the receiving landscape character and minimise impacts on landscape and visual receptors? The applicant's response should also include its position on whether there should be tighter controls within the Design Principles and Parameters [REP1A-008] to ensure that the design of access points would be appropriate to the receiving landscape character?</p>
LV1.27	The Applicant	<p>Design – Energy Storage Facility and Substations</p> <p>The applicant is asked to provide further explanation of how the energy storage facility (Work No. 2) and the onsite substations (Work No. 3) would be capable of being laid out and designed (including through use of colour and materials) in order to promote the best possible aesthetic and visual appearance and to minimise landscape and visual effects?</p>
LV1.28	The Applicant Stop Lime Down	<p>Glint and Glare – Stop Lime Down Assessment</p> <p>SLD provided a Glint and Glare Assessment at D1 [REP1-178]. The applicant is asked to consider the conclusions and recommendations set out in SLD's assessment, and in the forthcoming SoCG between the parties, the applicant and SLD are asked to set out where agreement can be found in relation to the assessment methodology, including but not necessarily limited to:</p> <ul style="list-style-type: none"> • The model output data. • The assessment of impact on local roads. • Impact significance definition. • How the cumulative footprint of the proposed development is assessed, including in relation to Badminton and Bowdown Farm Airfields. • The assessment of train driver safety.
LV1.29	The Applicant	<p>BESS Firefighting Storage Units</p> <p>The oBSMP [REP1-110] states that the BESS Area will contain a minimum of two firefighting water storage units of no less than 228,000 litres in capacity. The Applicant is asked to confirm whether the units would be above or below ground, and if above ground, provide indicative details of appearance including dimensions. It should also be confirmed that the Landscape and Visual Impact Assessment takes account of the possibility of above ground tanks.</p>
Land Use, Soils and Food Security (LSF)		
LSF1.1	The Applicant	<p>Food Security</p> <p>Wiltshire Council's Local Impact Report (LIR) [REP1-137] details that the loss of 30% BMV agricultural land associated with the site equates to approximately 5,000 tonnes of crops/year. Over a period of 60 years this equates to some 300,000 tonnes during the operation of the proposed development. This does not include construction, decommissioning or other periods where the land is left fallow because of the development.</p> <p>As discussed at Issue Specific Hearing 1, the Department for Environment and Rural Affairs (DEFRA) published a national security report on 20 January 2026, which emphasised the severe vulnerability of Britain's food systems. Specifically, it stated 'Without significant increases in UK food system and supply chain resilience, it is unlikely the UK would be able to maintain food security if ecosystem collapse drives geopolitical competition for food. The UK relies on imports for a proportion of both food and fertiliser and cannot currently produce enough food to feed its population based on current diets. Countries best placed to adapt are those that invest in ecosystem protection and restoration, and resilient and efficient food systems.'</p> <p>The applicant's application is dismissive of food security considerations because, as stated in the Planning Statement [REP2-017], the NPSs do not contain specific policy on the topic, and because analysis in the DEFRA Land Use Framework (March 2026) confirms that there is enough land to deliver the government's objectives for nature restoration and development without reducing domestic food production or compromising on these objectives.</p> <p>The ExA questions whether that is a simplistic view of the Land Use Framework, because the document also states that spatial decisions made by one sector will often affect another, meaning strategic spatial planning at landscape scale will be key to growth, food security and nature recovery. On that basis, land use is to be carefully managed. Further, it states that government is clear that food security is national security and that it agreed with respondents who called</p>

ExQ1	Question to:	Question:
		<p>for the strategic safeguarding of the best farmland from permanent land use changes, and for improving the resilience of agricultural land to the impacts of climate change.</p> <p>The ExA note the applicant's D2 response to the Council [REP2-038] that the loss of 5,000 tonnes of combinable crop from the site only represents a reduction of approximately 0.025% of UK production. However, in light of the very recent national food security alarm, the need for land use to be carefully managed, and the national policy position in NPS EN-3 (Paragraph 2.10.21) which recommends avoidance of the of "Best and Most Versatile" agricultural land where possible, the applicant is asked to provide the following information:</p> <ul style="list-style-type: none"> • How much of Wiltshire is farmland, and of that farmland how much is classed as being BMV and not BMV? • Cumulatively, how much farmland within Wiltshire would be occupied by solar farms currently benefitting from made DCOs and planning permissions, and of that farmland how much is classed as BMV and not BMV? • When the Lime Down proposal is added to the figures from bullet point 2, how much is classed as BMV and not BMV? • Robust evidence that a full and comprehensive assessment of availability of land at grades 5, 4 and 3b was conducted within the 20km radius of the grid connection before grades 3a, 2 and 1 were considered.
LSF1.2	The Applicant	<p>Agricultural Land Performance</p> <p>Paragraph 17.7.2 of ES Volume Chapter 17 [REP1-025] confirms that the Solar PV Sites measure 717.5 ha. This excludes the areas set aside for mitigation purposes. You are asked to confirm the total area of land being removed from agricultural activities across the entire Order limits for the lifetime of the development. Further to this, you are asked to confirm how this then impacts on immediately adjacent fields and their capacity for agricultural production in terms of maximising their agricultural yield.</p>
LSF1.3	The Applicant	<p>Permanent or Temporary Loss</p> <p>Given there is no secure commitment to return the land to agricultural use at the end of 60-year operational lifespan, should the ExA consider this land to be permanently removed from agricultural use?</p>
LSF1.4	The Applicant	<p>BMV Land for Ecological Mitigation</p> <p>ES Chapter 9 [APP-061] lists Skylark mitigation in field B12. Figure 17-2 [APP-172] shows this area as BMV agricultural land. NPS EN-1 states that '<i>Applicants should seek to minimise impacts on the best and most versatile agricultural land</i>'.</p> <ol style="list-style-type: none"> 1) Explain why you have chosen BMV agricultural land as ecological mitigation and if this is the best use of such land. 2) Explain what efforts were made to secure an appropriate area for ecological mitigation that is not BMV agricultural land which could have been immediately adjacent the Order limits? 3) Confirm if field B12 would be removed from agriculture for the lifetime of the proposed development, but if not please detail how agricultural activities may be affected.
LSF1.5	The Applicant	<p>ES Chapter 17 Conclusions</p> <p>ES Chapter 17, Table 17.4 [REP1-025] details that the criteria for determining the magnitude of change is considered 'high' when a proposal results in the long term or permanent loss of over 50ha of agricultural land, including a degree of Grade 1 and 2 BMV agricultural land. As there is no secure commitment to return the land to agricultural use post-decommissioning, you are asked to further explain the conclusions of this chapter, which concludes 'no significant effects on soils and agriculture'.</p>
LSF1.6	The Applicant	<p>Below Ground Infrastructure and Agricultural Activities</p> <p>ES Chapter 3 [APP-055] states that as part of decommissioning, below ground infrastructure would be removed to a depth of 1.2m to allow the recommencement of agricultural activities. You are asked to signpost the ExA to details for the restoration of these areas, such as foundations for the BESS and substations within the ES.</p> <p>You are also asked to confirm that this would be reviewed as part of the oDS [REP1-100] to take account of any changes to the depth necessary for ploughing in the future should agricultural practices change.</p>
LSF1.7	The Applicant	<p>Soil Performance</p> <p>Paragraph 9.7.29 of ES Chapter 9 [APP-061] states that '<i>In the absence of the Scheme, it is anticipated that the Solar PV Sites would remain in predominantly arable production, with associated intensive management regimes. Such intensive systems are predicted to entail the continued requirement for additional soil inputs and conditioners, with likely continued, incrementally or accumulatively negative implications for wildlife</i>'. However, paragraph</p>

ExQ1	Question to:	Question:
		<p>17.7.15 of ES Chapter 17 [APP-069] details that soil performance would be expected to remain the same as the current baseline but makes no negative comment on soil performance and/or health.</p> <p>You are asked to comment on the following:</p> <ol style="list-style-type: none"> 1) The use of the term 'intensive' would suggest an industrial agricultural regime. The applicant should clarify the current farming management arrangements and whether it qualifies as intensive farming. Alternatively, if the current farming arrangements do not qualify as 'intensive' then ES Chapter 9 should be updated to remove the term. 2) It is not clear what the effect on soils and wildlife would be in absence of the proposed development. The applicant should provide a clear and consistent statement across the ES clarifying the effects on both soils and wildlife in absence of the proposed development (a do-nothing scenario). The answer should consider how the land has been, and would be, farmed considering any applicable agri-environment schemes.
LSF1.8	The Applicant	<p>Soil Sealing</p> <p>ES Chapter 17 [APP-069] makes no reference to the effects of soil sealing resulting from the foundations of BESS and substations. You are asked to provide a commentary as to the effects and impacts on those areas affected by soil sealing and how these areas would be restored during restoration. Also, how would the method be secured in the dDCO.</p>
LSF1.9	The Applicant	<p>Outline Soil Resources Management Plan (oSRMP)</p> <p>Wiltshire Council has commented that the oSRMP [APP-280] should make specific reference to the use of soil boreholes to be analysed by a suitably qualified soil scientist rather than just 'site inspections'.</p> <p>You are requested to update the oSRMP [APP-280] to take account of this request or provide a robust response detailing why the use of boreholes and scientific analysis cannot be incorporated into the oSRMP.</p>
LSF1.10	The Applicant	<p>Soil Health</p> <p>What efforts, if any, would you undertake to ensure appropriate soil health over the lifespan of the proposed development to ensure the land within the Order limits could be returned to the same grade following decommissioning. Your response should also include the land proposed for ecological mitigation and enhancement. In providing a response you should take account of SLD's 'Situation Report: Lime Down Solar Farm. Impact on Soils and Agriculture'.</p>
LSF1.11	The Applicant	<p>Soil Health</p> <p>You are asked to provide a response to SLD's submission 'Runoff from Solar Panels at Lime Down' by Professor Richard Skeffington, specifically the article titled 'Plant and soil responses to ground-mounted solar panels in temperate agricultural systems' [REP1-175].</p>
LSF1.12	The Applicant	<p>Soil Management</p> <p>ES Chapter 17 [REP1-025] clearly states that no grazing would occur inside the solar PV sites and buffer zones would be maintained via cutting. Given SLD's submission that the soils are susceptible to compaction, provide details as to best practice to avoid damage to soil health and hydraulic properties, and incorporate these into the oCEMP [REP1-096], oOEMP [REP1-098] and oSRMP [APP-280]. For example, this could include grass cutting and panel cleaning only during periods of dry weather.</p> <p>Furthermore, soils beneath the solar panels would be left in shade. Please provide comment as to how this shading would affect soil health over a 60-year period.</p>
LSF1.13	The Applicant	<p>Decommissioning – Soil Storage and Soil Stability</p> <p>What assessments have been made into the safety of soil storage and repurposing of soil bunds during decommissioning, particularly in relation to the leaching of heavy metals or other contaminants into the soil, which is then proposed for a return to agricultural use?</p>
LSF1.14	The Applicant	<p>Soil Management Plan – Mixing of Soils</p> <p>What documentation and physical control measures would be put in place to prevent accidental mixing of soils? How would these measures be secured through the dDCO?</p>
LSF1.15	The Applicant	<p>Soil Management Plan - Stockpiles</p> <p>How would the suitability of soil stockpiles for restoration be assessed? Please confirm whether the final Soil Resources Management Plan would include a restoration methodology?</p>
LSF1.16	The Applicant	<p>Soil Management Plan – Reinstatement Gaps</p> <p>Please confirm why the oSRMP [APP-280] does not include measures to return hardstanding to agricultural use?</p>

ExQ1	Question to:	Question:
LSF1.17	Wiltshire Council	<p>Soil Management Approach</p> <p>You are asked whether the approach and content of the oSRMP [APP-280] in respect of the management of potential effects on soil resources is appropriate? If not, please detail additional methods and/or mitigation measures considered necessary.</p>
LSF1.18	The Applicant	<p>Community Orchard</p> <p>ES Figure 3-4-3.1 to 3-4-3.2 [REP1-030] suggests the provision of a community orchard in Field C25. Please detail the following:</p> <ol style="list-style-type: none"> 1) How community consultation informed the choice to provide a community orchard. 2) How community consultation informed the location for the community orchard. 3) Who would manage the orchard. 4) How the community orchard and its management is secured in the dDCO. 5) How a community orchard would be compatible with land identified as a Proposed Ground Nesting Bird Mitigation area on ES Figure 3-4-3.1 to 3-4-3.2.
Noise and Vibration (NV)		
NV1.1	The Applicant	<p>Operational Phase Noise</p> <p>Paragraph 14.4.12 of ES Chapter 14 [REP1-021] states that a series of assumptions were made for the generation of the operational noise model, primarily concerning the sound power levels of the operational plant, their time of operation and the local environment. Can the applicant explain why there is no commitment to revisit these assumptions at the design stage once actual sound power levels are known?</p>
NV1.2	The Applicant	<p>Tracker Panel Noise</p> <p>Paragraph 14.4.17 of ES Chapter 14 [REP1-021] states that from manufacturer specification sheets, it is known that the noise from each solar PV panel tracker motor would be less than 50 dB at a 1m distance and less than 40 dB at a 3m distance and that this level of noise would be unlikely to be perceptible at sensitive residential receptors, such that tracker noise emissions have not been considered in the operational noise assessment. Can the applicant:</p> <ol style="list-style-type: none"> 1) Clarify if it has assessed the level of noise from all panels in a field moving together at the same time on sensitive receptors, or if it has used the single motor decibel level to arrive at its position that this level of noise would be unlikely to be perceptible at sensitive residential receptors? 2) Direct the ExA to where it has assessed and detailed the noise effects of tracker motors on public rights of way receptors? If it has not undertaken such an assessment, explain why not, particularly in light of SLD's expert's assessment of the applicant's noise assessment [REP1-179], which identifies bridleways, footpaths or byways SHER16, NORT1, SHER18, LUCK57, NORT11, HULL1,2,4,5,6,7 and MALW59 as being subject to notable plant noise levels.
NV1.3	The Applicant	<p>132 kV Substation Operation</p> <p>Paragraph 14.4.20 of ES Chapter 14 [REP1-021] states that the 132kV substations are only to be operational during the daytime. Can the applicant explain why this is the case and whether any controls are required or in place to regulate this?</p>
NV1.4	The Applicant	<p>Representative Monitoring Locations</p> <p>On page 22 of ES Chapter 14 [REP1-021], the applicant states that monitoring location LT7 has not been used as a proxy for baseline sound levels at receptors due to the atypical results at this location, particularly at night. No further information about what makes the results at this location atypical is provided in the Chapter or in any of the accompanying appendices. The applicant is required to elaborate on why monitoring location LT7 has been excluded?</p>
NV1.5	Wiltshire Council	<p>BS 4142:2014 and Operational Noise Effects</p> <p>Paragraph 14.6.33 of ES Chapter 14 [REP1-021] states that <i>'where background levels are low, the absolute levels might suggest a more acceptable outcome than would otherwise be suggested by the difference between the values (existing and proposed noise rating levels). As such, where background noise levels are identified as being below the 'very low' threshold of 30dB, a background noise level of 30dB L_{A90} has been adopted with respect to the setting of operational noise LOAEL and SOAEL⁵.</i></p>

⁵ LOAEL: Lowest Observable Adverse Effect Level (LOAEL) – the level above which adverse effects on health and quality of life can be detected

SOAEL: Significant Observed Adverse Effect Level (SOAEL) – the level above which significant adverse effects on health and quality of life occur

ExQ1	Question to:	Question:
		<p>The ExA note in row 3 of Table 14-2 of ES Chapter 14, that the Council confirmed the use of 30dB as a minimum background noise level to be appropriate at the scoping stage. However, SLD's expert's submission at D1 [REP1-179] casts considerable doubt on the appropriateness of this methodology and the applicant's justification for it. SLD's expert states (amongst other things) that the applicant's methodology ignores the context of a very quiet rural area and adopts a "one size fits all approach", which artificially elevates the baseline and thus minimises the noise effects of the development on sensitive receptors. It also provides examples of this in action for several residential receptors (Townleaze Farm and Bradfield Manor).</p> <p>The Council is requested to review SLD's submission [REP1-179] and advise the ExA whether it still agrees with the applicant's justification for using an absolute background noise level of 30dB, or if (and why) it now agrees with SLD's concerns that raising the baseline in this way modifies the relevant thresholds for the LOAEL and the SOAEL and thus underplays the noise effects.</p>
NV1.6	The Applicant	<p>Operational Noise Results Summary</p> <p>Table 14-23 of ES Chapter 14 [REP1-021] presents the operational noise results summary. It records zero receptors above SOAEL during the day and night-time periods. However, Table 9 of ES Appendix 14-4 [REP1-061] reports Receptors R10 (Bradfield Farm) and R20 (Townleaze Farm) experiencing a SOAEL at night-time. The applicant is required to review this discrepancy along with the statement made in paragraph 14.10.51 of ES Chapter 14, which states these receptors experience adverse effects between LOAEL and SOAEL during the night-time. If on review, the operational noise at the aforementioned receptors would be above or equal to SOAEL, the ExA requires an additional analysis setting out proposed mitigation to reduce the noise impact (this is without prejudice to the methodology positions raised in ExQ1 NV1.5 above).</p>
NV1.7	The Applicant	<p>Receptors R10 and R20</p> <p>The applicant is required to explain the statement made in paragraph 14.10.52 of ES Chapter 14 [REP1-021] that the night-time rating level at Receptors R10 and R20 can be defined as being a low rating level, particularly in light of paragraph 14.6.31 which states that '<i>BS 4142 does not define 'low' in the context of background sound levels nor rating levels. The note to the Scope of the 1997 version of BS 4142 defined very low background sound levels as being less than about 30 dB LA90, and low rating levels as being less than about 35 dB LA_{r,Tr}.</i>' (Bold text is ExA's emphasis).</p>
NV1.8	The Applicant	<p>Environmental Impact Assessment Methodology 2</p> <p>Paragraph 6.7.7 of ES Chapter 6 [APP-058] states that, as a general rule, effects categorised as moderate, major/moderate, and major are considered significant in EIA terms, whereas those classified as moderate/minor or below are not. The ExA note that in paragraph 14.6.44 of ES Chapter 14 (Noise) [REP1-021], only effects predicted to be major/moderate or major are considered significant in the context of the EIA for noise and vibration. The applicant is required to explain the implications of excluding adverse moderate effects from the classification of significance.</p>
NV1.9	The Applicant	<p>Receptors</p> <p>Table 14-11 of ES Chapter 14 [REP1-021] defines the types of receptors that sit within high, medium and low noise sensitivity categories. The applicant states it has used ISEP Guidelines for Environmental Noise Impact Assessment (2014) to define potentially affected receptors and their sensitivity level; however, the ISEP Guidelines includes farms, open air amenities (for example public rights of way and areas of landscape value) and wildlife sites and fauna as possible receptors that may need to be considered. Such receptors are notably absent from the applicant's Table 14-11 and the noise and vibration assessment generally.</p> <p>NPS-EN-1 recognises at paragraph 5.11.30 that '<i>Public Rights of Way, National Trails, and other rights of access to land are important recreational facilities for example for walkers, cyclists and horse riders. The Secretary of State should expect applicants to take appropriate mitigation measures to address adverse effects...</i>' Similarly, NPS EN-3 at paragraph 2.10.42 provides that applicants '<i>are encouraged to design the layout and appearance of the site to ensure continued recreational use of public rights of way where possible during construction, and in particular during operation of the site.</i>'</p> <p>The applicant is required to rectify the deficiencies noted above in the applicant's noise and vibration assessments with regard to potential effects on walkers, cyclists and horse riders within close proximity to the Order limits and the construction traffic routes. Whilst the ExA acknowledge that the use of PRoW or roads by those receptors may be linear and transient, we note that plant noise hum is expected to be permanent and continuous throughout the 60 year operational period, such that it could reduce the use, tranquillity and enjoyment of the area. As such, the ExA expects the noise effects of the proposed development on those receptors to be appropriately considered by the applicant or robustly justified in its absence.</p>
NV1.10	The Applicant	<p>BESS, Substations and Public Rights of Way</p> <p>Paragraph 14.9.10 of ES Chapter 14 [REP1-021] states that the BESS area and 132 kV and 400 kV substations have been located a minimum of 450m and 400m from sensitive receptor locations respectively. Can the applicant confirm if this statement relates only to the receptors included in Table 14-11 of ES Chapter 14? If so, can the applicant provide details of the BESS area and substation(s) distances from pastoral farms, designated PRoW, stud farm establishments, proposed permissive PRoW, wildlife sites and any areas with known presence of fauna?</p>

ExQ1	Question to:	Question:
NV1.11	The Applicant	<p>BESS Bund and Barrier</p> <p>The ExA note that a 2m bund with additional 3m barrier around the eastern and southern boundary of the BESS area is proposed to attenuate noise and to reduce visual impacts. Paragraph 14.9.11 of ES Chapter 14 [REP1-021] cross refers the ExA to ES Figure 3-3 [APP-083]. That figure is a basic layout plan of the BESS and 400 kV substation. The ExA requires an elevation and cross section detail of the proposed bund and barrier. The ExA also requires information on the proposed bund and barrier material and colour, fixing mechanism, and resilience to adverse weather, such as high winds and corrosion. The ExA also notes that silencer units are proposed on 75% (198) of BESS containers. Can the applicant explain why silencer units are not proposed on all BESS containers?</p>
Resources and Waste Management (RWM)		
RWM1.1	The Applicant Wiltshire Council	<p>Anticipated Construction and Operational Waste Quantities</p> <p>The Infrastructure Planning (EIA) Regulations 2017 state that the description of the development should include an estimate, by type and quantity, of types of waste produced during the construction and operational phases (Schedule 4 Paragraph 1(d)). Anticipated quantities of waste have not been provided in ES Chapter 3 [APP-043], the oCEMP [REP1-096] or the oOEMP [REP1-106] for the construction and operation phases.</p> <p><u>The applicant:</u></p> <p>In line with the above Regulations you are asked to confirm the anticipated volumes of waste from the proposed development at all phases of the development, and the impact of waste generation on the capacity of local waste management facilities. Please confirm if these volumes of waste been accounted for in the GHG calculations.</p> <p><u>Wiltshire Council:</u></p> <p>In considering the number of solar schemes already approved, and the number in the planning and pre-planning stages, you are asked to comment on the current capacity of waste management facilities. Are you satisfied that sufficient capacity exists to manage the anticipated generated volume of waste?</p>
RWM1.2	The Applicant	<p>Below Ground Cables at Decommissioning</p> <p>At the end of the operational phase, it is proposed that all the below ground cables would be left in place. NPS EN-3 states that generally, it is expected that the panel arrays and mounting structures will be decommissioned, and underground cabling dug out to ensure that prior use of the site can continue. You are asked to explain the following:</p> <ol style="list-style-type: none"> 1) The reasoning for leaving the below ground cables in place. 2) Whether there would be adverse effects or potential hindrance to use of the land associated with the cables being left in place.
RWM1.3	The Applicant The Environment Agency All Local Authorities	<p>Waste</p> <p>Can each party provide commentary on the proposed development's compliance with the Regulations: Waste Electrical and Electronic Equipment (WEEE) 2013?</p>
Socio-Economics (SE)		
SE1.1	The Applicant	<p>Permissive Paths</p> <p>Wiltshire Council Highways' consultation response (March 2025), which is summarised in ES Chapter 13 [REP1-019], states that the creation of additional PRoW could be of considerable benefit to PRoW users, especially if MALW50 and GSOM15 were able to be linked to the PRoW network. It was noted that these two footpaths currently terminate at a point where no onward highway rights exist.</p> <p>You are asked to advise how you have responded to this request for MALW50 and GSOM15 connections?</p>
SE1.2	The Applicant	<p>Agricultural/ Rural Employment</p> <p>ES Chapter 16 [APP-068] details that a total of 20 full-time equivalent (FTE) agricultural jobs and a further 50 FTE tourism related jobs would be lost.</p> <ol style="list-style-type: none"> 1) Clarify whether these figures are for the construction years only or represent the total loss for the entire duration of the project. 2) Clarify how these figures have been determined. 3) Explain how these job losses may impact on local services, such as village shops, pubs and recreation facilities. 4) Provide detail of how the support for diversification into sheep farming (referenced in ES Chapter 16 [APP-068] and [REP1-108]) would be advantageous to the local area, given the applicant does not propose to graze the land in the Order limits and 749.3ha of agricultural land would be removed from agricultural use for up to 60 years.

ExQ1	Question to:	Question:
SE1.3	The Applicant	<p>Socio-Economic and Tourism and Recreation Impacts</p> <p>ES Chapter 16 [APP-068] sets a Study Area of 20km from the Order limits for the assessment of socio-economics, due to this equating to an approximate 30 minute commute time from the proposed development. Given the entire area for the proposed solar farm is agricultural land in the countryside, it is not clear to the ExA how a commute time is the appropriate methodology to determine the geographical extent of impacts on businesses from the proposed development, which many IPs liken to the 'industrialisation' of the countryside.</p> <p>Wiltshire Council have similarly raised questions about why the Study Area is based on immediate area, instead of the wider County in its RR [RR-4934] and WR [REP1-137]. As a result, the applicant is asked to justify why it thinks a 30 minute commute time is the appropriate geographical measure.</p>
SE1.4	The Applicant	<p>Outline Skills Supply Chain and Employment Plan Q1</p> <p>Paragraph 5.2.3 of the outline Skills Supply Chain and Employment Plan (oSSCEP) [REP1-108] states the applicant will seek 'to offer apprenticeships and other academic support during the construction or operational phase of the Scheme'. Please confirm if this should read 'and', as opposed to 'or'. If that is not the case, please detail why. Would opportunities also be explored during decommissioning? If not, please explain.</p>
SE1.5	The Applicant	<p>Outline Skills Supply Chain and Employment Plan Q2</p> <p>Paragraph 5.2.4 of the oSSCEP [REP1-108] states it will 'consider a programme to promote apprenticeships during the various phases of the Scheme.' Furthermore, paragraph 5.3.5 states 'Once construction commences it may be helpful to display or advertise for vacancies in suitable physical locations or media within the 20 km Study Area. Alternatively, a named Skills and Employment Manager for the Scheme would be made responsible for filling vacancies by reaching out to local contacts.'</p> <p>Overall, the language in this document is vague, as per the highlighted examples, and does not appear to commit the applicant to undertake any form of apprenticeship scheme or promote vacancies locally throughout the entirety of the proposed development.</p> <p>Elsewhere, section 6.3 'Plan Delivery' does not name any educational institutions in the list of stakeholders. Given you expect to provide skills training, including apprenticeships, please explain the reasoning behind this approach.</p> <p>Please review this document and provide comment on those issues listed above.</p>
SE1.6	The Applicant	<p>Outline Skills Supply Chain and Employment Plan Q3</p> <p>Paragraph 5.4.8 of the oSSCEP [REP1-108] states 'All international suppliers will be held to a minimum quality with regard to environmental, professional and ethical working practices (including but not limited to the banning of suppliers or manufacturers that engage in slavery or forced labour) as agreed by the members of Solar Energy UK'.</p> <p>You are asked to provide detail as to how this is enforced.</p>
SE1.7	The Applicant	<p>Public Rights of Way Network Temporary Diversions</p> <p>ES Chapter 16 [APP-068] states that PRoWs WT GRIT 20 and WT MALW 54 both require temporary diversions during construction and decommissioning. Please advise how long the diversions would need to be in place and the length of the diversion route provided, as this is not explained in the outline Public Right of Way and Permissive Paths Management Plan [REP1-104].</p>
SE1.8	The Applicant	<p>Public Rights of Way Network Post Decommissioning</p> <p>The Wiltshire Ramblers [RR-4935] requested confirmation of the status of the PRoW network post-decommissioning and whether the network would return to its pre-construction layout. Please confirm the status of the PRoW network following decommissioning.</p> <p>Should the position be anything other than the current pre-construction network please provide a map showing the future layout with an explanation.</p>
SE1.9	The Applicant	<p>Equine Health</p> <p>Concerns have been raised that the applicant has not undertaken a proper assessment of impacts and effects on equine health and businesses. ES Chapter 16 [APP-068] states that such businesses are of 'local importance and therefore low sensitivity', however IPs have suggested this underplays the economic importance of stud farms in the vicinity on the wider economy. For example, [REP1-158, REP1-202 and REP1-214] have provided evidence that equine health can be adversely impacted by noise and construction activities, whilst further concern has been raised about the sensitivities that horses experience when encountering electromagnetic fields. [REP1-191] further details the potential adverse effects on this IP's stud business arising from construction and maintenance activities.</p> <p>1) Given the unpredictable nature of horses and the impact that this could have on the safety and welfare of both horses and riders/handlers, you are asked to provide justification for considering these to be standard recreation receptors.</p>

ExQ1	Question to:	Question:
		<p>2) Given the number of equine related representations, you are also requested to provide a more detailed assessment of the impacts on job losses in and business viability of the equine sector (and its supporting industries) beyond the information presented in Table 2-10 of ES Appendix 16-2 [APP-241]. When providing your response you are asked to consider the specific concerns from the above noted submissions focusing on evidence relating to equine health.</p> <p>3) You are also asked to submit a map showing the location of equestrian facilities with a commentary of the name, address and business activities. This should be split between stud farms, stabling/livery yards and details of any other equine facility type within the 20km study area.</p>
SE1.10	Wiltshire Council	<p>Innovation Forum</p> <p>In your D2 submission [REP2-048] you make reference to a possible Innovation Forum which could help the proposed development 'evolve with new innovations and best practice' over its lifetime. You are asked to provide further detail, specifically the following and anything more you think would be helpful to the ExA:</p> <ul style="list-style-type: none"> a) Who would make up the Innovation Forum b) What powers would have the Innovation Forum have c) Would the Innovation Forum form part of the Community Liaison Forum d) Examples of where an Innovation Forum has been used elsewhere
Transportation, Traffic and Highway Safety (TT)		
TT1.1	The Applicant	<p>ES Appendix 13.1</p> <p>ES Appendix 13.1 (Transport Assessment) was split into two parts at D1 [REP1-057 (Part 1) and REP1-059 (Part 2)]. Part 1 of the document contains 801 pages, and Part 2 contains 183 pages. However, the page numbers for the annexes in the contents page do not reflect the number of inserted pages within each annex, making it difficult to locate the starting page for each annex within the document.</p> <p>Annex C for example, is listed as page 80 on the contents page of Part 1, yet it is actually located at page 46 of Part 2. Similarly, Annex K is listed as page 88 on the contents page of Part 1, yet it is located at PDF page 173 of Part 2. The page numbering in the contents page should therefore be revisited to take account of the number of insertions within each annex, both parts of Appendix 13-1 should contain a contents page and not just Part 1, and the Annex page number locations within the contents pages should be hyperlinked so that the start of each Annex can be easily located in one click.</p> <p>The ExA requests the submission of renumbered replacement documents and fully functioning hyperlinked contents pages at D3.</p>
TT1.2	The Applicant	<p>Outline Construction Traffic Management Plan Omissions (oCTMP)</p> <p>The oCTMP was updated at D1 [REP1-112], however, the figures at page numbers 41 and 42 in the contents page (Appendix A (Access Drawings – Solar PV Sites) and Appendix B (Cable Route Corridor)) are missing from the document. Likewise, Annexes A to F listed as pages 73 to 78 in the contents page, are also missing from the document.</p> <p>As per the issues locating the annexes in ES Appendix 13.1 (referred to in ExQ1 TT1.1 above), the page numbering in the contents page of the next revision of the oCTMP, which reinstates the missing Appendices and Annexes, should also be revisited to take account of the number of figures within each Appendix and the number of insertions within each annex. The contents page numbers should also fully hyperlinked to allow the figures and annexes to be located in one click.</p>
TT1.3	The Applicant	<p>Highway Improvement Areas Q1</p> <p>As part of its pre-application consultation response, Wiltshire Council Highways requested that proposed works to be undertaken in the Highway Improvement Areas (HIAs) should be clearly set out in the application material.</p> <p>The ExA note reference in section 1.7.14 of ES Appendix 13-1 [REP1-057] (Part 1) to the creation of junction widening, removal of things like bollards and signs, and trimming of hedges in the HIA locations listed in that section of the document, but the only figure showing any detail is Annex I of ES Appendix 13-1 [REP1-059] (Part 2) on PDF page 166, which shows 'Alderton Road Widening Areas for Two Passing Articulated 16.5m HGVs'. That figure also lacks any detail with regard to what works are required to facilitate the widening in the places shown, such as removal of hedgerows, dry-stone wall, verge, and so on, and whether the works would be temporary or permanent.</p> <p>The Applicant's oCTMP [REP1-112] provides some additional descriptive detail of temporary highway improvement measures in section 5.4, while paragraph 4.6.2 of that document states 'Where the construction routes pass through sections of road that are considered narrow and require widening or require surfacing works, these have been adopted into the design as 'Highway Improvement Areas'. Despite this information, none of these works are shown in any detail on any plan or figure within the application material and it remains unknown whether such works can be achieved.</p>

ExQ1	Question to:	Question:
		<p>The ExA considers that there is inadequate descriptive and illustrated detail of the highway improvement works (particularly the areas that require widening) that would take place in each of the HIAs.</p> <p>The ExA requires the Applicant to:</p> <ol style="list-style-type: none"> 1) Update ES Chapter 13, ES Appendix 13-1 and the oCTMP with a new Table in each document, which allocates a number and a geographical description to each of the temporary and permanent HIAs (in the same way the applicant has done for each of the site access points in Table 13-19 of ES Chapter 13), and provide a detailed schedule of HIA works intended for each of those numbered HIA areas; and 2) Provide a dedicated set of HIA drawings for each temporary and permanent HIA, illustrating the works required (installation and removal) at each location, or explain why this is not possible. The ExA appreciates the time it may take to produce these drawings, so while deadline 3 is the preferred submission date, they should be submitted no later than deadline 4.
TT1.4	The Applicant	<p>Highway Improvement Areas Q2</p> <p>The HIAs are seemingly included in Work Nos. 8A (temporary) and 8B (permanent) of the dDCO and shown in the work plans [APP-007] in different colour/hatching. However, the distinction between temporary and permanent HIAs is not shown in ES Figures 2-4-1 to 2-4-9 [APP-080], 3-1 to 3-1-5 [APP-081] and 3-2 to 3-2-10 [APP-082]. These figures should therefore be amended to delineate temporary and permanent HIA locations in different colours.</p> <p>However, please note that the light pink colour used to identify the HIA areas in ES Figures 2-4-1 to 2-4-9 is too similar to the colour used to delineate B Roads so this requires revision to ensure that the distinction is clear to the viewer.</p>
TT1.5	The Applicant	<p>Construction Access Points</p> <p>Paragraph 2.1.2 of the oCTMP [REP1-112] states that the 21 accesses required for the solar PV sites would be retained for use by maintenance vehicles once the development is operational. The oCTMP does not include any statement about the retention or otherwise of the accesses into the CRC. Whilst it is acknowledged that the vast majority of access points along the CRC would be existing access points, some new access points are proposed and some of the existing accesses are likely to necessitate widening and formalisation for construction purposes. The ExA is seeking to understand:</p> <ol style="list-style-type: none"> 1) Which new accesses created for construction along the CRC corridor would be closed post construction and the land/ boundary reinstated to its pre-construction state. 2) Which existing accesses (for the solar PV sites and CRC corridor) would be retained in their altered state/ size or reinstated to their pre-altered state/ size. 3) For any new or altered access which is proposed to be reinstated to its pre-altered state/ size, where this requirement is secured.
TT1.6	The Applicant	<p>Traffic Forecasting</p> <p>Section 13.4 of ES Chapter 13 [REP1-019] states that construction traffic forecasts have been developed based on professional judgement and derived from experience with other developments similar in size, scale and nature to the scheme. The applicant is asked to explain which other schemes informed this assessment, which of those other schemes have been completed, and which of those other completed schemes have had their actual traffic forecasting monitored and verified for accuracy?</p> <p>In addition, ES Chapter 13 also states that operation and maintenance phase traffic forecasts have again been developed based on similar projects. The applicant is asked to explain which other projects are similar to the Lime Down Proposal and whether they are operational. The ExA is concerned that the forecasting may be based on other projects which are not yet constructed or operational such that the accuracy of the forecasting of those other projects cannot be verified. In that regard, how can the ExA be assured that the figures underpinning the applicant's Transport Assessment are realistic?</p>
TT1.7	The Applicant The Local Highway Authority (LHA)	<p>Construction Worker Numbers</p> <p>Paragraph 3.2.7 of the oCTMP [REP1-112] states that 'on a peak day, assuming the build out of all areas/elements of the scheme concurrently, there is expected to be a peak of 622 workers spread across the solar PV sites. For assessment, construction workers have been spread across the solar PV sites on a proportional basis, based on the size of each area.' Table 1 of the oCTMP provides an indicative construction programme, which shows Lime Down A, B and D all starting construction at the same time but Lime Down A and B finishing after 9 months. Lime Down C and E would commence around the 8-9 month mark and would be built alongside the rest of Lime Down D. Given that workers to each of these sites would not be compelled to use the company shuttle buses (or car share) and given the different build out periods, the ExA is concerned that spreading out the assessment impact of workers on a proportional basis (and on the assumption that 50% would use shuttle buses and each car would accommodate 1.5 construction workers) is not cautious enough to capture local traffic hotspots at the worst case, and when in the construction period those worst case impacts are likely to occur. The ExA therefore requires the applicant to provide a detailed rationale for their chosen methodology.</p> <p>The ExA also welcomes any comment from the LHA on the appropriateness of the applicant's chosen methodology.</p>

ExQ1	Question to:	Question:
TT1.8	The Applicant	<p>Construction Shuttle Buses</p> <p>The ExA note the applicant's commitment in the oCTMP [REP1-112] to construction worker shuttle buses to minimise traffic during construction, and that it would monitor the uptake of this travel plan measure. The ExA also notes that the applicant assumes that 50% of workers would use shuttle buses and that this is based on a figure used in the Cottam Solar and West Burton Solar Projects. However, the ExA understands that neither of those consented projects have yet to be constructed, so as asked in ExQ1 TT 1.6 (above), how can the ExA be assured that the figures underpinning the applicant's Transport Assessment are realistic?</p> <p>In addition, the ExA note a lack of a clear performance measure attached to the shuttle bus commitment in the oCTMP and wishes to understand how the applicant intends to deal with low shuttle bus uptake if it arises?</p>
TT1.9	The Applicant	<p>Abnormal Indivisible Loads (AIL)</p> <p>There would be approximately 132 AIL movements associated with cable drum deliveries over the length of the CRC, up to 10 AIL movements associated with cable delivery within the solar PV sites, and approximately 13 AIL movements associated with transformers to the 132kV substations located in Lime Down A, C, D and E. Are these AIL figures included in the HGV calculations in Tables 13-20, 13-25 and 13-35 of ES Chapter 13 [REP1-019], and are these specific loads also considered in the assessment of effects on fear and intimidation of non-motorised user (NMU) and road users, and accidents and safety? The applicant is asked to direct the ExA to where these specific matters relating to AIL have been discussed in the application material.</p>
TT1.10	The Applicant	<p>Construction Phase Traffic Dispersal</p> <p>ES Chapter 13 [REP1-019] states that the construction vehicle routes to the Order limits would be secured through the CTMP and that there would not be transport and access effects outside these construction vehicle routes. A substantial number of RRs (too many to list) have identified concerns with the narrowness of the construction vehicle routes, so the ExA would like to understand whether the applicant has given any consideration to the likelihood for local traffic dispersal onto other roads (creating rat runs) from local people seeking to avoid the construction vehicle routes and potential conflict with HGVs.</p> <ol style="list-style-type: none"> 1) Please direct the ExA to where this particular issue has been discussed in the application material, or provide reason for not considering local traffic dispersal and the potential effects that may have. 2) Furthermore, the ExA would like to understand what measures are, or could be, put in place (in addition to the HIAs) to minimise safety concerns for local drivers on the construction vehicle routes?
TT1.11	The Applicant National Highways	<p>Construction Delivery Times</p> <p>The National Highways consultation response which is summarised in ES Chapter 13 [REP1-019], notes that junctions 17 and 18 of the M4 experience peak-hour congestion. The applicant states that it is their intention to aim to reduce network peak hour construction vehicle movements by requiring deliveries to be scheduled between 09:30 and 16:30 where possible.</p> <p><u>The Applicant:</u></p> <p>Can the applicant clarify:</p> <ol style="list-style-type: none"> 1) Whether its intention is for deliveries to be scheduled to pass through junctions 17 and 18 and be on local roads only after 09.30 and before 16.30, or whether those quoted delivery movement times relate to the arrival and departure times at the construction access points; 2) Whether any of the construction vehicle routes pass by primary or secondary schools (and if so where); and 3) How its delivery vehicle movements would be monitored, recorded and regulated to ensure that those vehicles are not on the local road network outside the specified times, and not on non-construction route roads at any time? The ExA note the oCTMP [REP1-112] commitment to a delivery slot booking system, but to what extent is monitoring and compliance, or non-compliance with that system to be communicated with the local highway authority and/or National Highways? <p><u>National Highways:</u></p> <p>Can National Highways provide further information on whether deliveries to the proposed development through junctions 17 and 18 should take place after 09:30 and before 16:30 on weekdays (or some other times)?</p>
TT1.12	The Applicant	<p>Deliveries</p> <p>The applicant states in paragraph 13.4.5 of ES Chapter 13 [REP1-019] that for the purpose of the transport assessment it has been assumed that only fixed solar PV panels are used across the scheme, with no tracker PV panels, because this scenario would require the greatest number of deliveries. Can the applicant explain why fixed solar PV panels would generate more deliveries than tracker PV panels?</p>

ExQ1	Question to:	Question:
TT1.13	The Applicant	<p>Receptor Sensitivity</p> <p>Table 13-3 of ES Chapter 13 [REP1-019] sets out the applicant's categorisation of traffic and transport receptor sensitivity. The ExA note that within the definition column there is no reference to rural roads, pedestrians, cyclists, equestrian or open recreational receptors (for example public rights of way), so the ExA is unclear whether those receptors fall within the applicant's high, medium, low or negligible sensitivity categories. In addition, for the low and negligible sensitivity categories, the ExA is unclear overall which receptors would fall into those categories, as no examples are given in the table of the types of receptors with low sensitivity to traffic flows or no material sensitivity to traffic flows. The applicant is therefore required to revisit and update Table 13-3 to address its shortcomings, and subsequently confirm whether any changes are also required to the 'Additional Explanation' column in Tables 13-4 and 13-5 as a result of the update to Table 13-3.</p>
TT1.14	The Applicant	<p>Major Receptors</p> <p>Paragraph 13.6.23 of ES Chapter 13 [REP1-019] states that there are no major receptors on the Motorway and A-Roads within the Study Area. Therefore, they are deemed to have negligible sensitivity to traffic flow changes. Can the applicant direct the ExA to where in ES Chapter 13 they have explained which receptors are major and minor?</p>
TT1.15	The Applicant	<p>Public Bus Providers</p> <p>Tables 13-10 and 13-11 of ES Chapter 13 [REP1-019] describes local bus routes within the Order limits. Can the applicant provide evidence of their consultation and correspondence with bus companies in relation to any potential disruptions to local bus services / routes during the construction phase?</p>
TT1.16	The Applicant	<p>The Street, Grittleton</p> <p>The ExA note the proposal to use The Street, Grittleton as part of the CRC construction vehicle access. What alternative routes exist or were considered to avoid using The Street, and why were they discounted?</p>
TT1.17	The Applicant	<p>Haul Roads</p> <p>Paragraph 13.10.7 of ES Chapter 13 [REP1-019] and paragraph 2.1.9 of the oCTMP [REP1-112] state that <i>the proposed haul roads serving Lime Down B from Access 4 and Lime Down D from Access 10 will be temporary for construction, replacement and decommissioning phases only</i>. There are further references to haul roads in ES Chapter 13 and ES Appendix 13.1 (Transport Assessment) [REP1-057]. However, Figures 3-1 to 3-1-5 [APP-081] and 3-2 to 3-2-10 [APP-082] do not include any legend for haul roads, yet access tracks are identified. Can the applicant clarify whether the term haul road is synonymous with the terms access track in the application material, and if not whether the haul roads should be annotated on the aforementioned plans, and included as separate plans within the oCTMP?</p>
TT1.18	The Applicant	<p>Non-Motorised User (NMU) Delay, Amenity, Severance and Safety</p> <p>Various paragraphs in section 13.10 of ES Chapter 13 [REP1-019] state that NMU flows and activity on local roads are observed to be low, and as a result the effects of construction vehicles to the local highway network is not likely to result in any significant delay to NMUs on the local highway network, while the effects of construction vehicles on NMU delay on the local highway network is considered to be minor. Similarly, the applicant has concluded that the likely effects on NMU amenity (including fear and intimidation) during the construction phase would also only be minor adverse and temporary on the local highway network. However, in relation to severance and safety, no consideration at all has been given to the potential impact on NMUs from an increase in HGV movements during the construction (and maintenance) periods.</p> <p>During its unaccompanied site inspections, the ExA observed pedestrians, cyclists and horse riders using the local roads, and due to the lack of dedicated footways at the side of many roads, the ExA itself had cause to regularly walk in the roads (particularly between PRow links). This suggests that NMU activity on the local road network is more prevalent and unavoidable than the applicant's assessment concludes, meaning that the effects on NMU delay, amenity, severance and safety is likely to be understated.</p> <ol style="list-style-type: none"> 1) To dispel the ExA's concerns that the applicant has not sufficiently assessed NMU activity on the local road network, can the applicant advise whether it undertook an analysis of local trip generators and amenities in the traffic and transportation study area(s) to identify likely desire lines for pedestrians, cyclists and equestrians? 2) Can the applicant advise what surveys were done in relation to NMU movements on the local highway network, when they were undertaken, and where in the application material the results of those surveys are provided? 3) Can the applicant advise why it has not given any consideration to NMU safety in its assessment of effects from construction traffic? 4) Can the applicant advise that it has had regard to the requirements of the Highway Code sections 213 – 215, and how these requirements have been factored into their assessment of suitability of the construction vehicle routes?

ExQ1	Question to:	Question:
TT1.19	Wiltshire Council (Local Highway Authority)	<p>Road Safety Data</p> <p>The applicant states in ES Appendix 13.1 (Transport Assessment) [REP1-057] that it obtained personal injury collision statistics on the local road network from Wiltshire Council. Can the Council advise if it keeps data on road traffic collisions with pedestrians, cyclists and horse riders and if so, whether this data was provided to the applicant and can be submitted into the Examination? The period 2018-2023 is the data period that the applicant has used, so for consistency purposes it is this period which the ExA is interested in.</p>
TT1.20	The Applicant	<p>Road Safety Audit</p> <p>Road safety audits are carried out to identify potential safety hazards for all road users, including pedestrians, cyclists, horse riders and motorists, and to recommend measures to reduce accidents and injuries. Wiltshire Council [REP1-137], SLD [REP1-172] and many other interested parties have expressed concern about the narrowness of many of the construction route roads for two HGVs to pass and lack of visibility in some locations. The ExA note that Annexes J and K in updated ES Appendix 13-1 (Transport Assessment) [REP1-059] (Part 2, from page 167) show the 'Construction Route Swept Path Analysis' for one 16.5m HGV and a car passing, and two 16.5m HGVs passing along all the minor roads being proposed for construction access. However, the lack of carriageway dimensions and other details on the figures (such as kerbing, verges, height of hedges and walls, and so on) and the lack of safety assessment, particularly for vulnerable road users, is a very real concern.</p> <p>The applicant is asked to explain why it has not commissioned a road safety audit at this time and why it thinks a post-decision, pre-construction survey would be adequate to identify potential poor safety blackspots and recommend measures to reduce accidents and injuries without creating materially new or materially different environmental effects.</p>
TT1.21	The Applicant	<p>Additional Mitigation</p> <p>The applicant has reported a fatal accident recorded on the B4040 construction vehicle route for Lime Down A, B and C, and has noted that it would provide additional warning signage of oncoming bends in this location during the construction phase. The ExA requires the applicant to update the oCTMP [REP1-112] to include this measure.</p>
TT1.22	The Applicant	<p>ES Chapter 13 Corrections</p> <p>Paragraph 13.13.7 of ES Chapter 13 [REP1-019] refers to Table 13-45 twice. The second reference should be corrected to Table 13-44.</p> <p>Paragraph 13.13.8 refers to Table 13-47. This reference should be corrected to Table 13-46.</p>
TT1.23	The Applicant	<p>Proposed Cable Route Access Locations Q1</p> <p>Paragraph 4.4.2 of the oCTMP [APP-287] provides a bulleted list of cable construction route access locations. Access 116 is not accounted for in the list, but pursuant to the Access Plan provided in application Figure 2.6 [APP-010] and ES Figure 13-12-4 [APP-157] it is co-located with access 117. As a result of this omission in the bulleted list, the rest of the oCTMP bulleted list and the locations attributed to each of the remaining accesses is also brought into question, particularly as the last bullet refers to access 127 and 1228, despite there being no access 1228 (or 128 if accounting for a typographical error) shown in the Access Plan provided in application Figure 2.6 [APP-010]. The applicant is asked to rectify the errors in paragraph 4.4.2 of the oCTMP.</p>
TT1.24	The Applicant	<p>Proposed Cable Route Access Locations Q2</p> <p>The cable route access locations are shown in Appendix B of the oCTMP [APP-287] (although these are missing from the updated version at D1 [REP1-112]). Access location 110 shown on Drawing No. PL110 Rev C in Appendix B appears to be access location 111 on Sheet 11 of the Access Plan provided in application Figure 2.6 [APP-010]. Similarly access location 111 shown on Drawing No. PL111 Rev C in Appendix B of the oCTMP [APP-287] appears to be access location 110 on sheet 11 of the Access Plan provided in application Figure 2.6 [APP-010]. The applicant is requested to rectify the discrepancy between the two documents and reinstate Appendix B in full into the next version of the oCTMP (in line with ExQ1 TT 1.2 above).</p>
Other Environmental Matters (OEM)		
OEM1.1	The Applicant Mr Simon Durrant	<p>400kV Cable Lifespan</p> <p>Mr Durrant's D1 submission [REP1-239] provides comment that a typical 400kV cable typically has a 40-year lifespan.</p> <p><u>Applicant:</u> Please provide comment and, if necessary, detail any maintenance work required to renew the cable and update the oOEMP [REP1-098].</p> <p><u>Mr Durrant:</u> Please provide a copy of 'The challenges with undergrounding at 400kV' by Scottish and Southern Electricity Networks as referenced in your WR [REP1-239].</p>