

# **Lime Down Solar Park**

**Planning Inspectorate Reference:  
EN010168**

**Wiltshire Council Response to ExA's First  
Written Questions (ExQ1)**

**Deadline 3 (15 June 2026)**

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ExQ1	Question to:	Question:
<b>Air Quality and Emissions (AQ)</b>		
AQ1.1	The Applicant Wiltshire Council	<p><b>Battery Energy Storage System (BESS) Worst Case Scenario and Plume Modelling</b></p> <p><u>The Applicant:</u></p> <ol style="list-style-type: none"> <li>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 <a href="#">[APP-239]</a></li> <li>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.</li> <li>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.</li> <li>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) <a href="#">[REP1-110]</a>. 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).</li> </ol> <p><u>Wiltshire Council:</u></p> <ol style="list-style-type: none"> <li>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 <a href="#">[APP-239]</a>.</li> </ol> <p>The council can reasonably conclude the methodology is acceptable because it reflects industry-standard modelling techniques, uses recognised input datasets, and provides a transparent, reproducible framework for assessment. As the modelling adopts precautionary assumptions and bounding scenarios, the council can be satisfied that the results are not understated. If impacts are acceptable under these assumptions, real-world impacts are likely to be equal or lower.</p> <p>The council can therefore accept the conclusions because:</p> <ul style="list-style-type: none"> <li>• The modelling demonstrates no significant adverse effects at receptors, and</li> <li>• This outcome is supported by a precautionary modelling framework.</li> </ul>
AQ1.5	The Applicant Wiltshire Council Natural England	<p><b>BESS Impacts on Wildlife, Livestock and Pets</b></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> <p>This question goes beyond the council's areas of expertise.</p> <p>The remit of Wiltshire Council's ecology officer's response does not extend to the effects on livestock and pets and relates only to wildlife. The council considers it is for the Applicant to provide a comprehensive answer to the specific question regarding the impact of a thermal runaway on wildlife in the absence of sufficient information within the Environmental Statement (ES).</p> <p>If a thermal runaway event were to occur, the exothermic reaction process would generate large amounts of flammable and potentially toxic battery gas. This could lead to fires that are difficult to extinguish, potentially causing widespread damage. This could lead to the degradation and destruction of habitats, including ancient woodland, ancient species-rich hedgerows and 'important hedgerows' protected by the Hedgerow Regulations 1997, and other priority habitats / habitats of principal importance (HPI), that are high intrinsic ecological value, but which also support wildlife, including protected species, species of principal importance (SPI) and species of conservation concern (SoCC). As well as damaging and destroying the habitat of faunal species, fire would likely result in injury to and killing of a wildlife.</p>

ExQ1	Question to:	Question:
		<p>The release of toxic battery gas and chemicals into the environment would contribute to pollution, thereby posing risk to wildlife and the habitat upon which they depend.</p> <p>The council does not have sufficient information or time available to attempt to estimate possible numbers of different species / species groups which could be affected by a thermal runaway event as this would be dependent upon the magnitude, duration and extent / area affected by such an incident. Nonetheless, it is considered that such an event could have a very significant adverse effect on fauna, flora and habitats.</p> <p>However, in general and with respect to livestock, the impact of a thermal runaway event will depend on a number of factors, including the distance from the event the livestock are located and the type of livestock. Domestic livestock on the whole are reasonably docile but an event like a fire with associated noise from emergency services will cause them stress and in some circumstances panic, resulting in a 'stampede' to get away from the event, breaking through fences and gates in the case of cattle and sheep trying to get out any way they can, which can result in death due to entanglement in the fence. In both cattle and sheep, should the animals be pregnant, an event such as this could cause abortions. Horses, and in particular thoroughbreds, are much more prone to stress than cattle or sheep and likely to respond in a more extreme manner than described above, potentially causing injury and death.</p>

**Compulsory Acquisition and Land Rights (CA)**

CA1.17	Any Affected Person Interested Parties	<p><b>Accuracy of the Book of Reference, Land Plans and Points of Clarification Q2</b></p> <p>The Book of Reference (BoR) <a href="#">[REP1-011]</a> 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 <a href="#">[APP-018]</a> or Land Plans <a href="#">[REP1-004]</a>? If so, please set out what these are and provide the correct details.</p>																								
		<table border="1"> <thead> <tr> <th data-bbox="736 1031 982 1073">Plot Number</th> <th data-bbox="991 1031 1457 1073">Rights Claimed</th> <th data-bbox="1466 1031 1991 1073">Nature of Rights</th> <th data-bbox="2000 1031 2792 1073">Interested / Affected Party</th> </tr> </thead> <tbody> <tr> <td data-bbox="736 1079 982 1255">01-007</td> <td data-bbox="991 1079 1457 1255">Acquire right to use / carry out works</td> <td data-bbox="1466 1079 1991 1255">Temporary and Permanent Rights (land shaded blue on the Land Plan)</td> <td data-bbox="2000 1079 2792 1255">This is an unregistered strip of land adjacent to highway and is not shown as part of the Wiltshire Council maintainable highway record. The BoR identifies Wiltshire Council as "reputed owner" and occupier. The council has no record of ownership of this land.</td> </tr> <tr> <td data-bbox="736 1262 982 1514">01-008</td> <td data-bbox="991 1262 1457 1514">Temporary Possession</td> <td data-bbox="1466 1262 1991 1514">Temporary (shading is unclear on the Land Plan but may be linked to plot 01-011)</td> <td data-bbox="2000 1262 2792 1514">This is an unregistered strip of land adjacent to highway, but it is difficult to ascertain precisely as the strip is very small/narrow. Note that Plot 01-011 is part of the same adjacent strip and referred to in the Book of Reference (BoR) - Part 1 as "unknown". The BoR identifies Wiltshire Council as "reputed owner" and "occupier". The council has no record of ownership of this land.</td> </tr> <tr> <td data-bbox="736 1520 982 1633">02-011</td> <td data-bbox="991 1520 1457 1633">Freehold Acquisition</td> <td data-bbox="1466 1520 1991 1633">Compulsory Purchase of Freehold (shaded pink on the Land Plan)</td> <td data-bbox="2000 1520 2792 1633">Not shown as part of the Wiltshire Council maintainable highway record. Wiltshire Council rights are only in respect of footpath NORT1 which crosses part of this land.</td> </tr> <tr> <td data-bbox="736 1640 982 1787">02-012</td> <td data-bbox="991 1640 1457 1787">Freehold Acquisition</td> <td data-bbox="1466 1640 1991 1787">Compulsory Purchase of Freehold (shaded pink on the Land Plan)</td> <td data-bbox="2000 1640 2792 1787">Not shown as part of the Wiltshire Council maintainable highway record. The BoR incorrectly identifies Wiltshire Council as owner or reputed owner as highways authority, and occupier (as highways authority).</td> </tr> <tr> <td data-bbox="736 1793 982 1961">03-004</td> <td data-bbox="991 1793 1457 1961">Freehold Acquisition</td> <td data-bbox="1466 1793 1991 1961">Compulsory Purchase of Freehold (shaded pink on the Land Plan)</td> <td data-bbox="2000 1793 2792 1961">Wiltshire Council is occupier as highway authority (part only) as regards footpath SHER18. Wiltshire Council's interest / public rights in the footpath are not mentioned in the Book of Reference – any acquisition will take subject to the existing footpath.</td> </tr> </tbody> </table>	Plot Number	Rights Claimed	Nature of Rights	Interested / Affected Party	01-007	Acquire right to use / carry out works	Temporary and Permanent Rights (land shaded blue on the Land Plan)	This is an unregistered strip of land adjacent to highway and is not shown as part of the Wiltshire Council maintainable highway record. The BoR identifies Wiltshire Council as "reputed owner" and occupier. The council has no record of ownership of this land.	01-008	Temporary Possession	Temporary (shading is unclear on the Land Plan but may be linked to plot 01-011)	This is an unregistered strip of land adjacent to highway, but it is difficult to ascertain precisely as the strip is very small/narrow. Note that Plot 01-011 is part of the same adjacent strip and referred to in the Book of Reference (BoR) - Part 1 as "unknown". The BoR identifies Wiltshire Council as "reputed owner" and "occupier". The council has no record of ownership of this land.	02-011	Freehold Acquisition	Compulsory Purchase of Freehold (shaded pink on the Land Plan)	Not shown as part of the Wiltshire Council maintainable highway record. Wiltshire Council rights are only in respect of footpath NORT1 which crosses part of this land.	02-012	Freehold Acquisition	Compulsory Purchase of Freehold (shaded pink on the Land Plan)	Not shown as part of the Wiltshire Council maintainable highway record. The BoR incorrectly identifies Wiltshire Council as owner or reputed owner as highways authority, and occupier (as highways authority).	03-004	Freehold Acquisition	Compulsory Purchase of Freehold (shaded pink on the Land Plan)	Wiltshire Council is occupier as highway authority (part only) as regards footpath SHER18. Wiltshire Council's interest / public rights in the footpath are not mentioned in the Book of Reference – any acquisition will take subject to the existing footpath.
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02-012	Freehold Acquisition	Compulsory Purchase of Freehold (shaded pink on the Land Plan)	Not shown as part of the Wiltshire Council maintainable highway record. The BoR incorrectly identifies Wiltshire Council as owner or reputed owner as highways authority, and occupier (as highways authority).																							
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		03-007	Freehold Acquisition	Compulsory Purchase of Freehold (shaded pink on the Land Plan)	Wiltshire Council is occupier as highway authority (part only) as regards footpath SHER18. Wiltshire Council's interest / public rights in the footpath are not mentioned in the Book of Reference – any acquisition will take subject to the existing footpath.
		03-009	Freehold Acquisition	Compulsory Purchase of Freehold (shaded pink on the Land Plan)	Wiltshire Council is occupier as highway authority (part only) as regards footpath SHER18. Wiltshire Council's interest / public rights in the footpath are not mentioned in the Book of Reference – any acquisition will take subject to the existing footpath.
		03-049	Freehold Acquisition	Compulsory Purchase of Freehold (shaded pink on the Land Plan)	This plot is not shown as part of the Wiltshire Council maintainable highway record. Potentially part of railway and in ownership of Network Rail. The BoR gives Wiltshire Council as occupier in respect of public byway LUCK57.
		03-059	Freehold Acquisition	Compulsory Purchase of Freehold (shaded pink on the Land Plan)	This land is an unregistered strip adjacent to the public highway, but part may be within maintained highway. The BoR gives Wiltshire Council as reputed owner and occupier but at least part of the subsoil may be in ownership of East Dunley Farm.
		03-061	Acquire right to use / carry out works	Temporary and Permanent Rights (shaded blue on the Land Plan)	This plot is not shown as part of the Wiltshire Council maintainable highway record. The BoR gives Wiltshire Council as reputed owner and occupier as highway authority, but the council has no record of ownership.
		03-064	Acquire right to use / carry out works	Temporary and Permanent Rights (shaded blue on the Land Plan)	This land is an unregistered strip of land adjacent to the public highway and is not shown as part of the Wiltshire Council maintainable highway record. The BoR gives Wiltshire Council as reputed owner and occupier as highway authority, but the council has no record of ownership.
		04-010	Freehold Acquisition	Compulsory Purchase of Freehold (shaded pink on the Land Plan)	This land is an unregistered strip of land adjacent to the public highway and is not shown as part of the Wiltshire Council maintainable highway record. The BoR gives Wiltshire Council as reputed owner and occupier as highway authority, but the council has no record of ownership.
		04-011	Freehold Acquisition	Compulsory Purchase of Freehold (shaded pink on the Land Plan)	Mainly unregistered strip adjacent to highway but bottom end may be within maintainable highway. The BoR gives Wiltshire Council as reputed owner and occupier as highway authority, but the council has no record of ownership.
		04-015	Freehold Acquisition	Compulsory Purchase of Freehold (shaded pink on the Land Plan)	This land is an unregistered strip of land adjacent to the public highway and is not shown as part of the Wiltshire Council maintainable highway record. The BoR gives Wiltshire Council as reputed owner and occupier as highway authority, but the council has no record of ownership.

ExQ1	Question to:	Question:			
		06-024	Freehold Acquisition	Compulsory Purchase of Freehold (shaded pink on the Land Plan)	This land is an unregistered strip of land adjacent to the public highway and is not shown as part of the Wiltshire Council maintainable highway record. The BoR gives Wiltshire Council as reputed owner and occupier as highway authority, but the council has no record of ownership.
		08-001	Acquire right to use / carry out works	Permanent Rights (shaded blue on the Land Plan)	This plot is not showing as part of the Wiltshire Council maintainable highway record and appears to be a pond / drainage feature adjacent the public highway. The BoR gives Wiltshire Council as reputed owner and occupier as highway authority, but the council has no record of ownership.
		11-012	Temporary Possession	Temporary (shaded yellow on the Land Plan)	This land is an unregistered strip of land adjacent to the public highway and is not shown as part of the Wiltshire Council maintainable highway record. The BoR gives Wiltshire Council as reputed owner and occupier as highway authority, but the council has no record of ownership.
		11-013	Acquire right to use / carry out works	Possibly both (shaded blue on the Land Plan)	This land is an unregistered strip of land adjacent to the public highway and is not shown as part of the Wiltshire Council maintainable highway record. The BoR gives Wiltshire Council as reputed owner and occupier as highway authority, but the council has no record of ownership.
		15-002	Temporary Possession	Temporary (shaded yellow on the Land Plan)	Not shown as part of the Wiltshire Council maintainable highway record. The BoR gives Wiltshire Council as reputed owner and occupier as highway authority, but the council has no record of ownership.
		15-003	Permanent Rights	Permanent Rights (shaded blue on the Land Plan)	Not shown as part of the Wiltshire Council maintainable highway record. The BoR gives Wiltshire Council as reputed owner and occupier as highway authority, but the council has no record of ownership.
		15-004	Temporary Possession	Temporary (shaded yellow on the Land Plan)	Not shown as part of the Wiltshire Council maintainable highway record. The BoR gives Wiltshire Council as reputed owner and occupier as highway authority, but the council has no record of ownership.
		15-005	Temporary Possession	Temporary (shaded yellow on the Land Plan)	Not shown as part of the Wiltshire Council maintainable highway record. The BoR gives Wiltshire Council as reputed owner and occupier as highway authority, but the council has no record of ownership.
		15-020	Acquire right to use / carry out works	Temporary and Permanent (shaded blue on the Land Plan)	Not shown as part of the Wiltshire Council maintainable highway record. The BoR gives Wiltshire Council as reputed owner and occupier as highway authority, but the council has no record of ownership.

ExQ1	Question to:	Question:
<b>Climate Change (CC)</b>		
CC1.4	The Applicant, Wiltshire Council	<p><b>Carbon Cost of Subsequent Food Imports</b></p> <p>Wiltshire Council's Local Impact Report (LIR) <a href="#">[REP1-137]</a> 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> <p><u>The Applicant:</u></p> <p>You are asked whether replacement food importation should be considered in ES Chapter 7 <a href="#">[APP-059]</a> 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></p> <p>You are asked whether this should be considered in ES Chapter 7 <a href="#">[APP-059]</a>. Please explain your answer and provide reasoning.</p> <p>Research indicates that the carbon footprint of each tonne imported cereal ranges from 250kg – 550kg of carbon dioxide, depending on the type of cereal, how it is produced and where it comes from. Ocean shipping contributes 10 – 30kg of carbon dioxide per tonne, or an extra 150t of CO2/year. However, other than the shipping element this is comparable to home produced cereal production.</p>
<b>Cultural Heritage (CH)</b>		
CH1.2	The Applicant Historic England Wiltshire Council	<p><b>Heritage Visualisations 1</b></p> <p>Paragraph 4.5.1 of ES Appendix 12-1 (Heritage Statement) <a href="#">[APP-219]</a> 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.</p> <p>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 <a href="#">[APP-099]</a> and ES Figure 12-1 <a href="#">[APP-143]</a>. The applicant is subsequently requested to provide the additional visualisations or justification as to why not.</p> <p>Wiltshire Council has suggested that additional visualisations would be helpful in its Built Heritage section of its Relevant Representation <a href="#">[RR-4934]</a>. It would be helpful if these included a viewpoint looking west from Farleaze Farm towards Site C, where it has been noted that there was limited assessment.</p>
CH1.6	Historic England Wiltshire Council	<p><b>Magnitude of Effects</b></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 <a href="#">[APP-064]</a>?</p> <p>Wiltshire Council can confirm that it is satisfied from both an archaeological and built heritage perspective.</p>
CH1.9	The Applicant Historic England Wiltshire Council	<p><b>Duration of Harm</b></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> <p>Wiltshire Council can confirm that it has not factored in or relied upon the temporary duration (60 years) of the main installation as a mitigating factor within their assessment of the levels of harm caused to built heritage assets. However, it considers that in the case of the construction impacts associated with the cable routes, the much shorter-term nature of the impacts is a more legitimate mitigation which does factor in to an extent in the already low levels of harm.</p>

ExQ1	Question to:	Question:
CH1.14	Wiltshire Council The Applicant	<p><b>Non-intrusive Construction Methodology</b></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>Wiltshire Council's agreement to this potential change in mitigation method should be secured through the DCO requirement, not left as narrative in the Outline Archaeological Mitigation Strategy. Any departure from non-intrusive methodology in sensitive fields should require the relevant planning authority's approval, following consultation with the council's Archaeologist, through the written scheme of investigation (WSI) and / or detailed archaeological mitigation strategy (DAMS).</p> <p>Requirement 12 should be amended to state that any intrusive alternative to identified non-intrusive construction methodology must be expressly identified in the WSI / DAMS and approved by the relevant planning authority after consultation with the council's Archaeologist before works in the relevant field parcel commence.</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><b>Draft Development Consent Order - Requirement 12</b></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> <p>Whilst it is acknowledged that this question was posed to the Applicant, the council considers that the scope of further work should be set out in a Detailed Archaeological Mitigation Strategy, which needs to be secured via a Requirement (condition) linked to any grant of consent.</p>
CH1.16	Wiltshire Council	<p><b>Grittleton House</b></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> <p>The council considers that the Applicant should work with Grittleton House's owners to identify additional and more robust and effective management proposals to be incorporated in the outline management plans which could assist in mitigating the impact from the scheme on the business and hence on the future viability and conservation of the asset. These could include measures such as the consideration of alternative sites for the construction compound, limited the area of construction served by this particular compound to reduce the time during which it is in use, providing greater certainty over the timing and / or length of the construction of the section of the cable route directly within the field of view from the house and during which the compound will be active.</p> <p>In the council's opinion, the only mitigation that would prevent material harm to the business that operates at Grittleton House would be for the compound to be located at a different location where it could not be seen or heard from the house.</p>

ExQ1	Question to:	Question:
<b>Cumulative Effects (CE)</b>		
CE1.2	All Local Authorities	<p><b>List of Cumulative Projects</b></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? 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 <a href="#">[REP1A-019]</a></p> <p>The council has been unable to provide a response to this question in the time available due to the need to cross-reference data across a variety of sources. Wiltshire Council would politely request that it can provide its response to this question at Deadline 4.</p>
<b>Draft Development Consent Order (dDCO)</b>		
Questions within this section refer to the dDCO updated at Deadline 1 <a href="#">[REP1-007]</a> (clean version)/ <a href="#">[REP1-008]</a> (tracked version)		
Articles		
DCO1.3	The Applicant	<p><b>Article 2(1) (Interpretation) Q3</b></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 <b>bold</b> text in subsequent versions of the dDCO:</p> <p><i>“maintain” includes inspect, repair, adjust, alter, remove, refurbish, reconstruct, replace and improve any part of, <b>but not remove, reconstruct or replace the whole of the authorised development, and “maintenance” and “maintaining” are to be construed accordingly;</b></i></p> <p>If the applicant disagrees with this recommended revised definition, it is required to explain why.</p> <p>Whilst it is acknowledged that this question was posed to the Applicant, Wiltshire Council agrees with the ExA that the definition of “maintain” is very broad. The council supports the ExA’s suggested wording to narrow the Applicant’s powers.</p>
DCO1.5	The Applicant Wiltshire Council	<p><b>Article 2(1) (Interpretation) Q6</b></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"> <li>1) The ExA refers the applicant to Requirement 4(1) of the <a href="#">A122 (Lower Thames Crossing) DCO 2025</a>, which required preliminary works to be carried out in accordance with a preliminary works environment management plan. <a href="#">[REP9-190]</a> 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?</li> <li>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.</li> </ol> <p><u>Wiltshire Council:</u></p> <p>The Council is asked:</p> <ol style="list-style-type: none"> <li>1) If the definition of PPW is too widely drawn;</li> <li>2) Whether greater control over PPW should be included within the dDCO; and if so</li> <li>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)?</li> </ol>

ExQ1	Question to:	Question:
		<p>Permitted Preliminary Works (PPW) is currently defined broadly and sits outside “commencement”. The definition is too wide, particularly site clearance, intrusive archaeological / geotechnical works, diversion / laying of apparatus and temporary facilities. The council’s requested requirement below follows the approach in Requirement 4 of the A122 (Lower Thames Crossing) Development Consent Order 2025 and Requirement 4 of the A303 (Amesbury to Berwick Down) Development Consent Order 2023, adapted for a solar DCO context. Recent solar DCO’s, including Oaklands Farm, Heckington Fen and Gate Burton, also support the principle that permitted preliminary works / site-preparation works should not proceed uncontrolled where they may give rise to environmental, highways, drainage, ecological, arboricultural, archaeological or amenity effects.</p> <p>A requirement should be added that no PPW may be carried out until a Preliminary Works Environmental Plan for the relevant land has been approved in writing by the relevant planning authority, following consultation with relevant consultees. The plan should cover location / extent, access, working hours, ecological / arboricultural / archaeological controls, drainage / pollution prevention, traffic / PRow controls, reinstatement, complaints and reporting.</p>
DCO1.6	The Applicant	<p><b>Article 2(1) (Interpretation) Q7</b></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> <p>Whilst it is acknowledged that this question was posed to the Applicant, from a legal perspective, the council takes the view that the broadening of the definition does not cause any concern as it would make sense that it covers all public rights of way as opposed to new ones.</p>
DCO1.13	The Applicant Wiltshire Council South Gloucestershire Council	<p><b>Article 9 – Application of Highway Authority Permit Schemes</b></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"> <li>1) What precedent(s) exist for this type of power benefitting the undertaker.</li> <li>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.</li> <li>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.</li> </ol> <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> <p>In practice, Article 9 as currently drafted would constrain the council’s ordinary permit-scheme controls by preventing refusal of a permit, or the imposition of permit conditions, where those controls amount to the application of restrictions under sections 58 or 58A of the 1991 Act. Wiltshire Council is pragmatic in relation to those provisions and does not anticipate relying on them unreasonably. However, the council does not consider that the undertaker has justified a blanket restriction on the council’s ability to rely on those provisions where necessary for highway asset protection, network co-ordination or public safety.</p>

ExQ1	Question to:	Question:
		<p>The council agrees with the ExA's alternative suggestion that any relaxation of the permit scheme should be restricted. Any relaxation of restrictions under sections 58 or 58A should be limited to specified Article 8 street works, on specified streets, where reasonably necessary for construction or decommissioning and where the undertaker has demonstrated that there is no reasonably practicable alternative programme.</p> <p>The Council's wider concern is with Article 9(3). The Council does not consider that Schedule 16 is an appropriate mechanism for resolving ordinary permit-scheme disputes. Permit decisions involve highway safety, timing, traffic management, network management, co-ordination, apparatus protection and road-space management. Those matters should remain subject to the ordinary permit-scheme framework and should not be recast as DCO requirement-discharge disputes.</p> <p>The Council therefore requests Art 9 be replaced as follows:</p> <p><i>9.—(1) The permit schemes apply with the modifications set out in this article to street works carried out under the power conferred by article 8 (street works).</i></p> <p><i>(2) Paragraph (3) applies only to street works carried out under article 8 in the streets specified in Schedule 4 where—</i></p> <p><i>(a) the works are reasonably necessary for the construction or decommissioning of the authorised development;</i></p> <p><i>(b) the undertaker has demonstrated to the relevant permit authority that there is no reasonably practicable alternative programme for those works which would avoid the restriction referred to in paragraph (3); and</i></p> <p><i>(c) the relevant permit authority is satisfied that the works can be carried out without unacceptable adverse effects on highway safety, traffic management, network management, emergency access, the structural integrity of the highway, the protection or placing of apparatus, public rights of way, or the co-ordination of works in the street.</i></p> <p><i>(3) Where paragraph (2) applies, a permit may not be refused, or granted subject to conditions, solely on the basis that the permit authority has imposed restrictions under section 58 (restrictions on works following substantial road works) or section 58A (restrictions on works following substantial street works) of the 1991 Act.</i></p> <p><i>(4) Nothing in paragraph (3) prevents the relevant permit authority from refusing a permit or granting a permit subject to conditions where it considers this necessary or appropriate in the interests of highway safety, traffic management, network management, emergency access, the structural integrity of the highway, the protection or placing of apparatus, public rights of way, or the co-ordination of works in the street.</i></p> <p><i>(5) Schedule 16 (procedure for discharge of requirements) does not apply to any decision to refuse a permit, grant a permit subject to conditions, vary a permit, or to any other decision, consent, approval, certificate, notice, permit, dispute or other matter arising under or in connection with—</i></p> <p><i>(a) a permit scheme; or</i></p> <p><i>(b) Part [X] of Schedule 15 (protective provisions for the protection of Wiltshire Council as local highway authority).</i></p> <p><i>(6) Nothing in this article limits, excludes or modifies Part [X] of Schedule 15, and the grant of a permit under a permit scheme does not constitute an approval under Part [X] of Schedule 15 unless Wiltshire Council expressly confirms in writing that it is to have that effect.</i></p>
DCO1.14	The Applicant	<p><b>Article 10 - Power to alter layout, etc., of streets</b></p> <p>The power in Article 10 authorises alteration etc. of any street within and beyond the Order limits. The EM <a href="#">[REP1-009]</a> 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> <p>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)?</p>

ExQ1	Question to:	Question:
		<p>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.</p> <p>Whilst it is acknowledged that this question was posed to the Applicant, Wiltshire Council's Highways Development Management (HDM) is similarly concerned as to why it is deemed necessary for Article 10 of the DCO to confer powers under (2) to "<i>alter the layout of any street</i>", so not just the streets identified with the Work Area plans and within the DCO Order Limits. Whilst Article 10(4) requires the Applicant to consult with the street authority, with the consent process to be in a form reasonably required by the street authority, the 6-week limit for determination / approval under Article 47(4) is a real concern as the council will have no idea as to the scale or complexity of any highway works outside the DCO Order Limits which the Applicant may seek to propose in the future. As such, the council see no reason why the Applicant should not follow the standard Wiltshire Council s278 Agreement process for developers works to the highway where the works duly required and proposed are outside of the DCO Order Limits. It is implied from Article 10 that works identified under (1) are not subject to the same consent or approval requirements given under (3) and (4). This has been a significant area of contention in the DCO drafting from the start and, to this extent, Wiltshire Council is seeking the insertion of 'Protective Provisions' in Schedule 15 to protect its interest where works to the public highway are concerned. However, these provisions as currently drafted would relate on to defined 'Roadworks' or 'Cable Works' within the Order Limits of the DCO, and specifically to Works Area Nos 8A and 8B indicated within the Works Plans. In other words, they would provide the authority with no protection in respect of works which the Applicant may propose outside the Order Limits. As such, and as stated above, this must be controlled using the standard s278 Agreement process, and so DCO powers under Article 10(2) waived for highway works which the Applicant 'may' propose or seek outside the Order Limits.</p>
DCO1.15	The Applicant Wiltshire Council South Gloucestershire Council	<p><b>Article 11 - Construction and maintenance of altered streets</b></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> <p>Under the s278 Agreement process that would otherwise generally apply, the highway works when completed and deemed satisfactory would be issued with a Provisional Certificate of Completion. At this point a 12-month 'Defects' or 'Maintenance' period would ensue with the developer retaining responsibility for maintenance during this time. Following a further inspection at the end of this period, the council would take-over maintenance. This is the way Article 11(1)(b) is drafted at present, but the point about the risk of consequent damage by construction trafficking to highway works completed early in the construction phase is a good one. As the council is mindful that construction damage to the narrow rural roads being proposed for HGV construction access could be far more widespread than subsequent damage to completed areas under works, the council is seeking a formal s59 Agreement (Highway Act 1980) within the DCO to cover potential damage to this wider network caused by extraordinary trafficking. If this is in place, then it would potentially cover damage defects liability for included road lengths which have been subject to works beyond the 12-month period.</p> <p>Alternatively, the council considers that the issue is best addressed by making Article 11 expressly subject to the Wiltshire highway protective provisions (as amended by Wiltshire Council). Those protective provisions require the undertaker to maintain the relevant road networks until the local highway authority issues the final certificate(s). The final certificate mechanism is preferable to a date tied to final commissioning because it is linked to highway completion, condition surveys, remedial works, defects, as-built information and the council's inspection and certification process.</p> <p>Wiltshire Council therefore requests that Article 11(1)(b) be replaced as follows: (b) unless otherwise agreed with the street authority and subject to Part [X] of Schedule 15, be maintained by and at the expense of—</p>

ExQ1	Question to:	Question:
		<p>(i) the undertaker—  (aa) for a period of 12 months from the date the alteration of that street is completed; or  (bb) where the street forms part of the local road network and the alteration constitutes or forms part of road works or cable works to which Part [X] of Schedule 15 applies, until the final certificate has been issued under that Part,  Whichever is the later; and  (ii) the street authority, from the expiry of the period referred to in sub-paragraph (i).</p>
DCO1.16	The Applicant	<p><b>Article 12 - Temporary closure, restriction or prohibition of use of streets and public rights of way Q1</b>  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 <a href="#">[REP1-009]</a> at paragraph 4.3.8 explains the need for motor vehicles on PRoW, but it does not cover 12(1)(c).  1) The applicant is requested to update the EM to justify the inclusion of Article 12(1)(c).  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?</p> <p>Whilst it is acknowledged that this question was posed to the Applicant, from a legal perspective, the council would agree that a reasonable time needs to be expressly stated to avoid possible conflicts. It is suggested that this could be amended to cover just the period of construction at that specific part of the Lime Down development.</p>
DCO1.17	The Applicant	<p><b>Article 12 - Temporary closure, restriction or prohibition of use of streets and public rights of way Q2</b>  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.’  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?  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> <p>Whilst it is acknowledged that this question was posed to the Applicant, a Temporary Traffic Regulation Order (TTRO) in most cases restricts the movement of vehicles and pedestrians are exempt unless specifically restricted. Any TTRO should state “reasonable access” to properties affected – this means access (including vehicular) from one end of the closure or the other, but access through the work site may not be possible. Access provision should also allow for cyclists and equestrians to leave their home or field, although it is acknowledged that this may only apply in a few locations.</p>
DCO1.20	Wiltshire Council South Gloucestershire Council	<p><b>Article 16 - Traffic regulation measures</b>  <u>The Applicant:</u>  Can the applicant explain why this Article appears to apply to any road within and outwith the Order limits?  <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> <p>Wiltshire Council believes the timeframes in Article 16(5)(a) and (5)(b) should be 8 weeks and 2 weeks respectively to allow time for full consultation and advertising twice. This aligns with industry best practice and will not unduly add strain on existing resources. Digital publication will probably become</p>

ExQ1	Question to:	Question:
		<p>statutory during the lifetime of the DCO and therefore the article should accommodate this. On-site publication for temporary Traffic Regulation Orders (TRO) are not prescribed, so the council does not do on-site notices.</p>
DCO1.26	The Applicant	<p><b>Article 40 - Felling or lopping of trees and removal of hedgerows Q1</b></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> <ol style="list-style-type: none"> <li>1) Explain what is meant by ‘near’.</li> <li>2) Should Article 40(1) be updated to include the following words in <b>bold</b> ‘...near any part of the authorised development <b>within the Order limits or encroaching upon the Order limits, or cut back its roots ....</b>’?</li> <li>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?</li> </ol> <p>Whilst it is acknowledged that this question was posed to the Applicant, the council’s Arboricultural Officers feel that the current wording is ambiguous and could result in excessive and / or unnecessary works or felling of trees. Therefore, the council agrees that Article 40(1) should include a requirement to consult and seek approval from Wiltshire Council for felling, lopping or removing, before this power is invoked. Furthermore, the council considers that the Article should be limited to “within the Order limits” rather than “near”.</p>
DCO1.27	The Applicant	<p><b>Article 40 - Felling or lopping of trees and removal of hedgerows Q2</b></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> <p>Wiltshire Council welcomes this question from the ExA as it goes directly to concerns raised in previous council responses.</p>
DCO1.28	The Applicant Wiltshire Council	<p><b>Article 41 - Trees subject to tree preservation orders (TPOs)</b></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> <ol style="list-style-type: none"> <li>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.</li> <li>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.</li> </ol> <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>

ExQ1	Question to:	Question:
		<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> <p>Given that all works to trees, including individual, groups and woodlands, that are protected by a Tree Preservation Order require consent from the LPA, even when proposing works to their own trees, it is appropriate that the Applicant should be required to consult and seek approval 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>Therefore, the council would require prior written approval to works to TPO trees outside the construction works specifically assessed and authorised. Deemed consent should not operate as a blanket long-term permission for future operational / maintenance / decommissioning works. The Local Authority is under a statutory duty to act reasonably and the DCO could have provision in that any approval by the Council (a) must not be unreasonably withheld; (b) must be given in writing; and (c) may be subject to any conditions as the Council considers necessary.</p> <p>Article 41 should be amended so TPO works during maintenance, operation or decommissioning require prior written approval of the relevant planning authority / tree offer, except in emergency.</p>
<b>Schedule 2 – Requirements</b>		
DCO1.35	The Applicant	<p><b>The use of the word ‘substantially’</b></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> <p>Whilst it is noted that this question is posed to the Applicant, Wiltshire Council shares the ExA’s concerns regarding the inclusion of the word “substantially”, as this word is considered too nebulous. The council considers that “substantially” should be deleted from Requirements 6 to 20.</p>
DCO1.36	The Applicant	<p><b>Approvals process</b></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> <p>Whilst it is noted that this question is posed to the Applicant, Wiltshire Council agrees with the ExA and considers that any approval from the relevant planning authority on Requirements must be given in writing. The council supports this inclusion and requests that the relevant wording be updated accordingly.</p>
DCO1.37	The Applicant Wiltshire Council	<p><b>Requirement 5 - Detailed design approval</b></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></p>

ExQ1	Question to:	Question:
		<p>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).</p> <p>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 <b>bold</b> 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, <b>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.</b></i></p> <p>Wiltshire Council agrees with the ExA's proposed amendments, as those elements are capable of materially affecting landscape, heritage, visual amenity, ecology and public safety and should be included within the detailed design approval.</p> <p>A new sub-paragraph should be added to Requirement 5 requiring details of fencing, gates, boundary treatment, signs, CCTV and lighting columns for Work Nos. 1, 2, 3. Paragraph (2) should also be amended to include, "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."</p> <p>As stated in previous submissions <a href="#">[RR-4934, REP1-137 and REP2-048]</a>, the council considers that additional amendments to Requirement 5 are required.</p>
DCO1.38	The Applicant Wiltshire Council Dorset and Wiltshire Fire and Rescue Service	<p><b>Requirement 6 - Battery safety management</b></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> <p>Whilst it is acknowledged that this would not ordinarily be required in the grant of planning permission, the council considers that this seems like a prudent approach. However, the council will defer to the Dorset and Wiltshire Fire and Rescue Service as it is outside the council's expertise.</p>
DCO1.39	The Applicant	<p><b>Requirement 7 - Landscape and ecological management plan</b></p> <p>The ExA seeks comment on whether it is necessary to include reference to PPW in Requirement 7(1) as noted in <b>bold</b> text as follows:</p> <p><i>7.—(1) No part of the authorised development may commence <b>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.</b></i></p> <p>Whilst it is noted that this question is posed to the Applicant, Wiltshire Council is supportive of these proposed amendments as it is the council's view that the permitted preliminary works should be covered by the Requirements if a separate Requirement requiring a Preliminary Works Environmental Management Plan is not included in the DCO as requested in the response to DCO1.5 above.</p>
DCO1.40	The Applicant	<p><b>Requirement 8 - Ecological protection and mitigation strategy</b></p> <p>The ExA seeks comment on whether it is necessary to include reference to PPW in Requirement 8(1) as noted in <b>bold</b> text as follows:</p> <p><i>8.—(1) No part of the authorised development may commence, <b>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.</b></i></p> <p>Whilst it is noted that this question is posed to the Applicant, Wiltshire Council is supportive of these proposed amendments as it is the council's view that the permitted preliminary works should be covered by the Requirements if a separate Requirement requiring a Preliminary Works Environmental Management Plan is not included in the DCO as requested in the response to DCO1.5 above.</p>

ExQ1	Question to:	Question:
DCO1.41	The Applicant	<p><b>Requirement 9 - Biodiversity net gain</b></p> <p>The ExA seeks comment on whether it is necessary to include reference to PPW in Requirement 9(1) as noted in <b>bold</b> text as follows:</p> <p><i>9.—(1) No part of the authorised development may commence <b>and no permitted preliminary works comprising site clearance may take place</b> 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></p> <p>Whilst it is noted that this question is posed to the Applicant, Wiltshire Council is supportive of these proposed amendments as it is the council's view that the permitted preliminary works should be covered by the Requirements if a separate Requirement requiring a Preliminary Works Environmental Management Plan is not included in the DCO as requested in the response to DCO1.5 above.</p>
DCO1.43	The Applicant	<p><b>Requirement 12 - Archaeology</b></p> <p>1) Delete the following symbols [ ... ] around Requirement 12(1).</p> <p>2) Also, the ExA seeks comment on whether it is necessary to include reference to PPW in Requirement 12(2) as noted in <b>bold</b> text as follows:</p> <p><i>12 (2) No part of the authorised development may be commenced <b>and no permitted preliminary works comprising intrusive archaeological surveys may take place</b> until a written scheme of investigation for that part has been submitted to and approved by the relevant planning authority.</i></p> <p>Whilst it is noted that this question is posed to the Applicant, Wiltshire Council is supportive of these proposed amendments as it is the council's view that the permitted preliminary works should be covered by the Requirements if a separate Requirement requiring a Preliminary Works Environmental Management Plan is not included in the DCO as requested in the response to DCO1.5 above.</p>
DCO1.44	The Applicant National Highways	<p><b>Requirement 15 - Construction traffic management plan</b></p> <p>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?</p> <p>Although this question has not been directed at Wiltshire Council (the local highway authority) it is clear from reviewing the draft highways protective provisions that this requirement is too skeletal for the extensive use of rural highways, cable route works, temporary closures, new and altered accesses, abnormal or heavy vehicle movements, and interaction with the permit scheme and highway protective provisions in this project.</p> <p>The Council seeks to replace requirement 15 with the below. This approach has been followed in other made DCOs.</p> <p><b>Construction traffic management plans</b></p> <p>15.—(1) No part of the authorised development may commence, and no permitted preliminary works may be carried out where those works would generate construction traffic, require access from the public highway, affect any highway asset, affect any public right of way or require temporary traffic management, until a construction traffic management plan for that part has been submitted to and approved by the relevant planning authority.</p> <p>(2) The construction traffic management plan must be substantially in accordance with the outline construction traffic management plan and must include, to the extent relevant to the part of the authorised development to which it relates -</p> <ul style="list-style-type: none"> <li>(a) construction traffic routes, including prohibited routes and route enforcement measures;</li> <li>(b) access points, egress points, visibility splays and internal haul routes;</li> <li>(c) HGV, abnormal indivisible load and construction staff vehicle movements, including daily and peak movements;</li> <li>(d) delivery booking, marshalling, holding areas and consolidation arrangements;</li> <li>(e) working hours, delivery hours and restrictions on school peak periods, local events and other sensitive periods;</li> <li>(f) staff travel, parking, shuttle bus and welfare arrangements;</li> <li>(g) temporary traffic management, lane closures, road closures, traffic signals, banksmen, signage and diversion routes;</li> <li>(h) arrangements for public rights of way, pedestrian, cyclist, equestrian, agricultural, residential and business access;</li> <li>(i) emergency services access and liaison arrangements;</li> </ul>

ExQ1	Question to:	Question:
		<p>(j) road space booking, permit scheme and temporary traffic regulation order requirements;</p> <p>(k) road condition surveys, highway asset surveys, monitoring and post-works surveys;</p> <p>(l) measures for preventing and removing mud, dust, debris, silt and surface water from the highway;</p> <p>(m) wheel washing, road sweeping and highway cleansing arrangements;</p> <p>(n) communication, complaints and incident reporting procedures;</p> <p>(o) procedures for managing non-compliance by contractors and subcontractors;</p> <p>(p) arrangements for damage notification, immediate safety works and permanent repair of highway damage;</p> <p>(q) details of any agreement or other arrangement under section 59 of the 1980 Act or equivalent mechanism for extraordinary traffic damage; and</p> <p>(r) any further information reasonably required by the relevant highway authority.</p> <p>(3) Before approving the construction traffic management plan the relevant planning authority must consult South Gloucestershire Council, the relevant highway authority, the relevant traffic authority, National Highways where the strategic road network may be affected, and the relevant emergency services.</p> <p>(4) The relevant planning authority must not approve the construction traffic management plan unless it is satisfied that the plan has appropriately addressed any highway, traffic, public rights of way, drainage or safety issue raised by the relevant highway authority or traffic authority.</p> <p>(5) All construction works associated with the authorised development must be carried out in accordance with the approved construction traffic management plan.</p> <p>(6) No construction traffic may use any route or access other than a route or access identified in the approved construction traffic management plan, save in emergency or where otherwise agreed in writing by the relevant highway authority.</p> <p>(7) Approval of the construction traffic management plan does not constitute approval under the Wiltshire Council protective provisions unless Wiltshire Council expressly confirms in writing that it is to have that effect."</p>
DCO1.45	The Applicant	<p><b>Requirement 16 - Public rights of way and permissive paths</b></p> <p>The ExA seeks comment on whether it is necessary to include reference to PPW in Requirement 16(1) as noted in <b>bold</b> text as follows:</p> <p><i>16.—(1) No part of the authorised development may commence <b>and no permitted preliminary works which may affect existing public rights of way may take place</b> 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></p> <p>Whilst it is noted that this question is posed to the Applicant, Wiltshire Council is supportive of these proposed amendments as it is the council's view that the permitted preliminary works should be covered by the Requirements if a separate Requirement requiring a Preliminary Works Environmental Management Plan is not included in the DCO as requested in the response to DCO1.5 above.</p>
DCO1.46	The Applicant	<p><b>Requirement 17 - Soil management</b></p> <p>The ExA seeks comment on whether it is necessary to include reference to PPW in Requirement 17(1) as noted in <b>bold</b> text as follows:</p> <p><i>17.—(1) No part of the authorised development may commence <b>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</b> until a soil resources management plan for that part has been submitted to and approved by the relevant planning authority.</i></p> <p>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?</p> <p>Whilst it is noted that this question is posed to the Applicant, Wiltshire Council would like to thank the ExA for raising these points and agree with both suggestions. The council's view is that the permitted preliminary works should be covered by the Requirements if a separate Requirement requiring a Preliminary Works Environmental Management Plan is not included in the DCO as requested in the response to DCO1.5 above.</p>

ExQ1	Question to:	Question:
DCO1.47	The Applicant Wiltshire Council	<p><b>Requirement 20 - Decommissioning and restoration</b></p> <p>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>.</p> <p>The ExA seeks comment on whether it is necessary for the outline Decommissioning Strategy <a href="#">[REP1-100]</a> to include an outline Restoration Plan.</p> <p>Wiltshire Council considers that the outline Decommissioning Strategy should include an outline Restoration Plan as decommissioning and restoration are not the same issue. The DCO should require an outline Restoration Plan now so that the end-state is not deferred for 60 years (or the scheme life) without parameters.</p> <p>Requirement 20(4) should be amended so the decommissioning plan must be in accordance with an outline Decommissioning and Restoration Strategy.</p> <p>In previous submissions <a href="#">[RR-4934]</a> and <a href="#">[REP1-138]</a>, the council has also raised the need for a financial bond and / or charge on the land to be secured to ensure that scheme components could not be abandoned should the undertaker cease trading or were unable to transfer liability of restoration costs as a consequence.</p>
<b>Ecology and Biodiversity (EB)</b>		
EB1.5	Wiltshire Council Natural England	<p><b>Bat Surveys</b></p> <p>In considering the contents of <a href="#">[REP1-218]</a> 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.</p> <p>If parties are satisfied, please provide comment on how it meets the requirements of the mitigation hierarchy.</p> <p>Wiltshire Council is not satisfied with the Applicant's approach to bat surveys for the reasons set out in detail in the council's Relevant Representation <a href="#">[RR-4934]</a>, Local Impact Report <a href="#">[REP1-137]</a>, Written Representation <a href="#">[REP1-138]</a> and Comments on Submission received at Deadlines 1 and 1A <a href="#">[REP2-048]</a>. Please refer to these responses for complete details.</p>
EB1.10	The Applicant Wiltshire Council	<p><b>Beavers</b></p> <p>ES Chapter 9 <a href="#">[REP1-015]</a> 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> <p>It is considered feasible, and indeed likely that beaver will spread towards the site during the 60-year period. Natural England commissioned a survey of beaver activity in the River Avon catchment to inform its advice to government on the reintroduction of beavers in England and because there had been increasing reports of beavers in the Avon catchment. Surveys were conducted during January-March 2022 covering approximately 280km of channel length. Beaver activity (field sign types) was recorded at a 10m resolution and the areas covered included the Avon upstream of Bath, including the Kennet and Avon Canal, the Somerset Frome, By Brook, Semington Brook, Biss Brook (all part of the Avon catchment) and upper reaches of the River Brue.</p> <p>The survey recorded a total of 771 beaver activity signs and it was estimated that there were 13 established territories, with an additional six temporary resident individuals, which may go on to form territories. Based on the number of territories, a population of around 50 beavers, excluding kits, was estimated at the time (49 ± 13 within the established territories and potentially six other individuals). These beaver territories occupy a total of 4-11% of the available bankside in the watercourses with a typical bankside length of 7.8km (nearly 6.4 km watercourse length) per territory.</p>

ExQ1	Question to:	Question:
		<p>The survey noted few management issues but concluded that this was probably because the population is in the early establishment phase. The study can be found here: <a href="#">Wild beaver population assessment on the River Avon and tributaries - NECR470</a></p> <p>The dispersal of beaver along the River Avon towards the site could have implications for the proposal and the ecological enhancement measures such as the riparian habitat planting over the lifetime of the development. It is deemed however, that this is a question for the Applicant to answer in the absence of sufficient consideration in the ES. The council will provide further comment once it has had the opportunity to review the Applicant's response.</p>
EB1.13	The Applicant Wiltshire Council	<p><b>Security Fencing – Deer</b></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> <p>Deer are quite frequently found on the PRow network, often they will run away from the user and then go through a part of the hedge or jump a small agricultural fence. There is always a risk that a PRow user will push a deer towards the road and the options for it to take will be less than they currently have. The council's PRow team do not have any requirement for the solar panels to be fenced in.</p> <p>Furthermore, given the scale of the Order Limits, it is considered that there could be increased grazing pressures and damage to planting in unfenced areas of the proposed development, such as ecology mitigation areas and that this could reduce the likelihood of planting succeeding. It is recommended that the Applicant gives this due consideration and puts forward appropriate measures to address this issue.</p> <p>Please refer to: <a href="#">New measures to help woodlands through improved deer management - GOV.UK</a></p> <p>Policy paper for reference: <a href="#">Deer impacts policy statement: managing the impacts of wild deer in England - GOV.UK</a></p>
EB1.16	The Applicant	<p><b>Arboriculture – Bincombe Wood</b></p> <p>During the ExA's Unaccompanied Site Inspection 1 (USI1) <a href="#">[EV4-001]</a> 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> <p>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.</p> <p><a href="#">Wiltshire Council's Arboricultural Officers welcome this question from the ExA as it goes directly to concerns raised in previous council responses.</a></p>
EB1.18	The Applicant Wiltshire Council	<p><b>Hedgerow Heights and Density</b></p> <p>ES Chapter 8 <a href="#">[APP-060]</a> 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>There is potential for some adverse impacts on biodiversity as a result of allowing all the existing, as well as newly planted, hedgerows within the Order Limits to grow to a height of 4.5m above ground level (AGL). These include, but are not limited to the following:</p>

ExQ1	Question to:	Question:
		<ul style="list-style-type: none"> <li>• The existence of hedgerows of differing heights and sizes within the Order Limits affords food and shelter for a range of wildlife. Management of all the hedgerows at the same height of 4.5m AGL could reduce the diversity of hedgerow habitat for fauna.</li> <li>• Some bird species, such as yellowhammer, favour short dense hedges of less than 2m in height with a thick base and wide grass margins alongside, for nesting. Such species may be deterred from nesting in taller hedgerows to be managed at 4.5m AGL.</li> <li>• Managing hedgerows in an 'A' shape, so that the hedgerow is thicker at the base and gets narrower at the top, provides maximum protection for wildlife, while allowing light to reach the ground flora. This may be less viable if all hedgerows are managed at a height of 4.5m AGL.</li> <li>• Management of hedgerows to a height of 4.5m, especially newly planted hedgerows, within ecology mitigation areas such as those for ground nesting birds, including skylark and yellow wagtail, could in effect obstruct and 'close' currently open views needed by such species, and may increase predation due to an increase in elevated vantage points and perch sites for raptors.</li> <li>• Good hedgerow management is important and entails, where possible, allowing trees to develop at roughly 20 metre intervals so that these can be used by birds as song perches as well as providing more habitat for other wildlife, such as bats. However, it won't be possible to allow individual trees to develop if the whole hedgerow is maintained at a height of 4.5m AGL and will remove the structural diversity of the hedgerows across the Order Limits.</li> <li>• The traditional management technique of coppicing, which involves cutting a tree in order to encourage enhanced growth and tree rejuvenation, won't be possible if all the hedgerows are to be maintained at a height of 4.5 AGL. Coppicing may be needed to grow a thicker hedge and involves cutting down to just above ground level to encourage vigorous regrowth.</li> <li>• Maintaining all the hedgerows at a height of 4.5m AGL could adversely affect the structural condition of hedgerows if not properly managed and could result in over-shading which in turn may lead to a reduction in the diversity of hedgerow ground flora. This could enable more competitive plant species, such as grasses, to become dominant thereby resulting in a decrease in the number of plant species used for food by farmland birds and invertebrates, such as butterfly caterpillars. However, although it has originally been considered that shorter hedges, around 2m tall, would prevent ground plants suffering from too much shade, come recent studies have shown that taller and wider hedges provide greater structural diversity, containing more floral species that can be beneficial to butterflies. Denser, well-connected hedges are more favourable for small mammals, such as dormice, and their predators. Variety is also required to support a range of different mammals and birds as each will have a preference, for example bats prefer trees due to hibernation space. Maintaining the ground flora at the hedge-bottom will help smaller mammals by providing extra food and cover from predators. Therefore, there are opposing points of view and studies on this matter.</li> </ul> <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> <p>Further clarification is sought from the ExA in relation to the question: "<i>Should replacement and new hedgerow planting have a specific density.</i>" This is because the question doesn't clearly specify or qualify what the specific density requirements would be seeking to deliver i.e. ecological, landscape or visual in nature? It's not clear what the ExA is asking in terms of density and this is relevant to how the question is answered.</p> <p>Nonetheless, with a view to assisting the ExA, please be advised that new native hedgerow planting would be typically specified / comprise a double staggered row between 350mm and 400mm between rows, planted at 350mm centres.</p>

ExQ1	Question to:	Question:
<b>Flood Risk, Hydrology and Water Resources (FWH)</b>		
FWH1.1	The Applicant Wiltshire Lead Local Flood Authority (The LLFA)	<p><b>Policy Compliance - Larger PV Panels</b></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></p> <p>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></p> <p>The LLFA is asked to submit comments on the documentation provided by SLD (referenced above).</p> <p>The LLFA notes the concerns raised by SLD regarding the potential hydrological effects of larger, non-standard PV panels and acknowledges that the evidence base for such configurations in the UK context is currently limited. The Applicant's ES Chapter 11 and supporting FRA documentation are based on the general assumption, consistent with NPS EN-3, that runoff from solar panels will drain to ground and not give rise to significant effects. However, this assumption appears to have been applied uniformly, without differentiation for panel dimensions, layout, or configuration. In this respect, SLD's submissions reasonably highlight that larger panels could alter runoff behaviour (e.g. concentration of flows at drip lines, reduced evaporation, and potential increases in soil moisture), particularly in areas of low permeability or where soils are sensitive to compaction. The LLFA considers that these are credible mechanisms that warrant further scrutiny rather than being dismissed through high-level assumptions.</p> <p>That said, the LLFA also recognises that the SLD analysis is largely precautionary and theoretical in nature and does not yet constitute conclusive evidence of significant flood risk effects at site scale. The concern is therefore not that impacts are proven, but that the current assessment does not robustly demonstrate that they would not occur. In order to address this uncertainty and ensure compliance with policy expectations, the LLFA requires the Applicant to provide a more explicit assessment of panel-induced runoff processes, including how different panel sizes and configurations could influence runoff rates, flow concentration, and soil interaction. This should be supported by appropriate evidence, which may include empirical studies, field data, or conservative modelling assumptions, and should demonstrate that the proposed layout and mitigation measures (including soil management and SuDS) are sufficient to prevent increased flood risk on and off site.</p>
FWH1.3	The Applicant The LLFA	<p><b>Flood Risk Assessment – Quantification of surface water and SUDS</b></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 <i>'set out (approximately) the existing rates and volumes of surface water run-off generated by the site'</i>.</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>

ExQ1	Question to:	Question:
		<p>We note the applicant's response to the LIR <a href="#">[REP2-038]</a> and Response to D1A Submissions <a href="#">[REP2-040]</a> 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"> <li>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.</li> <li>2) Provide outline drainage layouts for each site showing potential SUDS connections with existing drainage features and exceedance routing.</li> <li>3) Include any other information required by NPS EN-1, paragraph 5.8.15, bullet point 11 (i to x).</li> <li>4) Add all SUDS features to the figures within the Landscape and Ecology Mitigation plans <a href="#">[REP1-029]</a> to <a href="#">[REP1-032]</a> and provide an explanation of the multi-use purpose of each SUDS feature and how they contribute to water management and ecology.</li> </ol> <p><u>The LLFA:</u></p> <p>The ExA note the LLFA request for further hydraulic modelling in the Council's LIR <a href="#">[REP2-025]</a>.</p> <ol style="list-style-type: none"> <li>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 <a href="#">[REP1A-017]</a> and negate the need for further modelling in principle.</li> </ol> <p>While the information requested in Questions 1–4 would represent a necessary and substantial improvement to the current evidence base, the LLFA does not consider that it would, in itself, fully address the key sensitivities identified in paragraph 2.21 of <a href="#">[REP1A-017]</a>, nor negate the need for further modelling in principle. Those sensitivities relate to the management of runoff within a hydrologically connected, pathway-driven catchment, including maintaining established overland flow routes, managing runoff rates and volumes, and protecting downstream receptors such as Melksham and Trowbridge. The requested information would significantly strengthen understanding of baseline conditions, impermeable area effects, and the intended SuDS strategy, and would allow a clearer appraisal of how runoff would be controlled and routed across each site. In particular, provision of outline drainage layouts, quantification of runoff rates / volumes, and mapping of flow pathways would directly address current gaps in demonstrating compliance with NPS EN-1 and improve confidence in the proposed mitigation approach.</p> <p>However, given the scale of the Scheme, the reliance on extensive greenfield areas with sensitive flow pathways, and the acknowledged role of ditch networks and overland flow routes as primary conveyance mechanisms, the LLFA maintains that there remains a requirement for proportionate hydraulic assessment to verify how the system will behave under design and exceedance conditions. The requested information would form an essential foundation for this but would not alone demonstrate that flood risk would not increase across the catchment, particularly in relation to cumulative effects, construction-phase impacts (e.g. compaction), and interactions between SuDS and existing drainage features. Accordingly, while Questions 1–4 would materially reduce uncertainty, they would not remove the need for further modelling in principle, which remains necessary to provide confidence that the identified sensitivities can be robustly managed.</p> <ol style="list-style-type: none"> <li>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.</li> </ol> <p>The LLFA confirms that, while the information requested in Questions 1–4 is necessary and would significantly improve the evidence base, it is not sufficient on its own to address the key sensitivities identified in <a href="#">[REP1A-017]</a>. Those sensitivities are driven by <b>catchment-scale processes and defined flow pathways</b>, where overland flow routes and ditch networks act as primary conveyance mechanisms. The requested information would improve understanding of runoff rates, impermeable area effects, SuDS proposals, and drainage layout; however, it remains largely descriptive and does not demonstrate how flows will behave dynamically under design or exceedance conditions, or how changes in runoff will interact across the wider connected catchment.</p> <p>Accordingly, a <b>proportionate level of further hydraulic assessment is still required in principle</b>. This should be targeted and risk-based, focusing on key overland flow routes and ditch networks; exceedance flow routing; and screening-level checks of cumulative effects on downstream receptors. This does not require full detailed modelling of the entire scheme, but rather <b>focused testing of critical pathways and conditions</b>, including consideration of construction impacts such as soil compaction. Such an approach is necessary to provide confidence that runoff will be effectively managed and that flood risk will not increase within a hydrologically connected, pathway-driven system.</p>

ExQ1	Question to:	Question:
		<p>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.</p>
FHW1.5	<p>The LLFA The Environment Agency The Applicant</p>	<p><b>Flood Risk Assessment – Manning Calculations Results</b></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>The LLFA considers that SLD’s Manning’s calculations highlight potential sensitivity in flow conveyance systems and interaction between fluvial and surface water processes. The implications are that small changes in runoff routing could materially affect downstream flood risk due to ditch network connectivity. The LLFA therefore supports a precautionary approach requiring validation of hydrological assumptions. Reference: LLFA LIR [REP1-137] and SLD submission [REP1-174].</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	<p>The LLFA The Environment Agency</p>	<p><b>Flood Risk Assessment – Cable Route Corridor</b></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> <p>The LLFA does not consider that current submissions fully address risks associated with cable route drainage disruption, including impacts to shallow flow paths and groundwater connectivity. Further detail should be secured through method statements (e.g. HDD and trenching controls) and drainage management plans. Reference: LLFA LIR [REP1-137] and SLD D2 submission [REP2-051].</p>
FHW1.8	<p>The Applicant</p>	<p><b>Sequential and Exception Test</b></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>Whilst it is acknowledged this question is posed to the Applicant, the LLFA is not aware of any specific provisions or financial contributions toward flood risk management infrastructure that have been agreed with Wiltshire Council or relevant Parish Councils as part of this Scheme. Based on the information reviewed, the Applicant’s position within the Planning Statement [REP2-017] and supporting Annex C appears to rely on embedded site-level mitigation measures (e.g. SuDS, runoff control, and maintenance of greenfield rates) to demonstrate compliance with policy and to support the Exception Test, rather than any off-site interventions or agreed contributions to wider flood risk management infrastructure.</p>

ExQ1	Question to:	Question:
		<p>As such, the LLFA considers that the Applicant has not demonstrated delivery of a tangible reduction in flood risk to the wider community through infrastructure provision or financial contribution, as referenced in NPPF paragraph 178 and the Applicant's own Annex C. If the Applicant intends to rely on such benefits to support the Exception Test, this should be clearly evidenced through engagement with the LLFA and relevant stakeholders, including identification of specific measures, locations, funding arrangements, and confirmation of agreement in principle.</p> <p>2) If so, the applicant is asked to provide further information.</p> <p>If the Applicant intends to rely on such wider benefits to support the Exception Test, the LLFA would expect submission of clear and specific evidence, including: identification of proposed flood risk management measures beyond the site boundary; confirmation of engagement and agreement with Wiltshire Council and / or Parish Councils; details of funding or delivery mechanisms; and demonstration of how these measures would achieve a quantifiable reduction in flood risk to downstream receptors. In the absence of this information, the LLFA does not consider that this element of the Exception Test has been demonstrated.</p> <p>3) The applicant is asked to revise section 'An overall reduction in flood risk' to clarify this point.</p> <p>On behalf of the LLFA, no reduction in wider flood risk has been agreed or demonstrated. The Applicant's current wording therefore overstates the position and requires clarification. In the LLFA's view, the assessment indicates that the Scheme relies on on-site mitigation measures to maintain greenfield runoff conditions, rather than delivering a demonstrable or agreed reduction in flood risk to the wider community. As such, the relevant section should be revised to accurately reflect this position.</p>
FHW1.9	The Applicant	<p><b>Construction</b></p> <p>The EA has raised concerns in <a href="#">[REP2-049]</a> 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 <a href="#">[REP1-137]</a> 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 <a href="#">[REP2-038]</a>.</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>The Lead Local Flood Authority notes that this question is directed to the Applicant. However, from the LLFA's perspective, discussions with the Applicant and the Environment Agency remain ongoing, and key matters relating to construction-phase flood risk are not yet fully resolved. In particular, the LLFA's concerns regarding exceedance flow routing, floodplain impacts during construction, and the need for specific controls or requirements remain under discussion. At this stage, no formal agreement has been reached on how these matters will be addressed within the DCO framework.</p> <p>2) If further assessment is needed, the applicant is asked to provide timescales for the assessment.</p> <p>The Lead Local Flood Authority notes that this question is directed to the Applicant. However, from the information submitted to date, no specific timescales have been provided for undertaking any further assessment of construction-phase flood risk, including impacts on floodplain capacity and exceedance flow routing.</p> <p>The LLFA considers that, should further assessment be required, it is important that this is clearly time-bound and secured prior to the commencement of each phase of development, through an appropriate Requirement. In the absence of defined timescales, there is currently insufficient certainty that the necessary assessments will be completed in advance of construction activities.</p> <p>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.</p>

ExQ1	Question to:	Question:
		<p>The Lead Local Flood Authority notes that this question is directed to the Applicant. However, the LLFA considers that the current dDCO and outline management plans do not clearly or explicitly secure further assessment of construction-phase flood risk, including impacts on floodplain capacity and exceedance flow routing, prior to the commencement of works.</p> <p>While the Applicant relies on the Outline Construction Environmental Management Plan and subsequent detailed submissions, the LLFA considers that clearer and more explicit drafting is required within the dDCO (e.g. through a Requirement or strengthened wording) to ensure that any necessary assessment is undertaken, submitted, and approved before construction begins, rather than being deferred without defined scope or timing.</p>
FHW1.10	The LLFA The Environment Agency	<p><b>Operation – Surface Water Run-off Discharge to Watercourses</b></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> <p>In the absence of quantified discharge volumes, the LLFA cannot confirm that receiving watercourses have capacity to accommodate additional runoff without increasing flood risk. The LLFA requires demonstration of greenfield runoff rate compliance and confirmation that downstream systems are not adversely affected. Reference: NPPF para 173; NPS EN-1 para 5.8.15.</p>
FHW1.11	The Applicant	<p><b>Decommissioning</b></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> <p>Whilst it is acknowledged that this question is posed to the Applicant, the LLFA notes that the application does not provide information on how the proposed SuDS infrastructure will be managed at the end of the development's operational life. The Applicant should clarify whether SuDS features will be retained, modified, or removed as part of any decommissioning or restoration process, and how the site will be drained post-decommissioning.</p> <p>The LLFA also considers that the Applicant should demonstrate how flood risk will be managed during decommissioning works and confirm that there will be no increase in flood risk both during and following this phase. A proportionate, high-level drainage decommissioning or restoration strategy should be provided to support this.</p>
FHW1.12	The Applicant The LLFA	<p><b>Flood Risk to Infrastructure – Sites C1 and D</b></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"> <li>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.</li> <li>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.</li> </ol> <p><u>The LLFA:</u></p> <ol style="list-style-type: none"> <li>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.</li> </ol>

ExQ1	Question to:	Question:
		<p>The LLFA does not object in principle to the Applicant's "low risk" conclusion; however, this is not sufficiently evidenced. The assessment relies on proxy datasets and simplified methods rather than robust, site-specific analysis, and the ordinary watercourse is not explicitly modelled. Given its position between the proposed 400kV substation and BESS, there remains uncertainty as to whether it functions as an active flow route or conveyance corridor that could influence flood behaviour and infrastructure layout.</p> <p>The LLFA therefore requires the Applicant to: (i) undertake targeted topographic and channel survey of the watercourse corridor; (ii) provide proportionate hydraulic assessment (or equivalent evidence) to define flood extents, depths, and flow routes; and (iii) demonstrate that the layout maintains conveyance, including appropriate stand-offs and no obstruction of flow paths. The Applicant should also confirm how the watercourse will be protected and managed, and address any consenting requirements for works affecting an ordinary watercourse.</p>
FHW1.13	The LLFA	<p><b>Interaction with Future Plans for Gauze Brook Restoration</b></p> <p>St Paul Malmesbury Without Parish Council in their post hearing submission [<a href="#">REP1A-016</a>] 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 [<a href="#">REP1A-013</a>] (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> <p>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).</p> <p>The Lead Local Flood Authority (LLFA) understands that the proposals relating to the Gauze Brook are currently at an early, exploratory stage and do not yet constitute a formal scheme with defined timescales, funding, or detailed design. The information provided by St Paul Malmesbury Without Parish Council confirms that the work is in its infancy, with ongoing collaboration between the Parish Council, Hullavington Parish Council, and Wiltshire Council officers, including participation in walkover surveys and catchment-based discussions led by Wiltshire Wildlife Flood Management, intended to identify opportunities to alleviate flooding along the Gauze Brook. At present, there is no confirmed programme, outline business case, secured funding stream, or defined engineering design, and the concept remains focused on potential measures such as restoring the brook to a more natural, meandering alignment and introducing upstream flood storage ("flood pools") to attenuate flows and reduce downstream flood risk at Corston.</p> <p>From an LLFA perspective, this work is consistent with a natural flood management (NFM)-led approach, but it should be recognised that it is pre-feasibility and evidence-gathering in nature, rather than a deliverable scheme at this stage. Accordingly, no detailed assessment of impacts, costs, or delivery mechanisms has yet been undertaken. The Applicant has confirmed that the Scheme does not include in-channel works or permanent structures within Gauze Brook and would not prevent future restoration or intervention works, subject to separate design and consent processes.</p> <p>In summary, the LLFA confirms that while there is active local interest and early collaborative work on Gauze Brook flood alleviation, there are currently no defined timescales, design proposals, funding arrangements, or formal delivery plan, and therefore it should be treated as a developing concept rather than a committed flood scheme at this stage.</p> <p>2) The LLFA is asked to confirm agreement or otherwise with the applicant's conclusions.</p> <p>The Lead Local Flood Authority (LLFA) partially agrees with the Applicant's conclusions.</p> <p>The LLFA agrees that the Scheme does not include in-channel works within Gauze Brook and would not, in principle, prevent future restoration or natural flood management interventions, which remain subject to separate design and consents. The LLFA also accepts that the drainage strategy is intended to maintain floodplain function and control runoff to greenfield rates.</p> <p>However, the LLFA does not fully agree that there is no interaction with future plans. While restoration proposals are at an early stage, they may require floodplain space, land use flexibility, and flow pathway adjustments, and the Scheme could influence how such measures are configured or delivered in practice:</p> <ul style="list-style-type: none"> <li>• Restoration is not precluded in principle</li> <li>• But the Scheme may indirectly constrain or influence future options.</li> </ul>

ExQ1	Question to:	Question:
		<p>The LLFA therefore considers the Applicant's conclusion is reasonable but should be qualified to recognise potential indirect effects on future flood alleviation proposals.</p>
FHW1.15	The Applicant	<p><b>Water Quality</b></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 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> <p>1) The applicant is asked to provide an update on the discussions with the EA and Wiltshire Council and the likelihood of their resolution.</p> <p>Whilst it is acknowledged that this question is posed to the Applicant, the LLFA notes that a number of water quality matters remain under discussion between the Applicant, the Environment Agency, and Wiltshire Council. These issues relate primarily to groundwater protection, contamination risk, and regulatory controls, which fall within the remit of the Environment Agency. The LLFA therefore defers to the EA regarding the status of ongoing discussions and the likelihood of their resolution.</p> <p>The LLFA would expect that any outstanding matters are resolved and appropriately secured through the relevant environmental management plans and permitting regime, and that any agreed mitigation measures are reflected in the final drainage strategy to ensure surface water runoff does not adversely affect water quality.</p> <p>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.</p> <p>This question is directed at the Applicant, and much of it relates to water quality mitigation, monitoring, and pollution control, which are primarily Environment Agency responsibilities (especially groundwater, contamination, and environmental permitting). However, the LLFA does have a legitimate interest where this overlaps with surface water management and SuDS performance.</p>
FHW1.19	The LLFA	<p><b>Draft DCO – Ordinary Watercourse Consent and Environmental Permitting</b></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> <p>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.</p> <p>Wiltshire Council, as LLFA, does not agree that Articles 6 and 17 alone are sufficient. The disapplication of section 23 of the Land Drainage Act 1991 and regulation 12 of the Environmental Permitting (England and Wales) Regulations 2016 in respect of flood risk activities should be matched by equivalent DCO controls.</p> <p>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.</p>

ExQ1	Question to:	Question:
		<p>The council notes that Part 9 of Schedule 15 already contains a drainage-authority approval regime for “specified works”, including submission of plans, independent review, written approval, conditions for the protection of drainage works and ordinary watercourses, and requirements directed to the prevention of flooding. However, given the council’s concerns about pollution and flow disruption arising from horizontal directional drilling and temporary crossings near ordinary watercourses, the council considers that Part 9 should be amended as follows.</p> <p>However, Article 17 should be amended to make clear that, where the relevant watercourse, public sewer or drain falls within the drainage-authority regime, Part 9 governs the approval process instead of the generic Article 17(3) and (4) mechanism. That avoids parallel approval regimes and follows made-DCO precedent in other solar NSIPs.</p> <p>3) If the response is negative, the LLFA is requested to submit the proposed changes to the wording of the dDCO.</p> <p><b>Amendments to Part 9:</b></p> <p>In paragraph 117, amend the definition of “plans” as follows:</p> <p>“plans” includes any information reasonably required by the drainage authority including location details, grid references, sections, drawings, specifications, assessments and method statements and, where relevant, drainage method statements, construction and temporary works details, temporary crossing details, outfall details, pollution prevention measures, assessments of effects on flow, flood risk, water quality, structural integrity, operation, maintenance and access to any ordinary watercourse or drainage work, Horizontal Directional Drilling Method Statements, Frac-out Contingency Plans, and where the specified work relates to removal, reinstatement or decommissioning, decommissioning, removal, reinstatement and restoration details;</p> <p>In paragraph 117, at the end of the definition of “specified work”, insert:</p> <p><i>“and for the avoidance of doubt includes—</i></p> <p><i>(g) any temporary crossing, bridge, ramp, culvert, matting, haul road or other temporary structure in, on, over, under or within 8 metres of a drainage work;</i></p> <p><i>(h) any trenchless crossing, boring, drilling, horizontal directional drilling or similar operation carried out under, over, within 8 metres of, or otherwise likely to affect, an ordinary watercourse or drainage work;</i></p> <p><i>(i) any temporary or permanent outfall, headwall, channel, pipe, swale, ditch, drain, attenuation feature or other drainage connection which introduces water into, alters flow in, or may affect the operation of an ordinary watercourse or drainage work; and</i></p> <p><i>(j) any decommissioning, removal, reinstatement or restoration works which would fall within this definition if carried out during construction.”</i></p> <p>After paragraph 118(1), insert:</p> <p><i>“(1A) Where the specified work comprises or includes any temporary crossing, trenchless crossing, boring, drilling, horizontal directional drilling or other work which may give rise to a risk of frac-out, pollution, flow disruption or damage to an ordinary watercourse or drainage work, the plans submitted under sub-paragraph (1) must include, where relevant, a Horizontal Directional Drilling Method Statement, a Frac-out Contingency Plan, pollution prevention measures, temporary works details, reinstatement proposals and such further information as is reasonably required by the drainage authority to assess effects on flow, flood risk, water quality, structural integrity, operation, maintenance and access to the ordinary watercourse or drainage work.</i></p> <p><i>(1B) Plans for a specified work to which sub-paragraph (1A) applies are not to be treated as validly submitted for the purposes of sub-paragraph (4)(b) unless they include the information required by sub-paragraph (1A), insofar as relevant to the specified work.”</i></p> <p>After paragraph 118, add the following wording:</p> <p><i>“For the avoidance of doubt, this Part applies to decommissioning, removal, reinstatement and restoration works where those works constitute specified works.”</i></p>

ExQ1	Question to:	Question:
		<p><b>Amendment to Art 17:</b></p> <p>The Council requests the insertion of a new paragraph (5) into Article 17 as follows:</p> <p>“(5) Where the undertaker discharges water into, or makes any opening into, a watercourse, public sewer or drain belonging to or under the control of a drainage authority as defined in Part 9 of Schedule 15 (protective provisions), the provisions of Part 9 of Schedule 15 apply in substitution for the provisions of paragraphs (3) and (4).”</p> <p>The existing Article 17(5) to (7) should then be renumbered accordingly.</p> <p>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.</p> <p>The council does not consider that a separate schedule of decommissioning “consents” is required, because Article 6 already applies to decommissioning. However, the council considers that Part 9 should expressly confirm that its approval regime applies to decommissioning, removal, reinstatement and restoration works where those works constitute specified works.</p>
FHW1.20	The LLFA The Applicant	<p><b>Draft DCO – Requirements 11 (Surface and foul water drainage) and 20 (Decommissioning and restoration)</b></p> <p>The LLFA in Wiltshire Council’s LIR <a href="#">[REP1-137]</a> 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 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> <p>1) Comments regarding the introduction of a phasing approach in Requirement 11 and, if appropriate, proposed revised wording.</p> <p>The Council supports the introduction of an express phasing approach in Requirement 11. Requirement 11 already applies to the relevant “part” of the authorised development, but the Council considers that this should be made more explicit so that drainage design, implementation, verification, operation, maintenance and decommissioning are addressed on a phase-by-phase basis. This is necessary because the drainage solution for each phase may depend on the timing and interaction of temporary construction drainage, permanent SuDS, operational drainage, decommissioning drainage and the drainage arrangements for adjacent or connected phases.</p> <p>Proposed amendments are below. These are consistent with made DCOs, including A122 Lower Thames Crossing, London Luton Airport Expansion, M54 to M6 Link Road, East Yorkshire Solar Farm and West Burton Solar, which include part-based drainage approval requirements, consultation with the Environment Agency and / or LLFA, substantial accordance with outline drainage strategies, and implementation as approved. Other made DCOs, including Immingham OCGT, Keadby 3 and Net Zero Teesside, demonstrate the use of separate controls for temporary construction drainage, permanent drainage, pollution control, management and maintenance. The more detailed matters requested by the council including phase interdependencies, verification, decommissioning runoff, SuDS retirement and ordinary-watercourse interfaces — are project-specific elaborations of those established controls, necessary to enable the timely and effective discharge of Requirement 11 and to ensure that the disapplication of ordinary consenting regimes is matched by robust DCO controls.</p> <p><b>Amendment - Replacement Requirement 11</b></p> <p>The Council requests the following revised wording for Requirement 11:</p>

ExQ1	Question to:	Question:
		<p><b>Surface and foul water drainage</b></p> <p>11.—(1) No part of the authorised development may commence until written details of the surface water drainage scheme and, if applicable, the foul water drainage system for that part have been submitted to and approved in writing by the relevant planning authority following consultation with—</p> <p>(a) the Environment Agency; and</p> <p>(b) the relevant lead local flood authority.</p> <p>2) The written details submitted under sub-paragraph (1) may be submitted and approved by phase, provided that the submission identifies—</p> <p>(a) the phase or part of the authorised development to which the details relate;</p> <p>(b) any temporary drainage measures required during construction of that phase or part;</p> <p>(c) any permanent surface water drainage or SuDS measures required for that phase or part;</p> <p>(d) any relationship or dependency between the drainage measures for that phase or part and any other phase or part of the authorised development; and</p> <p>(e) the proposed arrangements for verification, operation, maintenance, retirement, removal, reinstatement or decommissioning of the drainage measures for that phase or part.</p> <p>(3) The written details submitted under sub-paragraph (1) must—</p> <p>(a) be substantially in accordance with the outline drainage strategy;</p> <p>(b) demonstrate compliance with the National Standards for Sustainable Drainage Systems, as amended, supplemented or replaced from time to time, published by the Department for Environment, Food and Rural Affairs and applicable at the date on which the written details are submitted under sub-paragraph (1);</p> <p>(c) include arrangements for the design, implementation, inspection, verification, operation, maintenance and decommissioning of the surface water drainage system throughout the construction, operation and decommissioning of the relevant part of the authorised development;</p> <p>(d) include pre-construction and post-construction exceedance flow routing, including exceedance routes during construction and decommissioning;</p> <p>(e) include measures for the management of construction and decommissioning runoff, sediment, pollution risk and temporary drainage;</p> <p>(f) include arrangements for the verification of any SuDS or other drainage measures before the relevant part of the authorised development is brought into operation;</p> <p>(g) identify any drainage works, ordinary watercourse interfaces, temporary crossings, outfalls, trenchless crossings, horizontal directional drilling works or other works which require approval under Part [X] of Schedule 15; and</p> <p>(h) include arrangements for the retirement, removal, replacement, reinstatement or restoration of any SuDS or drainage feature where that feature is temporary or is to be removed during decommissioning.</p> <p>(4) No drainage system, SuDS feature or other drainage measure approved under this requirement may be brought into operation until a verification report for that measure has been submitted to and approved in writing by the relevant planning authority following consultation with the relevant lead local flood authority.</p> <p>(5) Any approved scheme must be implemented, verified, managed and maintained as approved.</p> <p>(6) Nothing in this requirement removes the need for any separate consent or approval required under article 17 or Part [X] of Schedule 15.</p> <p>(7) Approval under this requirement does not constitute approval under article 17 or Part [X] of Schedule 15 unless the relevant consenting or approving authority expressly confirms in writing that it is to have that effect.</p> <p>2) Any information that should be included in the outline drainage strategies [<a href="#">APP-210</a> to <a href="#">APP-218</a>] and relevant outline management plans to support the preparation of the final documents and a timely discharge of the relevant requirements.</p> <p>The Council considers that the outline drainage strategy, or separate outline drainage strategies for each site and the cable route corridor, should be updated to include a clear checklist of the information required for the discharge of Requirement 11. This would assist the undertaker, the relevant planning authority, the LLFA and the Environment Agency and should reduce the risk of delay at discharge stage.</p>

ExQ1	Question to:	Question:
		<p><b>Additions - Outline Drainage Strategies</b></p> <p>The outline drainage strategies should include, as a minimum:</p> <ul style="list-style-type: none"> <li>(a) a clear drainage strategy section, or a standalone outline drainage strategy, with contents-page signposting;</li> <li>(b) a phase-by-phase drainage plan showing how drainage will be designed, implemented, verified, operated, maintained and decommissioned;</li> <li>(c) existing drainage information, including ordinary watercourses, ditches, culverts, field drains, flow routes, flood zones, flood risk receptors, groundwater constraints and any known drainage assets;</li> <li>(d) proposed temporary construction drainage and permanent operational drainage arrangements;</li> <li>(e) SuDS design principles, including source control, treatment train, exceedance routes, climate change allowances, runoff rates, runoff volumes, attenuation, infiltration assumptions and discharge points;</li> <li>(f) water quality controls and pollution prevention measures, including sediment management and measures relevant to construction, operation and decommissioning;</li> <li>(g) pre-construction and post-construction exceedance flow routing plans;</li> <li>(h) inspection, testing and verification requirements before operation of each relevant phase;</li> <li>(i) arrangements for operational inspection, maintenance, repair and replacement of drainage and SuDS features;</li> <li>(j) arrangements for retirement, removal, reinstatement or replacement of temporary or redundant SuDS and drainage features;</li> <li>(k) decommissioning runoff management measures;</li> <li>(l) soil reinstatement performance targets and verification measures, cross-referenced to the soil resources management plan;</li> <li>(m) ordinary watercourse interface controls, including any temporary crossings, outfalls, culverts, trenchless crossings, HDD works and frac-out contingency measures, cross-referenced to Part [X] of Schedule 15;</li> <li>(n) responsibilities for implementation, inspection, maintenance and long-term management; and</li> <li>(o) a requirement-discharge checklist identifying the information to be submitted with each Requirement 11 application.</li> </ul> <p>The relevant outline management plans should also be updated so that they are consistent with the outline drainage strategy. In particular:</p> <ul style="list-style-type: none"> <li>(a) the outline CEMP should address temporary construction drainage, sediment control, pollution prevention, construction exceedance routing, watercourse protection, temporary crossings and HDD / frac-out contingency measures;</li> <li>(b) the outline OEMP should address operational inspection, testing, maintenance, repair and replacement of drainage and SuDS features;</li> <li>(c) the outline decommissioning strategy should address decommissioning runoff, temporary drainage during removal works, retirement or removal of SuDS, ordinary watercourse protection, soil reinstatement and post-decommissioning verification; and</li> <li>(d) the outline soil resources management plan should address soil reinstatement targets and verification insofar as soil condition affects infiltration, runoff, erosion, sediment mobilisation and post-decommissioning drainage performance.</li> </ul> <p>3) Confirmation regarding the need for the LLFA to be included as a consultee for the discharge of Requirement 20 under 20(5)</p> <p>The Council confirms that the LLFA should be included as a consultee for the discharge of Requirement 20. Decommissioning has the potential to affect surface water runoff, temporary drainage, SuDS retirement, water quality, ordinary watercourses, soil reinstatement, exceedance flow routes and flood risk. Those are matters within the LLFA's technical remit and cannot be adequately addressed by consultation with the Environment Agency and highway authority alone.</p> <p><b>Amendments - Requirement 20(5)</b></p> <p>Requirement 20(5) should therefore be amended as follows:</p> <p><i>“(5) No decommissioning works must be carried out until the relevant planning authority has approved the decommissioning plan submitted in relation to those works, in consultation with South Gloucestershire Council, the Environment Agency, the relevant highway authority <u>and the relevant lead local flood authority.</u>”</i></p> <p><u>The Applicant:</u></p> <p>4) The applicant is asked to provide comments regarding the need to introduce phasing in the wording of Requirement 11.</p>

ExQ1	Question to:	Question:
		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 <a href="#">[APP-210 to APP-218]</a> (or any subsequent strategy, noting ExQ1 FHW1.18 above) to support timely discharge of the Requirement.
<b>General and Cross-Topic Questions (GCT)</b>		
GCT1.2	The Applicant Wiltshire Council	<p><b>Section 106 Contributions</b></p> <p>In paragraph 9.101 of its RR <a href="#">[RR-4934]</a> 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 <a href="#">[PDA-009]</a>. 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 <a href="#">[PDA-009]</a> 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 <a href="#">[REP2-025]</a>.</p> <p><a href="#">Wiltshire Council would welcome discussions with the Applicant regarding this. Whilst there has been an initial discussion with the Applicant on funding from a Public Rights of Way perspective, there have been no discussions on the developer monitoring contributions for the construction and operational and maintenance period for ecological aspects to date.</a></p> <p><a href="#">The council agree with the ExA that contributions should be index linked.</a></p> <p><a href="#">Furthermore, the council's Countryside Access Officer would be willing if necessary to speak with the local users groups and parish councils to look at any suggested new PRoW away from Lime Down.</a></p>
<b>Health and Wellbeing (HW)</b>		
HW1.1	Wiltshire Council	<p><b>Mental Health and Wellbeing</b></p> <p>The ExA note that in your submission at Procedural Deadline A <a href="#">[PDA-014]</a> 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> <p><a href="#">The Suffolk County Council Supplementary Planning Guidance is accessible through the following link: <u>Energy projects and the wellbeing of communities - Suffolk County Council</u>. The council will also submit a standalone version of this document into Examination as part of its response to these questions.</a></p> <p><a href="#">The above SPG has been referenced by the Applicant as part of the application process (Environmental Statement Volume 1, Chapter 18 Human Health <a href="#">[APP-070]</a>) and mentioned in various correspondence between the Applicant and Wiltshire Council.</a></p> <p><a href="#">The council notes that Schedule 2, Requirement 4 of the draft DCO <a href="#">[REP1-007]</a> requires that prior to development the Applicant will create a Community Liaison Group, the terms of reference for which will have regard to the above document as committed to in Reference 3.14.2 of the draft Statement of Common Ground with Wiltshire Council <a href="#">[REP2-025]</a>. This item remains Under Discussion.</a></p>

ExQ1	Question to:	Question:
HW1.2	The Applicant	<p><b>Alternative Access to Public Rights of Way Network</b></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> <p>Whilst it is acknowledged that this question was posed to the Applicant, Wiltshire Council's Countryside Access Officer would be willing if necessary to speak with the local user groups and parish councils to look at any suggested new PRow away from the Lime Down Solar Park development.</p>
HW1.3	Wiltshire Council The Applicant	<p><b>Mental Health</b></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></p> <p>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>It is noted and accepted that pre-application levels of emergency hospital submissions resulting from self-harm in the study area are higher than the UK average.</p> <p>Further consideration of this indicator can be done by consulting Wiltshire Intelligence JSNA, 2025: <a href="#">Health and disease Wiltshire Intelligence</a>.</p> <p>Rates of hospital admissions as a result of self-harm in Wiltshire (for all persons of all ages) have consistently been high, the County being an outlier in this area since approximately 2007 but have been reducing since 2020/21. Rates of hospital admissions due to self-harm in the wider population are significantly more pronounced in females, particularly in female children and young persons aged 10-24, compared with males, mirroring both the regional and national picture. As noted in the JSNA 'Further research is required to determine whether increased rates are due to a higher prevalence of self-harm and hospital admissions may be influenced to some degree by the configuration of local services. Close adherence to NICE guidance and / or limited local availability of alternative support services may necessitate practices that result in higher hospital admission rates.'</p> <p>Given the above, signposting felt in first instance as appropriate. Rates of this indicator will continue to be monitored both annually via the indicator and on a local level through partner organisations. If rates are found to be measurably higher in subject area further interventions and support will be provided.</p> <p>With reference to the above-mentioned Suffolk County Council Supplementary Planning Guidance, support beyond signposting will also be provided where needed by the Applicant. For example, EM03 refers to provision of funding Mental Health First Aid training for members of the communities and EM05 refers to engagement with SMEs – working with commissioned local mental health organisations and MO01 refers to the need to monitor, respond to and increase baseline wellbeing scores.</p> <p><u>The applicant:</u></p> <p>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>

ExQ1	Question to:	Question:
LV1.2	Wiltshire Council	<p><b>Landscape Fabric – Technical Note</b></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"> <li>1) Whether it agrees with the application of the applicant’s methodology set out in the technical note?</li> <li>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?</li> </ol> <p>The Applicant has submitted a Technical Note on Landscape Fabric and Landscape Character at Deadline 1 [REP1-121]. The council does not agree with the Applicant’s assessment of landscape fabric effects in the ES Chapter 8 Landscape and Visual [APP-060] and provides the following comments to justify its position.</p> <p>Wiltshire Council agrees that the methodology is in general accordance with GLVIA3 but has consistently expressed concern in relation to how the Applicant is applying its methodology within its assessment of ‘landscape fabric’ (natural and man-made elements and components), highlighting that the assessment is selective over which landscape fabric components are included, and also in relation to the assessed nature and level of effects for those limited components that are included within the assessment of physical change to baseline landscape fabric within the DCO Order Limits.</p> <p>The council has previously highlighted its concern regarding the application of LVIA Assessment Methodology in relation to assessment of Landscape Fabric within Section 8, paragraphs 8.10 to 8.15 and 8.27 to 8.31 of its Relevant Representation [RR-4934].</p> <p>While there is no glossary definition for ‘Landscape Fabric’ included within GLVIA3, landscape practitioners are increasingly using this term to alternatively define ‘landscape elements and components’ understood to comprise the physical tangible elements and features of the landscape in the same way.</p> <p>The Applicant’s technical note [REP1-121] under ‘definitions’ states at paragraph 2.1.7 (<i>underline, bold, council’s emphasis</i>)</p> <p><i>“<b>Landscape fabric</b> is the individual tangible elements or features such as landform, woodland, hedges, tree cover, vegetation that make up a landscape or site. <u>These can usually be described and quantified.</u>”. <u>These are the natural elements within the Site, for example the lengths of hedgerow or areas of woodland and grassland within each individual site.</u>”</i></p> <p>In this regard the council does not agree with the Applicant’s definition of landscape fabric as only including the ‘natural elements in the site’. The council considers that a correct assessment of landscape fabric includes natural and man-made elements and components and should identify, describe and quantify where useful, the change effects arising from landscape fabric removals, fabric additions and changed management of existing fabric components where this will result in a change to the physical fabric of the receiving landscape within and adjoining the DCO order limits.</p> <p>The following extracts are taken from the ‘Guidelines for Landscape and Visual Impact Assessment’ (GLVIA3) to support the council’s view (<i>underline, council’s emphasis</i>).</p> <p>GLVIA3, Chapter 5, Assessment of landscape effects, clearly states at “5.35 <i>The effects on landscape should embrace all the different types identified by the Regulations [EIA Regulations], namely the direct effects and any indirect, secondary, cumulative, short-, medium-and long-term, permanent and temporary, positive and negative effects of the development (as described in paragraph 3.22. They are likely to include:</i></p> <ul style="list-style-type: none"> <li>• <i><u>Change in and / or partial or complete loss of elements, features or aesthetic or perceptual aspects that contribute to the character and distinctiveness of the landscape;</u></i></li> </ul>

ExQ1	Question to:	Question:
		<ul style="list-style-type: none"> <li>• <u>Addition of new elements or features that will influence the character and distinctiveness of the landscape;</u></li> <li>• <u>Combined effects of these changes on overall character.</u>”</li> </ul> <p>At 5.36, “All effects that are considered likely to take place should be described as fully as possible;</p> <ul style="list-style-type: none"> <li>• <u>Effects on individual components of the landscape, such as loss of trees or buildings for example, or addition of new elements, should be identified and mapped (and if appropriate and helpful quantified by measuring the change).</u></li> <li>• <u>Changes in landscape character or quality / condition in particular places need to be described as fully as possible and illustrated by maps and images that make clear, accurately as possible, what is likely to happen.</u>”</li> </ul> <p>At 5.48, Magnitude of landscape effects, “<u>Each effect on landscape receptors needs to be assessed in terms of its size or scale, the geographical extent of the area influenced, and its duration and reversibility.</u>”</p> <p>At 5.49 “For example, <u>the effect of both loss and addition of new features</u> may be judged as major, moderate, minor or none, or other equivalent words. The judgements should for example, take account of:</p> <ul style="list-style-type: none"> <li>• <u>The extent of existing landscape elements that will be lost, the proportion of the total extent that this represents and the contribution of that element to the character of the landscape – in some cases this may be quantified;</u></li> <li>• <u>The degree to which aesthetic or perceptual aspects of the landscape are altered either by removal of existing components of the landscape or by the addition of new ones – for example, removal of hedges may change a small- scale, intimate landscape into a large-scale, open one, or introduction of new buildings or tall structures may alter open skylines;</u></li> <li>• <u>Whether the effect changes the key characteristics of the landscape, which are critical to its distinctive character.</u>”</li> </ul> <p>The Applicant’s technical note at 3.1.10, says “By treating Landscape Fabric as a separate Landscape Receptor, the approach allows the <u>physical landscape benefits of the Scheme (such as new hedgerows and meadows) at the Site level, to be quantified without affecting the separate assessment on Landscape Character. This is how the LVIA concludes that Landscape Fabric can be Moderate / Minor Neutral at the construction phase and become Moderate Beneficial at Year 15 once planting becomes established.</u>”</p> <p>The technical note at 3.1.10 confirms that the LVIA’s assessment of landscape fabric is separated from its assessment of landscape character, which the council agrees is the correct approach to take.</p> <p>However, the earlier paragraph 3.1.9 [REP1-121], appears to contradict from the approach outlined at paragraph 3.1.10 (underline council emphasis); “3.1.9 The LVIA has <u>fully assessed the Scheme effects on Landscape Character which includes consideration of: new built elements / components such as substations, internal access tracks, solar PV arrays, alongside changes to current land use and management, alterations to the rural road network, new planting and changes to vegetation management which are all components that together influence the baseline landscape character, including its perceptual and aesthetic qualities within the four Study Areas.</u>”</p> <p>Paragraph 3.1.9 of the technical note confirms that the assessment of the introduced built and manmade fabric components, alongside changes to land use and management, alterations to the local road network, new planting, hedgerow and vegetation management and perceptual and aesthetic qualities of the landscape fabric within the DCO limits, have been incorporated and considered within the separate assessment of landscape character.</p> <p>The technical note does not explain or justify why built and manmade or new energy infrastructure components, including buildings, BESS containers, access tracks and roads, boundary enclosures, substations and panel arrays introduced into the DCO limits are not considered within the scope of the LVIA’s assessment of landscape fabric. Limited and partial assessment of the landscape fabric components assessed is the reason why the LVIA concludes no significant adverse effects for landscape fabric components within its assessment of landscape fabric.</p>

ExQ1	Question to:	Question:
		<p>The technical note does not alter the council's view contained within its LIR [REP1-137]. The council maintains its position that the LVIA conflates its assessment of landscape fabric and landscape character. The council considers that the assessment of landscape fabric only represents a limited and partial assessment of landscape fabric effects within the DCO limits.</p>
LV1.4	The Applicant	<p><b>Landscape Fabric – Beneficial Effects</b></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"> <li>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?</li> <li>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?</li> </ol> <p>While this is a question for the Applicant, Wiltshire Council considers that planting measures which seek to improve the age structure and appropriate species diversity of the existing hedgerow trees present in the landscape could, if secured and successfully established, represent a long-term beneficial legacy effect to landscape fabric.</p> <p>Wiltshire Council highlights that the majority of the visual screening proposed is being secured on the basis of allowing existing field boundary hedgerows within the order limits to grow taller and be managed for the lifetime of the project at a greater height (circa 4.5m). The Council considers this proposed management change to existing hedgerows to help screen development across such a wide area cannot be considered to represent a landscape fabric benefit.</p> <p>Wiltshire Council additionally considers that the existing Elm hedgerows present within the DCO Order Limits are unlikely to provide effective screening for the life of the project. This is because Elm tree stems tend to die when they reach a certain size from Dutch Elm Disease. There is widespread evidence of small standing dead Elm trees within the study area and the DCO Order Limits that illustrate that Elm hedgerows that are not regularly maintained at lower heights typically become thin and gappy. Such hedgerows are unlikely to provide effective long-term screening functions.</p> <p>The change from seasonal arable landcover to permanent grass, cannot be viewed to be a landscape fabric benefit as this same grass would be substantially covered over by introduced built structures, internal roads, infrastructure compounds and it is unlikely or uncertain to be retained following decommissioning.</p>
LV1.5	Wiltshire Council	<p><b>Landscape Fabric – Enhancement Opportunities</b></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> <p>The management and enhancement opportunities identified under broad management objectives for <i>Limestone Lowland Landscape Character Type 16</i> and its single <i>Landscape Character Area 16A: Malmesbury – Corsham Limestone Lowland</i>, in so far as these specifically relate to the Applicant's proposed planting measures include;</p> <ul style="list-style-type: none"> <li>• <i>Conserve the network of hedgerows, hedgerow trees and woodland copses, and encourage new planting where the network has broken down.</i></li> <li>• <i>Conserve the remaining areas of ecological interest such as those with statutory designations, areas of ancient woodland, veteran hedgerow trees and chalk grassland.</i></li> <li>• <i>Maintain the subtle variations that occur throughout the landscape, encouraging local distinctiveness for instance in the variation in field boundaries from hedgerows to stone.</i></li> </ul> <p>The landscape management guidelines and management strategy actions for <i>Landscape Character Area 8: Hullavington Rolling Lowland</i>, in so far as these relate to opportunities for planting enhancement measures, are identified to include;</p>

ExQ1	Question to:	Question:
		<p><u>Under management guidelines</u></p> <ul style="list-style-type: none"> <li>• <i>The overall objectives for the area are to conserve and enhance its pastoral character.</i></li> <li>• <i>The continuity of hedgerows is important in shaping the character of the area and should be encouraged through appropriate land management programmes.</i></li> <li>• <i>River valleys should be enhanced by encouraging habitat creation and planting of riverside trees.</i></li> </ul> <p><u>Under management strategy actions</u></p> <ul style="list-style-type: none"> <li>• <i>Conserve hedgerows and mature trees, including planting new trees in existing hedges and planting specimen trees in field corners.</i></li> <li>• <i>Encourage woodland management to provide continuity of cover while optimising ecological value.</i></li> <li>• <i>Enhance the wetland character in riverside locations by planting willows along water courses in informal groups and broken lines, and by encouraging landowners to help in the creation of more diverse waterside habitats.</i></li> </ul> <p>The council considers that in areas where the historic field boundary pattern has been lost over time through field amalgamation and agricultural intensification, or has existing weak or declining hedgerow structure or low numbers of hedgerow trees, or only single species (dominant) hedgerow trees of similar age / maturity, that there is some merit in the Applicant's proposed planting measures where the proposals include re-planting lost historic field hedgerows or would increase the age diversity and species composition and distribution of hedgerow trees and field corner trees or seek to enhance or create more diverse waterside habitats and visual interest.</p> <p>In this regard the requirement for the Applicant's subsequent detailed planting proposals, may provide some-long-term opportunities for enhancement for landscape fabric, although the council has reservations in relation to how successful new hedgerow tree planting would be located within taller managed hedgerows. Planting trees in field corners is considered characteristic, but lines of trees planted adjacent to hedgerows wouldn't be characteristic of the character type and area where such planting is not associated with existing areas of historic parkland.</p>
LV1.6	Wiltshire Council Stop Lime Down The Applicant	<p><b>Landscape Character – Assessment Methodology</b></p> <p>In the ES <a href="#">[APP-060]</a> 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></p> <p>Wiltshire Council and SLD are asked if they consider that the applicant's approach is acceptable?</p> <p>Wiltshire Council considers the approach departs from the standard typical approach for assessment of landscape effects upon specific landscape character types and areas. Specific landscape character types and areas were identified as distinct landscape receptors and scoped in for assessment by ExA at EIA scoping stage. The assessment has not been carried out on this receptor basis.</p> <p>The landscape assessment fails to discuss or recognise that the DCO Order Limits falling within the Limestone Lowland Type are currently devoid of major electricity transmission and energy storage infrastructure, and proposes to introduce the most intense density of solar development (dispersed across Areas A to E) to be found within this Character Type, defined by the DCO area which almost bisects the Limestone Lowland from the Cotswolds National Landscape boundary in the west to the settlement of Startley in the east. The DCO area is in excess of 9km west / east and up to 5km north / south, arguably cutting a swathe through the most sensitive and largely unspoilt, intact rural area of this Landscape Character Type.</p> <p>The issue of Solar PV and BESS infrastructure impacting upon and cumulatively changing the Limestone Lowland landscape type and its sub-divided Landscape Character Areas has been consistently highlighted to the Applicant during the application process, yet the Applicant's assessment of landscape character fails to acknowledge that development of this scale and nature is acting as a highly relevant force for change, incrementally and cumulatively changing</p>

ExQ1	Question to:	Question:
		<p>the landscape fabric (natural and man-made elements and components) and character at a Landscape Character Type and Landscape Character Area scale over a large area and over a short timeframe.</p> <p><u>The applicant:</u> The applicant is asked to either:</p> <ol style="list-style-type: none"> <li>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</li> <li>2) Provide an updated assessment defining the effects relative to the separate landscape receptors rather than to each study area as a whole.</li> </ol>
LV1.9	<p>The Applicant Wiltshire Council Cotswolds National Landscape Board Stop Lime Down</p>	<p><b>Cotswold National Landscape – Setting</b></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> <p>Wiltshire Council considers that the setting of the Cotswolds National Landscape extends beyond its designated boundary in this area, particularly in relation to the Fosse Way corridor and the land to its north-west.</p> <p>The National Landscape boundary follows the northern edge of the DCO Order Limits at Foxley, passes south of Sherston, and continues along the western edge of the boundary at Alderton. The Fosse Way runs north-east to south-west through the National Landscape, with a gap of around 5 km where it leaves the designation near Foxley before re-entering it between Alderton and Grittleton. This corridor is well used for recreation and functions as a recognised route through the wider National Landscape.</p> <p>Wiltshire Council considers that the land adjacent to and north-west of the Fosse Way shares the rural character, special qualities and wider landscape associations of the National Landscape and is very much complimentary to it. Due to the route providing an important recreational connection both within the designated area and into the surrounding countryside, Wiltshire Council considers that the Fosse Way and the land to its north-west form an integral part of the setting of the Cotswolds National Landscape.</p>
LV1.14	<p>Wiltshire Council Cotswolds National Landscape Board</p>	<p><b>Visual Impact – Photomontages</b></p> <p>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.</p> <p>Wiltshire Council’s Landscape Officer agreed the viewpoint and photomontage locations at the outset of the project and remains satisfied with those locations.</p> <p>Additional photomontages may, however, be needed to illustrate intra-project sequential cumulative effects experienced by receptors moving through the landscape, including along public rights of way and local minor roads.</p>
LV1.19	<p>Wiltshire Council Stop Lime Down</p>	<p><b>Visual Impact - Residential Visual Amenity Assessment</b></p> <p>SLD explains in its Landscape and Visual Impact Report <a href="#">[REP1-170]</a> 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.</p> <p><u>Wiltshire Council:</u></p> <ol style="list-style-type: none"> <li>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?</li> </ol>

ExQ1	Question to:	Question:
		<p>Wiltshire Council considers that a limited number of residential properties are likely to experience significant adverse effects on visual amenity as a result of the proposed development. It therefore does not agree with the Applicant's position that a Residential Visual Amenity Assessment (RVAA) is unnecessary where there is potential for significant adverse visual effects on a property and on residents' amenity.</p> <p>Any assessment should follow the four-stage process set out in Landscape Institute Technical Guidance Note 2/19. This will establish which properties identified at Stage 3 as experiencing the greatest magnitude of change should proceed to Stage 4, where the Residential Visual Amenity Threshold may be engaged. Wiltshire Council does not consider that properties close to the Cable Route Corridor (CRC) should be included, given the temporary nature of works in that area.</p> <p>Properties requiring a full RVAA</p> <ul style="list-style-type: none"> <li>• Four properties at Grain Store Barn, Pig Lane, surrounded by field parcels C15, C16, C17 and C18.</li> </ul> <p>Properties potentially requiring a full RVAA</p> <ul style="list-style-type: none"> <li>• Farleaze Farm, with views across field parcels C12, C14, C16, C17 and C23.</li> <li>• Avil's Farmhouse (Grade II listed), with views into Area E.</li> <li>• Bradfield Manor Farmhouse, with views of Area D, the BESS and the substation.</li> </ul> <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>
LV1.23	The Applicant Wiltshire Council Stop Lime Down	<p><b>Cumulative and Combined Effects - Cumulative Sequential Visual Effects</b></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>Wiltshire Council is unable to agree with either the methodology or the conclusions in the Technical Note on Cumulative Sequential Visual Effects. The note considers only inter-project cumulative effects (that is, Lime Down and other solar or related infrastructure projects within the wider study area) and does not address intra-project sequential effects, where receptors move through the Lime Down project area and experience views of two or more proposed development areas A – E in sequence. These effects are of particular relevance to residents and other receptors travelling through the site. This concern is explained in full at paragraph 8.23 of Wiltshire Council's Relevant Representation [RR-4934] which states:</p> <p><i>"..... In this case the Fosse Way, which is a very popular recreational route is considered to be a key route where sequential effects should be assessed, but there are also PRoW and minor road links, particularly routes between settlements and circular routes close to settlements which will require assessment. A selection of potential Sequential Visual Effect routes is given at Table 8-23 of ES Chapter 8 [APP-060]. However, these have not been adequately assessed for potential effects and a full description of the effects as the receptor passes though the landscape is required. The ES focusses, erroneously, on Major Roads for determining sequential effects from roads. At ES para 8.10.46 it is stated that GVLIA3 refers to major roads. It does, but only as an example. It also states in GLVIA3 Table 7.1 that: "Sequential effects may be assessed for travel along regularly used routes....". Given the receiving landscape contains very few roads which would be classified as more than minor, it is obvious that these routes are those which are going to be used for travel within the [DCO] area and therefore the sequential effects of travelling along them must be assessed."</i></p>

ExQ1	Question to:	Question:
		<p>Wiltshire Council therefore considers that the Applicant's Environmental Statement places undue emphasis on major roads, while overlooking the well-used minor routes that define the character of the Lime Down project area and from which intra-project sequential effects are likely to be most noticeable.</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><b>Cumulative and Combined Effects – Cumulative Effects on Landscape Character</b></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> <p>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?</p> <p>Wiltshire Council considers that broad percentage-based comparisons across large landscape designations can understate the effect of development on the landscape that actually receives it.</p> <p>It is common to assess a proposal against a designated landscape, landscape character area or landscape character type. In this case, however, LCA 8 Hullavington Rolling Lowlands (largely contiguous with the Limestone Lowlands Landscape Type) covers a very extensive area. Although the proposed development would occupy 3.41% of the LCA, Wiltshire Council considers this to be a substantial area of development and not a minor change simply because the wider LCA within which the DCO area is located is large.</p> <p>For a development of the scale and spread of Lime Down, Wiltshire Council considers that cumulative landscape effects should be assessed initially in relation to the features and components which make up the subtle character differences of the receiving landscape across of Areas A-E and the CRC. These subtle but important variations in character that should have been identified in the LVIA. These include the natural and human-made features and components of the landscape, loosely described as its "fabric", which together create the observed local character variations, which provide the basis against which basis for assessing inter project cumulative landscape effects with other solar infrastructure and related developments on the key characteristics of the LCA.</p> <p>Wiltshire Council therefore considers that land-use change within the receiving landscape area of LCA8 should be used as an indicator when judging the significance of cumulative adverse effects on landscape character.</p>
<b>Land Use, Soils and Food Security (LSF)</b>		
LSF1.1	The Applicant	<p><b>Food Security</b></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>

ExQ1	Question to:	Question:
		<p>As discussed at Issue Specific Hearing 1, the Department for Environment and Rural Affairs (DEFRA) published a <a href="#">national security report</a> 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 [<a href="#">REP2-017</a>], 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 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 [<a href="#">REP2-038</a>] 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"> <li>• How much of Wiltshire is farmland, and of that farmland how much is classed as being BMV and not BMV?</li> <li>• 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?</li> <li>• When the Lime Down proposal is added to the figures from bullet point 2, how much is classed as BMV and not BMV?</li> <li>• 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.</li> </ul> <p><a href="#">Whilst Wiltshire Council acknowledge that this question was posed to the Applicant, the council would like to respond to the following points:</a></p> <ul style="list-style-type: none"> <li>• How much of Wiltshire is farmland, and of that farmland how much is classed as being BMV and not BMV? <a href="#">273,555ha of Wiltshire’s total 348,500Ha is farmed, or over 75% of available land. The Natural England Agricultural Land Classification (ALC) does not differentiate between subgrade 3a, BMV and subgrade 3b, non – BMV. However, using a calculated estimate Wiltshire has approximately 112,000Ha of BMV land.</a></li> <li>• 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? <a href="#">Wiltshire has over 1,200Ha of operational or approved solar farms, making it the county with the most solar land in England. Wiltshire Council has already exceeded its 2030 renewable energy target by roughly 39%. Wiltshire Council has assessed 61 sites covering 1278 Ha. 39.5 Ha are within commercial sites, e.g. MOD bases, race circuits, and 119Ha of solar farms are on grade 4 land. As yet none of Wiltshire’s grade 2 farmland is being used for solar energy, leaving 1,119.5Ha on grade 3 land. As previously mentioned, the ALC does not differentiate between grade 3a and 3b so unless an Applicant has had the soil sampling done, the council has not been able to give a definitive figure for the land classified as 3a (BMV) or 3b (non-BMV). Of the sites that have done soil sampling, 399Ha are grade 3b with just 43Ha grade 3a.</a></li> <li>• When the Lime Down proposal is added to the figures from bullet point 2, how much is classed as BMV and not BMV? <a href="#">The council is not able to answer this question accurately due to incomplete information. However, the Lime Down proposal would take out 263Ha of BMV land (30% of the total amount, of which 6% is grade 2) which based on the figures from bullet point 2 appears to be a significantly higher percentage than other solar farms in Wiltshire.</a></li> </ul>

ExQ1	Question to:	Question:
LSF1.7	The Applicant	<p><b>Soil Performance</b></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 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"> <li>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.</li> <li>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.</li> </ol> <p>Whilst it is acknowledged that this question was posed to the Applicant, with respect to point 1) above, the council notes that intensive agriculture in an arable farming sense tends to mean continuous arable cropping, which does result in loss of organic matter in the soil and nutrients being replaced with artificial fertiliser. However, most farms in Wiltshire practice rotational farming with break crops, including grass leys, which replenish soil nutrients to some extent and the organic matter. Livestock manure is also used to help soil health. Once the Applicant has clarified the current farming regime, the council will be in a better position to comment further.</p>
LSF1.10	The Applicant	<p><b>Soil Health</b></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> <p>Whilst it is acknowledged that this question was posed to the Applicant, the council considers that if the land was in continuous grassland over the lifespan of the scheme, then soil health will improve. There are other species that could be planted to further improve the soil health and help wildlife, e.g. clovers, vetches along with deeper rooting species like chicory and sheep's burnet. The council's main concern is that soil structure is not compromised at the end of the scheme, hence the request for soil trenches / pits to be dug to check for soil compaction once all heavy equipment has been removed from the site.</p>
LSF1.17	Wiltshire Council	<p><b>Soil Management Approach</b></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> <p>The Lead Local Flood Authority (LLFA) considers that the overall approach and structure of the Outline Soil Resources Management Plan (oSRMP) are appropriate in principle, as it aligns with recognised good practice and relevant guidance, including Defra's Construction Code of Practice and established soil handling methodologies. The document appropriately identifies key risks to soils, such as compaction, smearing, and handling under unsuitable moisture conditions, and proposes standard mitigation measures including controlled stripping, segregation of soil horizons, stockpile management, and monitoring during construction. However, the LLFA considers that the oSRMP relies heavily on future detailed SRMP provisions and contractor-led controls, and therefore does not yet provide sufficient certainty that soil-related impacts on drainage and runoff will be effectively managed across all phases, particularly in relation to hydrological performance. In particular, the oSRMP should be strengthened to include: (i) clear soil reinstatement performance targets, including infiltration rates, permeability, and runoff characteristics to ensure restoration to greenfield conditions; (ii) a defined verification and validation regime, including field testing (e.g. infiltration testing, bulk density/compaction testing) and formal sign-off criteria; (iii) linkage between soil management and surface water drainage performance, recognising that soil structure directly affects runoff generation and SuDS functionality; (iv) specific measures to address high-sensitivity clay soils identified on site, which are particularly vulnerable to long-term structural damage; (v) enhanced controls for wet weather working and contingency planning, beyond general guidance, including defined stop/go thresholds tied to measurable criteria; and (vi) stronger provisions for the decommissioning phase, including soil recovery, decompaction, and long-term monitoring of restored land. Without these additions, the LLFA considers that</p>

ExQ1	Question to:	Question:
		<p>there remains a risk that soil degradation could lead to increased surface water runoff, reduced infiltration, and adverse impacts on local flood risk, and therefore further detail is necessary to ensure the effective discharge of the relevant requirements.</p> <p>From the perspective of returning the land to agricultural use at the end of the scheme, and providing adequate checks are made for soil compaction, the council's economic development team are content, providing the Applicant complies with the guidance that has been committed to regarding working during wetter period, as contained within <a href="#">[APP-280]</a>.</p>
<b>Noise and Vibration (NV)</b>		
NV1.5	Wiltshire Council	<p><b>BS 4142:2014 and Operational Noise Effects</b></p> <p>Paragraph 14.6.33 of ES Chapter 14 <a href="#">[REP1-021]</a> 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<sub>A90</sub> has been adopted with respect to the setting of operational noise LOAEL and SOAEL<sup>1</sup>.</i></p> <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 <a href="#">[REP1-179]</a> 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 <a href="#">[REP1-179]</a> 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> <p>The council is required to have regard to national guidance when assessing the noise impact of commercial developments. BS 4142:2014 indicates that a rating level exceeding the background sound level by +5 dB is likely to be an indication of an adverse impact. Furthermore, Section 11 of BS 4142 emphasises that where background sound levels are low, absolute noise levels may be as important as, or more important than, the margin by which the rating level exceeds the background.</p> <p>The Association of Noise Consultants (ANC) Guide to BS 4142:2014 provides additional context, noting that the standard does not explicitly define "low" background or rating levels. However, reference is made to the 1997 version of the standard, which considered very low background sound levels to be below approximately 30 dB LA90, and low rating levels to be below approximately 35 dB LAr,Tr.</p> <p>In this case, the Applicant's noise assessment has appropriately considered both:</p> <ul style="list-style-type: none"> <li>• the difference between the scheme's rating level and the prevailing background sound levels; and</li> <li>• the context in which the sound will occur.</li> </ul> <p>For the daytime period, receptor points have been modelled at 1.5 m above local ground level, representing ground-floor windows. Background sound levels during the daytime do not fall below 30 dB LA90 at any noise-sensitive receptor. On this basis, the application of absolute rating level criteria during the daytime is not considered necessary.</p>

<sup>1</sup> 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>For the night-time period (23:00–07:00), an absolute noise level approach has been applied to reflect the noise impact on residential occupiers trying to sleep within bedrooms with open windows. Receptor positions have been modelled at:</p> <ul style="list-style-type: none"> <li>• 4 m above ground level (representative of first-floor bedroom windows), and</li> <li>• 6.5 m above ground level (representative of second-floor bedroom windows at certain locations).</li> </ul> <p>The assessment identifies two residential receptors (R10 and R20) where the external rating level is 35 dBA, including a +3 dB acoustic feature correction to account for a distinctive continuous hum. This corresponds to predicted internal bedroom noise levels of approximately 20–25 dBA. These internal noise levels are 5–10 dB below the 30 dB guideline value recommended in both BS 8233:2014 and the World Health Organisation (WHO) Guidelines to avoid sleep disturbance. As such, the assessment demonstrates that there will be no adverse impacts during the night-time period for residential receptors.</p>
<b>Resources and Waste Management (RWM)</b>		
RWM1.1	The Applicant Wiltshire Council	<p><b>Anticipated Construction and Operational Waste Quantities</b></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> <p>The Applicant has provided estimates of wastes to be generated over the lifetime of the proposed development, including construction and decommissioning in ES Chapter 20 Other Environmental Matters [APP-072].</p> <p>Wiltshire Council is of the opinion that the quantities of non-hazardous waste that may be produced by the development (wood, plastics, paper / cardboard and steel) are such that they are able to be accommodated by suitable facilities within the County, although noting the proximity principle they may be managed at one of the nearest appropriate facilities, which may not be within Wiltshire due to the location of the development in proximity to other waste planning authority boundaries.</p> <p>Regarding concrete and aggregates, it is assumed these will mainly be recycled. The specified quantities would not cause concern over the availability of capacity to be managed within the County although again, the proximity principle would allow for this to be managed at one of the nearest appropriate facilities which may not be in Wiltshire.</p> <p>The ES notes that it is likely that the solar PV panels and battery waste would be managed by specialist regional or national facilities. There are currently no such facilities in Wiltshire and so it is likely that this waste will be transported by road to these facilities.</p> <p>Regarding excavated soil, according to the remaining landfill capacity data tables published by the Environment Agency remaining void space for inert landfill in Wiltshire at the end of 2024 (the current reporting period) is 69,000m<sup>3</sup>. However, Wiltshire Council is aware of other sites, one of which has recently been permitted for 143,000m<sup>3</sup>, that could also accommodate inert waste of the volumes generated by the proposal. This is in addition to several operational and permitted quarries that will require restoration and take inert waste (circa. 750,000m<sup>3</sup>) over the lifetime of the construction phase. Therefore, there is sufficient capacity in Wiltshire to accommodate the excavated soils, although again, depending on the location of these sites (one is in the south of</p>

ExQ1	Question to:	Question:
		<p>the County at a distance from the proposed development) the waste may travel to a nearer facility to be managed, which may not be in Wiltshire. For example, there is a nearby quarry development on the Wiltshire border to the east of Cricklade that will take circa. 3,000,000m<sup>3</sup>, but falls within the Gloucestershire administrative area.</p>
RWM1.2	The Applicant	<p><b>Below Ground Cables at Decommissioning</b></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"> <li>1) The reasoning for leaving the below ground cables in place.</li> <li>2) Whether there would be adverse effects or potential hindrance to use of the land associated with the cables being left in place.</li> </ol> <p>Whilst it is acknowledged that this question was posed to the Applicant, the council considers that there may be an issue with leaving the cables in place in the case of some agricultural practices, e.g. sub-soiling.</p>
RWM1.3	The Applicant The Environment Agency All Local Authorities	<p><b>Waste</b></p> <p>Can each party provide commentary on the proposed development's compliance with the Regulations: Waste Electrical and Electronic Equipment (WEEE) 2013?</p> <p>The Applicant has within ES Chapter 20 Other Environmental Matters [APP-072] confirmed that all Solar PV Panels, cabling, conversion units, switchgear, BESS Area and substations would be removed from within the Order Limits as part of decommissioning.</p> <p>The ES notes that the WEEE Regulations place obligations on companies who place solar PV panels on the market to finance the costs of collection, treatment, recovery and environmentally sound disposal. It is assumed by the Applicant that specialist regional or national facilities would be in place at the time of decommissioning (and component replacement), and these would be developed in response to demand generated by the UK-wide solar PV panel industry, and would be reused, recycled, or recovered and not disposed of to landfill.</p> <p>The Outline Decommissioning Strategy submitted with the DCO Application [APP-279] advises that for the electrical components, prior to the decommissioning works commencing a detailed Decommissioning Strategy will be prepared which will provide a waste estimate, and specify key responsibilities, reporting and auditing requirements and waste recovery targets.</p>
<b>Socio-Economics (SE)</b>		
SE1.4	The Applicant	<p><b>Outline Skills Supply Chain and Employment Plan Q1</b></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> <p>Whilst it is acknowledged that this question was posed to the Applicant, Wiltshire Council considers that this should read 'and' as the economic impact resulting in job losses will, in the council's view, continue throughout the scheme and particularly during construction phases, so should include decommissioning.</p>
SE1.5	The Applicant	<p><b>Outline Skills Supply Chain and Employment Plan Q2</b></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>

ExQ1	Question to:	Question:
		<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> <p>Whilst it is acknowledged that this question was posed to the Applicant, Wiltshire Council agree that this commitment could be better defined, and would like all such agreements with the council agreed prior to planning permission being approved, should that be granted.</p>
SE1.8	The Applicant	<p><b>Public Rights of Way Network Post Decommissioning</b></p> <p>The Wiltshire Ramblers <a href="#">[RR-4935]</a> 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> <p>Whilst it is acknowledged that this question was posed to the Applicant, it is the council's understanding that the Applicant doesn't plan for any permanent diversions of the PRoW network. However, the council believes that where a permissive path has been provided that can clearly demonstrate to have provided improved connectivity, that it should be retained.</p>
SE1.10	Wiltshire Council	<p><b>Innovation Forum</b></p> <p>In your D2 submission <a href="#">[REP2-048]</a> 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"> <li>a) Who would make up the Innovation Forum</li> <li>b) What powers would have the Innovation Forum have</li> <li>c) Would the Innovation Forum form part of the Community Liaison Forum</li> <li>d) Examples of where an Innovation Forum has been used elsewhere</li> </ul> <p>There is an opportunity for innovation in long-term infrastructure at every stage of the project lifecycle. Over a 60-year project lifetime, there is potential for the technology, markets and industry standards to evolve, and there may also be a need to change practice due to the changing climate or socio-economic factors. Therefore the Scheme would benefit from having a clear process for being able to adopt changes and innovations over the lifetime of the project, to monitor and ensure accountability. An Innovation Forum could be one way to achieve this, but the Applicant may also have other suggestions or already have mechanisms in practice in projects elsewhere. The application mentions that "recycling will be carried out as far as practical and in accordance with legislation and guidance applicable over time". There is also scope to consider innovations in materials, digital monitoring and robotics and taking advantage of improvements in electric vehicle infrastructure over time and options for agrivoltaics as they continue to develop. This could help to mitigate some of the impacts of the project's operations on the community and the environment even more than currently envisaged by the proposal.</p> <ul style="list-style-type: none"> <li>a) It is conceivable that a processes for innovation already exist in the renewables industry, where businesses have their own Research and Development departments, network to learn from each other in collaboration with research institutes. There is scope to develop recycling or circular economy industries in the South West region so the Scheme's managers could actually help to encourage this and work to support supply chains in the UK. It is acknowledged that shareholders will be interested in tracking output and maximising innovation that improves performance and cost. However, the council are looking for some kind of reassurance of how innovations (if applicable) will flow into the Lime Down Solar Park scheme, and how the community and council can be reassured of this over the lifetime of the project, especially where new innovations will help to mitigate the identified impacts on the community and the environment, and also to monitor the impacts and whether the mitigation and DCO Requirements are having the desired effect. An Innovation Forum could consist of meetings between the developer / manager of the Scheme and a community and council representative.</li> </ul>

ExQ1	Question to:	Question:
		<p>b) The Innovation Forum should have a Terms of Reference detailing for example how often it meets, who its members are, what its powers are, what kind of monitoring or reporting is carried out. At this stage the council does not have specific requests in relation to the specific powers of the forum. The main purpose would be keep the community and council informed in relation to innovation, enable a space whereby the community and council may suggest or share innovations or local changes that might affect the operation of the project, and request the Scheme manager to consider them. It is suggested that Wiltshire Council is the main point of contact / liaison in relation to any innovation opportunities, for continuity.</p> <p>c) Yes, the Innovation Forum could form part of the Community Liaison Forum, however it is noted that the Community Liaison is only planned for the initial period of operation, so an additional process or mechanism may need to be put in place. It is suggested that the main liaison for updates of technology, standards or innovation is Wiltshire Council.</p> <p>d) The council does not have any specific examples of an Innovation Forum being used in a large infrastructure project. However, the council does have example of an Innovation Forum being used throughout the lifetime of the council's contracts with providers in the highways and waste sectors. Particularly the highways maintenance contractors are very proactive. They have been involved in innovation and research projects elsewhere and bring their learning into the Wiltshire delivery where appropriate. An Innovation Forum meeting is held at least twice a year to talk about developments in the industry which can improve delivery, efficiency, explore opportunities for carbon emissions reduction and increasing resilience and sustainability. There is also the example of the <a href="#">Crossrail Elizabeth Line</a> governance and innovation, which was put in place to ensure integration between its numerous contractors, but also provided the opportunity for anyone to input ideas, from site labourers to project directors. This is an example of a digital platform enabling exchange of ideas and innovation, which could be incorporated into the Lime Down Innovation process / forum.</p>
<b>Transportation, Traffic and Highway Safety (TT)</b>		
TT1.4	The Applicant	<p><b>Highway Improvement Areas Q2</b></p> <p>The HIAs are seemingly included in Work Nos. 8A (temporary) and 8B (permanent) of the dDCO and shown in the work plans <a href="#">[APP-007]</a> 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 <a href="#">[APP-080]</a>, 3-1 to 3-1-5 <a href="#">[APP-081]</a> and 3-2 to 3-2-10 <a href="#">[APP-082]</a>. These figures should therefore be amended to delineate temporary and permanent HIA locations in different colours. 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> <p>Whilst it is acknowledged that this question was posed to the Applicant, Wiltshire Council agrees that where works in the Highway Improvement Area are to be permanent or temporary this does need to be made clear. This will affect the detailed design of the works in the first instance, and where works are only intended to be temporary, then further drawings will be needed to show how the highway will be reinstated when the temporary works are removed.</p>
TT1.5	The Applicant	<p><b>Construction Access Points</b></p> <p>Paragraph 2.1.2 of the oCTMP <a href="#">[REP1-112]</a> 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"> <li>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.</li> <li>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.</li> <li>3) For any new or altered access which is proposed to be reinstated to its pre-altered state/ size, where this requirement is secured.</li> </ol> <p>Whilst it is acknowledged that this question was posed to the Applicant, this query appears to relate in the main to the temporary construction accesses along the Cable Route Corridor (CRC) and reinstatement requirements. As far as question (3) is concerned, the provisions in the pending Wiltshire Council Protective Provisions (once agreed) will hopefully cover off what the council requires in terms of the 'Cable Works' and approval of reinstatement proposals.</p>

ExQ1	Question to:	Question:
TT1.7	The Applicant The Local Highway Authority (LHA)	<p><b>Construction Worker Numbers</b></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> <p>The spread of expected construction works across the Lime Down A-E sites based on area size alone is considered somewhat simplistic. It would be expected that the 400kV substation and the BESS, which are both in the Lime Down D area, would attract well above the ‘average’ for the solar sites. The 400kV substation is currently predicted to be constructed in the first 6 months of the Schedule and the BESS over a 19-month period commencing in month 5 (Table 13-9 of Appendix 13-1 Transport Assessment (Rev 2) [REP1-057]). Whilst a 6-month timescale to construct a 400kV substation is possibly questionable as realistic, particularly given that 19-months is deemed necessary for the BESS, Lime Down D is still likely to be attracting proportionally more workers than other areas because of the BESS works. This is likely to result in greater light vehicle construction traffic pressure on the narrow access route between Dyson RBT and Bradfield Cottages. In commenting on the initial Scoping Note for the CTMP and Traffic Statement, the council also commented on the assumed traffic distribution for worker movements, or rather how this has been determined as it wasn’t clear. In specific comment it was stated: “What is less clear is how the ‘worker’ light vehicle arrival / departure trips have been distributed. Whilst it is reasonable to assume that all HGV trips will follow the proposed construction routes to / from M4 Junctions 17 and 18 (which would be imposed by the CTMP anyway), it cannot be assumed that all worker trips will follow the same. In short, the trip origins / destinations will likely have a wider spatial distribution. I suspect the cumulative overall changes shown at the 19nr locations simply assume that all light vehicle construction traffic follows the HGV routes. A more robust assessment based on the population distribution in the area surrounding Lime Down would seem a better and more realistic approach”. However, the Transport Assessment once submitted presented the same simplistic approach. It is accepted that predicting the most likely worker trip origins for a workforce where a large proportion may not be resident is difficult, but it is equally the case that the spatial distribution is unlikely to lead to all light vehicle worker trips arriving / departing along precisely the same routes as the HGVs.</p>
TT1.8	The Applicant	<p><b>Construction Shuttle Buses</b></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> <p>Whilst it is acknowledged that this question was posed to the Applicant, in the council’s initial Highways Development Management comments on the ‘Scoping Note for the CTMP and Traffic Statement’ it was stated: “It is noted that daily estimates of light vehicle construction traffic are based on the expected number of operatives (500 across Lime Down A-E), a car / shuttle bus mode split assumption and split based on the relative sizes of the Lime Down sites. The assumption that “50% of workers will arrive by shuttle bus” does seem high, despite the reasoning set out in paragraph 3.1.12 that this is based on acceptance in solar farm DCO applications elsewhere. I would prefer to see a lower shuttle bus assumed mode share used in Table 3.2 (say 20%), although from a local impact perspective, it is likely the HGV numbers will be of greater concern than light vehicle increases, especially when the two-way changes are distributed between sites”. This wasn’t followed up in the council’s Relevant Representation comments when reviewing the submitted Transport Assessment, namely because the Applicant asserted that this assumption had been previously accepted in review of both the Cottam Solar and West Burton Solar Projects. However, it does remain a council concern that the assumed mode share for shuttle bus usage is 50%, and that a lower figure should have been used, as advised at scoping to examine a ‘worst-case’ traffic loading on local roads.</p>

ExQ1	Question to:	Question:
TT1.10	The Applicant	<p><b>Construction Phase Traffic Dispersal</b></p> <p>ES Chapter 13 <a href="#">[REP1-019]</a> 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"> <li>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.</li> <li>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?</li> </ol> <p>Whilst it is acknowledged that this question was posed to the Applicant, the council considers that the Applicant has not considered the potential for diversion or avoidance routing by existing traffic using the proposed construction routes. In short, traffic volume forecasts assume no re-routing of existing traffic. This rationale assumes the achievable hourly link capacity on even the minor roads will not be exceeded with the expected increases in construction traffic. However, this is based on the assumption that 'relatively uninterrupted' 2-way passage can be maintained for vehicular traffic along the narrow rural lanes being proposed for HGV access throughout the construction period, even where passage opportunities for a car / HGV are constrained in many places and where the current opportunities for passing two HGVs are even less. Under this circumstance with regular potential impedance, the achievable 'link' capacities of the minor roads could fall sharply from theoretical maxima based on maintained 2-way flow without opposing passage conflicts.</p>
TT1.16	The Applicant	<p><b>The Street, Grittleton</b></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> <p>Whilst the council has no specific comment in response to this question, noting that it is posed to the Applicant, in reviewing the Stop Lime Down Written Representation, the council noted and supported the concerns about the number of HGVs which could use 'The Street' through Grittleton and the impact this could have on the village, notwithstanding the use of Alderton Road for HGV access to the solar farm PV sites (A-C) during the construction phase. In commenting on the SLD submission, it was stated that: "With regards to the specific impact on villages, the council would concur with the SLD view that the HGV trafficking impact of the cable route works on The Street in Grittleton could be underestimated. The establishment of the large compound east of Grittleton does suggest that the simple 'averaging' approach used by the Applicant to estimate HGV movements expected at each cable route access point is not likely to be applicable here. Furthermore, it would be expected that additional HGV trafficking would be needed in creating the compound itself". <a href="#">[REP2-046]</a></p>
TT1.18	The Applicant	<p><b>Non-Motorised User (NMU) Delay, Amenity, Severance and Safety</b></p> <p>Various paragraphs in section 13.10 of ES Chapter 13 <a href="#">[REP1-019]</a> 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"> <li>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?</li> </ol>

ExQ1	Question to:	Question:
		<p>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?</p> <p>3) Can the applicant advise why it has not given any consideration to NMU safety in its assessment of effects from construction traffic?</p> <p>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?</p> <p>Whilst it is acknowledged that this question was posed to the Applicant, the ExA's view concerning the potential magnitude of the HGV impacts on vulnerable highway users (NMU) using the minor rural lanes is supported, but the council is equally aware that the level of general NMU usage of the rural lanes in the area could be quite seasonal or, for example, more prevalent during the weekends than on a typical weekday. Notwithstanding this, it is considered and agreed that a more robust assessment on NMU usage should have been undertaken where sections of the lanes proposed for HGV construction access are very narrow, or where the road edges lack any verges so requiring pedestrians to remain within the carriageway. In the case of cyclists or equestrians, this would potentially remain the case anyway, with horse riders likely to be particularly impacted by the presence of HGVs. In the case of the latter, simple consultation with equestrian groups would have quickly established the rural lanes commonly used by horse riders.</p> <p>The council considers that the provision of the proposed permissive paths should be created prior to the start of any works to limit NMU requirement to use the highway network.</p>
TT1.19	Wiltshire Council (Local Highway Authority)	<p><b>Road Safety Data</b></p> <p>The applicant states in ES Appendix 13.1 (Transport Assessment) <a href="#">[REP1-057]</a> 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> <p>Wiltshire Council as Local Highway Authority will collect and maintain Personal Injury Collision (PIC) data for its highway network. The PIC data with supporting maps is included in Annex B to the Transport Assessment for the area associated with the Solar PV sites, which contains detailed information for 2018-2023 which the Applicant has stated has been obtained from Wiltshire Council. This information shows collisions involving a pedestrian, cyclist or horse rider, so the proportion of overall accidents involving an NMU could have been assessed and by sub-area.</p> <p>However, Wiltshire Council, and specifically its Road Safety Team, has no record of providing this information to the Applicant. The council would politely request that it can provide the data that it holds for the five-year period 2018-2023 at Deadline 4.</p>

Energy and Climate Adaptive  
Infrastructure Policy

# Community Engagement and Wellbeing

Supplementary Guidance Document

This is a supplementary guidance document, to support the Energy and Climate Adaptive Infrastructure Policy, which was adopted by Suffolk County Council's cabinet, on the 16th of May 2023.

## The scope and purpose of this Supplementary Guidance Document

Suffolk has natural and geographic advantages that make it attractive to project promoters for locating low-carbon technologies, and the consequent supporting infrastructure. This, therefore, creates significant challenges for the local economy, environment, and communities of Suffolk.

The Council considers that it is essential for project promoters to engage effectively and collaboratively with communities. Project promoters must have consideration for the impacts of their project on community wellbeing, both alone and in combination with other proposals, during all phases of the project, from the earliest stages of the pre-application period, through consenting, and during construction. In doing so, project promoters should recognise that:

- Individual energy and climate adaptive projects are part of a substantial, significant, widespread, and ongoing succession of infrastructure developments in this region, that are necessary to mitigate the impacts of, and adapt to the changing climate.
- Public understanding of the amount, extent, and speed of this requirement for new infrastructure is generally low, or at best, inconsistent.
- The technical processes of the national infrastructure consenting regime are neither appropriate, nor sufficient by themselves, to ensure that communities have an effective understanding of, and engagement with, the processes and delivery of change.
- The Nationally Significant Infrastructure Planning (NSIP) process is perceived by the public as exclusive and exclusory, being the province of experts, bureaucrats, and non-departmental public bodies. This characterisation of public perception is backed up by research<sup>1,2</sup>, as well as the Council's experience of previous projects.
- The consenting process results in significant adverse impacts on community wellbeing, particularly where multiple projects are being consulted on and consented across the same communities.
- Distributional fairness, such as community benefits, or shared community ownership, are a necessary addition to, rather than a substitute for, procedural fairness<sup>3</sup>, which must be created through effective dialogue with the affected communities.

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1 <https://www.sciencedirect.com/science/article/pii/S0301421517308212>

2 <https://www.liverpooluniversitypress.co.uk/doi/full/10.3828/tpr.2019.10>

3 Understanding Social Licence - <https://www.sciencedirect.com/science/article/abs/pii/S030626192031237X>



Project promoters have critical obligations to ensure procedural fairness, as defined by the Gunning Principles<sup>4</sup>, given the inherent imbalance of power between the project promoter and communities. This is essential to ensure a fair process, secure trust in the process, and as a result, safeguard community wellbeing. This is likely to require the project promoter to go beyond the regulatory or legislative minimum, throughout project design, consenting, and construction. As such, it is critical for the project promoter, to:

- Provide communities with a genuine opportunity to engage in collaborative dialogue with the promoter, allowing communities to shape the emerging project effectively and demonstrably, from the earliest possible stage of its design and development.
- Ensure that effective engagement methods and approaches with host communities, as well as appropriate community mitigation, are established for the construction, and where appropriate, the operational or decommissioning phases of the project.

The purpose of this Supplementary Guidance Document is to outline in principle how the Council expects project promoters to:

1. **Secure effective dialogue with communities about change**, through their engagement with those who are expected to host NSIP proposals, to ensure a fair process and to protect community wellbeing.
2. **Ensure assessment of community wellbeing**, as part of the Environmental Impact Assessment.
3. **Secure and safeguard community wellbeing**, through effective and robust mitigation measures, that minimise or eliminate the adverse impacts of pre-application engagement, consenting, and construction.

The Council recognises that community wellbeing, and the adverse impacts on it of infrastructure projects, is a relatively new and developing field of interest, therefore, the Council will continue to review and update this guidance appropriately.

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<sup>4</sup> <https://www.local.gov.uk/sites/default/files/documents/The%20Gunning%20Principles.pdf>

# The need for the consideration of community wellbeing impacts

Through discussion with communities in Suffolk, that are experiencing the impacts of multiple NSIP schemes, the Council has identified that these communities feel that project promoters have, in forming and promoting their proposals, overlooked the adverse impact this has on community wellbeing.

Feelings of fear, mistrust, anger, and frustration are all reported, along with impacted sleep, and inability to plan for the future, due to the uncertainty created by the proposed development.

These concerns echo feedback received by the Suffolk Emotional Needs Audit, carried out by Suffolk Mind in 2022<sup>5</sup>. The audit showed that for people living in the Saxmundham, Leiston, and Aldeburgh area, (that in addition to Sizewell C, hosts multiple energy projects) the least met needs were Community, Security, and Control, and when asked what could improve wellbeing locally, responses included:

- Having more say when it comes to local development
- Places where people can talk about their emotional wellbeing
- More community events and activities

In addition to the impacts on the whole community, community leaders, i.e. parish councillors, also report increased levels of emotional distress, because of the demands of the role they play, in supporting the community to navigate the NSIP process.

Parish councillors report feeling overwhelmed, both by technical information that is challenging to understand and interpret, and by the amount of time that needs to be invested in the process. Therefore, the burden of responsibility weighs heavily on a small number of people.

Alongside their duty to represent the views of the community in the consultation process, parish councils also take their responsibility to support the wellbeing of their parish very seriously. However, they report that they receive no signposting, training, or guidance to assist them in this role.

The cumulative effect of these issues has resulted in considerable impacts on the wellbeing of individuals, the overall wellbeing of the community, and has also led to an apparent loss of identity.

One member of the public described how the association with the energy projects has, *"created a perception that the nature of our village and parish.....has been completely altered, and is now one to be defined by the presence of large industrial complexes, rather than what it actually is, a rural community.....It remains a small rural village, with living breathing people, who strive to protect its unique quality."*

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<sup>5</sup> Suffolk Mind Emotional Needs Audit Reports and Accounts - Suffolk Mind

# Roles and responsibilities

## Suffolk County Council

### The Role of the County Council

Suffolk County Council is not the decision-maker for Nationally Significant Infrastructure Projects (NSIP). However, the County Council, routinely in collaboration with the relevant district or borough council, is a key statutory consultee, and its view carries significant weight with the Examining Authority (ExA) and, by extension, the Secretary of State (SoS). The role of the County Council is set out in more detail in the Energy and Climate Adaptive Infrastructure Policy<sup>1</sup>.

The wellbeing of Suffolk's communities is a corporate priority for the County Council<sup>6</sup>, therefore the health and wellbeing impacts of the consenting, construction, and operation of NSIP projects is a significant concern for the Council.

In addition to representing and supporting its communities, the Council also has a role, with partners, in providing support to town and parish councils to enable them to engage effectively with the NSIP process, and to that end, has published guidance<sup>7</sup> specifically designed to support them.

### Engagement with the County Council

A robust and effective Planning Performance Agreement (PPA) will be essential to ensure effective collaboration and engagement with Suffolk County Council. The Council's expectations on PPAs are set out in its published guidance<sup>8</sup>. The Council also expects early engagement with project promoters on the Statement of Community Consultation<sup>9</sup> (SoCC).

The Council expects, from the earliest stage, effective engagement to enable co-design of the project, between the promoter and statutory consultees, including the Council. Project promoters should ensure that the SoCC for the project is effective; in order that it not only meets the test of adequacy as defined in s55(5) of the Planning Act 2008, but also, that the quality and process of engagement, rather than just the extent, reach, and duration of consultation, facilitates co-design with communities and protects community wellbeing.

In its role as the Public Health Authority, the Council also expects engagement with its Public Health Directorate, alongside the Council's planning team, to discuss and agree the scope of mental health and wider human health impact assessments, within the Environmental Impact Assessment, and any required avoidance and mitigation measures.

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6 <https://www.suffolk.gov.uk/asset-library/imported/master-corp-strategy-report-2022-26.pdf>

7 <https://www.suffolk.gov.uk/asset-library/getting-to-grips-with-nsips.pdf>

8 <https://www.suffolk.gov.uk/asset-library/planning-performance-agreements-for-nationally-significant-infrastructure-projects.pdf>

9 Before a SoCC is finalised and published, an applicant must consult on its content with each local authority in whose area the Proposed Development is situated. The local authority's aim in responding to consultation about a SoCC should be to ensure that the people affected by a proposal can take part in a thorough, accessible and effective consultation exercise about a Proposed Development [s47 FAQs 2017](#)



## Town and Parish Councils

### Role and status of town and parish councils

Town and parish councils are specifically identified in the relevant regulations as a statutory party<sup>10</sup> in all cases, when it is expected they will host all, or any part, of an NSIP development.

The role and function of town and parish councils and parish meetings is set out in section 9 of the Local Government Act 1972<sup>11</sup>. Project promoters should therefore recognise that these are properly constituted and democratically accountable bodies, and that they are subject to the same or similar constitutional arrangements and codes of conduct as principal councils, that is, county, district, or unitary authorities.

In recognition of the limited capacity and resources of parish councils, the County Council encourages project promoters to consider providing financial support, to facilitate the engagement of town and parish councils with the NSIP process.

### Engagement with town and parish councils

The project promoter should recognise that the scale of projects consented through the Planning Act 2008 is likely to have significant and widespread impacts on a locality, such as to reshape place, during construction and operation. Therefore, promoters should work effectively with town and parish councils, both the members and appointed representatives.

It is also likely that the host communities are not accustomed to significant and rapid change in their environment, or the character of place. Therefore, effective engagement with communities, that supports them through the process of change, and over which they can have meaningful and effective dialogue and influence, without prejudice to any in principle objections they may have, is essential.

Therefore, genuine, and effective dialogue between the project promoter, and representatives of the affected localities is critical, to allow those communities directly impacted by the scheme, to shape its design and delivery. Likewise, it is essential for project promoters to engage effectively with host communities during the construction of the project.

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<sup>10</sup> The Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009 Schedule 1 with Note: "relevant", in relation to a body, shall mean the body which has responsibility for the location where the proposals may or will be sited or has responsibility for an area which neighbours that location.

<sup>11</sup> <https://www.legislation.gov.uk/ukpga/1972/70/part/I/crossheading/parishes>

# Guidance

## Part 1: Securing effective dialogue with communities about change

### The case for a new approach to promoter's engagement with communities

The objectives of the promoter's engagement with communities should be strategic as well as tactical.

The default approach to engagement to date has had a tactical focus, on consulting communities by informing them about the emerging and evolving details of the project. Whilst this is necessary, it is not sufficient.

Engagement with communities must also seek to build effective functional relationships of trust, confidence, and understanding, between the community and the project promoter.

The Council considers that consultation should principally be focused, especially in the early stages, on building and maintaining trust, by creating an effective framework for dialogue, conflict resolution, and management. This will create a space into which informing the community about a project, and discussing issues and options around it, can then be placed.

To summarise: the objective of engagement should be to create a framework of trust, fairness, and mutual confidence in process, into which the detail of the project proposal, is then inserted. The Council considers that such an approach will not only significantly improve the quality and effectiveness of engagement but will also help to safeguard community wellbeing.

**The Council recognises that this approach requires communities to engage and participate in the development of a framework for effective engagement, notwithstanding any objections that they may have, to either the principle, or details, of the emerging project.**

## The proposed approach to collaboration


To date, engagement undertaken by NSIP promoters with host communities has usually been focused on informing and consulting the target audience, therefore, covering only the basic levels of public engagement (see Figure 1<sup>12</sup>).

Figure 1: Spectrum of public participation: Increasing levels of public participation

### IAP2 Spectrum of Public Participation



IAP2's Spectrum of Public Participation was designed to assist with the selection of the level of participation that defines the public's role in any public participation process. The Spectrum is used internationally, and it is found in public participation plans around the world.

INCREASING IMPACT ON THE DECISION 					
	INFORM	CONSULT	INVOLVE	COLLABORATE	EMPOWER
PUBLIC PARTICIPATION GOAL	To provide the public with balanced and objective information to assist them in understanding the problem, alternatives, opportunities and/or solutions.	To obtain public feedback on analysis, alternatives and/or decisions.	To work directly with the public throughout the process to ensure that public concerns and aspirations are consistently understood and considered.	To partner with the public in each aspect of the decision including the development of alternatives and the identification of the preferred solution.	To place final decision making in the hands of the public.
PROMISE TO THE PUBLIC	We will keep you informed.	We will keep you informed, listen to and acknowledge concerns and aspirations, and provide feedback on how public input influenced the decision.	We will work with you to ensure that your concerns and aspirations are directly reflected in the alternatives developed and provide feedback on how public input influenced the decision.	We will look to you for advice and innovation in formulating solutions and incorporate your advice and recommendations into the decisions to the maximum extent possible.	We will implement what you decide.

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The Council considers that this basic approach to engagement is insufficient; given both the complexity and level of impact on a community created by an NSIP, and the public awareness and anxiety around the scale, and pace of change, of the energy generation and transmission system.

Project promoters should therefore, in accordance with the spectrum of public participation, seek to **involve** and **collaborate** with host communities in the design and delivery of their projects.

The National Infrastructure Commission's Project **Level Design Principles Handbook**<sup>13</sup> should underpin not only the approach to project design, but also the approach to engaging on design and placemaking with local communities. This is because, as Part 2, Why does Infrastructure Design Matter, states:

*"Public acceptance of such rapid and extensive change can best be supported by processes that are designed to achieve highest quality outcomes. And public acceptance will become easier to achieve if efforts are made to engage, and collaborate with, those directly affected by change. We know that transformative change is essential, therefore transformative thinking is also required. And that, ultimately, is why infrastructure design matters."*

Therefore, project promoters should focus on working with the representatives of town and parish councils as the properly constituted local body.

Based on good practice<sup>14</sup>, the Council considers that a good way for a project promoter to achieve community collaboration is for the project promoter to create a panel of people from the hosting parishes or towns. This should be one of various techniques utilised in developing relationships with local communities and actively seeking dialogue and community engagement throughout the approvals process and beyond.

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<sup>13</sup> <https://nic.org.uk/app/uploads/NIC-Design-Principles-Handbook-Digital-PDF.pdf>

<sup>14</sup> Case Study 2 in <https://nipa-uk.org/wp-content/uploads/2023/08/Clifford and Morphet - NIPA II Project A extension project report - Final 1.pdf>

The purpose of this panel should be as follows:

- To establish a panel made up of a group of engaged individuals, who have the confidence of the communities they represent, and who can engage and work with the promoter, without prejudice to any objections they may have to the scheme.
- To ensure that the project promoter can have a genuine, open, and ongoing dialogue with community representatives, in order to understand the character of place and community, local concerns and opportunities, and how to achieve the best possible outcomes for those who are likely to be most impacted by the construction and operation of the project.
- To work with the promoter by engaging with emerging details of the project, that are fit for the public domain, regarding how the project will be built, designed, and mitigated. This will ensure that the panel can participate actively in place making, regarding those aspects of the development around which there is flexibility. This will also ensure the panel can understand those aspects of the design that are fixed by constraints, and critically, the nature of those constraints.
- To understand the multiple design options, or multiple potential outcomes. These options or outcomes will be explained to the panel, interrogated by the panel, and the panel will provide feedback to the project promoter.
- To recognise that prior to determination of the Development Consent Order and the appointment of lead contractors, design outcomes will remain provisional. Therefore, development of the detailed designs used for the Discharge of Requirements will need to be finalised, in discussion with the panel, before submission to the discharging Local Authority.
- Lengthy or detailed discussion of the need for, or alternatives to, the project, are not for discussion at meetings of the panel, but are for other fora.

It is anticipated that the relevant county and district councillors would be part of the panel throughout, in addition to parish representatives. Furthermore, relevant Local Authority Officers would also be present, to observe proceedings, support participants in their consideration of issues, and to assist the project promoter in the facilitation of effective discussions.

Where a project requires associated development, that is in the hands of a third party, such as the electricity transmission or distribution operator, it is expected that this party would also participate in the panel engagement process.

It is expected that meetings of the panel are likely to require a neutral chair.

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# Part 2:

## Assessment of impacts on mental health and community wellbeing

### Rationale

It has been recognised that the consenting and construction of major infrastructure projects can have an adverse impact on the mental health and wellbeing of communities<sup>15</sup>.

Furthermore, NPS EN-1 requires applicants to assess adverse health impacts of their project. It is also noted that the World Health Organization (WHO) defines health as, "a state of complete physical, mental and social wellbeing and not merely the absence of disease or infirmity."<sup>16</sup>

It should be noted that many of the processes that are most likely to result in mental wellbeing impacts, take place outside the temporal scope of the Environmental Impact Assessment (EIA). This largely eliminates the opportunity to identify and mitigate these impacts through the EIA. Therefore, identification of potential harm and appropriate mitigation measures must be integrated into the pre-application consultation process.

### Approach

The Council expects that the mental health and wellbeing impacts of the project will be assessed in the Environmental Impact Assessment, alongside other human health aspects. The Institute of Environmental Management and Assessment (IEMA)'s Guides to "Effective Scoping of Human Health in Environmental Impact Assessment" and "Determining Significance for Human Health in Environmental Impact Assessment"<sup>17</sup> provide general good practice guidance on assessing human health and should be used by project promoters as guidance.

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15 <https://www.parliament.uk/globalassets/documents/commons-committees/hs2-phase-2a/written-evidence/043-Report-from-HS2---Mental-Health-Assessment-Scoping-Report---requested-by-Select-Committee-July-2018.pdf>

16 [https://cdn.who.int/media/docs/default-source/documents/publications/basic-documents-constitution-of-who/179f0d3d-a613-4760-8801-811dfce250af.pdf?sfvrsn=e8fb384f\\_1&download=true](https://cdn.who.int/media/docs/default-source/documents/publications/basic-documents-constitution-of-who/179f0d3d-a613-4760-8801-811dfce250af.pdf?sfvrsn=e8fb384f_1&download=true)

17 Both guides are available at [Human Health in Environmental Impact Assessment - November 2022 \(iema.net\)](https://www.iema.net)



There should be parity between mental and physical health in the assessments.

The mental health assessment should also consider the outlook of individuals in the community, i.e.

*"People's understanding or views of the project can be highly influential to their psychological and even physiological response to project changes. Such views may change through the project and depend on trust in the developer and regulators. Where there are strong and persistent concerns, sensitivity, particularly to mental health effects, is higher. Consider if there are people with strong views (or high degrees of uncertainty) about the project who may anticipate risks to their health and wellbeing and thus be affected by not only actual changes but also by the possibility of change."*<sup>18</sup>

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<sup>18</sup> IEMA guidance - [Human Health in Environmental Impact Assessment](https://www.iema.net) – November 2022 (iema.net)

# Part 3: Safeguarding and supporting community wellbeing

## Rationale

*“Potentially affected individuals and communities may feel disenfranchised by transformative infrastructure change ‘over their heads’. Missed opportunities to achieve benefits of well-executed community engagement not only lead to feelings of disempowerment and frustration among stakeholders but can potentially negatively impact on individual and community health and wellbeing. Health impact assessments that effectively assess planning and engagement processes can play a role in mitigating these impacts.”*

The health impacts of transformative infrastructure change: Process matters as much as outcomes - Environmental Impact Assessment Review - Vol 85 November 2020<sup>19</sup>

The Council considers that project promoters have a duty to take effective and robust measures to minimise and mitigate adverse impacts on community wellbeing, during the pre-application, consenting, construction, and decommissioning phases of their project. Given the spatial and temporal overlaps between projects, project promoters are expected to work collaboratively to minimise and mitigate these effects on community wellbeing.

**The Council considers that community leaders, be they formally or informally appointed to such a role, have a duty to protect community wellbeing by supporting efforts of the project promoter and others, to build and maintain trust, cooperation, and effective dialogue, notwithstanding their in-principal objection to a proposal.**

## Principles for good continuous engagement

Early and continuous engagement with communities will not only improve community understanding of the project but will, as set out in the Guide to Effective Scoping of Human Health in Environmental Impact Assessment; *“actively alleviate particular impacts upon mental health, by providing a sense of control, inclusion and participation. Such engagement activities could be considered primary mitigation.”*<sup>20</sup>

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<sup>19</sup> <https://www.sciencedirect.com/science/article/abs/pii/S019592551930513X>

<sup>20</sup> Human Health in Environmental Impact Assessment – November 2022 (iema.net)

Therefore, good community engagement should give participants confidence that their words and ideas count. This requires an honest approach, that openly recognises the scale of impacts, and the fact that the project may remake and radically change a place. Likewise, there should be a recognition that there will be non-tangible residual impacts on the community, including on the wellbeing of the community.

The key principles for good engagement, based on recognised best practice and the UK context<sup>21</sup>, include:

- Comprehensive and honest engagement, from the earliest stages of development.
- A clear explanation of the process and related timelines.
- Demonstrable and ongoing appreciation of, and responsiveness to, the impacts of multiple projects in the area, and the consequent impacts on the communities' wellbeing, and capacity to engage with a specific project.
- Clarity, around the purpose and scope of any specific engagement with communities, at different times during the formation of project proposals and around what the community is being 'asked' to contribute, or how they may influence any aspect of the proposal. For example, being clear when engagement is about one, or a combination of:
  - The specifics of the proposal
  - The principle of the proposal
  - The potential alternatives to the proposal
- Early signposting of any emerging proposals in principle, for community benefit or shared ownership schemes.
- Careful consideration of the timing of consultations. Considerations should include avoiding main holiday periods, unless holiday visitors are to be targeted in the consultation.
- Practical support, including phone helpline and drop-in events.
- A clear and effective feedback mechanism to address any comment, concern, or complaint.
- A regular in-person presence.
- A clear and comprehensive complaints and grievance mechanism.
- Where necessary and appropriate, a scheme for ongoing community engagement during the operation of the project.

By listening to local views and following up on these by making changes to the project, greater trust and confidence in the process will be engendered, which will contribute to the safeguarding of community wellbeing.

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<sup>21</sup> See also IEMA suggestions on what this means in the UK context here: <https://www.iema.net/resources/blog/2023/02/08/ia-outlook-journal-volume-15-public-participation-stakeholder-engagement-and-impact-assessment>

## Mitigation measures to minimise adverse impacts on community wellbeing

There are simple measures that can be taken to mitigate against the adverse impacts of the engagement and consenting process.

### Good quality, timely, and accessible information

This should include the project promoter:

- Providing access to easily understood summary material, concise, and “plain-English” summary documents.
- Delivering information regarding the proposed infrastructure programmes to community leaders, should be supported by face-to-face conversations to ensure that community leaders can ask questions, and get responses, in a timely manner.
- Providing a clear and early explanation of how, or if, the proposal would result in compulsory purchase and related processes, or if there may be significant impact on individuals, which would need to be compensated for.
- Proactively distributing information regarding compulsory purchase, and discretionary purchase schemes, or, in the absence of such a formal scheme, the mechanisms to deal with situations where there is extreme financial hardship, and/or a pressing need to sell.
- Ensuring that access to compensation schemes does not generate an undue administrative burden on, and consequent anxiety for, an individual or community.
- Maintaining proactive, regular, in person contact with communities, via attendance at parish council meetings. Acknowledging the concerns of the community and working with them to develop a supportive and collaborative dialogue.

Project promoters should consider how parish councils will be supported to understand the technical and complex nature of these projects. Support should be provided from the outset of any proposals and should be consistent throughout the process. Such guidance should be complementary to that published by Suffolk County Council and the Suffolk Association of Local Councils<sup>22</sup> (SALC), as well as any guidance provided by the relevant borough or district council.

### Relationship management

Consideration should be given to the employment of an independent third party to act as a “relationship manager” between the developers, local authorities, and the impacted communities, to ensure conversations remain positive and helpful.

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<sup>22</sup> <https://www.suffolk.gov.uk/planning-waste-and-environment/major-infrastructure-projects-including-nsips/nsip-information-for-town-and-parish-councils>

Through discussions with people in affected communities it has been found that their strong feeling is that regular, good quality community conversations with project promoters and local authorities are highly valued, having a significantly positive impact on the wellbeing of the community.

The creation of a "relationship manager" role would provide a consistent, impartial, single point of contact for a community. This would foster greater trust and improved relationships between the community and the other parties involved, thereby reducing the negative impacts of the project, and both preserving the wellbeing of the community and assisting in the development of the project proposals.

## Preservation and development of community assets

Project promoters should not only seek to understand the environmental and biophysical characteristics of a place, but also its societal and cultural characteristics: understanding what is important to people, what they love about where they live, and what they think would support their community to continue to thrive. Through engagement with the local community, project promoters should establish how these societal and cultural characteristics may be impacted by the project proposals.

Project promoters should invest in the development of community assets, as mitigation and enhancement. The identification of relevant assets should be undertaken in close collaboration with the community, and may include for example, proactively investing in supporting local community events, the enhancement of community buildings such as village halls or places of worship, or public spaces and community organisations, so supporting communities to continue to foster a sense of pride, allyship and belonging.

This will help not only to ensure better working relationships between communities and the project promoters, but ultimately result in better outcomes for local people.

Some measures to mitigate community wellbeing impacts are likely to be interlinked with other mitigation areas, for example Public Rights of Way. Therefore, the value to communities from such interrelated issues and opportunities, should be fully explored.



## Promotion of good emotional health and wellbeing

Alongside effective communication about the proposed changes, communities should also be proactively helped to maintain their own wellbeing throughout the process, through provision of good quality information and support. This could be provided through the following means:

- East Suffolk Council has developed a WellMinds resource which, supported by Suffolk County Council, will be available to all parishes across the county. These resources should be proactively distributed in a range of formats, to communities affected by large scale development<sup>23</sup>.
- Parish council representatives should be provided with suitable training and support to carry out their duties. Provision of funded Mental Health First Aid training for members of the community should be considered, along with networking opportunities, for people adopting this role, to liaise with others for support and supervision. In addition, training for the community in how to have supportive conversations about difficult subjects, such as suicidal ideation and self-harm, should be provided<sup>24</sup>.
- Consideration should be given to the funding of local mental health organisations, to enable them to mentor those who volunteer to undertake wellbeing support roles. This would ensure that volunteers receive appropriate training, support, and guidance, and would also reduce the feelings of isolation and overwhelm often described by community leaders in these roles.
- It should be noted that volunteers should not be expected to provide specific mental health support to individuals. Where this is necessary, people should be supported to access professional interventions from the Suffolk Wellbeing Service,<sup>25</sup> or their local GP surgery.

## Monitoring

Suffolk's Emotional Needs Audit 2022 provides baseline wellbeing scores for communities across the county. It may be beneficial for further audits to be carried out, in areas impacted by large scale development. However, to do so would require funding.

There is a potentially instrumental role for community members to play in monitoring and evaluation, in a way that builds community pride and ownership. Examples are emerging globally of how this may be done in the energy transition, and this approach is advocated in this guidance. The Council considers that all parties should explore the scope for collaborative and empowering levels of engagement, including:

- Follow-up activities and feedback
- Independent verification
- Two-way communication
- Partnerships
- Participatory monitoring
- Involvement in adaptive management<sup>26</sup>

Provisional Key performance Indicators for the monitoring and evaluation of engagement and community wellbeing set out in the Appendix.

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23 Well Minds East Suffolk <https://www.paperturn-view.com/?pid=ODc8797953>

24 <https://www.zerosuicidealliance.com/suicide-awareness-gateway-training>

25 <https://www.wellbeingnands.co.uk/suffolk/>

26 Morrison-Saunders, A. et al (2023) Distilling best practice principles for public participation in impact assessment follow up - Impact Assessment and Project Appraisal 41(1) <https://research-portal.uea.ac.uk/en/publications/distilling-best-practice-principles-for-public-participation-in-i>

## Appendix

## Provisional Key Performance Indicators for community engagement and the safeguarding of community wellbeing

Outcome reference	Indicator	Objective	Frequency	Measurement	Source of measurement data / method	Baseline (optional)	Volume and trajectory over years (Performance Targets - %, number, timescales etc. - or TBD <sup>s</sup> )								Comments
							Year 1				Year 2				
							Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	
<b>Informing communities</b>															
IN01	Provide good quality, timely, and accessible information to the community and its representatives.	Providing access to easily understood summary material that is concise and written in "plain-English".	Quarterly	% of survey respondents reporting 'good' access to concise and plain English information about the project from initial engagement through to follow-up via surveys.	Data collected from feedback surveys or community satisfaction surveys	N/A									Evaluate quarterly results of feedback surveys or community satisfaction surveys to track and inform improvements required.
IN02		Provide clear and early explanation of how, or if the proposal would result in compulsory purchase and related processes, or if there may be significant impact on individuals, which would need to be compensated for.	Quarterly	% of relevant survey respondents reporting clear and early explanation of how or if the proposals would result in compulsory purchase or if there may be significant impact on individuals through follow up surveys.	Data collected from feedback surveys or community satisfaction surveys										Evaluate quarterly results of feedback surveys or community satisfaction surveys to track and inform improvements required.
IN03		Proactively distribute information regarding discretionary purchase schemes or, in the absence of such a formal scheme, the mechanisms to deal with situations where there is extreme financial hardship, and/or a pressing need to sell.	Quarterly	% of relevant survey respondents reporting receiving access to information regarding discretionary purchase schemes and/or the mechanisms to deal with situations where there is extreme financial hardship, and/or a pressing need to sell through follow up surveys.	Data collected from feedback surveys or community satisfaction surveys										Evaluate quarterly results of feedback surveys or community satisfaction surveys to track and inform improvements required.
IN04		Ensure that access to compensation schemes does not generate an undue administrative burden on, and consequent anxiety for, an individual or community.	Quarterly	Overall decrease in % of relevant survey respondents reporting sentiment of undue administrative burden and consequent anxiety through follow up surveys.	Data collected from feedback surveys or community satisfaction surveys										Evaluate quarterly results of feedback surveys or community satisfaction surveys to track and inform improvements required.

Outcome reference	Indicator	Objective	Frequency	Measurement	Source of measurement data / method	Baseline (optional)	Volume and trajectory over years (Performance Targets - %, number, timescales etc. - or TBD*)								Comments
							Year 1				Year 2				
							Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	
IN05		Maintain proactive, regular, in person contact with communities, via attendance at parish council meetings. Acknowledging the concerns of the community and working with them to develop a supportive and collaborative dialogue.	Quarterly	% of relevant parish council survey respondents reporting, in person contact with project promoter, via attendance at parish council meetings; that acknowledgement of community concerns is made, and the promoter is working with the parish council to develop a supportive and collaborative dialogue.	Data collected from feedback surveys or community satisfaction surveys	N/A									Evaluate quarterly results of feedback surveys or community satisfaction surveys to track and inform improvements required.
<b>Involving communities</b>															
IV01	Build effective functional relationships of trust, confidence, and understanding with the community and its representatives.	During pre-application engagement, co-design and publish a framework for dialogue, conflict resolution and management with representatives of the host community, town and parish councils. Updating as necessary based upon user and community feedback.	Quarterly	Overall increase in % of survey satisfaction levels.	Data collected from feedback surveys	TBD									Evaluate results of feedback survey to enhance the framework as required.
IV02		Employment of an independent third party to act as a "relationship manager" between the developers, local authorities, and the impacted communities, to ensure conversations remain positive and helpful.	Quarterly	Overall increase in number and % of trust, confidence and understanding of the project from the community and its representatives from initial engagement with Relationship Manager to follow up surveys.	Follow up surveys	TBD									This measure will assess the effectiveness of the Relationship Managers approach to increasing trust, confidence and understanding of the project within the host community and its representatives.

Outcome reference	Indicator	Objective	Frequency	Measurement	Source of measurement data / method	Baseline (optional)	Volume and trajectory over years (Performance Targets - %, number, timescales etc. - or TBD <sup>2</sup> )								Comments
							Year 1				Year 2				
							Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	
<b>Collaborating with communities</b>															
CO01	Create a panel of people from the hosting parishes or towns to establish community collaboration.	Create a panel of people from the hosting parishes or towns comprising engaged individuals, who have the confidence of the communities they represent, and who can engage and work with the promoter, without prejudice to any objections they may have to the scheme. Panel members could include relevant county and district councillors, parish representatives and local authority officers.	Quarterly	Number and percentage of key representatives (TBD) at town and parish councils and privately engaged individuals taking membership in the panel (and maintained).	Data collection	TBD									Regularly review participation rates and adjust strategies to maintain or increase engagement levels as needed.
CO02		Provide the panel with emerging details of the project, that are fit for the public domain, regarding how the project will be built, designed, and mitigated. Engage with the panel to facilitate understanding of those aspects of the design that are fixed by constraints, and critically, the nature of those constraints.	Quarterly	Increase in % of panel understanding in aspects of constraints and their nature from initial engagement to follow-up survey.	Follow up surveys	TBD									Evaluate results of feedback survey and where necessary identify alternative means of collaborating with the panel to increase understanding as required.
CO03		Support the panel to understand the multiple design options, or multiple potential outcomes. These options or outcomes will be explained to the panel, interrogated by the panel, and the panel will provide feedback to the project promoter.	Quarterly	% increase of panel confidence in the feedback they have provided to the project promoter on the proposed multiple design options or multiple potential outcomes based on their understanding of the relevant process and outcomes via follow up survey.	Follow up surveys	TBD									Evaluate results of feedback survey and where necessary identify improvements to the approach in order that panel have sufficient understanding to inform their feedback to multiple design options or multiple potential outcomes.

Outcome reference	Indicator	Objective	Frequency	Measurement	Source of measurement data / method	Baseline (optional)	Volume and trajectory over years (Performance Targets - %, number, timescales etc. - or TBD <sup>2</sup> )								Comments	
							Year 1				Year 2					
							Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4		
CO04		Development of the detailed designs used for the Discharge of Requirements to be finalised in discussion with the panel, before submission to the discharging Local Authority.	Once	Panel consulted in a collaborative capacity in the designs proposed before they are finalised and submitted to the discharging Local Authority.	Confirmation from panel	N/A										Measure to ensure the Panel are consulted.
CO05	Community collaboration.	Provide communities with genuine and meaningful opportunity to engage in collaborative dialogue with the promoter, allowing communities to shape the emerging project effectively and demonstrably, from the earliest possible stage of its design and development.	Quarterly	Number of genuine and meaningful opportunities provided to host communities to engage collaboratively with the project promoter measured by % of community attendees reporting high satisfaction levels via follow up surveys.	Follow up surveys	N/A										This measure will assess the quality of the opportunities offered to the host community to genuinely collaborate in a meaningful way.
CO06		After providing any significant new information about the project, offer face-to-face conversations with community leaders, allowing Q&A.	Adhoc	% of face-to-face sessions offered to community leaders measured against the number of releases of significant new information about the project.	Data collection from project promoter	N/A										Evaluate the opportunities given to consult with community leaders in recognition of new information about the project.
CO07		Provide effective engagement methods and approaches with host communities, as well as appropriate community mitigation, for the construction, and where appropriate, the operational phases of the project.	Quarterly	Number of engagements facilitated to host communities that include community mitigation measured by % of community attendees reporting high satisfaction levels via follow-up surveys.	Follow up surveys	N/A										This measure will assess quality of the engagements facilitated to the host community that include community mitigation.
CO08		In close collaboration with the host community, identify relevant community assets in the community and invest in their development as mitigation and enhancement.	Quarterly	Number and % of community assets receiving investment (as mitigation and enhancement) in their development as a result of collaboration with host community and/or their representatives.	Data collected from project promoter	N/A										Evaluate the number of community assets developed through collaboration with the host community.

Outcome reference	Indicator	Objective	Frequency	Measurement	Source of measurement data / method	Baseline (optional)	Volume and trajectory over years (Performance Targets - %, number, timescales etc. - or TBD*)								Comments
							Year 1				Year 2				
							Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	
<b>Empower communities</b>															
EM01	Improve the communities ability to maintain their own throughout the process, through provision of good quality information and support.	Proactively distribute the WellMinds resource developed by East Suffolk Council.	Quarterly	Number supplied to residents and % of residents confirming receipt/having considered the information through follow up surveys.	Data collected from follow up surveys	TBD									Evaluate the portion of host community that has received and considered the resource and if necessary, revise approach to provision to increase engagement with the resource.
EM02		Provide parish/town council representatives with funded, suitable training and support in respect of the project to carry out their duties in supporting the host community.	Quarterly	Number of parish/town Council representatives receiving relevant training and support, to support the host community.	Data collected from provider	TBD									Evaluate the amount of parish/ town council representatives receiving relevant training to support their role in the community.
EM03		Provide funded Mental Health First Aid training for selected members of the community along with networking opportunities, for people adopting this role, to liaise with others for support and supervision.	Quarterly	Number and % of people in host community receiving Mental Health First Aid training from commissioned provider.	Data collected from provider	TBD									Evaluate the portion of host community receiving Mental Health First Aid training and enhance promotion if required.
EM04		Provide funded training for the community on how to have supportive conversations about difficult subjects, such as suicidal ideation and self-harm.	Quarterly	Number and % of people in host community receiving training from commissioned provider.	Data collected from provider	TBD									Evaluate the portion of host community receiving training to hold supportive conversations and enhance promotion if required.

Outcome reference	Indicator	Objective	Frequency	Measurement	Source of measurement data / method	Baseline (optional)	Volume and trajectory over years (Performance Targets - %, number, timescales etc. - or TBD <sup>2</sup> )								Comments
							Year 1				Year 2				
							Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	
<b>EM05</b>	Increase engagement with SME's.	Work with commissioned local mental health organisations to understand capacity and where necessary, provide funding to enable them to oversee those who volunteer to undertake wellbeing support roles. This would ensure volunteers receive appropriate training, support, and guidance, and would also reduce the feelings of isolation and overwhelm often described by community leaders in these roles.	Quarterly	% of volunteer survey respondents satisfaction levels regarding their capability/competence in their community support role and feelings of isolation and/or overwhelm.	Surveys	TBD									Evaluate results of feedback survey and where necessary identify gaps and/or enhancements required to the support offered via local mental health organisations so that volunteers are able to undertake wellbeing roles effectively and reduce any feelings they may have of isolation and overwhelm. Where gaps or enhancements are identified, work with the local mental health organisations to provide the required support to the volunteers.
<b>Monitoring</b>															
<b>MO01</b>	Monitor, respond to and increase baseline wellbeing scores using Suffolk's Emotional Needs Audit 2022 as baseline.	Support Suffolk Mind to carry out regular wellbeing audits in the host area, monitor and increase/improve wellbeing scores.	Quarterly	% increase of wellbeing scores amongst host community	Suffolks Emotional Needs Audit	TBD									Evaluate the quarterly progression rates to track improvements in wellbeing scores.

