

Lime Down Solar Park

**Planning Inspectorate Reference:
EN010168**

**Wiltshire Council Comments on Submissions
Received at Deadline 2**

Deadline 3 (15 June 2026)

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1. 7.12 Outline Construction Environmental Management Plan (Rev 3) [\[REP2-019\]](#)

- 1.1. The council understands that the Applicant intends to revise and reissue the majority of the outline management plans at Deadline 3, therefore the council reserves comment until it has had the opportunity to review these amended documents. This is particularly important, given the Applicant's response to the identified additional Requirements within the council's Local Impact Report [\[REP1-137\]](#).
- 1.2. However, as an example of the type of the changes that the council would require within the Outline CEMP, the council would require CV's with identifiable qualifications and their experience to be provided to the council for all roles e.g. Arboricultural Clerk of Works.
- 1.3. All works to Category B, Category A, Ancient Trees, Veteran Trees and Trees protected by a TPO are required to be appropriately monitoring, recorded and reported to the Local Planning Authority (LPA), including:
 - Tree removal
 - Canopy and root damage
 - Hand-digging and root pruning
 - Installation of ground protection.

- 1.4. Temporary compounds should be situated outside of the Root Protection Area (RPA), not canopy, of trees and woodlands so that it is consistent with the content of “Root loss / damage from excavation or soil compaction within RPAs”, rather than what is stated in “Tree Pruning”.
- 1.5. The removal of Category B, Category A, Ancient Trees, Veteran Trees and Trees protected by a TPO must be reported to the LPA prior to works being carried out.
- 1.6. From a flood risk and drainage perspective, while a range of flood risk mitigation measures are identified, the Outline CEMP relies on future preparation of a Flood Risk Management Action Plan and Water Management Plan, meaning there is limited certainty at this stage on how construction activities will avoid increasing flood risk, particularly during extreme rainfall events.
- 1.7. The proposed approach to temporary drainage and runoff management lacks detailed hydraulic design or quantification, limiting confidence that site runoff will be effectively controlled and will not exacerbate local flood pathways.
- 1.8. Although measures such as restricting works in Flood Zone 3 during warnings are noted, there is limited clarity on how construction sequencing will adapt dynamically to forecast rainfall events and catchment-wide conditions.
- 1.9. The reliance on management procedures (e.g. flood response, monitoring, and removal of plant during flood events) introduces uncertainty compared to embedded physical mitigation measures.
- 1.10. The Water Management Plan is referenced as a future document, and without defined performance standards, trigger levels, and response actions, the robustness of flood and water management cannot be fully assessed.
- 1.11. Water quality mitigation measures are largely procedural and depend on correct implementation of good practice. There is limited site-specific evidence demonstrating effectiveness under worst-case construction scenarios.
- 1.12. Proposed monitoring of water quality is high-level, with key details such as sampling locations, parameters, and thresholds deferred to later stages, reducing confidence in the adequacy of pollution control.
- 1.13. The approach to controlling sediment-laden runoff relies on standard measures (e.g. silt fences, bunds), but there is limited quantification of expected sediment loads and treatment capacity across the site.
- 1.14. Silt management measures are appropriate in principle, however their effectiveness is dependent on maintenance and inspection regimes which are not fully specified at this stage.
- 1.15. The commitment to undertake earthworks during drier periods is noted, but it is unclear how this will be managed in practice given programme constraints and potential climate variability.

- 1.16. The use of buffers (e.g. 10m to receptors) is identified, but there is limited justification for their adequacy in all locations, particularly for steeper slopes or highly connected drainage features.
- 1.17. Temporary SuDS and attenuation are referenced but not defined in detail, limiting the ability to assess whether sufficient storage and treatment capacity will be provided.
- 1.18. The interaction between temporary drainage systems and existing field drains and watercourses is not clearly demonstrated, creating uncertainty regarding downstream impacts.
- 1.19. Wheel washing and trackout controls are identified, however there is limited evidence that these measures alone will adequately prevent sediment mobilisation into nearby receptors.
- 1.20. The reliance on contractor-led implementation and future detailed CEMP development introduces uncertainty, particularly given the scale and spatial extent of the Scheme.
- 1.21. While spillage control measures are outlined, the cumulative risk of multiple small-scale pollution events across a large construction site is not assessed.
- 1.22. The document does not provide an integrated assessment of flood risk, water quality, and sediment management, limiting understanding of combined impacts.
- 1.23. There is limited clarity on how compliance with pollution prevention measures will be enforced and audited during construction.
- 1.24. The role of monitoring in triggering mitigation responses is not clearly defined, reducing confidence that corrective actions will be timely and effective.
- 1.25. Overall, the Outline CEMP provides a framework for managing flood risk, water quality, and silt; however, at this stage it lacks sufficient detail and quantified evidence to demonstrate that construction activities will not increase flood risk or adversely affect water environments.
- 1.26. Additionally, the council wishes to highlight that it believes that the reference to “Anglian Water” in bullet point 2 on Page 28 of Table 5 should be to “Wessex Water” instead. The Applicant is asked to consider this and amend as necessary.

2. 8.1 Statement of Commonality (Rev 3) [[REP2-023](#)]

- 2.1. The council notes that not all of its comments in its Comments on Submissions received at Deadlines 1 and 1A [[REP2-048](#)] have been addressed in this

iteration, although acknowledges that both documents were submitted at the same time.

- 2.2. However, under Section 4.2, and specifically paragraph 4.2.1, the Applicant states the matters recorded in the SoCG have been discussed through targeted meetings on specific topics, as well as monthly steering group meetings between the Applicant and Wiltshire Council.
- 2.3. The council wishes to highlight that there have not been any topic specific meeting requests received from the Applicant or the Applicant's landscape consultants in relation to any outstanding landscape and visual matters further to the submission of the council's Relevant Representation [RR-4934], Written Representation [REP1-138], Local Impact Report [REP1-137], or initial draft of the SoCG with Wiltshire Council [REP2-025]. No requests have been made by the Applicant during any monthly Steering Group meetings seeking to move forward any specific landscape and visual topic area or matters of disagreement apart from signposting to the various additionally submitted Technical Notes, which the council has already previously provided comment.

3. 8.4 Statement of Common Ground with Natural England [REP2-026]

- 3.1. It is evident from a review of the Statement of Common Ground (SoCG) with Natural England, and Table 2-1: Summary of engagement therein, that there has been substantial engagement and communication with Natural England (NE).
- 3.2. It is noted that in Table 2-1: Summary of engagement, against the date of 27 February 2025, it is stated: "*A lower survey effort was considered reasonable for Cable Route Corridor, although once habitat surveys have been completed, this conclusion can be better informed.*"
- 3.3. It is unclear, however, from a review of the SoCG whether this topic was discussed again in a meaningful way between the Applicant and NE once the habitat surveys within the CRC were complete. This is pertinent as Wiltshire Council has consistently requested appropriate level of survey within the CRC for protected species to ensure a comprehensive ecological baseline has been established, and then the council subsequently raised concern regarding the lack of survey actually undertaken within the CRC. The SoCG implies that NE had intended that the need for further / Phase 2 survey within the CRC would be re-discussed and appraised following completion of the habitat surveys. However, the impression that has consistently been given to Wiltshire Council is that it had been decided from the outset that there would be no further ecological survey / Phase 2 survey / species-specific survey within the CRC and there seemed to be no inclination to move from this position.
- 3.4. Section 3.4 Ecology and Biodiversity of the SoCG includes Table 3-3: Ecology and Biodiversity, and under reference 3.3.6 in the table, which pertains to the

sub-topic of 'Assessment – General' it states: “*Natural England’s advice is that in relation to issues within its remit there is a number of areas where the applicant has not provided sufficient evidence to demonstrate that the project will not result in significant adverse impacts on the natural environment.*”

3.5. This is noteworthy as it concurs with the view of Wiltshire Council.

Great Crested Newt (GCN)

3.6. It is evident from a review of the SoCG that along with Wiltshire Council, Natural England also has outstanding concerns regarding the Applicant’s intended approach with respect of GCN at the Solar PV Sites as it is detailed under reference 3.3.12 of Table 3-3: Ecology and Biodiversity of the SoCG:

“Natural England has outlined its position on European protected species and is seeking further information on potential impacts. This includes details of habitat clearance, badger survey methodology, mitigation for impacts on great crested newt (GCN) habitat related to the solar PV site, and evidence of engagement with Natural England where protected species licences may be required. To date, no draft protected species licence applications have been submitted for review. Natural England advise that further evidence is required to assess the potential effects and sufficiency of mitigation in relation to protected species. Natural England is not satisfied that sufficient evidence has been provided to demonstrate that the project will not result in significant adverse effects to protected species.”

3.7. It is also stated against reference 3.3.16 in Table 3-3: Ecology and Biodiversity of the SoCG:

“Survey effort to date is likely sufficient to support entry into the District Level Licensing scheme, though updated surveys may be needed if there is a long delay before consent. The proposed DLL approach for cable route impacts is considered appropriate; however, mitigation for Solar PV sites is less clear. While timing of works and pond buffers are welcomed, further consideration is needed for impacts to terrestrial, connective, and foraging habitats, particularly within 50m of ponds, where additional mitigation and licensing may be required.”

3.8. For more information, please refer to Wiltshire Council’s comments on The Applicant’s Response to Written Representations [[REP2-039](#)] under the reference of WC-062.

Habitats Regulations Assessments (HRA) and the Bath and Bradford-on-Avon Bats Special Area of Conservation (SAC)

3.9. It is noted from the entries against 19 February 2026 and 18 May 2026 in Table 2-1: Summary of engagement of the SoCG, that the Applicant and NE have reached an agreement for the HRA to be revised and resubmitted at Deadline 3. This is because NE requires the Applicant to assess Lime Down C as

potentially representing functionally linked land (FLL) for lesser horseshoe bats associated with the Bath and Bradford-on-Avon Bats SAC.

- 3.10. Nevertheless, before the agreement was actually reached to revise the HRA as aforementioned and whilst there was an ongoing disagreement on this matter, the 19 February 2026 entry in Table 2-1 specifies that “...*both parties agree mitigation is sufficient to conclude no significant adverse effects will likely occur on this species and therefore on the SAC.*” This extract from table 2-1 doesn’t seem to align with the statement in Table 3-3 under reference 3.3.7 in relation to the same matter of FLL for lesser horseshoe bats, as it states that NE’s position is as follows: “*Natural England is not satisfied that it can be excluded beyond reasonable scientific doubt that the project would not have an adverse effect on the integrity of the Bath and Bradford on Avon.*”
- 3.11. Whilst the requirement of NE for the Applicant to assess land within Lime Down C as FLL for lesser horseshoe bats is welcomed by Wiltshire Council, the council would have expected the same level of survey and assessment to have been required in relation to the confirmed greater horseshoe consultation zone around the Box Mine component of the SAC that coincides within the CRC, and for surveys to have been required and conducted within key habitats in this area of FLL to ensure a robustly robust and accurate HRA. It is noted that in Table 3-3 under reference 3.3, NE’s position on this matter is stated as follows: “*For the Bath and Bradford on Avon Bats SAC, Natural England agrees that the solar PV site itself is not functionally linked land for greater horseshoe bats. However, the cable route corridor lies within an impact zone and could be functionally linked, meaning likely significant effects cannot be ruled out due to potential loss or fragmentation of commuting habitat. Impacts relating to loss of roosts, killing, or injury of greater horseshoe bats can be screened out.*”

4. 9.21 Applicant’s Response to the Local Impact Report [REP2-038]

Economic and Regeneration

- 4.1. The council notes the Applicant’s confirmation that the uplift in employment opportunities will be substantial for a short time, but that in the longer term the scheme will have a negative effect on employment prospects in the area. The local skills training scheme will help mitigate this.
- 4.2. The council also welcomes the clarification of the economic impact on the local area – earlier iterations submitted by the Applicant were to the council’s mind obtuse. The council would also like to thank the Applicant for providing an estimate of the likely business rates that might be paid as a result of this scheme but would point out that this does not have any influence on the council’s position.
- 4.3. The council disagrees with the Applicant’s assertion that the economic impact will be adverse rather than significant in the local area during the construction

phase. However, the monitoring of local businesses during the scheme, as suggested by the council and agreed by the Applicant, will provide evidence to prove this and help to inform any subsequent similar schemes in the UK. The council also considers that a business compensation scheme, agreed prior to permission for this scheme being granted, would help to mitigate the economic impact of the scheme during periods of construction and decommissioning.

- 4.4. The council disagrees with the assertion that there will be no significant effects in respect of transport and access, or that the scheme will not significantly increase congestion in the local area. Wiltshire Council Highways team will also be commenting on this assertion.

Archaeology

- 4.5. The council notes the Applicant's response that there are potential positive impacts from taking archaeological remains out of regular cultivation. The council considers that although there may be a theoretical potential benefit, this has not been demonstrated in detail on this particular scheme to the level of detail that the council would need in order to consider it a benefit.
- 4.6. Similarly, there is a difference of views with the Applicant over the impacts of the operational phase. The council has concluded the benefits are neutral, but the Applicant consider them to be positive. The council's view is that the public benefits of the proposed public engagement programme to help to neutralise or off-set the archaeological damage that will be done by the need to excavate some archaeological features and site, therefore the overall effect is neutral rather than positive.

Highways and Transport

- 4.7. With regards to the Negative Impacts – Construction Phase, and specifically regarding HGV Passage, the council's comments on the latest Transport Assessment (Rev 2) were submitted at Deadline 2 [[REP2-048](#)]. This response included detailed comments on the swept path analysis undertaken to two 16.5m HGVs in Annex K. The Applicant's response makes the arguments that:
- The proposed booking system set up to manage HGV arrivals and departures will be able to hold back any HGV cross-over, should there be any delays on the roads. This will prevent HGVs generated by the Scheme passing each other in opposite directions on the local roads forming part of the construction routes.
 - Annex K, to the revised Transport Assessment, demonstrates there is adequate carriageway width and / or passing place opportunity for two HGVs along the construction routes outside any of proposed bespoke Highway Improvement Areas such as Alderton Road.
 - In conclusion, no mitigation measures outside of those proposed already will be needed or be put in place to improve passage opportunities for two HGVs. Reasoning stated is that excessive widening of existing rural

routes to allow two HGVs to pass would be over engineering, and unnecessary due to the temporary nature of the construction period and what the Applicant considers to be low numbers of daily HGV movements.

- 4.8. The council does not consider the risk of two opposing HGVs meeting can be totally removed by the booking system. Furthermore, the council does not consider that additional works to accommodate this 2-way HGV passage on the rural lanes outside the Alderton Road HIA works set out now within Annex I to the Transport Assessment aren't required.
- 4.9. With respect to the damage consequences to the local highway network, the Applicant refers to the Outline Construction Traffic Management Plan [[REP1-112](#)], and the additional wording amendments included at Deadline 1 to make the process for remediation of road damage during the construction phase clearer. Where immediate repairs are required during the construction phase for safety reasons, the Outline CTMP [[REP1-112](#)] now expressly requires these to be undertaken at the time. This is welcomed, but the council preference is still a formal s59 Agreement defining the full extent of the local network to be covered by highway condition surveys, the timing of these and the form they should take and an Applicant acceptance that the trafficking introduced onto the rural lanes included during the construction phase is wholly extra-ordinary as defined by s59 of the Highways Act.
- 4.10. With regards to the HGV Volumes, there is still some clarification sought on these estimates following DCO application document review. This includes the latest Transport Assessment (Rev 2) [[REP1-057](#) and [REP1-059](#)]. The Applicant refers to the inclusion of this revised Transport Assessment within the Deadline 1 suite of documents. Highway and transport comments were made as part of the Wiltshire Council Deadline 2 submission [[REP2-048](#)]. The council's comments are not re-iterated here but suffice to say that aspects of the Annex E calculations still need verification. For example, the supporting calculations undertaken to derive the number of PV Modules and Mounting Structures for each Lime Down site have not been fully provided or verified by evidence from existing solar farm sites. Another example would be the council's concerns over the HGV allowance made for off-site disposal of excavated spoil (see comments on Applicant's Response to Written Representations [[REP2-039](#)] below).
- 4.11. Furthermore, with regards to the ability to control design and execution of highway works under conferred DCO powers, the council notes that the now issued Draft Protective Provisions document for 'The Protection of the Local Highway Authority' is noted in the Applicant's response. This document is under review by highway officers in Development Management, Network Management and the Area Highway Team (Maintenance). The council has reasonable confidence that a suitable form of these provisions can be successfully agreed for inclusion in Schedule 15 to the DCO.

Public Rights of Way

- 4.12. The council's preference is that the Public Right of Way contribution is secured through a Section 106 Agreement rather than through a Community Benefit for express clarity and committed funds to be provided to mitigate the impacts of the scheme. It is noted that this is something that is also flagged up by the ExA within their Written Questions at GCT1.2, and highlights the need for the consideration of index linking and that 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.
- 4.13. The council notes that the Applicant's response to Table 5-1 as considered above, seems a departure from what the Applicant has stated in its response to Table 17-1, where it states: "*the Applicant considers the request for additional contributions towards the wider PRow network in relation to the Scheme via a Section 106 Agreement, to be something that should be explored further in consultation with Wiltshire Council*".

Landscape and Visual

- 4.14. The Applicant's response in respect of Overview and commentary in relation to compliance with Development Plan Policy CP51 (Landscape) and CP42(i) (Standalone renewable energy installations) is noted. However, the council maintains its view that harmful adverse landscape effects are understated, while beneficial positive landscape effects are overstated within the ES LVIA. The council fundamentally disagrees that significant adverse effects to the character of the landscape are only short-term as a result of the changed land use and introduced energy generating and storage infrastructure.
- 4.15. The council considers that there could be some positive landscape fabric benefits in the long-term, see also Wiltshire Council response to the ExA First Written Questions, question LV1.4, but highlight there could also be some long-term adverse effects, as hedgerows will have developed into tree lines, and would need to be coppiced and gapped up to reinstate back to low hedgerows after such a long-time frame. While neutral effects could arise as / if the land is returned to arable farming use by the removal of grassland or other proposed enhancing vegetation during decommissioning and land restoration.
- 4.16. The council considers that the project will harm the setting of the Cotswold National Landscape and causes significant harm to landscape character which cannot be acceptably mitigated. The requirements of policy CP51 and CP42(i) are not satisfactorily demonstrated in the council's view and remain a material planning consideration.
- 4.17. With respect to the overview and commentary in relation to the council's view that the overall impact that the overall impact on the unique character of the Limestone Lowland Landscape Character will be significantly negative across all phases of the project, the Applicant's comments noted. The council provides

the following comments on each of the primary points included within the Applicant's response as follows.

Point 1: Dispersed Nature of the Sites

- 4.18. The council considers that it is due to the large scale of these individually large sites (A to E) alongside the very long cable route corridor, which together results in unacceptable landscape and visual change within this receiving landscape and visual context.
- 4.19. The Applicant highlights that "*solar panels are distributed 'in and amongst' the landscape features to assimilate them into the landscape.*" The council considers that the visual mitigation proposed, changes large swathes of existing characteristic hedgerow fabric components impacting character and views across a wide area.

Point 2: Nature of Scheme being 'Overlaid' and Reversible

- 4.20. The scale of the land use change and the introduction of solar panels and frames, substations, BESS and access tracks 'overlaid' across existing agricultural fields does not alter the fact that this change is significant and adverse.

Point 3: Strong Framework of Existing Vegetation

- 4.21. The council highlights that the form and character of existing hedgerows which are maintained at a low level around many fields, are characteristic landscape fabric components that will be physically changed by the proposed management of hedgerows (existing and proposed) at higher levels (4.5m minimum) resulting in enclosing the landscape to reduce and screen views of rolling limestone lowland.
- 4.22. Existing baseline vegetation outside the DCO Order Limits, which may be important to help integrate the development into the wider landscape, and mitigate visual effects including; existing taller hedgerows, tree stands, shelter belts, plantations, copses and woodlands, cannot be relied upon to be consistently present in the landscape, either through intentional future management actions, or natural loss / decline from disease or poor management over the 60+ year life of the project.

Point 4: The Benefits of Mitigation

- 4.23. The council considers that mitigation measures are not a benefit of the scheme. Mitigation is highlighted to be necessary to reduce the magnitude of visual effects. Whereas genuine landscape and visual enhancement would be considered a benefit of the scheme. The mitigation to reduce visual effects by allowing existing hedgerows to grow tall to screen development consequently reduces openness and viewers visual depth and interest, impacting views and visual amenity and is therefore not considered to be a benefit.

- 4.24. The council acknowledges that the scheme includes landscape enhancement by strengthening some existing landscape fabric components i.e. native field boundary hedgerows and planting new hedgerow trees, woodland, riparian corridor planting etc.

Point 5: Biodiversity Net Gain

- 4.25. The council recognises that delivering BNG is an ecological benefit and positive enhancement which can influence the condition and character of the receiving landscape resource.

Point 6: Receiving Landscape

- 4.26. The Applicant's response includes comments on the landscape and visual section of Wiltshire Council's Local Impact Report [REP1-137] the response references the council's considerations and conclusions of the likely resulting landscape effects upon landscape fabric components, landscape character, and for visual receptors at construction, operation (year 1 & 15) and decommissioning development phases.
- 4.27. Furthermore, the council would welcome the ExA's suggestion at DCO1.47 in their First Written Questions, that it is necessary for the 7.14 Outline Decommissioning Strategy [REP1-100] to include an Outline Restoration Plan as part of Requirement 20 in Schedule 2 of the draft DCO (Rev 2) [REP1-007].
- 4.28. The council notes the Applicant's comments where they align with the council's view, but also where they differ to the council's view as included with the LIR [REP1-137]. However, the Applicant's response does not lead the council to change or alter its view over the assessed levels of landscape and visual harms or benefits considered likely to arise for a development of this scale and nature inserted into the landscape at this location and the Council stands by its considerations of landscape and visual matters as included within its LIR [REP1-137].

Built Heritage

- 4.29. The council does not agree that there will be *"no impact to the character and appearance of heritage assets."*
- 4.30. Whilst the council agrees that the direct impact on the heritage significance of the Grittleton House asset will be localised and time limited, there are also concerns regarding the potential impact on the long-term viability of the business and hence the conservation of the building. Details are set out in the council's comments on 9.22 The Applicant's Response to Written Representations [REP2-039] below.
- 4.31. Furthermore, the Applicant's response refers to the update to the Outline CTMP (Rev 2) [REP1-112] where Paragraph 2.3.2 has been added to respond to concerns regarding the potential for impact on the Rodbourne Conservation Area: *"Design of works to the track to the south-west of Rodbourne Road*

(Works Number 8b) needed to facilitate permanent access to Lime Down E (Work No. 1 to 6 and 9 to 10) will be undertaken in consultation with the Wiltshire Council Conservation Officer and Highway Officer.” The council has commented [[REP2-048](#)] that it is unclear what the mechanisms would be for ensuring this occurs, how much ability the Conservation Officer would have to influence the design and / or what would happen if there was any conflict of opinion. Whilst the provision is welcomed and has potential to allow some influence over the nature of the works, it clearly cannot necessarily reduce the potential impact to the character and appearance of the Conservation Area. In addition, it does not provide any commitment to the reinstatement of the rural character of the track and junction following construction or, at worst, at decommissioning.

Flood Risk and Drainage

4.32. The Lead Local Flood Authority (LLFA) maintains that:

- The Applicant’s reliance on outline management plans does not provide sufficient certainty on detailed drainage performance.
- The Applicant’s assumption that solar panel areas will remain permeable is not supported by site-specific quantitative evidence.
- The limited hydraulic modelling restricts understanding of surface water flow paths and localised flood risks.
- A proportionate but broader modelling approach is required to demonstrate no increase in flood risk.
- Exceedance flow routing is not consistently demonstrated across the Scheme.
- The evidence base does not clearly show how runoff will be managed across all parcels.
- Cable route impacts on land drainage systems are not fully resolved.
- There is insufficient evidence that trenching / reinstatement will not alter drainage pathways.
- The cumulative runoff effects across fields are not adequately assessed.
- Soil compaction risks require further quantitative assessment.
- The absence of a defined SuDS strategy limits clarity on long-term management.
- The approach to SuDS at decommissioning stage lacks sufficient detail.
- There is limited assurance that downstream receptors will not be affected.
- Sediment and pollution control relies heavily on management measures.
- There is no integrated assessment across construction, operation, and decommissioning.
- Hydrological variability is not fully incorporated.
- The absence of mapped exceedance pathways reduces confidence.
- Drainage mitigation appears procedural rather than design-led.

- The impacts on ordinary watercourses are not consistently addressed.
- There is limited verification of natural drainage behaviour during operation.
- The monitoring and maintenance arrangements are not clearly defined.
- The evidence of achieving greenfield runoff / betterment targets is limited.
- Flood Zone 3b considerations are not fully integrated.
- The construction impacts on drainage systems are not fully quantified.
- Responsibilities for drainage maintenance are unclear.
- The approach to uncertainty is not clearly articulated.
- There is limited integration with landscape / ecology.
- Further sensitivity testing is required.
- There is insufficient evidence of no cumulative flood risk impact.
- The overall evidence does not fully demonstrate compliance with no increase in flood risk.

4.33. This raises uncertainty in demonstrating compliance with NPS EN-1 requirements to ensure no increase in flood risk. Further site-specific quantitative evidence, modelling (where proportionate), and clear secured design / mitigation measures are required to provide confidence to the LLFA that flood risk will not be increased elsewhere.

Soils and Agriculture

4.34. Whilst the loss of 5000t/annum of combinable crops, which is at the lower end of possible losses, is not a significant amount in terms of total UK production, the cumulative loss of arable land to infrastructure and housing schemes over time will impact the UK's food security, making us more reliant on food imports. Current and recent events have highlighted the fragility of supply chains, and with climate change having an increasing negative impact on food production worldwide it is becoming increasingly important to preserve our food producing land. Wiltshire Council are supportive of renewable energy in an effort to reduce carbon dioxide emissions but feel there are other forms of renewable energy that are less land hungry and, in some cases, more efficient than solar energy that takes up large areas of land.

4.35. The council are pleased to see more clarity on the soil sampling / bore holes that will be done at the end of the scheme to ensure the land is ready to resume agricultural production. The council also note the requirements for how pollution incidents will be dealt with.

Arboriculture

4.36. Schedule 13 lists the documents and plans to be certified and if the Arboricultural Impact Assessment and Outline Arboricultural Method Statement [[APP-206](#)] are documents and plans to be relied upon, then it is the council's

preference to have them included in Schedule 13 for express clarity and transparency.

Consolidated List of Suggested Requirements with Reasons

- 4.37. The council notes that in the vast majority of cases, the Applicant disputes the need for additional Requirements as the Applicant considers that they are or are able to be covered through the discharge of the various Outline Management Plans. The council maintains that additional Requirements and / or strengthening of commitments through additional detail and content within the Outline Management Plans is required. The Applicant has indicated that the vast majority of the outline management plans will be revised and resubmitted at Deadline 3, and therefore the council reserves comment on whether the amendments sufficiently address the council's identified Requirements until it has had the opportunity to review the updated versions.
- 4.38. As an example of the above, the Applicant's comments in relation to Table 16-13: Arboriculture suggests that "*Arboricultural mitigation is secured through the Outline CEMP [REP1-096] and the Outline OEMP [REP1-098], which are certified documents secured by Requirements 13 and 14 of the DCO and subject to approval by Wiltshire Council. In addition, a pre-commencement Requirement will ensure that no stage of development may commence until the Detailed AMS has been approved, with all works thereafter carried out in accordance with the approved details, ensuring full control and compliance with BS 5837:2012*". With respect to the pre-commencement conditions, the AIA and AMS for all arboricultural works to trees and groups within the solar arrays and cable route, the council's Arboricultural Officers require that the AIA and AMS and all associated plans be submitted as separate appendix to the overarching CEMP / OEMP.
- 4.39. The Outline Landscape and Ecological Management Plan and ES Figure 3-4 must contain a table of species of tree, size, quantity and location to be provided for mitigated planting within the solar sites post completion of construction. The detail of mitigated planting for the removal of Category U and Category C trees must also be included within the design for replanting.

5. 9.22 Applicant's Response to Written Representations [REP2-039]

Landscape and Visual

- 5.1. With respect to the Applicant's response to WC-002, Wiltshire Council stands by its view that the scheme is fundamentally not landscape led. Instead, the Environmental Statement assesses the impacts of a predetermined site selection rather than demonstrating that landscape considerations informed the choice, scale, or configuration of development.

- 5.2. It has been incumbent on the Applicant to carry out consultations with the CNL and Wiltshire Council in order to refine the proposals to a certain degree, but this is a part of the normal planning process and not an indication of the scheme being landscape-led.
- 5.3. With respect to the Applicant's response to WC-002 and WC-020, for the reasons stated in WC-020 the council maintains its stance that the extant Core Policy 51 should be a material consideration in the DCO application decision making process. It also reiterates that the harm to the receiving landscape and visual amenity of the DCO application area of High Landscape Sensitivity and its surroundings, is such that there will be long-term adverse effects which cannot be adequately mitigated and cannot comply with the requirements of CP51.
- 5.4. The council sees no evidence that the scheme is landscape led and reiterates its view that what has been provided by the Applicant is not landscape led and cannot be considered so, it is an assessment of a fait accompli in terms of the development sites selected. It is difficult to see how a project informed by a genuine 'landscape-led' approach could reasonably conclude that development of the scale proposed was suitable to be introduced into an accepted high value landscape. A genuine landscape led scheme prioritises the existing natural, cultural and topographical features, using landscape character to guide design and location of development and infrastructure without disrupting or dominating the character of the receiving environment.
- 5.5. The Applicant's response with respect to WC-021 through WC-031 provides no additional evidence to allay the council's concerns that the distinctive rural landscape of high value and high sensitivity of this section of the Fosse Way route and the setting of the CNL will be industrialised for a period of 60+ years creating a potentially irreversible change to the character and visual amenity of the landscape. The Applicant's ES LVIA has consistently downplayed the significance of effect of the development proposals on the Fosse Way.
- 5.6. In respect of WC-021 to WC-024, it is considered by the council that the entire route of the Fosse Way through the DCO application area should be considered, and not just a single receptor which comprises the byway section of the route, as many receptors are using the route, whether a byway or minor road with no pavements (as is the norm on rural minor routes), to transit from one part of the CNL to the other. Therefore, the council recommends that a sequential cumulative visual impact assessment is undertaken along the length of the Fosse Way within the DCO Order Limits.
- 5.7. It appears that at WC-031, there has been an attempt to downplay the effect of hedgerow loss relating to the Fosse Way route, by stating that: *'In the context of the hedgerow network across the Solar PV Sites (which is 73.44 km), this loss will be proportionately very small (far less than 1 %)...'*. This is entirely irrelevant as the specific exemplified concern expressed, relates to the landscape and visual effects on the Fosse Way Route and not the rest of the development areas A-E and the CRC. Clearly, the percentage of the hedgerow removed along the Fosse Way will be higher.

- 5.8. In respect of WC-025 and WC-026, the Council reiterates its opinion that growing existing hedges to at least 4.5m to screen the solar panels will create a tunnel-like effect which is out of character with the existing expansive views. However, to the south-east of the Fosse Way, panels will remain visible viewed over the low eastern roadside hedgerow (located outside DCO boundary limits, beyond the control of the Applicant).
- 5.9. With respect of the Applicant's response to WC-027 and WC-040, there remains no indication as to where soil storage will take place, the quantities involved and the duration of the storage. As stated in the response to WC-032 and WC-045, it is likely that these stockpiles will remain in place until decommissioning in 60 years. The council considers that this is a fundamental issue which must be further examined, as the construction and design of soil storage areas has the capacity to result in significant changes to landform, land use and landscape character / visual amenity given the large DCO footprint area. The ES LVIA has no assessment of the landscape and visual effects of soil storage and makes no guiding mitigating recommendations over the physical form or location of these to minimise as far as possible any resulting landscape and visual effects, despite their potential to have significant adverse landscape and visual effects.
- 5.10. The Applicant's response to WC-047 relates to the council's consideration of on-site soil stockpiling requirements. The council notes the Applicant's response to the council's comments but reiterates that the 500mm track construction depth referenced and used in the council's calculations is taken from the Applicant's own illustrative drawing 'Access track to the BESS Area' (6.3 Environmental Statement Volume 3, Appendix 3-3 Illustrative Drawings [APP-184]) which clearly illustrates a 500mm total construction depth (for the calculation provided by the council) which is likely to require excavation both topsoil and subsoil levels, both which will require separate stockpile storage for 60+ years pending full land restoration at decommissioning.
- 5.11. The Applicant considers that the council has overestimated the required footprint areas for soil stockpiling in its calculations of (worst case) 3m high stockpile storage heights, which the council does not accept.
- 5.12. The Applicant's calculation assumes an unsupported stockpile perimeter edge of 43 x 43 x 2.4m high (i.e. vertical 2.4m perimeter edges) to support their differing conclusion. The council has factored a 45-degree angle of repose (1 in 1 gradient) to support 3m high stockpile sloping perimeter edges within its stockpile footprint calculations; the Applicant's calculation does not. If anything, the council has underestimated its footprint areas slightly to accommodate the storage of 4,500m³, as a 60-degree angle of repose would be more realistic (1 in 2 gradient) to maintain soil stockpile profiles. The council stands by its estimates as included within its Written Representation [REP1-138] for the above reasons.
- 5.13. With respect to the Applicant's response to WC-033 through WC-044, the concerns expressed by the council remain in respect of the two major areas of

solar panels and infrastructure to both the north and south of the Norton, Lime Down Solar Park Sites B and D respectively, as well as a particularly large swathe of the cable route corridor located to the southwest of the village which includes a major construction compound and proposes site access from the end of the byway section of the Fosse Way. The proposed development will effectively surround the settlement with very large industrial developments in a distinctly rural and relatively tranquil area with High Landscape Value and Sensitivity, which the council considers have not been adequately assessed against the receiving landscape character and the visual amenity of the area. The response by the Applicant has been to primarily reiterate their ES LVIA assessments which, the council considers have consistently downplayed the adverse landscape and visual effects of the proposals on the village of Norton and the surrounding countryside.

- 5.14. The Applicant's response to WC-049 relates to the council's consideration of the 9.2 Tranquillity Technical Note [PDA-010] for Lime Down Solar Park, which was provided by the Applicant at Procedural Deadline A on 9 March 2026. The council has reviewed its comments and the response from the Applicant [REP2-039] and maintains that its comments, as included within its Written Representation [REP1-138] on this matter remain valid, concluding at 5.23: *"The Tranquillity Technical Note [PDA-010] hasn't answered the fundamental questions relating to how the potential noise from the proposed development from construction to decommissioning is going to affect the landscape as a resource and the receptors (residents and visitors) within the receiving landscape area/s. It is unlikely that this can be ascertained with any degree of certainty until a fully detailed development scheme is submitted."*

Ecology and Biodiversity

- 5.15. Wiltshire Council's Ecology Officer has not provided responses to every reference detailed in Section 2 but instead has responded to those references where it has been deemed necessary or helpful for the Examining Authority (ExA).

WC-005: Executive Summary

- 5.16. The council's Ecology Officer notes the Applicant's response to this point but does not consider that it wholly addresses all the points and concerns raised on this topic and instead appears to effectively repeat information that has already been provided previously and which has therefore already been considered by Wiltshire Council. As such, the council maintains its view as set out in the Written Representation [REP1-138] and Comments on Submissions Received at Deadlines 1 and 1A [REP2-048], submitted at Deadline 2.
- 5.17. Furthermore, the summary in the column titled 'Comments / Issue Raised' set out under reference WC-005 fails to recognise that in its Written Representation, the council's Ecology Officer did acknowledge and discuss the provisions of Article 40 and other control documents together with the considered shortfalls and outstanding concerns. These concerns remain in the

whole for the reasons already discussed in the aforementioned representations submitted by the council.

WC-006: Executive Summary

5.18. See comments for references WC-055, WC-056 and WC-057 below.

WC-007: Executive Summary

5.19. The Applicant's response to the issue is noted. The explanation provided therein, which specifies that modified grassland in poor condition comprises a UKHab habitat type and predicted condition rather than a comment on its quality for use by birds, is superfluous however, because the council is obviously aware of this information as evidenced by the representations it has already provided and the fact that the council has required the Biodiversity Net Gain (BNG) assessment and Statutory Biodiversity Metric to be completed on the basis that post-development grassland habitat projected to be attainable underneath and between the panels should comprise modified grassland of poor condition. Moreover, the response fails to wholly address the issue raised within the council's Written Representation related to the statement within paragraphs 9.12.31 - 9.12.32 of the ES Chapter 9: Ecology and Biodiversity [[APP-061](#)] that there would be creation of 'diverse' grassland types underneath and between the Solar PV Panels and that this will reduce the impacts of displacement of skylark and yellow wagtail. The issue raised by the council also pertained to the fact that the suggestion put forward in paragraphs 9.12.31 - 9.12.32 of the ES Chapter 9 contradicts the projection reported elsewhere within Chapter 9 and other documents on the advice of Wiltshire Council, that as aforementioned, only modified grassland in poor condition can be expected to establish under and between panels.

5.20. It is therefore considered that the Applicant's response to WC-007 fails to fully acknowledge the points made by the council in its Written Representation. Please note the inaccuracy of paragraphs 9.12.31 – 9.12.32 of the ES Chapter 9 were verbally acknowledged by the Applicant's ecological consultant during a meeting on 1st April 2026 and within the associated meeting minutes subsequently drafted by the ecological consultant.

WC-008: Great Crested Newts

5.21. See comments for reference WC-062 below.

WC-009: Biodiversity Net Gain

5.22. See comments for references WC-063 to WC-074 inclusive.

WC-050: Draft Development Consent Order and Hedgerows

5.23. The Applicant's response is duly noted. The council is, however, familiar with the Hedgerow Regulations 1997 and the 'important hedgerow' criteria and recognises that the criteria relate to archaeological and heritage / historical

factors as well as matters of ecological value including number of composite woody species. Nonetheless, 'important' hedgerows are distinct from most other habitats within or adjacent to the Order Limits in that they are legally protected from removal by virtue of a dedicated Statutory Instrument, namely the Hedgerow Regulations 1997 (SI No. 1160).

- 5.24. Moreover, in order to determine whether a hedgerow meets the 'important' criteria detailed in the regulations there must have been specific evaluation and / or survey, and although the associated methodology and evidence of findings isn't explicitly provided within Chapter 9 of the ES [APP-061] or the ES Volume 3, Appendix 9-1: Ecological Baseline Report [APP-198], this must be available to the Applicant given that Schedule 12 of the Draft DCO includes a table of 'important' hedgerows within the Order Limits which indicates that the 'important' hedgerows have been identified by evaluating all the hedgerows with regard to the Hedgerow Regulations criteria.
- 5.25. As such, it is not evident why the evidence and information that must have been collated during the aforementioned identification process hasn't been included within ES Volume 3, Appendix 9-1: Ecological Baseline Report and / or ES Chapter 9 to demonstrate which criteria the hedgerows have been assessed as fulfilling, and to allow verification. The reason why this supporting information has not or cannot be provided is not apparent.
- 5.26. If a hedgerow was determined as being 'important' for ecological reasons, because in addition to being at least 30 years old, one of the criteria it met is that it includes woody species and associated features as specified in Schedule 1, Part II Criteria, paragraph 7(1) of the Hedgerow Regulations, then it follows that this must have been ascertained by means of survey. The results of that survey should be clearly provided within the ES and relevant supporting appendix (either a dedicated Hedgerow Survey Report or within ES Volume 3, Appendix 9-1: Ecological Baseline Report) together with contextual discussion in relation to the Hedgerow Regulations 1997. It is noted that the 'Methodology' section of ES Volume 3, Appendix 9-1: Ecological Baseline Report (APP-6.3) doesn't have any discussion regarding hedgerows survey, only habitat survey. There is also no discussion regarding hedgerow survey within ES Chapter 9 (Section 9.6: Assessment Methodology under subheading of 'Field Survey'). It is therefore assumed that the hedgerows must have been surveyed with regard to the regulation criteria during the habitat survey, although this is not specified in the report or in Chapter 9 of the ES.
- 5.27. Therefore, although the Applicant's response to WC-050 states that the assessment of hedgerows within ES Volume 1, Chapter 9 Ecology and Biodiversity (Rev 2) [REP1-015] was based on their intrinsic value to biodiversity and that this is in line with the evaluation of all other habitat types present within the Order Limits and in accordance with the methodology described for the evaluation of Ecological Importance in paragraphs 9.6.19 to 9.6.22 of ES Chapter 9 Ecology and Biodiversity (Rev 2) [REP1-015], given the legal protection afforded to 'important hedgerows' this should have implications for how the hedgerows are valued and should be recognised within the ES. Moreover, given the dedicated survey required to determine if a hedgerow

meets the criteria in Schedule 1, Part II Criteria, paragraph 7(1) of the Hedgerow Regulations, a greater level of survey is therefore required than for other habitats present that are of lower ecological value.

WC-051: Draft Development Consent Order and Hedgerows

- 5.28. The Applicant's response to the issues and concerns raised by the council as detailed in reference WC-051 effectively constitutes a duplication of information that has already been acknowledged, appraised and discussed by the council within its Written Representation, Local Impact Report (LIR), Relevant Representation and Representation submitted at Deadline 2.
- 5.29. Therefore, whilst the provisions of Article 40(4) and control documents cited are duly noted, the council considers that the Applicant's response does not adequately address the queries raised or allay the council's concerns because a fully justified reason why Schedule 12 Part 1 and 2 of the Draft DCO needs to effectively include the entire extents of all hedgerows within the Order Limits is yet to be provided in the council's opinion. The current scope of Schedule 12 of the Draft DCO is still considered to represent a misuse of the 'Rochdale Envelope' approach given that any detailed design required prior to commencement of construction should not need to substantially deviate or differ from the DCO control documents and plans. Therefore, whilst it is recognised that it's likely not possible at this stage to determine the exact details of all hedgerow removal required across the Order Limits, the Scheme design should be sufficiently evolved to avoid the need for the Draft DCO to be prepared on the basis that any extent of any hedgerow within the Order Limits may need to be removed. It should have been possible to refine the lists of hedgerows that could potentially be subject to removal or partial removal.

References WC-052 to WC-054: Draft Development Consent Order and Hedgerows

- 5.30. The Applicant's responses to the issues and concerns raised by the council are duly noted, however, much of the responses effectively constitute a duplication of information that has already been acknowledged, appraised and discussed by the council within its Written Representation, Local Impact Report (LIR), Relevant Representation and Representation submitted at Deadline 2. As such, the Applicant's responses do not wholly address or overcome the queries raised.
- 5.31. As a point of clarity, the council wishes to highlight that some text in the Comment / Issue Raised column has been paraphrased from the council's Written Representation with the result that some extracts from DCO documents included within the council's Written Representation have been presented within the aforementioned column in such a way that they could be misconstrued as the council's words.

WC-055: Habitats Regulation Assessment (HRA)

- 5.32. The Applicant's response is noted. Nonetheless, it appears to omit any response to the concern raised regarding the lack of evidence to demonstrate

that the HRA has been assessed on the worst-case scenario as is required when relying on the Rochdale Envelope approach.

- 5.33. In addition, although the Applicant's response specifies that they provided comment regarding the outstanding habitat surveys within the CRC in their Response to Relevant Representations (Part 1) [PDA-009] and that an updated ES Volume 1, Chapter 9: Ecology and Biodiversity (Rev 2) [REP1-015] with the findings of the outstanding surveys was submitted at Deadline 1, it should be recognised that Deadline 1 was not until 1st May 2026, almost five months after the council submitted its Relevant Representation and nearly eight months after the DCO application was submitted.

WC-056: Habitats Regulations Assessment (HRA)

- 5.34. The Applicant's response in part effectively repeats back information already discussed within the associated comment / issue under reference WC-056, rather than actually answering it. Confirmation by the Applicant that a total of 50 m of hedgerow is expected to be removed is noted. However, the council had already deduced this and the onus of the comment in the Written Representation pertained to how the HRA lacked the appropriate level of detail and inconsistency between submitted documents.
- 5.35. The Applicant's response stipulates that "*...outcome and conclusions of the HRA Report [APP 275] have been discussed and agreed in principle with Natural England, with only minor procedural points of clarification remaining between the parties which are expected to be resolved through ongoing discussions.*"
- 5.36. The council has reviewed the Applicant's Response alongside the Statement of Common Ground with Natural England (May 2026 Revision 1) [REP2-026] and therefore provides associated comments in relation to this document within this response.

WC-057: Habitats Regulations Assessment (HRA)

- 5.37. The Applicant's response is noted although it repeats information already acknowledged and discussed by Wiltshire Council within previous representations and reports and does address the crux of the matter.

WC-061: Breeding Birds

- 5.38. Please see the council's comments against reference WC-007 which are also relevant to WC-061.
- 5.39. The Applicant's response to WC-061 includes the following statement: "*The Applicant acknowledges the reference to 'diverse' grassland in this instance primarily extends to grassland types within buffer zones and easements, which are expected to represent the relatively diverse grassland habitat type 'other neutral grassland' once established.*"

- 5.40. Recognition that use of 'diverse' in the context of modified grassland in poor condition which is projected to constitute the attainable grassland under and between the solar panels in order to be suitably conservative and precautionary in accordance with advice from Wiltshire Council, is welcomed. Similar recognition is not apparent in the Applicant's Response to reference WC-007.
- 5.41. The Applicant's response specifies that "*...although grassland expected to establish within and beneath panels has been assumed to represent modified grassland in poor condition, this does not preclude it from providing valuable foraging habitat for ground nesting birds including skylark and yellow wagtail.*"
- 5.42. In relation to the projected modified grassland, the Applicant's response also specifies that "*...fundamentally the grassland can still be expected to provide improved foraging resources for skylark in comparison to existing arable habitats generally.*"
- 5.43. For clarity, the council wishes to highlight that at no point has it stated that modified grassland in poor condition is precluded from providing foraging habitat for ground nesting birds, including skylark and yellow wagtail.
- 5.44. Displacement of ground nesting birds from the Solar PV Sites could result in birds nesting off-site in adjacent and nearby open fields where suitable nesting habitat is present, as well as within any suitable open areas of the Order Limits that won't have solar arrays, and birds may therefore continue to forage within areas of the Solar PV Sites that will no longer be suitable for ground nesting, due to proximity and because field margins of the Solar PV Sites will be uncultivated. It is deemed that displaced birds will need to exploit all available foraging opportunities and resources that adjacent and nearby habitats afford, including those within the Solar PV Sites.
- 5.45. In addition, although not a comment on the potential intrinsic value of modified grassland as a foraging resource, it should be borne in mind that solar arrays provide elevated vantage points and perch sites for raptors, thereby likely increasing the predation risk for any birds foraging within the Solar PV Sites and ground-nesting in the vicinity and / or within areas of the Site without solar arrays.
- 5.46. In relation to the Applicant's conclusion that modified grassland within the Solar PV Sites is expected to provide improved foraging resources for skylark compared to existing arable habitats, it should be noted that existing habitats in the Solar PV Sites, including arable fields, already serve as a foraging resource as well as nesting habitat. Therefore, even if the arable fields within the Solar PV Sites do not constitute optimal foraging habitat, and the removal of arable land from productive cultivation will potentially enhance its foraging potential, the council considers it important that purported benefits for breeding birds, especially ground-nesting species such as skylark and yellow wagtail which will largely be displaced from the proposed Solar PV Sites, are thoroughly considered with due regard to all potential adverse effects and risks to breeding productivity.

5.47. It is the council's view that the proposed mitigation measures will not fully mitigate, compensate or offset the overall harm and adverse impacts to breeding birds, especially ground-nesting species. For information, the council is aware of the recent publication of *Solar Farms & Skylark* (Solar Energy UK, June 2026).

WC-062: Great Crested Newts and Mitigation Strategy for the Solar PV Sites

5.48. The Applicant's response is noted. The council is, however, familiar with the detail of the well-known studies cited within the Applicant's response. In the main, the Applicant's response presents information that the council has already reviewed and appraised to inform its Written Representation. It is recognised though, that the response now provides confirmation that the Applicant does not intend to acquire a great crested newt mitigation licence for the Solar PV Sites. This information has been lacking to date and should have been explicitly discussed and justified within the submitted DCO documents.

5.49. Despite the avoidance and mitigation measures proposed, including the implementation of protected buffer zones, the sensitive timing of certain works and attendance of an Ecological Clerk of Works (EcoCoW), the council remains concerned regarding the potential for contravention of the Conservation of Habitats and Species Regulations 2017, particularly beyond the proposed 50m buffers around ponds. The council highlights to the ExA that Natural England's 'standing advice' for great crested newts (GCN) clearly sets out that it is not only an offence to deliberately kill, injure, disturb or capture GCN or to deliberately destroy their eggs, but that it is also an offence to damage or destroy their breeding sites and resting places (including when GCN are not present) and to possess, control or transport them (or any part, alive or dead). The 'standing advice' specifies that it is also an offence under the Wildlife and Countryside Act 1981 to intentionally or recklessly:

- Disturb them while they occupy a structure or place used for shelter or protection;
- Obstruct access to a place used for shelter or protection.

5.50. The 'standing advice' stipulates: "*If the developer has chosen not to use a DLL where one exists and their activities are likely to affect GCN, the developer must apply for a GCN mitigation licence.*"

5.51. It is the council's view that despite the avoidance and reduction measures proposed, given the nature and scale of the works and activities proposed at the Solar PV Sites, the potential for an offence to be committed cannot be discounted and that a suitably robust rationale to substantiate why a mitigation licence will not be obtained, has still not been provided. Furthermore, it would have been prudent and straight forward for the Applicant to extend its application to use Natural England's District Level Licensing (DLL) Scheme for the Cable Route Corridor (CRC) so that it also encompasses the Solar PV Sites. It is not evident whether this matter has been discussed between the Applicant and their ecological consultant and Natural England during the course of the substantive number of communications and meetings that appear to have taken

place between the parties according to the Statement of Common Ground with Natural England (May 2026 Revision 1) [[REP2-026](#)] submitted at Deadline 2. The council presumed this topic would have been discussed, especially in light of the Applicant's recent application to Natural England to use their GCN DLL Scheme for the CRC.

- 5.52. Nevertheless, it is evident from a review of the SoCG, that Natural England also has outstanding concerns regarding the Applicant's intended approach with respect of GCN at the Solar PV Sites as it is detailed under reference 3.3.12 of Table 3-3: Ecology and Biodiversity of the SoCG:

“Natural England has outlined its position on European protected species and is seeking further information on potential impacts. This includes details of habitat clearance, badger survey methodology, mitigation for impacts on great crested newt (GCN) habitat related to the solar PV site, and evidence of engagement with Natural England where protected species licences may be required. To date, no draft protected species licence applications have been submitted for review. Natural England advise that further evidence is required to assess the potential effects and sufficiency of mitigation in relation to protected species. Natural England is not satisfied that sufficient evidence has been provided to demonstrate that the project will not result in significant adverse effects to protected species.”

- 5.53. It is also stated against reference 3.3.16 in Table 3-3: Ecology and Biodiversity of the SoCG [[REP2-026](#)]:

“Survey effort to date is likely sufficient to support entry into the District Level Licensing scheme, though updated surveys may be needed if there is a long delay before consent. The proposed DLL approach for cable route impacts is considered appropriate; however, mitigation for Solar PV sites is less clear. While timing of works and pond buffers are welcomed, further consideration is needed for impacts to terrestrial, connective, and foraging habitats, particularly within 50m of ponds, where additional mitigation and licensing may be required.”

WC-065: Biodiversity Net Gain (BNG)

- 5.54. The Applicant's response is noted; however, the council maintains its view on this matter.

WC-066: Biodiversity Net Gain (BNG)

- 5.55. The Applicant's response is noted; however, it does not wholly address or overcome the issues raised. Although the response confirms that all hedgerows to be temporarily removed within the CRC have been treated as lost, followed by creation on reinstatement as set out in paragraph 1.8.2 of the BNG Assessment Report [[REP1-089](#)], this cannot be verified for the reasons the council has already explained.

WC-067: Biodiversity Net Gain (BNG)

5.56. The Applicant's response is noted; however, it does not wholly address or overcome the issues raised and the council maintains its view on this matter.

WC-069: Biodiversity Net Gain (BNG)

5.57. The Applicant's response states: *"The Minimum Mappable Units (MMU) for baseline UK Habitat Classification surveys across the Scheme was determined based on guidance presented in Section 2.2 of the UK Habitat Classification User Manual Version 1.0 (May 2018), published by the UK Habitat Classification Working Group. No updates to the guidance relating to MMU are presented in UK Habitat Classification Version 2.0 (2023). As such, the guidance set out within the UK Habitat Classification User Manual Version 1.0 is considered to represent the most recent published guidance relating to MMU and represents a robust source from which to justify determination of MMU at the Solar PV Sites and Cable Route Corridor."*

5.58. The Applicant is therefore specifying that the 2018 version of the UKHab Classification User Manual was used. For clarity, the BNG Assessment Report did not cite the 2018 version of the user manual or even include it in the References section, hence why the council queried where the approach adopted was actually advocated in the guidance, because as far as the council is aware, the approach adopted by the Applicant is not recommended in the current version of the UKHab document. This is because, importantly, the 2018 version of the document has been superseded by UK Habitat Classification Version 2.0 (UKHab Ltd. 2023) which was published in July 2023 and therefore should have been used for Lime Down Solar Park as it was published in time. The methodology detailed in the current UKHab document should have been used, and it is not considered appropriate to default to, and rely upon approaches detailed in the out-of-date version because it is more convenient for the project. All parts of the methodology from the 2018 version that the authors deemed still sound and appropriate for use would have been transposed across into the 2023 version, and so any omissions regarding MMUs from the 2023 are clearly intentional.

5.59. Critically, the council considers that the ExA should note that in relation to UK Habitat Classification Version 2.0 (UKHab Ltd. 2023), UKHab Ltd states on its website: *"It supersedes all older versions, which should not be used in any circumstances."* (See for details: [UKHAB Documentation – ukhab](#)).

5.60. The Applicant's response to this matter then stipulates: *"In line with the Handbook for Phase 1 Habitat Survey (2010 Edition), target notes were collected where notable ecological features, including habitat parcels that were too small in size to be captured by the MMU, were present."*

5.61. It then states: *"Habitats identified as target notes were not included within the BNG calculations presented within the BNG Assessment Report [REP1-089] and Statutory Biodiversity Metric [REP1-091], owing to the MMU and given that the habitat types were not notable in the context of the baseline habitats"*

recorded. This limitation is recognised within the BNG Assessment Report [REP1-089] but is not considered significant for the reasons outlined above;...”

- 5.62. Firstly, the use of target notes is not considered to comprise a suitable substitute for appropriate mapping. Secondly, whilst there is a broad discussion regarding the limitation in the ‘Limitations’ section of the BNG Assessment Report, contrary to the Applicant’s response, there is not a full explanation about the use of target notes for smaller areas of habitat and nor is there an explanation anywhere else in the BNG Assessment Report. Furthermore, the adopted methodology and use of target notes for smaller areas of habitat is not described in the ES Volume 3, Appendix 9-1: Ecological Baseline Report either as it should have been if the Applicant is relying on this approach and the use of very large MMUs. This is a significant omission from the description of the methodology employed.
- 5.63. The council therefore maintains its position in respect of the issues raised under WC-069 as the concerns raised have not been suitably addressed and the explanations in the Applicant’s response have not been adequately substantiated.

WC-070: Biodiversity Net Gain (BNG)

- 5.64. The Applicant’s response confirms that the Minimum Mappable Unit of 400m² for area-based habitats and 20m for linear features which was applied across the Solar PV Sites was also applied within the Cable Route Corridor (CRC). Whilst the confirmation of method is acknowledged, this evidently should have been clearly explained in the methodology of the relevant submitted DCO documents and comprises a considerable omission.
- 5.65. As detailed in the council’s comments above in respect of WC-069, the council remains concerned regarding the MMU adopted and does not consider it has been sufficiently justified given that contrary to the indication from the Applicant, the method used does comprise a deviation from the UKHab Classification User Manual seeing as Version 2.0 published in July 2023 should have been complied with for Lime Down Solar Park.

WC-071: Biodiversity Net Gain (BNG)

- 5.66. It is noted that the Applicant’s response specifies: *“The Applicant acknowledges that all individual trees comprising Irreplaceable Habitat have been grouped within a single row within the Statutory Biodiversity Metric [REP1-091]. These features were consolidated within the Metric, as with other habitat elements within the Scheme.”*
- 5.67. This is not considered to provide a robust rationale for the deviation from The Statutory Biodiversity Metric User Guide (Last updated: 3 July 2025) (hereafter referred to as ‘the User Guide’). It also fails to explain or address why no explanation was presented in the ‘user comments’ column in the metric to justify why the trees have been grouped together in one row and why no explanation

has been provided within paragraphs 1.3.6 1.3.7 or the Limitations section of the BNG Assessment Report [[APP-273](#)].

- 5.68. The information now provided is noted. The Applicant indicates in their response that the Tree Helper was used. If so, it is unclear why it was blank and not completed within the submitted metric. Evidently it should have been completed within the metric to allow review of the information.
- 5.69. The council's concerns have not been overcome or adequately addressed in respect of this matter.

WC-072: Biodiversity Net Gain (BNG)

- 5.70. The information now provided is noted and welcomed, given that it was omitted from the submitted Statutory BNG Metric [[REP1-091](#)].

WC-073 and WC-074: Biodiversity Net Gain (BNG)

- 5.71. The Applicant's responses are noted. Nonetheless, the council remains concerned regarding the consolidation of habitat rows within the submitted Statutory BNG Metric [[REP1-091](#)] and subsequent omission of individual habitat parcel references for the reasons already expressed and explained.

Highways and Transport

- 5.72. With regards to the Applicant's response to WC-011: Road Network and WC-088: HGV Construction Routes and Two-Way Passage Volumes, the council commented on the latest Transport Assessment within its Deadline 2 response [[REP2-048](#)]. This response included detailed comments on the swept path analysis undertaken for two 16.5m HGVs in Annex K.
- 5.73. Whilst the availability of satisfactory passage opportunities for a car / HGV along all the rural lanes should be regarded a 'minimum' level of highway safety safeguarding, it is not considered the 'worst case' scenario which the DCO proposals should address. Despite the best intentions of the proposed booking system, it is the Council's retained view that there will inevitably be occasions when two opposing HGVs will meet and a much higher risk of this occurring than exists now. The Applicant also refers to the latest Transport Assessment in response in stating: "*Annex K in Volume 3, Appendix 13-1: Transport Assessment [[REP1-057](#) and [REP1-059](#)] demonstrates where there is adequate carriageway width and / or passing place opportunity for two HGVs along the construction routes*". As will be noted in the Council's comments on Annex K [[REP2-048](#)] the adequacy of these passing locations is disputed.
- 5.74. With regards to the Applicant's response to WC-030: The Fosse Way, the council notes that the underlying calculations relating to the predicted HGV trip generations over the construction period and typical daily flows on roads such as The Fosse Way remain an area under discussion with the Applicant.

- 5.75. With respect to the Applicant's response to WC-084 and WC-085: Protective Provisions, the council notes the now issued Draft Protective Provisions document for 'The Protection of the Local Highway Authority'. However, the council would prefer to have a specific 'overarching' s59 Agreement in place for highway damages redress, this setting out the full extent of the Highway Condition surveys and timing of these. As currently drafted in the Protective Provisions, the condition surveys as noted would appear to relate only to the highway extents within the defined road work or cable works areas, so work zones indicated on the bespoke Work Area plans. This therefore excludes very large lengths of the narrow rural lanes being proposed for HGV construction access where over-run or structural damage is considered a high risk by the council. Whilst additional wording on condition surveys and timings has been incorporated within the revised 7.22 Outline Construction Traffic Management Plan (Rev 2) [REP1-112], this is not considered a substitute for a formal s59 Agreement under the Highways Act 1980 with supporting plans showing the full extent of the highway network to be monitored throughout the construction period.
- 5.76. Regarding the Applicant's response to WC-086: Protective Provisions, the issued Draft Protective Provisions document for 'The Protection of the Local Highway Authority' is noted and is under review by highway officers in Development Management, Network Management and the Area Highway Team (Maintenance).
- 5.77. With respect to HGV routing non-compliance the Applicant notes "*The Applicant has also updated the Outline CTMP [REP1-112] at Deadline 1 to provide further detail on matters requested by Wiltshire Council. Section 6.14 includes further clarifications as to what monitoring / reporting / actions would be implemented in cases where proposed construction routes are not followed*". The council has commented separately on the revised CTMP at Deadline 2 and commented on this [REP2-048]. To reiterate, the council response in part stated: "*Given the legally binding powers under the DCO and OCTMP to comply with the prescribed HGV construction routes, it would be useful to understand what enforcement mechanisms can be applied and put in place beyond simple driver retraining. This seems rather 'light touch' and the power to impose fines against delivery operators consistently failing to comply with routing under the DCO or OCTMP would seem a more effective deterrent*".
- 5.78. With respect to the Applicant's response to WC-089: HGV Volumes – Solar Farm Sites (Construction Phase), the council commented on the latest Transport Assessment within its Deadline 2 response [REP2-048], which includes the latest supporting calculations for the HGV trip generation predictions. This remains an area of concern.
- 5.79. The council notes that in the Applicant's response to Reference 3.9.5 of the 8.2 Statement of Common Ground with Wiltshire Council [REP2-025], it states "*In terms of excavated material, there will be no site wide reprofiling required. It has been assumed that any excavated material will be reused on site. In the event of any spoil being taken off site, where possible this will be undertaken by the same tippers used for incoming supply of aggregate*". The council

questions what impact on HGVs will it have if the same tippers cannot be used. Furthermore, 7.16 Outline Site Waste Management Plan (Rev 2) [REP1-102] and expressly Table 3 estimates that the volume of excavated soil that is likely to be deemed unsuitable for refill and compaction is circa **139,666** cubic metres. As this is defined as a Waste Type, then it would not be unreasonable to assume that the entirety of this volume, or at least a proportion, would need to be exported off-site by HGVs. This seems to contradict the Applicant's assertion that "*any excavated material will be re-used on site*".

Cultural Heritage

- 5.80. With regards to the Applicant's response to WC-083, paragraphs 1 and 2 of the response are noted and noted disputed.
- 5.81. However, with regards to paragraph 3, regarding the site visit to Grittleton House, the council disagrees with the assessment that there are "*some limited views between the Grittleton House and agricultural land within the cable route, including the southern part of a compound area*". The council notes that there are a number of trees along the boundary which provide intermittent screening in summer months, but that there is no hedgerow other than the relatively short length of the hedge screening the tennis courts within the boundary of the house. The cable route runs across the full length of the field of view consistent with the front elevation of the house and views of construction and of parts of the construction compound whilst the works are ongoing, from the high status bay window at the head of the stairs on the first-floor landing and from principal bed chambers and also from areas of the grounds, will be clear and significant. The visual impact would be greater if the works were to be carried out in the winter when tree cover would be reduced. In addition, construction will be visible and obtrusive in the views of the house which are available from footpath GRIT20. There is also expected to be some impact from noise during construction which will impact on the ability to experience the asset within its otherwise rural setting.
- 5.82. The Applicant's response notes that "*the Applicant considers that the existing screening provided by the existing hedgerow and trees, along with the temporary nature of works as a result of the installation and cabling would not effect how the asset is experienced within its wider agricultural setting*". The council disagrees – Grittleton House was designed, constructed and occupied as a country house within a picturesque rural landscape. Its location would have been selected to provide extensive and attractive views across the owner's land holdings and architectural features such as the bay windows were intended to enhance enjoyment of the rural setting. The cable route and compound occupy an area running across the full field of view from the principal garden frontage and this makes a significant contribution to the setting of the asset as an essential element of the landscape within which was designed to be viewed experienced. The impact from the construction and compound will be intrusive within this rural setting and will reduce the ability of those owning, working in or visiting the property to experience the asset as it was experienced historically. As a result there will be some harm to the significance of the asset, albeit that this will be temporary in duration.

- 5.83. It is understood that this impact will be relatively short-lived given that the construction works and occupation of the compound will be temporary. It is further noted that the removal of the compound and making good of the cable route following construction mean that there will be no lasting impact on the landscape. However, while the Applicant has relied upon the temporary nature of the works in reaching the conclusion that the works “*will not effect [affect] how the asset is experienced*” it is noted there are no specific controls over the length of time for construction or occupation of the compound. The council has also previously noted in its Comments on Submissions received at Deadlines 1 and 1A [REP2-048] that the update to Table 6 of the 7.12 Outline Construction Environmental Management Plan (Rev 2) [REP1-096], which is intended to address impacts from construction compounds and which provides guidance to the contractor to undertake works as far away from the assets as reasonably practicable, is advisory in nature and does not secure any certainty in respect of the impacts from construction compound areas and cannot be considered as providing any additional mitigation of the potential harm. There is therefore some uncertainty regarding the duration and level of the impact. Noting that it is, however, ultimately both temporary and reversible, the overall impact in the medium / long-term on the heritage significance of the asset resulting purely and directly from the construction itself, would be limited, albeit that there would be a considerable impact from the construction within its immediate setting for a short length of time.
- 5.84. However, the Grade II* listed house is currently in use as a country house hotel and venue and its conservation via its future maintenance and repair in good condition relies upon the continuing viability of this business. Clearly there could be other benign uses which might occupy the building in time should the current use fail but there is no certainty that this would be the case or over the length of time that this might take. High maintenance assets of this type can and do fall into considerable disrepair during periods of disuse, which could make it less attractive for future occupation and prejudice its future. It is understood (anecdotally from the current owners) that the current business runs at the margins of viability and any disruption, such as could happen if the attractiveness of the building for its primary use as a wedding venue was called into question in public opinion, could have a significant impact on the long term viability of the business and hence the conservation of the building. The National Planning Practice Guidance notes that “*In the case of buildings, generally the risks of neglect and decay of heritage assets are best addressed through ensuring that they remain in active use that is consistent with their conservation.*” (Paragraph: 002) and continues to note that “*When assessing any application which may affect the setting of a heritage asset, local planning authorities may need to considerthe fact that developments which materially detract from the asset’s significance may also damage its economic viability now, or in the future, thereby threatening its ongoing conservation.*” (Paragraph: 013).
- 5.85. The council therefore considers that the Applicant should work with Grittleton House’s owners to identify additional and more robust and effective management proposals 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 consideration of alternative sites for the construction compound, limiting 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.

5.86. Paragraph 4 is noted. The 7.22 Outline Construction Traffic Management Plan (Rev 2) [REP1-112] has been updated (a provision referred back to as noted here in the 7.12 OCEMP (Rev 2) [REP1-096]) to include a requirement that the design of the works to the access track from Rodbourne Road to the Lime Down E (Works number 8b) will be undertaken in consultation with the Conservation Officer. However, as the council has already noted its Comments on Submissions received at Deadlines 1 and 1A [REP2-048] in respect of the update to Table 6 of the 7.22 OCTMP (Rev 2) [REP1-112] *“It is unclear what the mechanisms would be for ensuring this occurs, how much influence the Conservation Officer would have to influence the design and / or what would happen if there was any conflict of opinion. Whilst the provision is welcomed and has potential to allow some influence over the nature of the works, it clearly cannot necessarily reduce the potential impact to the character and appearance of the Conservation Area. In addition, it does not provide any commitment to the reinstatement of the rural character of the track and junction following construction or, at worst, at decommissioning.”*

5.87. Paragraph 5 is noted and not disputed.

Construction and Decommissioning

5.88. The Applicant’s response to WC-098 does not seem to relate the content of the council’s comment. The council notes that the Applicant has not responded to its proposed wording for the Requirements relating to ‘Commencement of the authorised development’ and ‘Phasing of the authorised development and date of final commissioning’. The council awaits a response from the Applicant.

5.89. Similarly, the Applicant’s response at WC-099 does not address the council’s concerns regarding decommissioning and land restoration, including the need for a financial bond and / or charge on the land to be secured. This has previously been stated in the council’s correspondence with the Applicant on the draft DCO and as contained within its Relevant Representation [RR-4934]. The council notes that the ExA First Written Questions also seek views from the council on whether Requirement 20 should include an Outline Restoration Plan.

Book of Reference and Land Matters

5.90. The council notes the Applicant’s response, although this does not address the council’s query of the accuracy provided in the Book of Reference. The council notes that this is something which the ExA have flagged up in their Written Questions at CA1.17.

6. 9.24 CONFIDENTIAL Great Crested Newt District Level Licence Impact Assessment and Conservation Payment Certificate (IACPC) [REP2-041]

6.1. The Covering Letter states:

“Great Crested Newt District Level Licence Impact Assessment and Conservation Payment Certificate The Applicant has submitted the Great Crested Newt District Level Licence Impact Assessment and Conservation Payment Certificate (IACPC) [EN010168/EXAM/9. 24] at Deadline 2. Due to the sensitive information contained within the certificate, this document is submitted as confidential. The Applicant notes that the certificate has been signed by both the Applicant and Natural England, confirming Natural England’s involvement in the preparation and agreement of the document. Please note that Wiltshire Council has been provided with an unredacted version of the payment certificate to demonstrate progress on this issue.”

6.2. The Impact Assessment and Conservation Payment Certificate (IACPC) was emailed to Wiltshire Council (WC) by the Applicant’s ecological consultant on 6th May 2026. The council’s Ecology Officer responded on 13th May 2026 to advise that a couple of observations regarding the IACPC had been added into the initial Statement of Common Ground (SoCG) between the Applicant and Wiltshire Council.

6.3. The council had also previously provided comments regarding great crested newt (GCN) and the requirements in respect of mitigation, as well as queries regarding whether an IACPC had been obtained, in the Local Impact Report (LIR) [REP1-137] and Written Representation [REP1-138] submitted at Deadline 1.

6.4. In relation to the IACPC, the council’s in the initial SoCG under reference 3.5.17 are as follows:

“Confirmation that the Applicant intends to use Natural England’s GCN District Level Licensing Scheme (DLL) in respect of the CRC is acknowledged and welcomed as this clarification had not been provided within the PEIR and as such, the Council’s statutory consultation response had queried this point. Nevertheless, the required Impact Assessment and Conservation Payment Certificate (IACPC) from Natural England should have been obtained by the Applicant and submitted with the DCO application. ES Chapter 9 specifies that there is intention to apply to use the DLL but it does not stipulate that an application for a IACPC has been submitted to date. The omission of the necessary IACPC in support of the DCO application is considered an important issue for the reasons detailed in the Council’s Relevant Representation (January 2026).

A copy of the IACPC was emailed to Wiltshire Council on 6 May 2026. There are a couple of discrepancies noted in the IACPC. Firstly, Section 2.1 states

there are no ponds within the proposed site boundary (which for the purposes of the IACPC is the CRC) and Section 2.2 states that the total number of ponds within 250m buffer around the proposed site boundary is 150, whereas paragraph 3.3.59 of ES Volume 3, Appendix 9-1: Ecological Baseline Report [APP-198] stipulates that approximately 130 waterbodies were identified within the CRC and surrounding 250m.

Secondly, Section 3.1 of the IACPC indicates that the DLL enquiry has been submitted with survey information, (which means Habitat Suitability Index ((HSI)) information, presence/absence survey data, population class (if GCN present). This has implications for how the remainder of the form has been completed and what has been agreed with Natural England (NE). However, the DCO application has not been accompanied by any such GCN survey information pertaining to the CRC and instead indicates there has been no species-specific survey in respect of the CRC. Given that Annex 3 to the IACPC provides figures which relate to the entire Order Limits rather than just the boundary of the CRC to which the application to use DLL applies, it is assumed that GCN survey information for the Solar PV Sites was submitted to the NE with the DLL application and that this accounts for why it is has been stated in the IACPC that survey information has been provided. Clarification on this matter should be sought.”

- 6.5. Following Wiltshire Council’s input into the initial draft of the SoCG, the council did not have sight of the subsequent responses and amendments provided by the Applicant until it was published at Deadline 2 [\[REP2-025\]](#). Thus, the responses provided by the Applicant to the points raised by the council in the SoCG regarding the IACPC have been reviewed to inform the preparation of the comments herein.
- 6.6. It is noted that the Applicant’s response to the first query raised by the council in the SoCG regarding the IACPC needlessly explains that where ponds will not be directly impacted they are excluded from the DLL ‘site boundary’ by Natural England and that the site boundary is not contiguous with the Order Limits in this case, whereas the query raised by the council actually related to the discrepancy between Section 2.2 of the IACPC and paragraph 3.3.59 of ES Volume 3, Appendix 9-1 [\[APP-198\]](#) in respect of the total number of ponds within the 250m buffer of the site boundary i.e. the cable route corridor. The Applicant’s response in the SoCG then states: “*A number of ponds associated with the Solar PV Sites are also present within 250 m of the of the Cable Route Corridor. As a point of clarity, paragraph 3.3.59 of ES Volume 3, Appendix 9-1: Ecological Baseline Report [REP1-083] refers to ponds within 250m of the Cable Route Corridor, excluding those ponds associated with the Solar PV Sites which are separately described. However, for the purposes of the DLL, all ponds within 250 m of the Cable Route Corridor are considered as part of the impact assessment regardless of their location relative to other elements of the Scheme. As a result, more ponds are captured in the IACPC than have been described as being associated with the Cable Route Corridor in ES Volume 3, Appendix 9 1: Ecological Baseline Report [REP1-083].*”

- 6.7. The Applicant's response is noted, however, paragraph 3.3.59 does not in fact specify or make it clear that the count of ponds within 250m of the CRC excludes those 'associated with the Solar PV Sites'. As such, contrary to the suggestion in the Applicant's response, it is not really a point of clarity because the required information had not been explicitly provided in ES Volume 3, Appendix 9-1: Ecological Baseline Report or indeed elsewhere hence why Wiltshire Council raise the matter of the apparent discrepancy in Section 2.2 of the IACPC. For the avoidance of doubt, paragraph 3.359 of ES Volume 3, Appendix 9-1 [APP-198] in its entirety is as follows:

"During the desk-based assessment, approximately 130 waterbodies were identified within the Cable Route Corridor and surrounding 250 m. District Level Licensing will be utilised for works within the Cable Route Corridor, which assumes the presence of GCN within local waterbodies and stipulates mitigation and compensation measures to reduce and offset impacts on this species. As such no surveys to determine the presence or likely absence of GCN have been undertaken for ponds within the Cable Route Corridor."

- 6.8. In terms of the council's second query regarding the IACPC as detailed in the SoCG, it is recognised that the Applicant's position has been updated in the SoCG [REP2-025] to state: *"The Applicant confirms that survey information submitted to Natural England in support of the DLL enquiry comprised the GCN presence / absence surveys of ponds at the Solar PV Sites as detailed in ES Volume 3, Appendix 9-5: Great Crested Newt Survey [APP-202]."*
- 6.9. However, earlier within the same updated position statement from the Applicant in the SoCG, it is specified: *"The IACPC contains an 'Impacts Plan' corresponding with the Cable Route Corridor elements of the Order Limits."* As such, given that the IACPC clearly sets out that the great crested newt (GCN) district level licensing (DLL) application to Natural England (NE) pertains to the CRC element of the Scheme only, the council maintains its view that it follows that only survey information relating to the CRC, rather than survey information relating to the Solar PV Sites, would qualify as supporting survey information and that therefore, Section 3.1 of the IACPC application form should have been completed to state that no survey information had been submitted and the remainder of the form should have followed suit.
- 6.10. As such, whilst the council notes the response from the Applicant to this query, it does not consider that this adequately addresses the issue or answers the query, and the council remains concerned that the IACPC may have been completed incorrectly and in a manner that suggests a greater level of pertinent supporting ecological baseline information was provided than was the case given that for the purposes of the IACPC, supporting survey information would have to relate to the CRC. It is recognised that NE has nevertheless signed the IACPC on 30th April 2026, but the ExA may wish to seek clarity on this matter from either the Applicant and / or NE.

7. 9.28 Applicant's Response to Lead Local Flood Authority on Hydraulic Modelling Requirements [REP2-045]

7.1. The Lead Local Flood Authority (LLFA) maintains that:

- The Applicant's position relies heavily on policy interpretation with limited site-specific quantitative evidence demonstrating no increase in flood risk.
- The separation of panel areas from infrastructure does not fully consider integrated hydrological behaviour across the site.
- Dependence on management measures introduces uncertainty over long-term performance, which is not quantified.
- Potential cumulative runoff impacts across the full site extent are not explicitly assessed.
- Limited evidence is provided demonstrating control of preferential flow pathways.
- Panelled areas contribution to runoff is not quantified, creating uncertainty in compliance with EN-1.
- No scenario testing or sensitivity analysis is presented to demonstrate robustness of outcomes.
- Site-specific variability such as soil and slope is not assessed consistently at a detailed level.
- Reliance on precedent is not supplemented with direct site validation evidence.
- Scale of development suggests need for additional quantitative analysis.
- Interaction between cable corridors and drainage features is not explicitly assessed.
- Potential compaction effects during construction are not sufficiently evidenced quantitatively.
- No modelling of overland flow routing under extreme rainfall events is presented.
- Drainage connectivity between parcels is not clearly demonstrated.
- Long-term maintenance effectiveness is assumed but not validated through evidence.
- Potential exceedance flow behaviour is not fully discussed.
- There is limited demonstration of how SuDS principles apply across panel areas.
- The risk of erosion at drip lines is acknowledged but not quantified for the site.
- Localised flood impacts are not assessed in combination across catchments.

- There is no clear validation of ground condition assumptions across all parcels.
- Evidence does not fully demonstrate resilience under climate change scenarios.
- Functional floodplain interactions with infrastructure are not consistently explored.
- There is limited clarity on how mitigation measures will be enforced and verified.
- No spatial representation of runoff pathways is included.
- Hydrological interactions with existing drainage networks are not detailed.
- Assumptions on permeability remain untested for worst-case conditions.
- Potential impacts on ordinary watercourses are not systematically assessed.
- There is insufficient demonstration that all flood risk mechanisms are addressed holistically.
- The absence of integrated catchment-wide modelling limits understanding of system behaviour.
- The overall approach may not fully evidence compliance with no increase in flood risk requirement.

7.2. This raises uncertainty in demonstrating compliance with NPS EN-1 requirements to ensure no increase in flood risk. Further site-specific quantitative evidence, modelling (where proportionate), and clear secured design / mitigation measures are required to provide confidence to the LLFA that flood risk will not be increased elsewhere.

8. Stop Lime Down Comments on Submissions Received at Deadlines 1 and 1A [REP2-051]

8.1. The Stop Lime Down submission highlights that:

- Limited changes to the FRA indicate unresolved drainage issues remain.
- Lack of detailed SuDS design limits understanding of runoff and water quality management.
- Firewater containment capacity remains uncertain under combined storm / fire scenarios.
- Watercourse Crossing Schedule lacks sufficient mapping / detail for assessment.
- Potential disruption to field drainage systems along cable route not fully addressed.

- 8.2. This raises uncertainty in demonstrating compliance with NPS EN-1 requirements to ensure no increase in flood risk. Further site-specific quantitative evidence, modelling (where proportionate), and clear secured design / mitigation measures are required to provide confidence to the LLFA that flood risk will not be increased elsewhere.