



Lime Down

Solar Park

The Applicant's Response to Submissions Received at Deadline 2

June 2026

Revision 1

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1 Introduction

1.1 Purpose of the Document

1.1.1 This document provides Lime Down Solar Park Limited (the Applicant's) response to submissions made at Deadline 2 (22 May 2026) by Interested Parties. It is noted that Deadline 2 submissions consist of comments on submissions received at Deadline 1 and 1A, Written Representations (WRs), and Local Impact Reports (LIRs).

1.1.2 A total of nine documents were submitted by Interested Parties at Deadline 2 and published on the Planning Inspectorate (PINS) website on 27 May 2026. The Examining Authority (ExA) subsequently exercised its discretion to accept three additional submissions, two of which were published on the PINS website on 1 June 2026, with the third published on 5 June 2026.

1.1.3 Given a submission from Wiltshire Council sought to provide the Examining Authority with an update on the status of the Draft Local Plan [REP2-047], a response has not been provided in this document, however the contents of the submission have been noted by the Applicant.

1.2 Structure of the Report

1.1.4 This document provides a response from the Applicant to the matters raised in the submissions and is structured as follows:

- **Table 1-1** sets out the list of acronyms used for management documents that form part of the Applicant's submission and may have been referred to by the Applicant in responding.
- **Table 1-2** lists the local authorities that have submitted comments. These submissions are presented and responded to in full in **Section 2** of this document.
- **Table 1-3** lists the statutory consultees, undertakers and notable parties that have submitted comments and with whom the Applicant is seeking to undertake a Statement of Common Ground. These submissions are presented and responded to in full in **Section 3** of this document.
- **Table 1-4** lists the parties that have submitted comments and are also listed within the **Book of Reference [REP1-011]**. These submissions are presented and responded to in full in **Section 4** of this document.
- **Table 1-5** lists the submissions received from members of the public and all remaining organisations and businesses. These submissions are presented and responded to in **Section 5** of this document.

1.1.5 References to the Application documentation are provided in accordance with the referencing system set out in the Planning Inspectorate's Lime Down Solar Park [Examination Library](#).

- 1.1.6 Revision suffixes have also been attached to any documents which have been revised and resubmitted to the Planning Inspectorate during the Examination.

Table 1-1 List of Acronyms

Acronym	Document
BESS	Battery Energy Storage System
BNG	Biodiversity Net Gain
BSMP	Battery Safety Management Plan
CEMP	Construction Environmental Management Plan
CNL	Cotswolds National Landscape
CR	Consultation Report
CTMP	Construction Traffic Management Plan
DCO	Development Consent Order
DS	Decommissioning Strategy
EIA	Environmental Impact Assessment
EPMP	Ecological Protection and Mitigation Plan
EPMS	Ecological Protection and Mitigation Strategy
EqIA	Equality Impact Assessment
ES	Environmental Statement
FRADS	Flood Risk Assessment and Drainage Strategy
FTE	Full Time Equivalent
GVA	Gross Value Added
LEMP	Landscape and Ecological Management Plan
OEMP	Operational Environmental Management Plan
PEIR	Preliminary Environmental Information Report
PROWPPMP	Public Rights of Way and Permissive Paths Management Plan
SRMP	Soil Resources Management Plan
SSCEP	Skills, Supply Chain and Employment Plan
SWMP	Site Waste Management Plan
WRS	Water Resources Strategy

1.3 Tables of Parties submitting comments

Table 1-2 List of Organisations whose submissions are Responded to in Section 2

Examination Library Reference	Acronym	Book of Reference Plot Number	Relevant Representation Received from
REP2-048 REP2-046	WCD1 WCWR	Party not referenced in the Land and Rights Negotiations Tracker.	Wiltshire Council

Table 1-3 List of Parties whose submissions are Responded to in Section 3

Examination Library Reference	Acronym	Book of Reference Plot Number	Relevant Representation Received from
REP2-049	EA	N/A	Environment Agency
REP2-050	NH	09-018, 09-019, 09-020, 09-021, 13-003, 13-005, 13-006, 13-008, 13-009, 13-012, 13-013, 13-014, 13-016, 20-001, 20-002, 20-003, 21-001, 21-002, 21-003, 21-004, 21-005, 21-006, 21-007	National Highways
REP2-051	SLD	N/A	Stop Lime Down

Table 1-4 List of Parties whose submissions are Responded to in Section 4

Examination Library Reference	Acronym	Book of Reference Plot Number	Relevant Representation Received from
REP2-052	DAW	03-045, 03-046, 03-047, 03-052, 03-053, 03-054,	David Alan Walker

		03-055, 03-061, 04-004, 04-005, 04-006, 04-007, 04-008, 04-009	
REP2-054	JRE	05-043, 06-001, 06-002, 06-003, 06-004, 06-005, 06-006	Mr John and Mrs Rosmarie Eavis
AS-015	RBF	08-004, 08-005	Roberts Berry Farm

Table 1-5 List of Parties whose submissions are Responded to in Section 5

Examination Library Reference	Acronym	Book of Reference Plot Number	Relevant Representation Received from
REP2-053 REP2-055	JMB JMB2	N/A	Joan Marie Bassler
AS-014	IR	N/A	Isabel Ross

2 The Applicant's responses to host and neighbouring Local Authorities

2.1 Wiltshire Council

Table 2-1: [REP2-048](#) and [REP2-046](#)

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
Wiltshire Council Comments on Submissions Received at Deadlines 1 and 1A				
WCD1-001	Transport and Access	Land Plan (Rev 2) [REP1-004]	<p>1 2.2 Land Plan (Rev 2) [REP1-004]</p> <p>1.1. Wiltshire Council's previous highways and transport comments on the 2.2 Land Plan, as made in its Relevant Representation [RR-4934], remain. As stated then: "<i>The 23 number land plans indicate areas in blue and yellow shading which encroach over the existing public highway limits in several locations, notably Farhill Lane, Fosse Way, Alderton Road, the A429, A420 Bristol Road and the A4 Bath Road. In the case of the 'blue' land identified the KEY cites that "New rights (including restrictions) to be compulsorily</i></p>	<p>The Applicant has responded to this comment at WC-330 of Applicant's Response to Relevant Representations (Part 1) [PDA-009].</p> <p>The Applicant confirms that works to the public highways are controlled by Part 3 (Streets) of the Draft Development Consent Order [REP1-007]. The rights that may be acquired in each plot number are listed in Schedule 9 to the draft DCO. Temporary possession powers are included to ensure that there is no conflict between the proposed works and privately owned land interests,</p>

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			<i>acquired and temporary use of land and in relation which it is proposed to suspend or extinguish easements, servitudes and other private rights". In the case of the 'yellow' land identified it is stated "Temporary use of land and in relation to which it is proposed to temporarily suspend easements, servitudes and other private rights". It is assumed in both cases that, where this is also public highway, that normal rights of passage will not be affected by these designations on the Land Plans. Furthermore, where it is stated that new rights are to be compulsory purchased, it is unclear what rights will be sought and how this will impact public highway land within the areas of blue shade".</i>	<p>primarily in the subsoil of the highway.</p> <p>The normal rights of passage for users of public highways will not be affected by the compulsory acquisition and temporary possession powers. Any temporary restriction, closure or diversion would be carried out under article 12 (temporary closure, restriction or prohibition of use of streets and public rights of way) of the Order. Please also refer to DCO1.16 and DCO 1.17 in the Applicant's Response to the Examining Authority's First Written Questions [EN010168/EXAM/9.29].</p>
WCD1-002	Transport and Access	Land Plan (Rev 2) [REP1-004]	1.2. There are ongoing discussions with the Applicant over highway 'Protective Provisions' to be written in the draft DCO to protect Wiltshire Council highway	The Applicant makes note of this comment. Please refer to WCD1-025.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			interests. It is anticipated this will follow a similar vein to the Protective Provisions wording set out in Appendix 1 of the National Highways Relevant Representation [RR-3426] .	
WCD1-003	Transport and Access	Works Plan (Rev 2) [REP1-005]	<p>2. 2.3 Works Plan (Rev 2) [REP1-005]</p> <p>2.1. The 23 number Works Plan drawings identify works proposed within public highway as Works Numbers 8A or 8B. As noted in past highway comments [RR-4934], it is therefore inferred that where lengths of public highway are excluded from these designations on the Works Plan, no mitigation or improvements are deemed necessary by the Applicant to accommodate the increased HGV trafficking expected during construction. The exclusion of the following minor road lengths on the planned construction routes remains a concern:</p>	The Applicant makes note of this comment. To confirm, where lengths of public highway are excluded from these designations on the Works Plan, no mitigation or improvements are deemed necessary by the Applicant to accommodate the increased HGV trafficking expected during construction.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
WCD1-004	Transport and Access	Works Plan (Rev 2) [REP1-005] Lime Down Areas A-C	<u>Lime Down Areas A-C</u> <ul style="list-style-type: none"> The length of Farhill Lane between the junction with Fosse Way and the planned access points to Lime Down area A (circa 1.1km) - Sheet 1 	See response to WCD1-101.
WCD1-005	Transport and Access	Works Plan (Rev 2) [REP1-005] Lime Down Areas A-C	<ul style="list-style-type: none"> Significant lengths of the Fosse Way, with the only 8B works areas identified linked to the Lime Down Area C access junction works - Sheets 1, 3 and 4. Whilst highway works within these areas 'could' additionally include the provision of temporary passing places to allow two HGVs to pass during the construction phase, it is unclear if this is the intent. However, there is still a significant length of Fosse Way (870m) between 	See response to WCD1-107 and WCD1-108.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			<p>the junction at Fosse Lodge at the southern corner of the Lime Down C site and Alderton Road, which is deemed as needing no passing mitigation to accommodate HGVs. Whilst the horizontal road alignment here is straight, it is unclear whether this long distance and forward visibility available would allow two opposing HGV drivers to be fully aware of each other easily, with one thus able to wait at a suitable passing point before entering this length of Fosse Way, this assuming one exists which is not clear.</p>	
WCD1-006	Transport and Access	Works Plan (Rev 2) [REP1-005]	<p><u>Lime Down Area D</u></p> <p>Unnamed road between the roundabout junction with Wellington Place Road and Bradfield Cottages (circa 1.7km) -</p>	See response to WCD1-102 to WCD1-104.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
		Lime Down Area D	Sheet 5 (Part). 8B work area extents on this route are limited to a length north of Bradfield Cottages, where the access points to Lime Down Area D are proposed. This is a significant concern given the volume of HGV construction traffic expected on this route to / from the A429, its carriageway width and alignment to the northwest of the junction with The Street.	
WCD1-007	Transport and Access	Works Plan (Rev 2) [REP1-005]	2.2. The council considers it would be helpful if the drawing key described what each of the keyed shadings apply to rather than just listing works reference numbers. The council can see no reason why the full information should not be provided as keyed information on the plans, as this would better assist understanding and review of the planned works within the DCO limits.	The Applicant has updated the Works Plans [EN010168/APP/3.1] (Rev 3) at Deadline 3 in line with suggestion in the comment by adding a reference to the works along with the works number.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
WCD1-008	Scheme Description and DCO Process	3.1 Draft Development Consent Order (Rev 2) [REP1-007]	<p>1. 3.3.1 Draft Development Consent Order (Rev 2) [REP1-007]</p> <p>3.1. The council has made previous comments on the Draft DCO as contained within its Relevant Representation [RR-4934], Written Representation [REP1-138] and Local Impact Report [REP1-137]. The council maintains its position as contained within those documents.</p>	The Applicant notes this comment and refers the Council to its previous responses in the 9.1 Applicant's Response to Relevant Representations (Part 1) [PDA-009] , 9.22 Applicant's Response to Written Representations [REP2-039] , and 9.21 Applicant's Response to the Local Impact Report [REP2-038] .
WCD1-009	Scheme Description and DCO Process	3.1 Draft Development Consent Order (Rev 2) [REP1-007]	<p>3.2. It is noted that Schedule 12, Part 2 and 3 headings within the Contents section have been corrected (with the previous Part 3 having now been removed). However, these amendments are only shown as tracked within the Contents and not within the document itself.</p>	The Applicant confirms that this was an error in the table of contents only.
WCD1-010	Transport and Access	3.1 Draft Development Consent	<u>Article 10 – Power to alter layout, etc., of streets</u>	The Applicant refers the Council to its previous responses on this matter. Article 10 provides the

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
		Order (Rev 2) [REP1-007] Article 10 – Power to alter layout, etc., of streets	3.3. There are no changes to this Article in Revision 2, so past comments remain applicable [RR-4934 and REP1-138]. Council officers have expressed past concern over the ability of the council to control works being undertaken within the public highway, and from the highway development management perspective, the ability to ensure that the proposed site access and other works meet the adoptable standard. The Applicant has alluded to the fact that: " <i>A separate agreement will not be necessary as the undertaker's powers relating to the alteration of streets are conveyed by Article 10 of the DCO as opposed to the Highways Act 1980 ("HA 1980")</i> ". However, this is a little vague. The DCO needs 'Protective Provisions' for Wiltshire Council (Highways) to be included in Schedule 15, with appropriate reference made to this in this	power to alter the layout of streets. Paragraph (3) secures that temporary alterations must be restored to the reasonable satisfaction of the street authority. Article 11(1) provides the same requirement for permanent alterations, that they are completed to the reasonable standard of the street authority. In this way, the Council can ensure that works meet an adoptable standard. Additionally, article 15 expressly provides for the Applicant and any street authority (including the Council as highway authority) to enter into agreements, such an agreement including the detail of the alteration works to ensure they meet the specification required by the Council.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			Article as may be required. Article 10(4) states that: " <i>The powers conferred by paragraph (2) may not be exercised without the consent of the street authority, such consent to be in a form reasonably required by the street authority</i> ". This might usefully cross-reference the said Protective Provisions in due course.	
WCD1-011	Transport and Access	3.1 Draft Development Consent Order (Rev 2) [REP1-007] Article 14 – Access to works	<u>Article 14 – Access to works</u> 3.4. There is again no drafting change made to this Article in this revision to the DCO, so previous comments remain valid. To reiterate, there is concern about the precise wording of Article 14, as it implies that approval by the highway authority is only required for new access locations proposed beyond those set out in Schedule 7, Parts 1 and 2. In short, all the accesses in Schedule 7, whether permanent or temporary, are seemingly deemed approved in at	Article 14 provides the power to form and lay out new accesses, or to improve existing accesses. The alteration of the highway to implement these accesses will be carried out under article 10, and completed to the reasonable satisfaction of the street authority (under article 10(3) for temporary accesses, and article 11(1) for permanent accesses). As noted above at WCD1-010, article 15 enables agreements to be entered into to include the detail of these works. Alternatively, this detail

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			<p>least principle under powers conferred in Article 14. The Applicant has previously advised in response that: <i>“Access works however would be secured through the discharge of the Construction Traffic Management Plan (“CTMP”) via Requirement 15 which requires approval from the Council prior to the commencement of the Scheme”</i>. However, the council does not consider that the detailed design and technical approval of permanent highway works is a part of the CTMP process. It is noted the National Highways Protective Provisions in Schedule 15 include for technical approval of all works drawings and associated Road Safety Audits as part of these provisions. That should be case with Wiltshire Council Protective Provisions, which need adding to this Schedule.</p>	<p>could be included in the detailed CTMP for approval. A third option is for the approval to be carried out pursuant to a process set out in protective provisions. This provides complete flexibility for the Council to identify its preferred method of providing technical approval, noting that this is inherent in the Applicant being able to complete highway works to the reasonable satisfaction of the local highway authority.</p>

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
WCD1-012	Transport and Access	3.1 Draft Development Consent Order (Rev 2) [REP1-007] Article 15 – Agreements with street authorities	<u>Article 15 – Agreements with street authorities</u> 3.5. Article 15 is also unchanged in this revision to the DCO. The council's Relevant Representation [RR-4934] states that "review of DCO Article 15 states in (1) that "A street authority and the undertaker may enter into agreements". The concern is the use of the word 'may' (highlighted in bold), which suggests that the undertaker is not bound or required to do so". However, as noted earlier, the inclusion of bespoke Wiltshire Council 'Protective Provisions' may negate the need for a formal and separate agreement in all cases. Given the powers conveyed under DCO Article 10, and assuming this is backed with Protective Provisions for Wiltshire Council to be added in Schedule 15, it remains unclear as to when the provisions in Article 15 would then	The word 'may' is used in recognition that a street authority is the person responsible for maintenance of a road. For private roads, the street authority is typically the landowner. It would be inappropriate to mandate that an agreement is entered into with every street authority. Not only are individual landowners unlikely to wish to engage in the additional burden of a bespoke agreement relating to private roads, such a requirement would conflict with the power to compulsorily acquire the rights in land; the Applicant could have a land right to use an access track, but be unable to make effective use of that land right due to a landowners unwillingness to enter into an agreement under article 15. The Applicant is also mindful that only the freehold owner of land may dedicate a street as public

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			<p>be needed. If the DCO articles in themselves give no power to dedicate new land as public highway then this may be one instance, but confirmation is sought.</p>	<p>highway. The reference to 'adoption' in article 15(1)(d) is in reference to a notice to adopt a street as public highway that a highway authority may make under section 228 of the Highways Act 1980. This is the available mechanism for the local highway authority to adopt land as public highway, and is likely to be appropriate where an access is formed over unregistered land in unknown ownership.</p> <p>As noted above at WCD1-011, it is not necessary for an agreement to be entered into with the local highway authority under article 15; this is simply one of three mechanisms that the Council can opt to use to approve the technical specification of highway works and ensure they are completed to the relevant standard.</p>

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
WCD1-013	Arboriculture Ecology and Biodiversity	3.1 Draft Development Consent Order (Rev 2) [REP1-007] Article 40 – Felling or lopping of trees and removal of hedgerows	<u>Article 40 – Felling or lopping of trees and removal of hedgerows</u> 3.6. Paragraph (4) of Part 6, Article 40 has been amended to cite the Ecological Protection and Mitigation Strategy (EPMS) instead of the LEMP. The previous omission of the reference to the EPMS has been highlighted in the Ecology and Biodiversity Considerations section of Wiltshire Council's Written Representation [REP1-138] given that the Hedgerow Removal Plan(s) is embedded within the submitted Outline EPMS instead of having been submitted as a standalone plan(s).	The Applicant notes this comment. A response to the Council's Written Representation (WC-051) on this matter was provided at Deadline 2 in 9.22 Applicant's Response to Written Representations [REP2-039] . Please also refer to DCO 1.27 in the Applicant's Response to the Examining Authority's First Written Questions [EN010168/EXAM/9.29] submitted at Deadline 3.
WCD1-014	Ecology and Biodiversity Arboriculture	3.1 Draft Development Consent Order (Rev 2) [REP1-007]	3.7. The Written Representation stated: " <i>The council's Ecology Officer queries why paragraph (4) of Article 40 [APP-016] refers to only the LEMP and not also to the 7.19 Outline Ecological Protection and Mitigation Strategy (EPMS)</i> "	The Applicant notes this comment. A response to the Council's Written Representation (WC-051) on this matter was provided at Deadline 2 in 9.22 Applicant's Response to Written Representations [REP2-039] . Please also refer to DCO

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
		Article 40 – Felling or lopping of trees and removal of hedgerows	<i>[APP- 284] and the Hedgerow Removal Plan(s) embedded within the EPMS and / or 6.2 Environmental Statement Volume 2, Figure 3-4-1 to 3-4-5.2 Landscape and Ecology Mitigation Plan [APP-084] and 6.3 Appendix 9-8 Schedule of Protective Ecological Buffers [APP-205]. It is deemed that citing other pertinent documents and plans in Article 40, paragraph (4) would serve to ensure that approved hedgerow removal is suitably prescriptive and that there is consistency across the documents and plans for the avoidance of doubt."</i>	1.27 in the Applicant's Response to the Examining Authority's First Written Questions [EN010168/EXAM/9.29] submitted at Deadline 3.
WCD1-015	Ecology and Biodiversity Arboriculture	3.1 Draft Development Consent Order (Rev 2) [REP1-007] Article 40 – Felling or lopping of	3.8. The revised Draft DCO was submitted for Deadline 1 and so was the council's Written Representation, nonetheless, the council seeks to highlight that given that paragraph (4) of Article 40 has been amended to cite only the EPMS, the issues raised by the	The Applicant notes this comment. The extent of hedgerow removal is controlled as set out in the outline Ecological Protection and Mitigation Strategy [REP1-106] .

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
		trees and removal of hedgerows	council in its Written Representation have not been wholly addressed in respect of the wording of the article.	
WCD1-016	Arboriculture	3.1 Draft Development Consent Order (Rev 2) [REP1-007] Article 41 – Trees subject to tree preservation orders	<u>Article 41 – Trees subject to tree preservation orders</u> 3.9. Clarity is sought as to why the duty to replace protected trees does not apply as per Article 41 2(b).	The Applicant notes this comment. The duty under section 206(1) does not apply, to ensure there is clarity that compensatory planting will be controlled by the 7.18 Outline Landscape and Ecological Management Plan (LEMP) [APP-283] . Compensatory planting for all removed trees will be undertaken and TPO trees will be replaced as per the guidance in the Outline LEMP.
WCD1-017	Scheme Description and DCO Process	3.1 Draft Development Consent Order (Rev 2) [REP1-007]	Schedule 2 - Requirements The council considers that numerous additional Requirements are required, as contained within its Local Impact Report [REP1-	The Applicant has responded to this in the 9.21 Applicant's Response to the Local Impact Report [REP2-038] .

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
		Schedule 2 - Requirements	137]. However, it is acknowledged that this report was submitted at the same time that the Rev 2 version of the Draft DCO was submitted by the Applicant. Therefore, the council will not repeat its requirements here in order to allow the Applicant an opportunity to respond.	
WCD1-018	Scheme Description and DCO Process	3.1 Draft Development Consent Order (Rev 2) [REP1-007] Schedule 2 - Requirements	3.10. The council welcomes the inclusion of a phasing and timetable Requirement within Requirement 2. However, the current drafting does not require the phasing scheme or timetable to be approved by the relevant planning authority, only submitted to it. This does not reflect the drafting that the council requested the Applicant include, nor does it reflect similar Requirements on other DCO solar schemes, for example the Mallard Pass Solar Farm DCO. Furthermore, in light of information disclosed by the	The Applicant does not consider that a requirement that a phasing plan be approved by the relevant planning authority would meet the tests for planning conditions which apply, by virtue of section 120(2)(a), to DCO Requirements. These tests are that a Requirement must be necessary, relevant to planning, relevant to the development permitted, enforceable, precise, and reasonable in all other respects. A requirement that a phasing plan be approved fails the first test as it is not necessary. The

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			<p>Applicant at Issue Specific Hearing 1, and in the absence of sufficient assurance or certainty provided within the Applicant's Post Hearing Submission [REP1A-012], the council considers that the Requirements should be as contained within its Written Representation [REP1-138].</p>	<p>Environmental Statement has assessed, as the worst case scenario, all of the development coming forward at once in a single phase. There is therefore no potential harm or worse environmental effect that is being managed through phasing of the Scheme, and therefore no necessity for the phasing to be approved.</p> <p>It is also noted that NPPF confirms that pre-commencement conditions should be avoided unless there is a clear justification.</p> <p>The purpose of the Requirement to share details of the phasing with the relevant planning authority is to enable them to understand when they will need to allocate resource to the discharge of requirements, etc. This is achieved through the current drafting, and approval of</p>

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				the phasing plan cannot be justified.
WCD1-019	Construction and Decommissioning	3.1 Draft Development Consent Order (Rev 2) [REP1-007] Schedule 2 - Requirements	3.12. Furthermore, as highlighted in its Relevant Representation [RR-4934], the council considers that the Community Liaison Forum should be in place for a period of six years post construction and during decommissioning. The council welcomes the commitment to resume the Community Liaison Forum in the Outline Decommissioning Strategy [REP1-100] during the decommissioning phase and considers that Requirement 4 should be amended to reflect that the Forum will be resumed and in place in advance of all decommissioning activity. The council does also not agree with the limit to the Forum's operational life for a period of 1-year post final commissioning.	<p>The Applicant has noted Wiltshire Council's comments in respect of Community Liaison during decommissioning and had directed Wiltshire to the Outline Decommissioning Strategy [REP1-100], secured by Requirement 20 in Schedule 2 to the Draft Development Consent Order (DCO) [REP1-007]. The Applicant is confident that the working of this condition is sufficiently commit to the reestablishment of the Community Liaison Group during decommissioning, and therefore redrafting of Requirement 4 is not considered necessary.</p> <p>The Applicant considers one-year post-construction to be sufficient time for any residual community engagement matters following construction to be addressed</p>

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				through the Community Liaison Group. The drafting of Requirement 4 confirms this is a <u>minimum</u> committed timeframe unless otherwise with the relevant planning authority. The Applicant does not agree that six years (to which this is the first reference made by Wiltshire Council) is necessarily proportionate, particularly given the commitment for a dedicated community contact to remain in-post during the entirety of the Scheme's operation – as secured through the Outline Environmental Management Plan [REP2-021] by Requirement 14 of Schedule 2 to the Draft DCO [REP1-007] .
WCD1-020	Construction and Decommissioning	3.1 Draft Development Consent Order (Rev 2) [REP1-007]	The council maintains that Detailed design approval should not be restricted to work Nos. 1, 2 and 3 in Requirement 5. All work packages should be included.	The Work Nos. requiring detailed design approval are the works that constitute above-ground development that is not otherwise subject to approval elsewhere. The exception to this is Work No. 4,

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
		Schedule 2 - Requirements		being the connection into the National Grid substation. This exclusion is on the basis that these works can be carried out in any event under the permitted development rights held by National Grid, and that within its substation, the design of the connection works must meet whatever technical and other requirements are stipulated by National Grid.
WCD1-021	Construction and Decommissioning	3.1 Draft Development Consent Order (Rev 2) [REP1-007] Schedule 2 - Requirements	3.14. The council notes the amendments to Requirement 20 Decommissioning and restoration. However, the council considers that its drafting as contained within Wiltshire Council's Written Representation [REP1-138] should be utilised.	The Applicant notes this comment, and notes that whilst Wiltshire Council prefers its drafting, it has not identified any specific concerns with the drafting proposed by the Applicant.
WCD1-022	Arboriculture	3.1 Draft Development Consent	3.15. As noted within its Statement of Common Ground, the council considers that it is important that a	The Applicant notes this comment, but as per the response to the Statement of Common Ground

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
		Order (Rev 2) [REP1-007] Schedule 2 - Requirements	Detailed Arboricultural Impact Assessment and Arboricultural Method Statement should be submitted to and approved by the local planning authority as a stand-alone document as part of the DCO. A separate Requirement is therefore required to secure this. The methods of decommissioning should be specified within these documents to ensure minimal impact on underground soil structures and tree root systems manifested over the term of the solar park. Preventing damage to soil particles during pile removal (de-piling or extraction) is important to maintain ground stability, avoid settlement, and preserve soil structure, therefore all piles should be left in situ during and after decommissioning.	does not intend to submit the Detailed Arboricultural Impact Assessment and Arboricultural Method Statement as standalone certified documents as they are already secured and certified as part of the Environmental Statement. However, as set out in the 6.3 ES Volume 3, Appendix 10-1 Arboricultural Impact Assessment and Outline Arboricultural Method Statement [APP-206] an Arboricultural Impact Assessment and Arboricultural Method Statement will be produced prior to decommissioning. This is secured in Table 4 of the Outline Decommissioning Strategy [REP1-100] .

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
WCD1-023	Arboriculture	3.1 Draft Development Consent Order (Rev 2) [REP1-007] Schedule 12 – Hedgerows to be Removed	3.16. In terms of the content of Schedule 12, aside from the correction to the title of Part 2, there appears to have been no revisions to the contents of Part 1 and 2. Critically, there has been no reduction in the number of hedgerows listed and no refinements in terms of the extents of hedgerow specified for removal in either Part 1 or 2 as has been requested by the council. As such, although Article 40 paragraph (4) has been amended to stipulate that hedgerow can be removed to the extent set out in the EPMS (which contains the Hedgerow Removal Plan), rather than the LEMP, the council remains concerned regarding the scope of Part 1 and 2 of Schedule 12 given that it effectively lists every hedgerow, and the associated entire approximate lengths, within the Order Limits.	While Schedule 12 (Hedgerows to be removed) to the Draft Development Consent Order (DCO) [REP1-007] does list every hedgerow where removal may be required, this is subject to Article 40(4) which provides that the undertaker may only remove the hedgerows listed to the extent set out in the Outline Ecological Protection and Mitigation Strategy (EPMS) [REP1-106] . The Outline EPMS [REP1-106] is in turn secured by Requirement 8 within Schedule 2 (Requirements) and, as such, breach of these measures would be an offence. This approach is required in advance of detailed design in order to allow the Applicant flexibility within the parameters set by the Outline EPMS [REP1-106] . The final EPMS and, by extension, the extent of removal in respect of the hedgerows listed in Schedule 12, will be subject to the approval of

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				<p>Wiltshire Council in consultation with the relevant statutory nature conservation body. The Applicant intends to include a clarificatory footnote within Schedule 12 in the next iteration of the Draft DCO [REP1-007].</p> <p>Please also refer to DCO1.27 in the Applicant's Response to the Examining Authority's First Written Questions [EN010168/EXAM/9.29] submitted at Deadline 3.</p>
WCD1-024	Arboriculture	3.1 Draft Development Consent Order (Rev 2) [REP1-007] Schedule 12 – Hedgerows to be Removed	3.17. The council's Ecology Officer has previously raised concern with Part 2, Article 6, paragraph (3) which provides for the disapplication of the Hedgerows Regulations 1997, particularly given that Part 1 and Part 2 of Schedule 12 appears to list all hedgerows within the Order Limits. Although the 3.2 Explanatory Memorandum (Rev 2) [REP1-009] specifies that this approach has	The Applicant notes this comment. Please see response to WCD1-023 .

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			precedent in other DCOs and lists three examples, the council remains concerned and the revisions undertaken to the Draft DCO have not suitably addressed or overcome these concerns.	
WCD1-025	Transport and Access	3.1 Draft Development Consent Order (Rev 2) [REP1-007] Schedule 15 – Protective Provisions	3.18. Schedule 15 'Protective Provisions' will need a 'Part' added to provide protective measures for Wiltshire Council as the Local Highway Authority, which is currently absent. It is accepted that this is a matter under discussion with the Applicant which is not yet part of the draft DCO. It is envisaged this will be of similar form to the Protective Provisions already included for National Highways, with the existing Wiltshire Council s278 Agreement template used in part to formulate clause wording. It is noted the proposed National Highways Protective Provisions in place cover the following in part:	As agreed with Wiltshire Council on 14 April 2026, the Applicant has prepared draft protective provisions for the protection of the Local Highway Authority which have been shared with Wiltshire Council for comment. Subject to any comments on the draft protective provisions that Wiltshire Council might have, the Applicant intends to include these protective provisions in the Draft Development Consent Order (DCO) [REP1-007] at a future deadline. The Applicant is confident that the form of the protective provisions can be agreed with Wiltshire Council prior to the close of the Examination.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
WCD1-026	Transport and Access	3.1 Draft Development Consent Order (Rev 2) [REP1-007] Schedule 15 – Protective Provisions	<p><i>Prior Approvals</i></p> <ul style="list-style-type: none"> The need to obtain detailed design technical approval of the highway works prior to commencement, including Stage 1-2 Road Safety Audits. It also requires the proposed 'Scheme of Traffic Management' to undertake the highway work to be submitted and approved. 	<p>The Applicant makes note of this comment. Please see responses to WCD1-012 and WCD1-025.</p> <p>Section 2.3 of the Outline Construction Traffic Management Plan (CTMP) [REP1-112] submitted at Deadline 1 includes the need to obtain detailed design technical approval of the highway works prior to commencement, including Stage 1-2 Road Safety Audits. It also states that A programme for the works, method statement and any traffic management proposals will be submitted for approval.</p> <p>The preparation, approval and implementation of the final CTMPs, substantially in accordance with the Outline CTMP [REP1-112], are secured through Requirement 15 of Schedule 2 of the Draft Development Consent Order [REP1-007].</p>

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
WCD1-027	Transport and Access	3.1 Draft Development Consent Order (Rev 2) [REP1-007] Schedule 15 – Protective Provisions	<p><i>Construction of the Cable Works and Highway Works</i></p> <ul style="list-style-type: none"> • Need for compliance with National Highways' road space booking procedures when booking road space on the strategic road network prior to and during the carrying out the road works or cable works. • Requirement for inspections of the ongoing and completed highway works. 	<p>In respect of the local highway network, Section 2.3 of the Outline Construction Traffic Management Plan [REP1-112] submitted at Deadline 1 includes the need to contact Wiltshire Council to book road space prior to any works undertaken in the public highway.</p> <p>The preparation, approval and implementation of the final CTMPs, substantially in accordance with the Outline CTMP [REP1-112], are secured through Requirement 15 of Schedule 2 of the Draft Development Consent Order [REP1-007].</p> <p>In relation to the strategic highway network, the Applicant has included protective provisions for National Highways as Part 5 of Schedule 15 to the draft Development Consent Order [REP1-007]. The protective provisions are close to agreement</p>

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				and provide National Highways is satisfied provided it with necessary oversight and control of works that may affect the strategic highway network.
WCD1-028	Transport and Access	3.1 Draft Development Consent Order (Rev 2) [REP1-007] Schedule 15 – Protective Provisions	<i>Payments</i> <ul style="list-style-type: none"> Provision for design checking and supervision fee payments. 	Please refer to WCD1-012 and WCD1-025, above.
WCD1-029	Transport and Access	3.1 Draft Development Consent Order (Rev 2) [REP1-007] Schedule 15 – Protective Provisions	<ul style="list-style-type: none"> <i>Certification of Works</i> Provision for the issue of a Provisional Certificate of Completion and a Final Certificate, with an intervening 'Defects' period. 	Please refer to WCD1-012 and WCD1-025, above.
WCD1-030	Transport and Access	3.1 Draft Development	3.19. The Protective Provision requirements included for National	Please refer to WCD1-012, which explains how an agreement can be

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
		<p>Consent Order (Rev 2) [REP1-007]</p> <p>Schedule 15 – Protective Provisions</p>	<p>Highways include the need for a Bond or Surety based on the estimated full cost of the highway costs and a contingency allowance. Furthermore, an 'Indemnity' clause is also included whereby the undertaker fully indemnifies National Highways from and against all costs, claims, expenses, damages, losses and liabilities suffered by National Highways arising from, or in connection to the construction, maintenance or use of the road works. In short most, if not all, of these provisions are typically included within the standard Wiltshire Council s278 template, although this goes further in discussing road space booking requirements and matters linked to 'Permits' which are not. It would thus seem entirely reasonable for Protection Provisions covering Wiltshire Councils' highway</p>	<p>entered into with any street authority, including the relevant highway authority. Such an agreement could make equivalent provision to what would typically be included in a section 278 agreement; however such an agreement would be entered into under article 15 of the Order reflecting that the highway works will be carried out pursuant to powers in the Order and not under the Highways Act 1980.</p>

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			interests to be added to Schedule 15.	
WCD1-031	Transport and Access	3.1 Draft Development Consent Order (Rev 2) [REP1-007] Schedule 15 – Protective Provisions	3.20. The council is in discussions with the Applicant with the intention for the Protective Provisions for the benefit of the Local Highway Authority to be included within the draft DCO to be submitted at Deadline 3.	Please refer to WCD1-025, which confirms that protective provisions for Wiltshire Council as highway authority are being discussed.
WCD1-032	Transport and Access	3.1 Draft Development Consent Order (Rev 2) [REP1-007] Schedule 16 – Procedure for the Discharge of Requirements	3.21. The council welcomes the extension to the period for the discharge of applications from eight to ten weeks in 2.(2). However, this does not reflect the time period that the council requested the Applicant to include (as contained within correspondence dated 15 April 2026), nor does it reflect the discharge period in other made solar DCO's. The council considers that the period for discharge should	The Applicant considers that the ten week period for the Council to respond to applications to discharge Requirements is suitable, balancing the need for the Council to have sufficient time to consider the application properly, with the efficient delivery of the Scheme which is critical national priority infrastructure. The Applicant notes that Appendix 1 to the Planning Inspectorate's Advice Note 15: Drafting Development

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			be twelve weeks, noting that the determination period in the Cottom Solar Project DCO was 13 weeks.	Consent Orders, which consists of standard drafting for dealing with the procedure for discharge of certain approvals, provides for only 42 days (6 weeks) for the application to be determined.
WCD1-033	Transport and Access	3.1 Draft Development Consent Order (Rev 2) [REP1-007] Schedule 16 – Procedure for the Discharge of Requirements	3.22. Additionally, as previously advised to the Applicant (as contained within correspondence dated 15 April 2026), the council considers that the period for requesting further information should be extended to 20 working days in 3.(2), which would be in line with the Mallard Pass Solar Farm DCO.	<p>The Applicant considers that the period of 15 working days for the Council to request further information is appropriate. It remains available to the Council, should it identify at a later date that it does not have sufficient information to approve an application, to refuse that application and provide as grounds that there was sufficient evidence.</p> <p>The timescale helps ensure that applications are looked at promptly, consistent with the nationally significant and nature of the Scheme.</p> <p>It is also noted that Appendix 1 to the Planning Inspectorate's Advice</p>

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				Note 15: Drafting Development Consent Orders, provides as standard drafting that a request for further information should be made within 10 business days.
WCD1-034	Transport and Access	3.1 Draft Development Consent Order (Rev 2) [REP1-007] Schedule 16 – Procedure for the Discharge of Requirements	3.23. As per the council's original comments on the draft DCO, as contained within the council's Relevant Representation [RR-4934], the council requires the following additional wording to be included against each numerical charge within Clause 5 to state "or the fees applicable at the time of application by the Applicant". This is due to the extended time period in which applications for discharge will be made given the scheme's stated operational life of 60 years.	The fees proposed are consistent with those widely included in made Solar DCOs. The Applicant considers that the fees proposed are reasonable and proportionate. The Applicant has updated paragraph 5 to confirm that the fee relating to the application to discharge the decommissioning is the fee applicable at the time the application for the discharge of requirement 20 is made for 'the carrying out of any operations not coming within any of the above categories' listed as item 11(2) of the table in Part 2 (Scale of Fees) of Schedule 1 to the Town and Country Planning (Fees for Applications, Deemed Applications,

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				Requests and Site Visits) (England) Regulations 2012.
WCD1-035	Transport and Access	3.1 Draft Development Consent Order (Rev 2) [REP1-007] Schedule 16 – Procedure for the Discharge of Requirements	3.24. Furthermore, the council maintains, as per its Relevant Representation, that the Applicant should be required to undertake pre-submission consultation with the local planning authority and all required consultees on all proposed documents for discharge. The Applicant should also maintain a Register of Requirements to alert the public, community and / or other stakeholders of the status of the documents to allow visibility of the approved documents. The council considers that this should be included, and a separate Requirement incorporated into the DCO within Schedule 2.	The Applicant does not agree that such a Requirement meets the necessary tests (please refer to WCD1-018) as it is not necessary and could not be drafted in a way that is sufficiently precise. It would be difficult to quantify within the draft DCO the degree and appropriate level of pre-consultation that is proportionate to the Requirement being discharged. Whilst a number of requirements specify named parties that must be consulted on the discharge of that requirement, it remains open to the Council to consult more widely. It should also be noted that failing to consult prior to seeking the discharge of a Requirement is at the Applicant's risk, as there may be an increased chance of rejection or requests for further

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				<p>information, meaning the Applicant is commercially incentivised to front-load issues as much as possible to ensure a streamlined discharge purpose.</p> <p>Finally, as noted in WCD1-018, section 120 of the Planning Act 2008 makes it clear that Requirements are equivalent in nature to planning conditions. Planning conditions are not subject to pre-submission consultation requirements. There is no justification for this to be mandated in relation to discharge of the requirements.</p> <p>A separate requirement to maintain a public Register of Requirements is also not considered to be that meets the necessary tests to be captured within Schedule 2. In any event, to the extent that the public and other stakeholders will continue to be informed regarding relevant matters of the Scheme as</p>

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				it progresses, this would be through the Community Liaison Group under Requirement 4, and the consultation mechanisms for the discharge of requirements and the development of detailed management plans.
WCD1-036	Consultation and Engagement (Lands)	Book of Reference (Rev 2) [REP1-011]	<p>4. 4.3 Book of Reference (Rev 2) [REP1-011]</p> <p>4.1. It is acknowledged that the Rev 2 Book of Reference was submitted by the Applicant at the same time as the council's comments on it as contained within its Written Representation [REP1-138]. Therefore, the council does not seek to repeat the comments made in that response in order to allow the Applicant an opportunity to respond.</p>	The Applicant notes this comment.
WCD1-037	Consultation and Engagement (Lands)	Book of Reference (Rev 2) [REP1-011]	<p>4.2. However, in reviewing the Rev 2 version of the Book of Reference, the council has noted that parcel 14-006a was added to the Book of</p>	The Applicant acknowledges, and have provided responses directly to each plot below

Reference	Theme	Issue	Comments/Issues Raised				Applicant's Response
			Reference. As part of this review, the council has also reconsidered parcels 14-009 and 14-010 and therefore the narrative in relation to these 2 parcels has been amended.				
WCD1-038	Consultation and Engagement (Lands)	Book of Reference (Rev 2) [REP1-011]	4.3. As a consequence, the council has provided its response in the same format as that within its Written Representation to aid review.				The Applicant acknowledges, and have provided responses directly to each plot below
WCD1-039	Consultation and Engagement (Lands)	Book of Reference (Rev 2) [REP1-011]	Plan Reference	Rights Claimed	Temporary or Permanent Rights Claimed	Owner or Occupier (as local highway authority)	N/A
WCD1-040	Consultation and	Book of Reference	14-006a	Acquire right to use / carry	Permanent	Maintainable highway (see	The Applicant after diligent inquiry, identified the council as the local Highway Authority

Reference	Theme	Issue	Comments/Issues Raised				Applicant's Response
	Engagement (Lands)	(Rev 2) [REP1-011]		out works		Figure 8 Thingl ey Overbr idge within Written Repres entatio n) and partiall y within legal title	
WCD1-041	Consultation and Engagement (Lands)	Book of Reference (Rev 2) [REP1-011]	14-009	Acquir e right to use / carry out works	Possibl y both	Maintai nable highwa y (see Figure 8 Thingl ey Overbr	The Applicant after diligent inquiry, identified the council as the local Highway Authority

Reference	Theme	Issue	Comments/Issues Raised				Applicant's Response
						idge within Written Representation) and partially within legal title	
WCD1-042	Consultation and Engagement (Lands)	Book of Reference (Rev 2) [REP1-011]	14-010	Acquire right to use / carry out works	Possibly both	Maintainable highway (see Figure 8 Thingley Overbridge within Written Representation)	The Applicant during diligent inquiry has identified that the council are not an interested party within plot 14-010, as spatially, this plot falls outside of the adopted highways data provided by the council

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
WCD1-043	Ecology and Biodiversity	ES Volume 1 Chapter 9 Ecology (Rev 2) [REP1-015] Other Neutral Grassland	<p>5. 6.1 ES Volume 1 Chapter 9 Ecology (Rev 2) [REP1-015]</p> <p><u>Other Neutral Grassland</u></p> <p>5.1. In respect of other neutral grassland (ONG), it is noted that revisions to Table 9-8 and Paragraph 9.10.100 indicate a reduction in the estimated area of ONG present within the cable route corridor from 15.44 ha as detailed in the last iteration of ES Chapter 9, to 3.06 ha in the Rev 2 iteration submitted at Deadline 1.</p>	<p>The Applicant notes this comment. The extent of other neutral grassland (ONG) habitat present within the Cable Route Corridor was reduced in ES Volume 1, Chapter 9: Ecology and Biodiversity (Rev 2) [REP1-015] submitted at Deadline 1 to reflect the results of UK Habitat Classification surveys completed following submission of the DCO application. In the first iteration of ES Chapter 9 [APP-061], habitat type in un-surveyed areas of the Cable Route Corridor were estimated on a precautionary basis, with grassland habitat assumed to comprise ONG.</p>

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
WCD1-044	Ecology and Biodiversity	ES Volume 1 Chapter 9 Ecology (Rev 2) [REP1-015] Ditches and Watercourses – Construction Phase Impacts	<u>Ditches and Watercourses – Construction Phase Impacts</u> 5.2. In terms of construction phase impacts on ditches and watercourses, it is noted that the revised iteration of ES Chapter 9 details in Paragraph 9.10.145 that two additional new permanent culverts for access across 'wet' ditches are proposed in the Solar PV Sites compared to the previous iteration of ES Chapter 9. As such, five new permanent culverts across 'wet' ditches, each approximately 6m wide, are now proposed in the Solar PV Sites and should be given due consideration in terms of the impact assessment. Three are proposed at locations within Lime Down D, one at a location in Lime Down B, and one in Lime Down C. Paragraph 9.10.145 specifies that the culverts will be designed so that the flow of water through the channel is not impeded with the	The Applicant notes this comment. Potential impacts arising from the construction of new access, including habitat loss and fragmentation, are described in Paragraph 9.8.3 of ES Volume 1, Chapter 9: Ecology and Biodiversity (Rev 2) [REP1-015]. Paragraph 9.10.45 sets out how a very small proportion (less than 0.2%) of the existing network of ditch habitat will be lost due to the creation of new permanent culverts. Paragraph 9.10.148 also highlights how the short width of any new permanent crossing is typically representative of existing culverts and land bridges elsewhere within the ditch network, and that water will be able to flow through any new culvert, meaning significant fragmentation impacts will be avoided. With reference to the five new permanent culverts at 'wet' ditches

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			<p>base of the culvert being set beneath the existing channel bed and it sets out that less than 0.2% of the overall wet ditch / watercourse network will be impacted by the construction of new accesses, however it completely omits any discussion regarding the potential for adverse effects on this ecologically important habitat. Nonetheless, the same paragraph goes on to discuss how several other new culverts for access proposed at dry or seasonally inundated ditches within the Solar PV Sites are not expected to have an impact on the quality of the ditch network or its value to wildlife and how three new proposed non-vehicular crossings for permissive paths are not expected to result in adverse impacts on the ditch network or wildlife present. It is unclear why there has been no meaningful discussion regarding the potential for adverse impacts</p>	<p>at Lime Down B, C and D, a description of the habitats at each location is provided with the ES Volume 3, Appendix 9-9 Watercourse Crossing Schedule [REP1-126]. The crossing at Lime Down B is labelled OW31, the crossing at Lime Down C is labelled OW28, and those within Lime Down D are labelled OW22, OW29 & OW30 in Table 1 of this document. As described in Paragraph 3.2.7 of ES Volume 3, Appendix 9-1: Ecological Baseline Report (Rev 2) [REP1-083], ditches are classified as 'wet' ditches if they were considered likely to retain water for more than 4 months of the year. This includes ditches which are in fact dry for large parts of the year, for instance ditches which may regularly inundate with water over the typical wetter winter months, but which regularly dry out during the summer. For each of the crossing</p>

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			<p>arising from the five new permanent culverts for access, and yet there is some, albeit limited, discussion of the potential for impacts on wildlife and the quality of the ditch network in relation to the new culverts at dry ditches and for permissive paths. This is considered to be an omission, particularly as Paragraph 9.10.145 concludes there will be no significant effects on the extent and quality of the ditch network within the Solar PV Sites through the creation of new crossings. As such, it is considered that the potential for effects hasn't been fully assessed and that the conclusion has not been adequately evidenced or substantiated.</p>	<p>points in Lime Down D, the habitat descriptions clearly describe how the ditch at each location appears to be regularly dry and only hold water on a seasonal basis, which limits the potential for impacts on the quality of such habitats as a result of new culverts.</p> <p>Elsewhere in ES Chapter 9 [REP1-015], the potential impacts of new crossings on protected or notable wildlife species or species groups are discussed. For example, Paragraph 9.10.315 highlights how no new crossings for access are required at any watercourse identified as potentially suitable for fish. Paragraphs 9.10.212 and 9.10.307 further highlight how the creation of new culverts are not expected to result in fragmentation impacts, for riparian mammals and white-clawed crayfish respectively.</p>

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				The Applicant therefore considers the conclusion of no anticipated significant effects on the ditches or watercourses as a result of creation of new permanent culverts (as reached in ES Chapter 9 [REP1-015]) to be robust.
WCD1-045	Ecology and Biodiversity	ES Volume 1 Chapter 9 Ecology (Rev 2) [REP1-015] Aquatic Macrophytes	<u>Aquatic Macrophytes</u> 5.3. It is noted that the Rev 2 ES Chapter 9 now includes discussion regarding aquatic macrophytes and that the Schedule of Changes states that Table 9-9 was updated " <i>in relation to including aquatic macrophytes as a protected species.</i> " It is unclear why it references 'a protected species' – presumably this is an error. It is also noted that the Schedule of Changes indicates that the updates relating to aquatic macrophytes are in response to Wiltshire Council's Relevant Representation [RR-4934]. Whilst the inclusion of this new section pertaining to aquatic	The Applicant confirms that the reference to aquatic macrophytes as a protected species in the Schedule of Changes in ES Volume 1, Chapter 9: Ecology and Biodiversity (Rev 2) [REP1-015] is a minor error, and this should instead state ' <i>in relation to including aquatic macrophytes as an Important Ecological Feature</i> '. The Applicant does not propose to update the chapter at this stage as this is a minor error but will correct the reference should the chapter need to be updated going forwards. The Applicant confirms the inclusion of aquatic macrophytes as an Important

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			macrophytes is welcomed, in the interests of accuracy and clarity, it should be noted that contrary to the suggestions in the Schedule of Changes, these revisions were not recommended or discussed in the Council's Relevant Representation.	Ecological Feature within ES Chapter 9 [REP1-015] was on account of recommendation by the Environment Agency rather than Wiltshire Council.
WCD1-046	Ecology and Biodiversity	ES Volume 1 Chapter 9 Ecology (Rev 2) [REP1-015] Aquatic Invertebrates	<u>Aquatic Invertebrates</u> 5.4. The addition of new discussion regarding aquatic invertebrates, in addition to white-clawed crayfish, is noted.	The Applicant notes this comment.
WCD1-047	Ecology and Biodiversity	ES Volume 1 Chapter 9 Ecology (Rev 2) [REP1-015] White-Clawed Crayfish – Construction	<u>White-Clawed Crayfish – Construction Phase Impacts</u> 5.5. Paragraphs 9.10.304 – 9.10.309 discuss potential construction phase impacts on white-clawed crayfish (WCC). Given that Paragraph 3.3.100 of Appendix 9- 1 Ecological Baseline Report (Rev 2) [REP1-083] states suitable habitat for white-clawed	The Applicant notes this comment. With reference to the three new permanent culverts at 'wet' ditches at Lime Down D, a description of the habitats at each location is provided with the ES Volume 3, Appendix 9-9 Watercourse Crossing Schedule [REP1-126] and those within Lime Down D are labelled OW22, OW29 & OW30 in

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
		Phase Impacts	crayfish is present at the Gauze Brook and Gabriel's Well watercourses in Lime Down D and E as well as a small number of wet ditches directly connected to these watercourses, and assumes presence in the absence of survey, together with the fact that three new circa 6m wide permanent accesses for culverts are proposed across 'wet' ditches at Lime Down D, the council considers that the potential for adverse effects on WCC during construction may have been underestimated.	Table 1 of this document. As described in Paragraph 3.2.7 of ES Volume 3, Appendix 9-1: Ecological Baseline Report (Rev 2) [REP1-083] , ditches are classified as 'wet' ditches if they were considered likely to retain water for more than 4 months of the year. This includes ditches which are in fact dry for large parts of the year, for instance ditches which may regularly inundate with water over the typical wetter winter months, but which regularly dry out during the summer. For each of the crossing points in Lime Down D, the habitat descriptions clearly describe how the ditch at each location appears to be regularly dry and vegetated with predominantly coarse grasses and ruderal vegetation, indicative of ditches which regularly dry out. This habitat is not suitable for white-clawed crayfish, which are reliant on waterbodies which hold

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				permanent standing or running water, and as such white-clawed crayfish are highly unlikely to be impacted by the creation of new permanent culverts described in Paragraph 9.10.304 of ES Volume 1, Chapter 9: Ecology and Biodiversity (Rev 2) [REP1-015] .
WCD1-048	Ecology and Biodiversity	ES Volume 1 Chapter 9 Ecology (Rev 2) [REP1-015]	5.6. Furthermore, the lack of dedicated WCC survey at locations with suitable habitat means that it is not known whether WCC are in fact present or likely absent and has resulted in an incomplete baseline. In turn, this seems to have precluded any consideration in ES Chapter 9 regarding whether any further mitigation or compensation may be required over and above that proposed, or even whether a mitigation licence may be needed to facilitate any of the works at specific locations. Please refer to Natural England's standing advice on WCC.	The Applicant notes this comment. The rationale for not undertaking specific detailed surveys for white-clawed crayfish is set out in Paragraphs 3.3.100 and 3.3.102 of ES Volume 3, Appendix 9-1: Ecological Baseline Report (Rev 2) [REP1-083] , with the main rationale being that suitable habitat is limited across the Order Limits, and furthermore any such suitable habitat will be predominantly retained. Where suitable habitat for white-clawed crayfish may be impacted in discrete and localised locations, for instance for temporary crossing of ditches or

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				<p>watercourses within the Cable Route Corridor, the Applicant has committed to adopting mitigation measures designed to avoid impacts as far as reasonably possible as described in Paragraph 9.12.46 of ES Volume 1, Chapter 9: Ecology and Biodiversity (Rev 2) [REP1-015]. These measures are described in, and secured by, Method Statement 14 of the Outline Ecological Protection and Mitigation Strategy (EPMS) (Rev 2) [REP1-106]. Such measures include pre-commencement inspections by a suitably qualified Ecological Clerk of Works (EcoCoW) who will oversee works affecting impacted habitat. As set out in Paragraph 14.3.2 of the Outline EPMS [REP1-106], any requirement for further avoidance/mitigation measures and indeed any requirement for licensing will be evaluated by the</p>

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				EcoCoW. The Applicant has considered the Natural England standing advice on white-clawed crayfish in the design of the proposed avoidance/mitigation measures, and it is the Applicant's view that these measures are in accordance with this advice. It is therefore the Applicant's view that the assessment with regards to white-clawed crayfish in ES Chapter 9 [REP1-015] is robust.
WCD1-049	Hydrology, Flood Risk and Drainage	ES Volume 1 Chapter 11 Hydrology, Flood Risk and Drainage (Rev 2) [REP1-017] Surface Water Drainage Strategy	6. 6.1 ES Volume 1 Chapter 11 Hydrology, Flood Risk and Drainage (Rev 2) [REP1-017] Surface Water Drainage Strategy 6.1. In Paragraphs 11.1.7 to 11.1.9 , the inclusion of standalone drainage strategies for the BESS and substations provides improved clarity compared to previous iterations. However, the strategies remain high-level and do not clearly demonstrate integration	The Applicant notes Wiltshire Council's acknowledgement that the standalone drainage strategies for the BESS and substations provide improved clarity. The Applicant does not agree that the drainage strategy is deficient because detailed drainage designs are not fixed at this stage. The purpose of the DCO is to assess the Scheme within defined design parameters, consistent with the Rochdale Envelope / design

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			<p>with the wider drainage network. There is insufficient information on cumulative discharge rates, connectivity between systems and interaction with downstream receptors. Consequently, the revised information does not fully demonstrate that the overall drainage system will operate effectively without increasing flood risk.</p>	<p>envelope approach, and to secure the drainage principles that the detailed design must comply with.</p> <p>At this stage, the final BESS supplier and enclosure arrangement, transformer and switchgear layouts, foundation solution, finished levels, hardstanding extents, drainage components, lining requirements, hydraulic controls, outfall arrangements and detailed SuDS features have not been selected. These matters cannot reasonably be fixed now without removing the flexibility needed for detailed design, procurement and current best available technology within the assessed parameters.</p> <p>The submitted drainage strategy therefore seeks to agree and secure the drainage principles that the development must adhere to,</p>

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				<p>rather than present a final construction drainage design.</p> <p>For the BESS, the relevant principles include a formal sealed and isolatable drainage system, attenuation and controlled discharge during normal operation, automatic isolation during an incident, no uncontrolled discharge during incident conditions, retained water testing and active post-incident management. These principles are set out in Firewater Containment and Drainage Strategy – Lime Down D Battery Energy Storage System [REP1-124]. For the substations, the relevant principles include source containment within bunded transformer and plant areas, associated isolation arrangements, protection of the wider substation drainage system from contamination, inspection and testing of retained water, and</p>

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				<p>tanker removal where required. These principles are set out in the Standalone Firewater Containment and Drainage Strategy – Lime Down Substations [REP1-125]. Drainage from formal impermeable infrastructure is secured through Requirement 11: Surface Water Drainage of the Draft DCO [REP1-007]. Construction water management is secured through Requirement 13: Construction Environmental Management Plan and the Outline CEMP [REP2-019]. Operational inspection and maintenance are secured through Requirement 14: Operational Environmental Management Plan and the Outline OEMP [REP2-021].</p>
WCD1-050	Hydrology, Flood Risk and Drainage	ES Volume 1 Chapter 11 Hydrology, Flood Risk	6.2. The reduction of runoff to 70% of greenfield rates is supported and aligns with Lead Local Flood Authority (LLFA) policy	The Applicant notes Wiltshire Council's support for the commitment to restrict runoff to 70% of greenfield rates.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
		and Drainage (Rev 2) [REP1-017] Surface Water Runoff Rates	expectations. However, this commitment is not supported by sufficient technical evidence. There is no information provided on the basis of calculation, storm durations, or sensitivity to climate change scenarios. This limits confidence in the robustness of the proposed runoff control.	The Applicant does not agree that the commitment is unsupported. The 70% greenfield restriction is reported in the site-specific Flood Risk Assessments (FRA) & Drainage Strategies provided in ES Volume 1, Appendices 11-1 to 11-9 [REP1-037 to REP1-054] for formal impermeable infrastructure areas where controlled discharge is required. For example, ES Volume 3, Appendix 11-6: Flood Risk Assessment and Drainage Strategy - Lime Down D / BESS [REP1-047] , Section 3.3, Table 1 and paragraph 3.3.2 identify the existing runoff rate and proposed restricted discharge rate for the BESS Area. Paragraph 3.3.2 confirms a proposed discharge rate of 8.64 l/s, providing a 30% betterment to the existing 1 in 2-year rate, equivalent to restriction to 70% as advised by Wiltshire Council LLFA.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				<p>Section 3.4 and Table 2 of ES Volume 3, Appendix 11-6 [REP1-047] then identify the attenuation storage parameters, including the proposed discharge rate, impermeable area, flow control device and estimated storage volume for the 1 in 100-year plus climate change event. The attenuation volumes are noted as indicative at this stage and are to be verified at detailed design.</p> <p>This is the appropriate DCO-stage approach. The application provides the drainage basis and secured design parameters, while final calculations, contributing areas, storm durations, hydraulic controls and climate change sensitivity will be confirmed through detailed drainage design once the final infrastructure layout and technology selection are known.</p>

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				That detailed design is secured through Requirement 11: Surface Water Drainage of the Draft DCO [REP1-007] . Panelled areas are separate from these formal drainage systems. They remain permeable and are not treated as impermeable hardstanding.
WCD1-051	Hydrology, Flood Risk and Drainage	ES Volume 1 Chapter 11 Hydrology, Flood Risk and Drainage (Rev 2) [REP1-017] Attenuation Design	<u>Attenuation Design</u> 6.3. The use of attenuation features is appropriate; however, the design remains conceptual. There is no clear evidence of storage volumes, hydraulic controls, or exceedance routing. Without this information, it is not possible to determine whether the system is resilient to design events or extreme rainfall conditions.	The Applicant notes Wiltshire Council's support for the use of attenuation features. The Applicant does not agree that the absence of final storage volumes or final hydraulic control details at this stage makes the strategy inadequate. Storage volumes and flow controls depend on the final technology, equipment footprint, hardstanding areas, levels and detailed drainage layout. Those details will be fixed through detailed design, not at this stage of the DCO process.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				<p>The submitted documents secure the design principles and parameters that the detailed design must meet. Formal drainage areas will be designed to the secured discharge restrictions, including the 70% greenfield rate commitment where required, and attenuation for the 1 in 100-year plus climate change event.</p> <p>Storage volumes, hydraulic controls and exceedance routing will be confirmed through the detailed drainage design under Requirement 11: Surface Water Drainage of the Draft DCO [REP1-007]. For the BESS, Firewater Containment and Drainage Strategy – Lime Down D Battery Energy Storage System [REP1-124] confirms the performance principles for incident containment, including full containment during an incident, automatic isolation, no</p>

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				<p>uncontrolled discharge, and post-incident testing and management.</p> <p>For the substations, the Standalone Firewater Containment and Drainage Strategy – Lime Down Substations [REP1-125] confirms that incident containment is provided at source within banded transformer and plant areas, with associated isolation arrangements, rather than relying on the wider substation drainage system as the containment volume.</p>
WCD1-052	Hydrology, Flood Risk and Drainage	<p>ES Volume 1 Chapter 11 Hydrology, Flood Risk and Drainage (Rev 2) [REP1-017]</p> <p>Downstream Impact Assessment</p>	<p><u>Downstream Impact Assessment</u></p> <p>6.4. The assessment does not demonstrate that receiving watercourses have sufficient capacity to accommodate controlled discharge rates. There is an absence of hydraulic modelling or evidence of downstream constraints. As such, it has not been demonstrated that the</p>	<p>The Applicant does not agree that a separate downstream capacity assessment or receiving watercourse hydraulic model is required.</p> <p>Panelled areas remain permeable, are not positively drained to watercourses and do not create a new formal drainage catchment. This position is addressed in detail</p>

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			<p>scheme will not increase flood risk beyond the site boundary.</p>	<p>in Applicant's Response to Lead Local Flood Authority on Hydraulic Modelling Requirements [REP2-045], which explains why panelled areas should not be treated as connected impermeable hardstanding and why blanket field-scale hydrological modelling is not required.</p> <p>The relevant controls for panelled areas are soil protection, vegetation establishment, retention of existing overland flow routes and management of compaction. These factors are management-dependent variables, not fixed drainage infrastructure, and are therefore controlled through secured construction, soil and operational management measures rather than by modelling assumed future ground conditions. Formal impermeable infrastructure, including the BESS, substations</p>

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				<p>and other hardstanding areas, is assessed separately within the site-specific FRA & Drainage Strategy [REP1-037 to REP1-054]. These areas will be drained in accordance with the drainage hierarchy, with attenuation and controlled discharge where required.</p> <p>For example, ES Volume 3, Appendix 11-6: Flood Risk Assessment and Drainage Strategy - Lime Down D / BESS [REP1-047], Section 3.3 and Section 3.4 identify the restricted discharge rate and attenuation storage basis for the BESS Area. The proposed discharge rate of 8.64 l/s provides a 30% betterment to the existing 1 in 2-year rate, equivalent to restriction to 70% of the existing rate, with attenuation storage estimated for the 1 in 100-year plus climate change event. The parts of the Scheme that could</p>

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				otherwise create faster runoff are therefore controlled to restricted rates relative to the equivalent baseline condition. On that basis, there is no uncontrolled increase in discharge that would require additional downstream capacity modelling.
WCD1-053	Hydrology, Flood Risk and Drainage	ES Volume 1 Chapter 11 Hydrology, Flood Risk and Drainage (Rev 2) [REP1-017]	<u>Construction Pollution Control</u> 6.6. The identification of washdown and refuelling areas on impermeable surfaces away from watercourses is welcomed. These measures follow good practice and are considered effective in minimising pollution risks, subject to appropriate implementation via the Construction Environmental Management Plan (CEMP).	The Applicant notes that this issue is agreed. The identified construction pollution control measures are secured through Requirement 13: Construction Environmental Management Plan of the Draft DCO [REP1-007] and the Outline CEMP [REP2-019] . The detailed CEMP will include the Water Management Plan, temporary drainage arrangements, washdown and refuelling controls, sediment controls, water quality monitoring and pollution prevention measures required for construction.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
WCD1-054	Hydrology, Flood Risk and Drainage	ES Volume 1 Chapter 11 Hydrology, Flood Risk and Drainage (Rev 2) [REP1-017] Foul Water Management	<u>Foul Water Management</u> 6.7. The use of sealed systems is supported as it removes direct pathways to receptors. However, the long-term performance of such systems is dependent on management and maintenance procedures, which introduces a degree of uncertainty that must be controlled through enforceable measures.	<p>The Applicant notes Wiltshire Council's support for sealed foul water systems.</p> <p>The Applicant agrees that management and maintenance are relevant to long-term performance but does not agree that this creates an unresolved uncertainty.</p> <p>Construction welfare facilities will be self-contained and managed through the detailed CEMP. Operational foul water from substations will be stored in sealed tanks or cesspools, with periodic removal by tanker to an appropriately licensed disposal facility.</p> <p>No foul water discharge to ground, surface water drains or watercourses is proposed. Construction controls are secured through Requirement 13: Construction Environmental Management Plan, and</p>

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				operational management and maintenance controls are secured through Requirement 14: Operational Environmental Management Plan of the Draft DCO [REP1-007] .
WCD1-055	Hydrology, Flood Risk and Drainage	ES Volume 1 Chapter 11 Hydrology, Flood Risk and Drainage (Rev 2) [REP1-017] Flood Risk Baseline (SFRA Reference)	<u>Flood Risk Baseline (SFRA Reference)</u> 6.8. Reference to the Wiltshire Strategic Flood Risk Assessment is appropriate and ensures that the assessment reflects local flood risk context. This strengthens the baseline understanding.	The Applicant notes this comment.
WCD1-056	Hydrology, Flood Risk and Drainage	ES Volume 1 Chapter 11 Hydrology, Flood Risk and Drainage	<u>SuDS Strategy</u> 6.9. The application of SuDS principles is supported; however, details on treatment stages, flow paths, and integration across the	The Applicant notes Wiltshire Council's support for the application of SuDS principles. The Applicant does not agree that the SuDS strategy is inadequate

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
		(Rev 2) [REP1-017]	site are limited. It is not clear how the hierarchy of SuDS components will function collectively to manage runoff effectively.	<p>because final treatment stages and flow paths are not fixed at this stage.</p> <p>The DCO application secures the principles that the detailed drainage design must comply with. It does not need to fix the final drainage layout before the final technology, equipment footprints, levels, hardstanding extents and construction methodology are known.</p> <p>The Scheme does not require one integrated drainage network across all Solar PV Sites. Panelled areas remain permeable and will drain to ground. Formal impermeable infrastructure will be drained locally through SuDS-based systems, attenuation and controlled discharge where required.</p> <p>With regards to flow paths, the Applicant has updated ES Volume 2, Figures 11-1 to 11-8 (Rev 2)</p>

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				<p>[EN010168/APP/6.2] at Deadline 3 of examination to show flow direction on the mapping which will aid in understanding the direction of flow across the Sites.</p> <p>For the BESS, the drainage system is also required to operate in incident mode through isolation and containment, as set out in Firewater Containment and Drainage Strategy – Lime Down D Battery Energy Storage System [REP1-124]. For the substations, incident containment is provided at source within bunded plant areas, with the wider drainage system protected from contamination, as set out in the Standalone Firewater Containment and Drainage Strategy – Lime Down Substations [REP1-125]. The final treatment train, flow paths, maintenance access and hydraulic controls will be confirmed through</p>

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				detailed drainage design secured through Requirement 11: Surface Water Drainage of the Draft DCO [REP1-007] . Operational inspection and maintenance will be secured through Requirement 14: Operational Environmental Management Plan and the Outline OEMP [REP2-021] .
WCD1-057	Hydrology, Flood Risk and Drainage	ES Volume 1 Chapter 11 Hydrology, Flood Risk and Drainage (Rev 2) [REP1-017] Exceedance Flow Management	<u>Exceedance Flow Management</u> 6.10 There is limited reference to exceedance flow routing across the site. Without clearly defined exceedance pathways, it is not possible to confirm that flows during events exceeding design capacity will be safely managed without causing flooding on or off site.	The Applicant does not agree that exceedance flow management has been omitted, or that a separate scheme-wide exceedance model is required. Baseline exceedance pathways have been considered through the Environment Agency surface water flood risk mapping, existing topography, drainage features, ordinary watercourses and Manning's-based open-channel calculations where appropriate. This has informed the Scheme design, including retention of existing overland flow routes where

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				<p>practicable, permeable access tracks, avoidance of unnecessary obstruction to drainage pathways and the embedded mitigation set out in the assessment.</p> <p>Panelled areas remain permeable, are not positively drained to watercourses and do not create a new connected hard drainage catchment. The Applicant's position on panelled areas and the proportionality of further modelling is set out in Applicant's Response to Lead Local Flood Authority on Hydraulic Modelling Requirements [REP2-045].</p> <p>For formal drainage areas, including BESS, substations and other hardstanding areas, exceedance routing will be confirmed through detailed drainage design in accordance with relevant guidance and policy. This will include management of</p>

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				<p>the design events, including the 1 in 100-year plus climate change event, with runoff retained on site as far as practicable and exceedance flows routed safely where capacity is exceeded.</p> <p>This is secured through Requirement 11: Surface Water Drainage of the Draft DCO [REP1-007]. Construction-phase temporary drainage and runoff controls will be set out in the detailed CEMP, secured through Requirement 13: Construction Environmental Management Plan and the Outline CEMP [REP2-019].</p>
WCD1-058	<p>Hydrology, Flood Risk and Drainage</p> <p>Cumulative and In-Combination Effects</p>	<p>ES Volume 1 Chapter 11 Hydrology, Flood Risk and Drainage (Rev 2) [REP1-017]</p>	<p><u>Cumulative Impact</u></p> <p>6.11. The assessment does not clearly address cumulative impacts of the development, particularly in relation to multiple drainage catchments and phased implementation. Without this, there</p>	<p>The Applicant does not agree that cumulative flood risk and drainage effects have not been addressed.</p> <p>The Scheme has been assessed as a whole across its multiple drainage catchments. The existence of more than one</p>

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
		Cumulative Impact	is uncertainty regarding the overall impact on the receiving environment.	<p>drainage catchment does not create a cumulative flood risk effect in itself. Each part of the Scheme has been assessed according to the relevant drainage mechanism and receiving environment.</p> <p>Panelled areas remain permeable, are not positively drained to watercourses and do not create a new connected hard drainage catchment.</p> <p>The Applicant's position on panelled areas and the proportionality of further modelling is set out in Applicant's Response to Lead Local Flood Authority on Hydraulic Modelling Requirements [REP2-045]. Formal impermeable infrastructure areas are assessed separately within the site-specific FRA & Drainage Strategy [REP1-037 to REP1-054]. Where controlled discharge is required, these areas are managed through</p>

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				<p>local drainage systems, attenuation and restricted discharge, including restriction to 70% of equivalent greenfield rates for relevant events and attenuation for the 1 in 100-year plus climate change event. This means the elements of the Scheme that could otherwise generate faster runoff are controlled relative to the equivalent baseline condition.</p> <p>Phased implementation does not alter these drainage principles. Each phase will be required to comply with the same secured drainage and construction control framework. Construction-phase risks from temporary drainage, disturbed ground, sediment mobilisation and soil compaction will be controlled through the detailed CEMP and Water Management Plan, secured through Requirement 13: Construction Environmental</p>

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				<p>Management Plan and the Outline CEMP [REP2-019]. To the extent that Wiltshire Council's comment is intended to refer to cumulative effects with other local developments, those developments would also be subject to the same policy requirement not to increase flood risk off site and to provide their own drainage controls where required. The cumulative scenario is therefore not one in which multiple developments can lawfully discharge uncontrolled runoff to the receiving environment.</p> <p>On that basis, the Applicant does not agree that there is uncertainty regarding the overall impact on the receiving environment, or that further cumulative hydrological modelling is required.</p>

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
WCD1-059	Hydrology, Flood Risk and Drainage	ES Volume 1 Chapter 11 Hydrology, Flood Risk and Drainage (Rev 2) [REP1-017] Construction Phase Drainage	<u>Construction Phase Drainage</u> 6.12. The identification of temporary drainage measures is welcomed; however, the level of detail is limited. There is insufficient information on how runoff will be managed across construction phases, particularly in areas of disturbed ground.	<p>The Applicant notes Wiltshire Council's acknowledgement that temporary drainage measures have been identified.</p> <p>The Applicant does not agree that the level of detail is inadequate for this stage. Construction drainage cannot be fixed in full before final construction sequencing, compound locations, contractor methodology and phasing are confirmed. This is normal for a DCO scheme, where detailed construction methodology is developed within the assessed and secured parameters following consent.</p> <p>The DCO secures the required control framework. A Water Management Plan will form part of the detailed CEMP and will set out temporary drainage arrangements, sequencing, sediment controls, water quality monitoring, watercourse crossing controls,</p>

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				<p>buffer protection and contingency measures. This will include measures for managing runoff from disturbed ground during construction.</p> <p>Construction-phase drainage, runoff and pollution controls are secured through Requirement 13: Construction Environmental Management Plan of the Draft DCO [REP1-007] and the Outline CEMP [REP2-019]. Soil handling, reinstatement and compaction risks are also managed through the Outline Soil Resources Management Plan [APP-280] and Requirement 18: Soil Management of the Draft DCO [REP1-007].</p> <p>The Applicant therefore does not agree that further construction drainage detail is required at this stage.</p>

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
WCD1-060	Hydrology, Flood Risk and Drainage	ES Volume 1 Chapter 11 Hydrology, Flood Risk and Drainage (Rev 2) [REP1-017] Overall Drainage Strategy Conclusion	<u>Overall Drainage Strategy Conclusion</u> 6.13. Whilst the Chapter provides improvements and a clearer narrative compared to earlier submissions, the proposals remain largely outline. The absence of detailed hydraulic evidence, integration of components, and downstream capacity assessment limits confidence that the Scheme will not increase flood risk.	The Applicant notes Wiltshire Council's acknowledgement that ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [REP1-017] provides improvements and a clearer narrative. The Applicant does not agree that the outline nature of the proposals prevents the conclusion that the Scheme would not increase flood risk. The DCO application assesses the Scheme within defined design parameters and secures the drainage principles that detailed design must meet. This is consistent with the Rochdale Envelope / design envelope approach used for NSIP assessment, where detailed layout, technology, supplier selection and construction methods are refined

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				<p>after consent within assessed parameters.</p> <p>Panelled areas remain permeable and are not formal drainage catchments. They are not positively drained to watercourses and do not create a new connected hard drainage system. The Applicant's position on panelled areas and the proportionality of further modelling is set out in Applicant's Response to Lead Local Flood Authority on Hydraulic Modelling Requirements [REP2-045]. Formal impermeable infrastructure is assessed separately within the site-specific FRA & Drainage Strategy [REP1-037 to REP1-054]. Where controlled discharge is required, drainage will be provided through SuDS-based systems, attenuation and restricted discharge, including restriction to 70% of equivalent greenfield rates for relevant events</p>

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				<p>and attenuation for the 1 in 100-year plus climate change event. The FRA appendices provide the drainage basis, including indicative discharge rates and attenuation storage parameters, with detailed verification secured through Requirement 11: Surface Water Drainage of the Draft DCO [REP1-007]. BESS incident drainage and containment principles are set out in Firewater Containment and Drainage Strategy – Lime Down D Battery Energy Storage System [REP1-124], including full containment during an incident, automatic isolation, no uncontrolled discharge, retained water testing and active post-incident management.</p> <p>Substation containment principles are set out in the Standalone Firewater Containment and Drainage Strategy – Lime Down</p>

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				<p>Substations [REP1-125], including source containment within bunded plant areas, associated isolation arrangements, protection of the wider drainage system from contamination, retained water testing and tanker removal where required.</p> <p>Construction and operational controls are secured through Requirement 11: Surface Water Drainage, Requirement 13: Construction Environmental Management Plan, Requirement 14: Operational Environmental Management Plan and Requirement 18: Soil Management of the Draft DCO [REP1-007]. The Applicant therefore does not agree that further hydraulic evidence, integration evidence or downstream capacity assessment is required to demonstrate that the</p>

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				Scheme will not materially increase flood risk.
WCD1-061	Transport and Access	ES Volume 1 Chapter 13 Transport and Access (Rev 2) [REP1-019]	<p>7. 6.1 ES Volume 1 Chapter 13 Transport and Access (Rev 2) [REP1-019]</p> <p>7.1. There have been no revisions made to Table 13-4, which sets out the assessed 'Sensitivity' classification of roads forming the construction routes to the solar PV sites. As such, previous comments [RR-4934] remain concerning the minor route to Lime Down area D from the A429. This still doesn't seem to be broken down into sufficient separate links in assessing receptor sensitivity. For example, whilst the part of the route between the A429 and the crossroads junction to the northeast of Hullavington might be agreed as 'Low' sensitivity, the onward route past Bradfield Cottages to Lime Down D access points 8, 9 and 20 is clearly more</p>	<p>The section of the construction route between Hullavington Crossroads and Bradfield Cottages does not include significantly different receptors to those on the section between the A429 and Hullavington Crossroads as per the Sensitivity Definitions provided in Table 13-3 of ES Volume 1, Chapter 13-1: Transport and Access [REP1-019]. This section of road has therefore been classified as 'Low' sensitivity.</p> <p>The potential impact on 'Road User and Pedestrian Safety', 'Severance', Non-Motorised User Amenity' and 'Fear and Indimidation' has been assessed in ES Volume 1, Chapter 13-1: Transport and Access [REP1-019], when the need for further assessment has been identified in accordance with the ISEP</p>

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			sensitive. Representations made by others have indicated that this part of the route is more widely used by pedestrian users routing between Hullavington and public rights of way (PRoW) to the northeast, where no footways exist. As such and based on the criteria set out in Table 13-3 , it might be expected that sensitivity here would be at least Medium / High, given daily HGV construction trafficking is expected to be high.	Guidelines and the specified rules relating to change in traffic flow.
WCD1-062	Transport and Access	ES Volume 1 Chapter 13 Transport and Access (Rev 2) [REP1-019]	7.2. It is noted that 'Impacts' considered and how these are assessed / graded under criteria set out in Table 13-6 to the Environmental Statement still exclude 'Highway Safety' per-se. However, minor roads subject to increases in HGV trafficking, and where two-way passage for two HGVs is limited to only specific passing places, is going to lead to increased safety risk if such	See response to WCD1-061. Regarding comments on severance, the increase in expected levels of daily HGV flows is assessed by means of the 'magnitude of impact' variable. This is then assessed against the receptor sensitivity which is a separate variable based on the Sensitivity Definitions provided in Table 13-3 of ES Volume 1 ,

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			<p>opportunities for passage are infrequent with large distances and no inter-visibility between them. It is accepted this could be covered and encompassed under 'Road User and Pedestrian Safety' where, as noted, ISEP Guidance isn't being applied but 'professional judgement' based on analysis in the Transport Assessment. As such, this is commented on in reviewing this latest document separately. It is noted that the 'Severance' criterion (ISEP) and impact rating is based on very district percentage range changes in HGVs, not just the change in overall traffic. Given the expected level of daily HGV construction trafficking on the route between Dyson RBT and Bradfield Cottages, how can it thus be the case that this route is classed as 'low' sensitivity throughout given that the existing 2-way average daily HGV volume at Bradfield</p>	<p>Chapter 13-1: Transport and Access [REP1-019].</p> <p>The potential impact on 'Road User and Pedestrian Safety', 'Severance', Non-Motorised User Amenity' and 'Fear and Intimidation' has been assessed in ES Volume 1, Chapter 13-1: Transport and Access [REP1-019], when the need for further assessment has been identified in accordance with the ISEP Guidelines and the specified rules relating to change in traffic flow. As noted, a road safety analysis has also been reviewed as part of ES Volume 3 Appendix 13-1: Transport Assessment [REP1-057 to REP1-059].</p> <p>As per paragraph 3.16 of the ISEP Guidance, caution needs to be observed when applying the specified severance thresholds as very low baseline flows on roads such as Bradfield Cottages and</p>

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			<p>Cottages (Table 13-17) is only 48. Similarly, the daily existing volume of 2-way HGV traffic on Alderton Road and Fosse Way is only 20. With regards to the latter, the HGV delivery predictions in Table 13.20 show an 'Average Day' number of expected 2-way HGV movements linked to Lime Down areas A-C of 32, so a 160% change.</p>	<p>Alderton Road are unlikely to experience severance impacts even with high percentage changes in traffic.</p>
WCD1-063	Transport and Access	ES Volume 1 Chapter 13 Transport and Access (Rev 2) [REP1-019]	<p>7.3. Table 13-20 shows the predicted number of HGV movements associated with the construction of the Lime Down solar PV sites, including the 400KV substation and the BESS on Area D. This overall number of HGV deliveries and movements appears to be unchanged from the previous version, so a total of 13,043 deliveries and so 26,086 2-way movements over the entirety of the 2-year construction period over all areas. Differences include a dis-aggregation of the substation /</p>	<p>The Applicant makes note of this comment.</p> <p>The trip generation calculations included in Table 13-20 of ES Volume 1 Chapter 13 Transport and Access (Rev 2) [REP1-019] also includes for a 50% uplift in daily trip generation for peak times. This 50% uplift has been taken forward as the daily trip generation and translates to 19,565 deliveries and 39,130 two-way movements.</p> <p>See response to WCD1-082-087 regarding HGV movement</p>

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			<p>BESS figures and critically the expected vehicle types, with the predominant vehicle type now expected to be 10m tippers delivering aggregate (2,865) and only 445 16.5m articulated HGV deliveries linked with substation units / cabling. These vehicles were all previously advised as being articulated HGVs (3,310). The other key change is division of the Lime Down D areas to 'West' and 'East', so some routing now assumed to take place via the direct A429 access (Access Ref 10). However, the 2-way 'peak' HGV trafficking to Lime Down D (West), so the Bradfield Cottages route is still expected to be 56. As now noted in the Wiltshire Council Written Representation [REP1-138] and indeed the first draft of the Statement of Common Ground (SoCG), the council does require more clarification and verification surrounding these HGV movement</p>	<p>estimates linked to the solar PV sites and substation / BESS installation, which demonstrates trip generations calculations are based on reasonable assumptions and evidence.</p> <p>Section 6.7 of the Statement of Need [REP1-085] gives details of the land use associated with large scale solar and confirms in paragraph 6.7.1 that this Scheme design falls within the range indicated by NPS EN-3. Module mounting structures logically therefore are also within the ranges used by other consented or operational solar farms. Total access track length is based upon the indicative site designs.</p>

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			<p>estimates linked to the solar PV sites and substation / BESS installation. Comments made in the Written Representation are re-iterated below for completeness:</p> <p><i>“The predicted volumes of HGVs expected during the construction phases for each of the Lime Down SF sites (A-E) is still a point of discussion, with some clarification sought on these estimates following DCO application document review. The supporting calculations undertaken for Modules and Mounting Structures for each Lime Down site have not been fully provided or verified by evidence from existing solar farm sites. For example, whilst the total number of assumed PV Modules for each of the Lime Down sites (A-E) has been provided, it is unclear how these quantities have been derived. The area occupied by</i></p>	

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			<p><i>panels on each site will be known (Works Area 1), but the density / ha assumed and how this compares with the assumptions adopted for other consented solar farm sites or those in operation is unknown. The same query applies to module mounting structures, as assumptions made regarding the type of mounting structures or foundations / supports are also absent. Similarly, aggregate volumes are not determined on a Lime Down site-by-site basis, or on what basis, so the total access track lengths and their width / depth of construction. It is further noted the 'waste' calculations account for only removal of packaging, so seemingly exclude any allowance for removal of excavated 'spoil' material associated with the construction of the access trackways, the construction compounds and the</i></p>	

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			<i>foundation bases for the BESS and 440kV and 132KV substations".</i>	
WCD1-064	Transport and Access	ES Volume 1 Chapter 13 Transport and Access (Rev 2) [REP1-019]	7.4. Any under-estimates in components or the need for the export of even some of the considerable spoil needed to construct the access tracks / compounds / bases could significantly increase the volume of predicted HGV movements needed over the construction period, so adding to the highway safety and indeed damage concerns. As such, Table 13-20 to the Environmental Statement Volume 1, Chapter 13 [REP1-019] is still not accepted by the council, until such time as these HGV estimates are duly considered to be sufficiently robust. The council's Highways Development Management Officer thus offers no comment on the flows on specific routes and expressly the expected average percentage changes in HGVs	<p>The Applicant makes note of this comment.</p> <p>The Applicant maintains that where baseline flows are low, any change in traffic flow will result in a large percentage change, but this will unlikely lead to a significant effect if the absolute numbers are considered low. One additional vehicle every 7 to 8 minutes is not considered significant, particularly given the existing link is not congested and traffic is free flowing. Moreover, there will be no additional HGV movements outside of the proposed delivery times specified at Section 3.4 of the Outline Construction Traffic Management Plan [REP1-112].</p> <p>Comments relating to trip generation estimates are provided in responses to WDC1-082 to</p>

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			<p>shown in Table 13.25. However, this table still shows HGV increases of 238-250% on Alderton Road / Fosse Way (Lime Down A-C), and 117% between 'The Street' at Hullavington and Bradfield Cottages (Lime Down D). In paragraph 13.10.33, it is stated that "<i>high percentage changes in HGVs typically reflect a low baseline number of HGVs. Real term numbers of HGVs are relatively low. For example, on Link 6, Alderton Road, the number of HGVs in the 2028 baseline is 20 per day. This increases to 70 during peak construction phases. Whilst an increase of 250% appears high, the actual increase of HGVs is 50. Where baseline flows are low, any change in traffic flow will result in a large percentage change, but this will not necessarily lead to a likely significant effect</i>". However, with planned deliveries taking place as</p>	<p>WDC1-087. This demonstrates trip generations calculations are based on reasonable assumptions and evidence.</p>

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			<p>advised between 9:30 and 16:30 to avoid the weekday peak periods, this level of increase would relate to a frequency of circa 7-8 HGVs per hour during the working day, or a movement every 7-8 minutes. This does not appear to be an insignificant effect or impact when the level of movement frequency is considered. If estimates are duly found to be low, this frequency could be even higher.</p>	
WCD1-065	Transport and Access	ES Volume 1 Chapter 13 Transport and Access (Rev 2) [REP1-019]	<p>7.5. Table 13-35, which also remains unchanged, shows the projected increases in overall flows and HGV volumes along the cable route corridor. As stated before, overall increases on certain minor roads are quite significant, with changes in HGV flows of >30% affecting a much greater proportion of minor roads where the cable route crosses. It is advised that HGV access will largely consist of 10m tipper trucks to construct the</p>	<p>The Applicant makes note of this comment and that the detailed layout of access points for 10 metre tipper trucks and AILs to the cable route corridor will be a matter for the technical approval of works by Wiltshire Council secured by the protective provisions to be included in Schedule 15 to the DCO.</p> <p>The swept path of a 10-metre tipper truck is shown at each cable route access location in Annex D of ES Volume 3 Appendix 13-1</p>

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			haul road and laydown areas, but AIL movements associated with cable drum deliveries will be needed over the length of the Grid Connection Cable works. Whilst more a matter to be agreed / approved as part of the temporary access works, it will need to be demonstrated to the Wiltshire Council Network Management team that passage for 10m tipper trucks can be safely accommodated along all the minor roads intended for access and, where AIL access is needed, that this is physically possible.	Transport Assessment (Rev 2) [REP1-057 and REP1-059] Annex H of ES Volume 3 Appendix 13-1 Transport Assessment (Rev 2) [REP1-057 and REP1-059] shows AIL turning movements at the critical points along the proposed AIL construction routes for the cable route corridor and demonstrates that access by AILs and HGVs is physically possible.
WCD1-066	Transport and Access	ES Volume 1 Chapter 13 Transport and Access (Rev 2) [REP1-019]	7.6. In paragraph 13.11.1, it is now stated in part that the Applicant will be committed to: " <i>Conduct a Stage 1 and Stage 2 Road Safety Audit at all access junctions to recommend additional safety measures at the access points</i> ". The council would seek more than that, so the	Section 2.3 of the Outline CTMP [REP1-112] submitted at Deadline 1 includes the need to obtain detailed design technical approval of the highway works prior to commencement, including Stage 1-2 Road Safety Audits. This would

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			<p>submission for Wiltshire Council's Highways approval of all detailed layout and construction drawings together with a supporting Stage 2 Road Safety Audit is needed as part of required 'Protective Provisions' in Schedule 15 to the DCO.</p>	<p>include the submission of detailed layout and construction drawings.</p> <p>The preparation, approval and implementation of the final CTMPs, substantially in accordance with the Outline CTMP [REP1-112], are secured through Requirement 15 of Schedule 2 of the Draft Development Consent Order [REP1-007].</p> <p>Please also refer to WCD1-025, WCD1-12, and WCD1-030, in relation to the agreement of prospective provisions with Wiltshire Council.</p>
WCD1-067	Noise and Vibration	ES Volume 1 Chapter 14 Noise and Vibration (Rev 2) [REP1-021]	<p>8. 6.1 ES Volume 1 Chapter 14 Noise and Vibration (Rev 2) [REP1-021]</p> <p>8.1. Although the noise calculations indicate that predicted sound levels at sensitive receptors remain unchanged, Tables 8 and 9 of ES Volume 3, Appendix 14-4: Noise Modelling [REP1-061] show that</p>	<p>The Applicant notes this comment and would like to provide further clarification. Both the raw baseline monitoring data and the interpretation and analysis thereof, as presented in ES Volume 3, Appendix 14-3: Baseline Noise Survey [APP-236], remains unchanged. However, the resulting</p>

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			the modelled baseline monitoring data has been revised. In particular, the thresholds for LOAEL and SOAEL have been increased for the operational and maintenance phases at 16 sensitive receptors, purportedly " <i>to accurately relate to the typical background sound levels.</i> "	typical background levels, presented in Table 1 of Appendix 14-3, had not be transposed correctly to Tables 8 and 9 of ES Volume 3, Appendix 14-4: Noise Modelling [APP-237] . Therefore Appendix 14-4; Noise Modelling [REP1-061] required an update to accurately reflect the typical background levels presented in Appendix 14-3. This does not change the outcomes previously reported with respect to likely significant effects.
WCD1-068	Noise and Vibration	ES Volume 1 Chapter 14 Noise and Vibration (Rev 2) [REP1-021]	8.2. Table 14-23 of Chapter 14: Noise and Vibration [REP1-021] further confirms that, as a consequence of these increased thresholds, the number of daytime sensitive receptors falling between LOAEL and SOAEL has decreased from 37 to 28.	The Applicant notes and agrees with this comment.
WCD1-069	Noise and Vibration	ES Volume 1 Chapter 14 Noise and	8.3. However, the meaning of " <i>accurately relate</i> " in this context is unclear. Furthermore, the	The Applicant accepts that further clarification is warranted and has

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
		Vibration (Rev 2) [REP1-021]	justification for amending the modelled baseline monitoring data at this stage of the application process is not explained and warrants clarification.	provided this in the response to WCD1-067 above.
WCD1-070 / 071	Soils and Agriculture	ES Volume 1 Chapter 17 Soils and Agriculture (Rev 2) [REP1-025]	<p>9. 6.1 ES Volume 1 Chapter 17 Soils and Agriculture (Rev 2) [REP1-025]</p> <p>9.1. With respect to ID 3.15.2 in Table 17-1, the Applicant is asked to confirm that option agreements have been agreed with all landowners within the option area for the scheme's lifetime.</p>	<p>The details of the individual lease terms were confidential. As confirmed during Issue Specific Hearing 1 (see [REP1A-012]), some of the leases do not run for the full 60-year operational period of the Scheme. In circumstances where the Applicant is unable to extend the term of a lease by agreement, the relevant part of the Scheme would be required to be decommissioned earlier than the maximum 60-year lifespan. Compulsory acquisition powers could not be used to extend these parts of the Scheme as the powers sought in the DCO are time limited and therefore in such circumstances, the relevant part of</p>

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				the Scheme would need to be decommissioned.
WCD1-072	Soils and Agriculture	ES Volume 1 Chapter 17 Soils and Agriculture (Rev 2) [REP1-025]	9.3. Wiltshire Council is pleased to see the updates to receptor sensitivity in Table 17-3 .	The Applicant notes that this issue is agreed.
WCD1-073	Landscape and Visual Impact	ES Volume 2 Figure 8-14 Baseline Photography and Photomontages – VP1-22 (Part 1) [REP1-033], VP23-24 (Part 2) [REP1-034] and VP45-CNL G (Part 3) [REP1-035]	<p>1. 10. 6.2 ES Volume 2 Figure 8-14 Baseline Photography and Photomontages – VP1-22 (Part 1) [REP1-033], VP23-24 (Part 2) [REP1-034] and VP45-CNL G (Part 3) [REP1-035]</p> <p>10.1. Whilst the panoramas are a useful tool in assessing the potential effects, it is not clear from the information provided in which fields the developments are proposed, although it is a relatively simple procedure to indicate this on photographs. The council does</p>	<p>The Applicant has provided the additional annotation to the viewpoint photographs to include the key features and information as suggested to help orientate the reader. 6.2 ES Volume 2 Figure 8-14 Baseline Photography and Photomontages [REP1-033 to REP1-035] has been revised and submitted at Deadline 1.</p> <p>The request by Wiltshire Council to identify panel fields, substations and BESS locations did not form part of the original request and these have not been added to ES Volume 2 Figure 8-14 Baseline</p>

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			not consider that it is their responsibility to explain how to represent development areas / features on viewpoint photographs, but needless to say, although the additional information is useful, the quality and ease of interpretation of the information provided remains lacking and is not overly helpful in interpreting visual effects.	Photography and Photomontages submitted at Deadline 1.
WCD1-074	Ecology and Biodiversity	ES Volume 2 Figure 9-1-13 to 9-1-24 Baseline Habitats Map – Cable Route Corridor [REP1-036]	<p>11. 6.2 ES Volume 2 Figure 9-1-13 to 9-1-24 Baseline Habitats Map – Cable Route Corridor [REP1-036]</p> <p>11.1 The Baseline Habitat Maps for the CRC have been resubmitted on account of the additional habitat survey data collated for the CRC. It is noted however, that the figures submitted at Deadline 1 have not been given updated drawing or revision numbers or dated so that it can readily be seen at a glance,</p>	The Applicant notes this comment. Any subsequent figure submissions will include appropriate revision numbers for ease of reference.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			that these figures comprise the latest iterations.	
WCD1-075	Ecology and Biodiversity	ES Volume 2 Figure 9-1-13 to 9-1-24 Baseline Habitats Map – Cable Route Corridor [REP1-036]	11.2. Wiltshire Council's Written Representation [REP1-138], should be referred to for discussion on the absence of habitat reference numbers on baseline habitats maps and the associated implications as these comments still stand and are pertinent to these submitted figures.	The Applicant notes this comment. A response to the Council's Written Representation (WC-065) on this matter was provided at Deadline 2 in 9.22 Applicant's Response to Written Representations [REP2-039] .
WCD1-076	Transport and Access	ES Volume 3 Appendix 13-1 Transport Assessment (Rev 2) [REP1-057 and REP1-059]	12. 6.3 ES Volume 3 Appendix 13-1 Transport Assessment (Rev 2) [REP1-057 and REP1-059] 12.1. As noted in previous comments [RR-4934], many parts of the supporting Transport Assessment simply mimic the content taken from it into Chapter 13 of the Environmental Statement [REP1-019]. As such, commentary is not replicated on points already raised above but focuses on	The Applicant makes note of this comment.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			supporting information solely in the Transport Assessment.	
WCD1-077	Transport and Access	ES Volume 3 Appendix 13-1 Transport Assessment (Rev 2) [REP1-057 and REP1-059]	12.2. With respect to Table 13-12 'Lime Down – Anticipated Construction Deliveries (HGV), please see comments on Table 13-20 of the ES Chapter 13 Transport and Access (Rev 2) above.	The Applicant makes note of this comment.
WCD1-078	Transport and Access	ES Volume 3 Appendix 13-1 Transport Assessment (Rev 2) [REP1-057 and REP1-059]	12.3 Previous Wiltshire Council Highways Development Management comments [RR-4934] on Annex C remain valid, so the 'Solar PV Sites Access Drawings (Ref: 1-20 inclusive)'. As stated then, these only show the swept paths for 16.5m articulated HGVs and 'indicative' black lines showing the necessary extent of the access width and bell-mouth, so assumed to be the position of new intended kerbing. These are not considered	<p>The Applicant makes note of this comment.</p> <p>To confirm the black lines shown on the drawings (Ref: 1-20 inclusive) in Annex C of ES Volume 3 Appendix 13-1 Transport Assessment (Rev 2) [REP1-057 and REP1-059] show the location of the new intended kerbing.</p> <p>It is accepted that the drawings are regarded as preliminary and that</p>

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			<p>sufficient in themselves for highway works approval, as there are no details of the new 'apron' construction, kerbing, 'tie-in' joints to the existing carriageway and, where drainage ditches are present, any new culverts or changes to existing. Visibility splays will need to be DMRB or MfS compliant as the road type and speed limit dictates, and 85th percentile speed surveys undertaken as required to evidence any reduction to 'Y' values below the required standard dictated by the posted speed limit. With Wiltshire Council Protective Provisions included in Schedule 15 to the DCO, it is accepted that detailed design approval could be included in a way that would be acceptable to the council, with this requirement extending to these access points listed in Schedule 7, Parts 1 and 2. In short, these drawings can only be regarded as</p>	<p>detailed design approval will be covered by Wiltshire Council Protective Provisions included in Schedule 15 to the Development Consent Order.</p>

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			'preliminary' or no more than 'approval in principle'.	
WCD1-079	Transport and Access Arboriculture	ES Volume 3 Appendix 13-1 Transport Assessment (Rev 2) [REP1-057 and REP1-059]	12.4 The council's Arboricultural Officers note that the existing track will be used for articulated HGV vehicles for Solar PV Sites: Accesses 13, 14 and 15 which are immediately adjacent to North Bincombe Wood. It is considered that use of this access track will have a long-term negative impact on this Protected Ancient Woodland. Therefore, to prevent any impact, the access track and access points should be located outside the 15 metre buffer.	The Applicant notes this comment. Following design discussions and taking Wiltshire Council comments into consideration, the Outline Construction Environmental Management Plan (OCEMP) [REP1-096] has been updated to include a 15m buffer for all works from North Bincombe Wood. The access road adjacent to North Bincombe Wood is no longer being used and a new construction access is to be constructed. Final alignment of the access track is to be confirmed following further design and engineering discussions.
WCD1-080	Transport and Access	ES Volume 3 Appendix 13-1 Transport Assessment (Rev 2) [REP1-057	12.5. Previous Wiltshire Council Highways Development Management comments [RR-4934] on Annex D also remain applicable. These show the 'Cable Route Corridor Access Drawings'	The Applicant makes note of this comment. It is accepted that the drawings are regarded as preliminary and that detailed design approval will be

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
		and REP1-059]	and, whilst most of these are temporary accesses for construction purposes only, the comments made in respect of the Solar PV site accesses are equally applicable. The drawings for each access show the swept paths associated with a 10.2m tipper and very indicative proposed kerb- lines to accommodate these. In short, there is an absence of construction detail whilst, in many cases, the Ordnance Survey background is very sketchy or almost non-existent. The lack of background makes it unclear whether drainage ditches are affected, and so any works associated with temporary piping necessary. It would be normal practice for a temporary construction access submission under s184 of the Highway Act to include detail drawings of the intended works, this on a topographical survey base as required. The council would see no	covered by Wiltshire Council Protective Provisions included in Schedule 15 to the draft DCO [REP1-007] . Please also refer to WCD1-025, WCD1-12, and WCD1-030, which reference protective provisions to be agreed with Wiltshire Council.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			reason to deviate from such requirements for the temporary access junctions needed along the cable route corridor. It would again be possible to write in the specific drawing requirements for temporary works into Wiltshire Council Protective Provisions; which is a requested addition to Schedule 15 of the DCO.	
WCD1-081	Transport and Access	ES Volume 3 Appendix 13-1 Transport Assessment (Rev 2) [REP1-057 and REP1-059]	12.6. Annex E shows the 'Solar PV Sites Trip Generation Calculations' for the construction phase. As noted in the Wiltshire Council Written Representation [REP1-138], the council still has key queries with some of the data presented and calculations as follows:	The Applicant makes note of this comment.
WCD1-082	Transport and Access	ES Volume 3 Appendix 13-1 Transport Assessment (Rev 2) [REP1-057	<ul style="list-style-type: none"> Whilst the total number of assumed PV Modules for each of the Lime Down sites (A-E) has been provided, it is unclear how these quantities have been 	The quantities of PV Modules for each of the Lime Down sites (A-E) is based on the areas to be occupied by panels and initial layouts and designs prepared by the Applicant. These densities are

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
		and REP1-059]	derived. The area occupied by panels on each site will be known (Works Area 1), but the density / ha assumed and how this compares with the assumptions adopted for other consented solar farm sites or those in operation is unknown. A degree of validation or 'proving' is needed to confirm this quantity is robust and not being underestimated.	comparable to other solar schemes. Please see the response to WCD1-063 regarding panel densities.
WCD1-083	Transport and Access	ES Volume 3 Appendix 13-1 Transport Assessment (Rev 2) [REP1-057 and REP1-059]	<ul style="list-style-type: none"> The same query applies to module mounting structures, as assumptions made regarding the type of mounting structures or foundations / supports are also absent. 	The quantities of Module Mounting Structures for each of the Lime Down sites (A-E) is based on the areas to be occupied by panels and initial layouts and designs prepared by the Applicant. These densities are comparable to other solar schemes.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				Please see the response to WCD1-063 regarding mounting structures.
WCD1-084	Transport and Access	ES Volume 3 Appendix 13-1 Transport Assessment (Rev 2) [REP1-057 and REP1-059]	12.7. In short, the number of PV Modules set out in the 'Components' sheet is not validated or verified by any evidence based on the coverage area of each the Lime Down PV sites. As the number of HGV deliveries is then based on what can be carried in a regular 40ft container, this quantum estimate of the PV Modules and how it has been derived is very important to know. It is a little unclear why the module mounting structures, which are presumably component items and needed for each PV Module, are expressed in tonnage and not unit numbers in the same way.	<p>The quantities of PV Modules and Module Mounting Structures for each of the Lime Down sites (A-E) is based on the areas to be occupied by panels and initial layouts and indicative designs prepared by the Applicant. These densities are comparable to other solar schemes. The quantities for mounting structures were then assessed in tonnes as this was the key metric for transporting. This was then calculated against the total amount of tonnes required for mounting structures in relation to the amount of Solar PV Panels.</p> <p>The Applicant has provided further information regarding modules at Deadline 3 in Applicant's response to Stop Lime Down</p>

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				Written Representation – Appendix D Transport Report [EN010168/EXAM/9.34] at 3.5.5, Table 3-1.
WCD1-085	Transport and Access	ES Volume 3 Appendix 13-1 Transport Assessment (Rev 2) [REP1-057 and REP1-059]	<p>12.8. Other concerns that could collectively add to the numbers of predicted HGVs are as follows:</p> <ul style="list-style-type: none"> • 'Waste' calculation still allows for only removal of PV Module and Module Mounting Structure packaging, so excludes any removal of excavated material associated with the construction of the access trackways, compound and the foundation bases for the BESS and 440KV and 132KV substations. This could be a significant amount of off-site disposal of spoil, unless it is being 	It has been assumed that any excavated material will remain 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. While it is anticipated that most of the spoil from the construction of access tracks etc. will remain on site, the calculations at Annex E of ES Volume 3, Appendix 13-1: Transport Assessment [REP1-057 and REP1-059] allow for general construction activities, including the removal of spoil, other construction waste and the

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			<p>assumed that all excavated material is reused on site / or transported offsite as required in the same tippers used for the incoming supply of aggregate. Paragraph 1.5.7 now states that <i>"The anticipated trips for general construction activities include fencing and landscaping activities. While it is anticipated that most of the spoil from construction of access tracks etc. will remain on site, the calculations allow a comfortable buffer for general construction activities, including the removal of spoil, other construction waste and the installation and removal of construction compounds"</i>. However, it does remain very unclear how the predicted 2,700 HGV</p>	<p>installation and removal of construction compounds.</p> <p>Calculations presented in Annex E of ES Volume 3, Appendix 13-1: Transport Assessment [REP1-057 and REP1-059] set out how HGV deliveries linked to fencing and general landscaping have been derived and how much allowance has been made for spoil.</p>

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			<p>deliveries linked to fencing and general landscaping have been derived from the Excel spreadsheet figures, and how much allowance is made within this for possible off-site disposal of spoil and so the percentage of the total volume of topsoil / subsoil excavation needed to construct the access trackways and bases.</p>	
WCD1-086	Transport and Access	ES Volume 3 Appendix 13-1 Transport Assessment (Rev 2) [REP1-057 and REP1-059]	<ul style="list-style-type: none"> The volume of aggregate needed to construct the BESS and substation bases is very significant and is shown to generate large numbers of HGV deliveries (2,865). It will thus be sensitive to any variation in the assumed construction depth, which is assumed to be 0.5m in the calculations. However, scheme description elsewhere 	<p>The area beneath the conversion units will be relatively small in area. The calculations presented in Annex E of ES Volume 3, Appendix 13-1: Transport Assessment (Rev 2) [REP1-057 and REP1-059] include a buffer for a further 50% uplift in all HGV construction trips, which comfortably accounts for any localised changes in depth such as this. It also unlikely that the entire</p>

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			identifies the conversion units sitting on a 0.8m layer of aggregate. Clarity is required as to which is correct.	area of the BESS and Substation will need to be surfaced.
WCD1-087	Transport and Access	ES Volume 3 Appendix 13-1 Transport Assessment (Rev 2) [REP1-057 and REP1-059]	<ul style="list-style-type: none"> Similarly, the volume of aggregate needed to construct the access trackways is also very significant and is shown to generate very large numbers of HGV deliveries (4,940). It will thus also be sensitive to any small variations in the stated construction depths, which are assumed to be only 0.3m for general access tracks and 0.5m for BESS access tracks in the calculations. However, Appendix 3-3 shows a typical depth of up to 0.65 for the BESS trackways. 	<p>The typical depth of the access tracks are shown in Appendix 3-3. 0.3 metres is a standard depth of general internal access tracks (subject to CBR value). This is a worst-case assumption, as most internal access tracks will not require aggregate and will spur off from the main internal tracks as grass tracks for maintenance purposes and access by 4x4 vehicles.</p> <p>A BESS access track ranges between 0.35 and 0.65 metres depending on the CBR value of the soil. A depth of 0.5 metres has therefore been taken as a reasonable assumption. Moreover, the calculations presented in</p>

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			Clarity is required as to which is correct.	Annex E of ES Volume 3, Appendix 13-1: Transport Assessment (Rev 2) [REP1-057 and REP1-059] include a buffer for a further 50% uplift in all HGV construction trips, which would comfortably accounts for any changes in depth to 0.65 metres if required.
WCD1-088	Transport and Access	ES Volume 3 Appendix 13-1 Transport Assessment (Rev 2) [REP1-057 and REP1-059]	12.9. Annex F now shows the 'Solar PV Sites Trip Generation Link Flows' during the construction phase. Mindful of the ongoing queries concerning the predicted number of HGV deliveries, the council's Highways Development Management Officer does not comment unduly on the HGV link flow diagrams in reviewing now. However, it is noted two 'sets' of flows have been produced based on the 50% Uplift daily HGV flows and 'Average' daily HGV flows (so figures shown collectively for the	The Applicant makes note of this comment. The link flows have been disaggregated into hourly flows to provide further understanding of the likely traffic to be experienced by existing users during the peak months of construction for each link identified. The daily flows are also presented in Annex F of ES Volume 3, Appendix 13-1: Transport Assessment (Rev 2) [REP1-057 and REP1-059] . It is accepted that there will be some minor variations in arrivals

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			<p>Lime Down PV sites in Table 13-12). However, each set of flows then comprises 8 number plans representing the 'Hour ending 10:00' to 'Hour ending 17:00', so in effect the advised weekday 9:30-16:30 period intended for construction deliveries. This seems to be an unnecessarily disaggregated approach to presenting the HGV link flows and assumes that the execution of the works on a typical day (or peak day) will achieve a perfectly smooth distribution of delivery arrivals and departures throughout the day, which seems unrealistic despite best endeavours. There will inevitably be variations in arrivals on any given day, and so departures, so a likelihood of some 'spiking' in the daily HGV profiles. It would seem better to just present the daily total HGV figures, whereupon knowledge of the planned period for deliveries</p>	<p>and departures on any given day, however, the profile will remain relatively flat due to the implementation of the booking system as specified in Section 6.7 of the Outline Construction Traffic Management Plan [REP1-112], which is secured by Requirement 7 in Schedule 2 of the Draft Development Consent Order [REP-1-007].</p>

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			<p>makes it easy enough to calculate a typical hourly average. So, for example, the average and 50% uplift figures for Alderton Road obtained from Table 13-12 are 32 and 50 HGV movements respectively per day. This taken across the 7-hour delivery period would give hourly 2-way HGV increases of 4- 5 on average or 7 as a maximum. The purpose of the exercise would appear to be to show link diagrams with extremely low hourly numbers although, as previously noted, peak 2-way increases of 7-8 HGVs per hour on Alderton Road in Grittleton would still equate to one HGV every 7-8 minutes.</p>	
WCD1-089	Transport and Access	ES Volume 3 Appendix 13-1 Transport Assessment (Rev 2) [REP1-057	12.10. Annex I and expressly Drawing SP53 now shows the planned 'Highway Improvement Area' works along Alderton Road to allow the passage of two 16.5 articulated HGVs. These works are	The Applicant makes note of this comment. Drawing SP53 in Annex I of ES Volume 3, Appendix 13-1: Transport Assessment (Rev 2) [REP1-057 and REP1-059] uses a topographical survey base.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
		and REP1-059]	shown to be areas of proposed carriageway widening at 8 number locations to allow some opportunities for HGV passage. However, what is shown is very indicative and, as with the access junction works, it is considered detailed drawings based on a topographical survey base would need to be submitted to Wiltshire Council for full technical approval as part of DCO provisions. It is also unclear whether these passing bay works are intended to be permanent, or just temporary and removed at the end of the construction period. The council's Highways Development Management Officer would suggest it would be advantageous to retain as permanent areas of carriageway widening given the routine need for HGV access to maintain the solar farm infrastructure during its planned 60-year operational life cycle.	<p>The Applicant accepts that General Arrangement and a full pack of detailed drawings based on a topographical survey base would be submitted to Wiltshire Council for full technical approval as part of the DCO protective provisions.</p> <p>The Applicant is currently proposing the works as temporary and to be moved at the end of the construction period. However, these can be implemented as permanent works if formally requested by Wiltshire Council.</p>

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			Details which the council would expect to see submitted for approval prior to construction include the following:	
WCD1-090	Transport and Access	ES Volume 3 Appendix 13-1 Transport Assessment (Rev 2) [REP1-057 and REP1-059]	<ul style="list-style-type: none"> General Arrangement (GA) drawings showing the length of each treatment area and resultant carriageway width dimensions. A separate swept path overlay should be provided confirming the achievable passage of two 16.5m articulated HGVs without conflict. 	See response to WCD1-089. Detailed drawing will also include a separate swept path overlay confirming the achievable passage of two 16.5m articulated HGVs without conflict.
WCD1-091	Transport and Access	ES Volume 3 Appendix 13-1 Transport Assessment (Rev 2) [REP1-057 and REP1-059]	<ul style="list-style-type: none"> Details of the proposed widening construction including any proposed kerbing to retain the new road edge and proposed 'tie in' to the existing carriageway construction. If kerbs with an upstand are proposed, the means of maintaining edge drainage 	See response to WCD1-089.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			would need to be indicated, such as the use of grips.	
WCD1-092	Transport and Access	ES Volume 3 Appendix 13-1 Transport Assessment (Rev 2) [REP1-057 and REP1-059]	<ul style="list-style-type: none"> Any changes to roadside ditches if affected by proposed widening works. 	See response to WCD1-089.
WCD1-093	Transport and Access	ES Volume 3 Appendix 13-1 Transport Assessment (Rev 2) [REP1-057 and REP1-059]	<ul style="list-style-type: none"> Any impact on hedgerow or roadside trees. The aim should be to avoid carriageway widening and associated excavation to formation within the root zone of any significant trees along Alderton Road. 	The Applicant notes this comment. See response to WCD1-089.
WCD1-094	Transport and Access	ES Volume 3 Appendix 13-1 Transport Assessment (Rev 2)	12.11. There are no carriageway widening works proposed within the length of Alderton Road through Grittleton, which could be a safety concern if there is no	The Applicant makes note of this comment. Drawing SP52 in Annex I of ES Volume 3, Appendix 13-1:

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
		[REP1-057 and REP1-059]	<p>opportunity for 2-way HGV passage between the junction with The Street and the first proposed area of works to the north of the village. It seems unlikely that there would be inter-visibility between these two locations for two HGV drivers, plus any incoming HGV turning left into Alderton Road would not be able to see clearly until already executing this movement. A similar concern exists with the distance between the northernmost area of proposed widening and the junction with Fosse Way, although no intervisibility distance is indicated or whether it would be possible for a southbound HGV to wait at the Fosse Way junction to allow a northbound HGV to pass without conflict. It appears that the eight passing locations proposed would have appropriate intervisibility between them, but it would again be helpful to have these spacing</p>	<p>Transport Assessment (Rev 2) [REP1-057 and REP1-059] demonstrates that there are frequent opportunities for two HGVs to pass on the section of road between the junction with The Street and the first proposed area of works to the north of the village.</p> <p>Drawing SP52 in Annex I of ES Volume 3, Appendix 13-1: Transport Assessment (Rev 2) [REP1-057 and REP1-059] will be updated at Deadline 3 to demonstrate inter-visibility between HGVs turning left into and right out of Alderton Road.</p> <p>The comment relating to passing opportunities on the Fosse Way junction is addressed in response to WCD1-101.</p>

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			distances indicated on the drawing for clarity.	
WCD1-095	Transport and Access	ES Volume 3 Appendix 13-1 Transport Assessment (Rev 2) [REP1-057 and REP1-059]	Annex J (which was previously Annex H) shows the Construction Route Swept Path Analysis' for a 16.5m articulated HGV and an estate car along all the minor roads being proposed for construction access, so: <ul style="list-style-type: none"> • Drawings SP34 Rev B and SP36 Rev B: Dyson RBT to Bradfield Cottages • Drawings SP38 and SP39 A: Farhill Lane: Fosse Way junction to Lime Down A • Drawings SP42 Rev A and SP47 Rev A: Alderton Road • Drawings SP43, SP44, SP45 and SP46: Fosse Way 	The Applicant makes note of this comment.
WCD1-096	Transport and Access	ES Volume 3 Appendix 13-1 Transport Assessment (Rev 2)	12.13. In previous Wiltshire Council comments on the Transport Assessment [RR- 4934], the council's Highways Development Management Officer referred	The Applicant makes note of this comment. Responses to WCD1-097 to WCD1-099 are provided below.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
		[REP1-057 and REP1-059]	specifically to the content of what was then Annex H. It is not intended to reiterate all that dialogue here, but would re-make the following comments:	
WCD1-097	Transport and Access	ES Volume 3 Appendix 13-1 Transport Assessment (Rev 2) [REP1-057 and REP1-059]	<ul style="list-style-type: none"> Between Dyson Roundabout and Bradfield Cottages (Drawings SP34 and SP36) the analysis indicates that the existing carriageway width is, for the most part, only able to pass an HGV and a car. Furthermore, parts of the route do not even accommodate passage for a car / HGV, requiring one driver to wait in a suitable location to allow passage of the other through the 'narrowed' sections. Some of these restricted passage sections appear quite long, as indicated by the intervisibility distances 	<p>The Applicant makes note of this comment.</p> <p>Drawings SP34 and SP36 have now been superseded by Drawings SP34-B and SP36-B provided in Annex J of ES Volume 3, Appendix 13-1: Transport Assessment (Rev 2) [REP1-057 and REP1-059] at Deadline 1. Drawings SP34-B and SP36-B are based on a topographical survey base and demonstrate an HGV and car can pass for the vast majority of the route. The longest length of restricted passage between a car and HGV is just under 30 metres in length, which is reasonable.</p>

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			shown between passing points. At that time no part of the route had been assessed for passing opportunity for two opposing HGVs. This is now included as Annex K which is commented on below.	
WCD1-098	Transport and Access	ES Volume 3 Appendix 13-1 Transport Assessment (Rev 2) [REP1-057 and REP1-059]	<ul style="list-style-type: none"> Drawings SP42 and SP47 showed the HGV / Car swept path passage analysis for a length of Fosse Way and Alderton Road. It was noted from the Works Plans [APP-007] that a significant part of this was indicated as a Highway Improvement Area on Sheet 18 (Works Ref 8A). However, it remained unclear from Drawing SP47 what improvement works, if any, were proposed based on this analysis. There was a concern that no 	The Applicant makes note of this comment.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			assessment had been done to consider passage opportunities for two opposing HGVs. Annex I now contains a plan showing indicative widening improvements to achieve passing opportunities for two 16.5m HGVs, whilst Annex K now shows the swept path analyses for two HGVs. See comments on those respective Annexes separately as contained above and below.	
WCD1-099	Transport and Access	ES Volume 3 Appendix 13-1 Transport Assessment (Rev 2) [REP1-057 and REP1-059]	<ul style="list-style-type: none"> Drawings SP43-SP46, which do not appear to have been revised or altered, provide the swept path analysis for the remaining part of Fosse Way proposed for construction access. These suggest that there are significant lengths where the existing carriageway 	SP43-SP46 in Annex I of ES Volume 3, Appendix 13-1: Transport Assessment (Rev 2) [REP1-057 and REP1-059] have been updated at Deadline 3 to demonstrate inter-visibility between HGVs and cars on the Fosse Way based on topographical survey base and to include indicative widening improvements within the

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			width is insufficient to pass a car / HGV without verge over-run or one driver waiting at a suitable passing point. Some of the inter-visibility distances measured between possible passing points are quite long and, in some cases, up to 215m, which is a concern even though the alignment is relatively straight for the most part. It was previously unknown as to whether two HGVs could pass anywhere along the length of Fosse Way without over-riding / damaging the grass verges. However, this analysis has now been provided in Annex K which is commented on below.	Order Limits. This demonstrates an HGV and car can pass for most of the route. The longest length of restricted passage between a car and HGV is just under 75 metres in length, which is considered reasonable.
WCD1-100	Transport and Access	ES Volume 3 Appendix 13-1 Transport	12.14. Annex K now, as requested, shows the shows the Construction Route Swept Path	The Applicant makes note of this comment.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
		Assessment (Rev 2) [REP1-057 and REP1-059]	<p>Analysis' for two 16.5m articulated HGVs along all the minor roads being proposed for construction access. Content includes the following drawings:</p> <ul style="list-style-type: none"> • Drawing SP50 Rev A: Farhill Lane: Fosse Way junction to Lime Down A • Drawing SP51: Dyson RBT to Bradfield Cottages • Drawing SP52: Alderton Road • Drawings SP54 and SP55: Fosse Way 	
WCD1-101	Transport and Access	ES Volume 3 Appendix 13-1 Transport Assessment (Rev 2) [REP1-057 and REP1-059]	<p>Drawing SP50 Rev A – Farhill Lane 12.15. The new analysis now suggests that there are numerous sections where two 16.5m articulated HGVs could currently pass on this length of road. Furthermore, where this is not possible, the driver inter-visibility</p>	<p>The Applicant makes note of this comment.</p> <p>The drawings have been based on OS mapping as this section of road presents a number of clear opportunities for HGVs to pass.</p> <p>Drawing SP50-Rev demonstrates the passage of two HGVs using</p>

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
		Drawing SP50 Rev A – Farhill Lane	between passing points is generally shown to be under 100m. This suggests that the existing carriageway width where passage is possible is at least 5.5m, so the minimum necessary to pass two large vehicles (MfS). This would ideally be 6.0m to provide some passage tolerance and to avoid HGV wheel-running along the carriageway outer edge, which is unlikely to have a physical kerb restraint. It would be helpful to see some dimensions added to the plan to show the 'actual' carriageway widths through some of the passing sections. The 'base' used for tracking should also be a topographical survey due to the inherent inaccuracies with OS-Landline data, noting that even small width errors could be significant. The only minor concern is the possible conflict between an HGV turning left into this lane from Fosse Way, and one proceeding	industry standard software. The Applicant will provide further drawing updates at Deadline 4 in response to the Examining Authority's First Written Questions (ExQ1) [PD-010] . It is noted that WC suggest that turning movements at the junction with Fosse Way could be managed by Banksmen. This can be included confirmed as part of a Final CTMP for Lime Down A, after the Outline CTMP [REP1-112] , is secured through Requirement 15 of Schedule 2 of the Draft Development Consent Order [REP1-007] .

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			southbound from Lime Down A towards this junction. Whilst the intervisibility of 125m between the junction and the first passing point to the north is not excessive, the analysis indicates that the left turn would require an 'overtake' taking up most of the width at the junction. Furthermore, the inbound HGV drivers would not be able to see ahead until completing this left turn manoeuvre. However, this might be capable of management with a banksman in this location.	
WCD1-102	Transport and Access	ES Volume 3 Appendix 13-1 Transport Assessment (Rev 2) [REP1-057 and REP1-059] Drawing SP51 – Dyson RBT	Drawing SP51 – Dyson RBT to Bradfield Cottages 12.16. The analysis suggests that 2-way passage for HGVs is generally achievable over long lengths of the route section between Dyson RBT and the junction with The Street (Insert 1). Where the carriageway width is deemed insufficient, the inter-visibility between available passing	The Applicant makes note of this comment and the agreement there are acceptable opportunities for the two-way passage of HGV vehicles between Dyson RBT and the junction with The Street (Insert 1) The Applicant will provide further updates to SP51 at Deadline 3 in response to the Examining

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
		to Bradfield Cottages	points is generally 100m or less, which is considered acceptable. However, it would again be useful to see some measured carriageway widths on the passing sections added as dimensions to the drawing to confirm these are a minimum of 5.5m, or preferably greater.	Authority's First Written Questions (ExQ1) [PD-010].
WCD1-103	Transport and Access	ES Volume 3 Appendix 13-1 Transport Assessment (Rev 2) [REP1-057 and REP1-059] Drawing SP51 – Dyson RBT to Bradfield Cottages	12.17. Insert 2 shows a very critical section of the Lime Down D access route between The Street junction and the access to the Flying Monk Café / Taproom. The swept path analysis indicates that 2-way HGV passage is possible around the 60-70 degree bend some 150m northwest of the junction with The Street, with width also sufficient to accommodate this on the immediate approaches. There is a narrow section indicated between this bend and the junction with The Street where two HGVs would be	The Applicant makes note of this comment and the agreement there are acceptable opportunities for the two-way passage of HGV vehicles between The Street junction and the access to the Flying Monk Cafe/Taproom. The section referred to between the bend to the north west and the junction with The Street is a straight flat section of road, which provides a clear line of sight unaffected by the vertical alignment.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			<p>unable to pass. However, the inter-visibility between possible passing positions in both locations is shown to be 130m, which is considered acceptable if this is a clear line of sight unaffected by the vertical alignment. Between the bend and the access to Brookside, so where the route also passes under the railway, the analysis suggests the carriageway width to be quite variable, so providing a series of short sections potentially suitable for passing HGVs with similarly short narrow sections between them. This at face value suggests no mitigation may be needed to further improve passing provision for HGVs through this length. However, it would be helpful to see some carriageway width dimensions additionally provided at intervals on this drawing, or a supporting drawing, to confirm widths in the passing zones indicated are a minimum of 5.5m</p>	<p>Drawing PL300 has now been prepared and is included in Annex K of ES Volume 3, Appendix 13-1: Transport Assessment (Rev 3) [EN010168/APP/6.3] submitted at Deadline 3. This demonstrates vertical visibility over the 132-metre distance between the Brookside junction and the Flying Monk Cafe.</p> <p>Drawing SP51 has now been updated and is included in Annex K of ES Volume 3, Appendix 13-1: Transport Assessment (Rev 3) [EN010168/APP/6.3] submitted at Deadline 3. This drawing now shows a 10-metre tipper using the suggested concrete apron on the west side of the carriageway and passing a 16.5 metre articulated vehicle. This reduces forward visibility to approximately 75 metres. 83% of HGVs accessing Lime Down D (west) will be 10 metre tippers or rigid vehicles.</p>

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			<p>and ideally greater, certainly around the bend where greater road width would be needed for passing two large articulated HGVs. It appears that the base is a topographical survey, so it should be readily possible to provide this carriageway width data for a defined series of chainage intervals between The Street and the Flying Monk Café access. It is accepted that the opportunities for widening the carriageway between The Street junction and the bend are limited, but between the bend and Brookside there are areas of verge which could facilitate carriageway widening if required. To the north of Brookside, the swept analysis indicates that there is no passing opportunity for two HGVs between this junction and the access to the Flying Monk Café. Whilst a 132m inter-visibility line is indicated, examination of Google Earth footage suggests it may be quite</p>	<p>The Applicant maintains that no mitigation works to improve HGV passage under the DCO are needed through this section.</p> <p>The Applicant will provide further updates to SP51 at Deadline 3 in response to the Examining Authority's First Written Questions (ExQ1) [PD-010].</p>

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			difficult for two opposing HGV drivers to see one another clearly, as the road line bends slightly between the two points and the hedge line on the western line could screen this view. There is, however, a large access on the west side with the concrete apron within this length which might be improved to provide an interim passing point. On balance, it is not accepted that no mitigation works to improve HGV passage under the DCO are needed through this section.	
WCD1-104	Transport and Access	ES Volume 3 Appendix 13-1 Transport Assessment (Rev 2) [REP1-057 and REP1-059] Drawing SP51 –	12.18. Insert 3 shows the final part of the route from the Flying Monk Café access to the proposed Lime Down D access points (Refs 7, 8 and 20). Whilst some possible passing positions for two HGVs are indicated, most of the road length is too narrow, which is a concern as some of the inter-visibility sightlines indicated are quite long,	The Applicant makes note of this comment and that the Flying Monk Café access to the proposed Lime Down D access points (Refs 7, 8 and 20) and that it is accepted that, as this length is close to the Lime Down D access points, it may be easier to manage and prevent any HGV departure if an incoming HGV is observed within this section. This

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
		Dyson RBT to Bradfield Cottages	with a 167m spacing in one case. It is accepted that, as this length is close to the Lime Down D access points, it may be easier to manage and prevent any HGV departure if an incoming HGV is observed within this section. Even so, it would be preferable to see some mitigation works considered and included to improve passing opportunity provision.	can be managed by the proposed booking system set out in Section 6.7 of the Outline Construction Traffic Management Plan (Rev 2) [REP1-112] .
WCD1-105	Transport and Access	ES Volume 3 Appendix 13-1 Transport Assessment (Rev 2) [REP1-057 and REP1-059] <i>Holding Areas for Incoming HGVS</i>	<i>Holding Areas for Incoming HGVS</i> 12.19. The OCTMP advises that a booking system would be employed for HGV deliveries to each Lime Down site to co-ordinate arrival slots, this would then be used to time departures to avoid opposing HGV conflicts within the narrow roads proposed for construction access as far as possible. However, some HGVS making deliveries will inevitably arrive earlier than their allocated 'slot' time, or possibly later due to	The Applicant makes note of this comment. As set out in the updated Outline CTMP (Rev3) submitted at Deadline 3, the booking system would require incoming vehicles to contact the site manager when approaching the site. This will allow departing vehicles to be held back in the construction compounds to avoid two HGVS passing on minor roads on the construction routes.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			<p>travel delays. In either scenario, a 'holding' location will be needed for these HGVs to wait as may be required after contacting the site manager. It is still unclear where this is intended to be on the planned construction route to Lime Down Areas A-C, although a location towards the southern end of Fosse Way would seemingly be logical. Similarly, it is still unclear where this intended holding area would be on the route to Lime Down Area D.</p>	<p>For incoming vehicles arriving earlier than their allocated 'slot' time, or possibly later due to travel delays suggested holding locations have been included in the updated Outline CTMP (Rev3) submitted at Deadline 3.</p> <p>On rare occasions where arriving HGVs might not make contact with the site manager or will not be able to use the identified holding locations, there will still be frequent opportunities for two HGVs to pass as demonstrated at Annex K of ES Volume 3 Appendix 13-1 Transport Assessment (Rev 2) [REP1-057 and REP1-059].</p> <p>It is the Applicants' position that holding areas for incoming deliveries will not be required.</p>
WCD1-106	Transport and Access	ES Volume 3 Appendix 13-1 Transport Assessment	<p>Drawing SP52: Alderton Road 12.20. Alderton Road is proposed to have HIA widening improvements, so refer separately</p>	<p>The Applicant makes note that Wiltshire Council accepts that the HIA widening improvements on Alderton Road facilitate acceptable</p>

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
		(Rev 2) [REP1-057 and REP1- 059] Drawing SP52: Alderton Road	to comments on Annex I. This drawing provides the driver inter-visibility distances between the eight locations proposed for carriageway widening, and these all look acceptable. The analysis also suggests that, for the most part, 2-way HGV passage is considered possible on the length of Alderton Road through Grittleton. However, it is necessary to see actual carriageway width measurements with dimensions shown on the drawing, noting the need for a 5.5m minimum width and ideally a 6.0m width for comfort. It is noted that temporary traffic signals are proposed to control traffic at the Alderton Road / The Street junction. The HGV left turn swept path into Alderton Road is not indicated but is likely to require most of the available bell-mouth width. As such, the stop position on Alderton Road will need to be well set-back as part of the	driver intervisibility and that for the most part, 2-way HGV passage is considered possible on the length of Alderton Road through Grittleton. The Applicant has provided further updates to SP52-Rev A at Deadline 3 in response to the Examining Authority's First Written Questions (ExQ1) [PD-010] . Drawing SP52 in Annex I of ES Volume 3, Appendix 13-1: Transport Assessment (Rev 2) [REP1-057 and REP1-059] has been updated at Deadline 3 to demonstrate inter-visibility between HGVs turning left into and right out of Alderton Road. SP52 in Annex I of ES Volume 3, Appendix 13-1: Transport Assessment (Rev 2) [REP1-057 and REP1-059] demonstrates that an HGV driver approaching on

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			<p>planned temporary traffic management. At the northern end of Alderton Road, the council's Highways Development Management Officer is concerned at the lack of inter-visibility through the bend at the junction with Fosse Way. Whilst there is a potential passing point indicated on Fosse Way some 57m to the northeast of this bend, an HGV driver approaching on Fosse Way would not be able to see an opposing HGV on Alderton Road until passing this point and reaching the corner. However, it is accepted that 2-way passage is deemed possible in the part of Alderton Road just south of this bend.</p>	<p>Fosse Way is able to see an opposing HGV on Alderton Road.</p>
WCD1-107	Transport and Access	ES Volume 3 Appendix 13-1 Transport Assessment (Rev 2) [REP1-057	<p>Drawings SP54 and SP55: Fosse Way</p> <p>12.21. Drawing SP54 shows the southern length of Fosse Way extending to the railway bridge. Whilst there are some possible</p>	<p>The Applicant makes note of the comments. While intervisibility between passing places for two HGV's exceeds 200 metres in places, the Fosse Way is a straight and relatively flat road ensuring</p>

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
		and REP1-059]	<p>passing points indicated for two 16.5m articulated HGVs, it is also the case that the inter-visibility between some of these is very long. For example, there is length of over 200m just south of the junction by Frome Lodge, and a length of 424m where passage for two HGVs is not possible to the north of this junction. In short, it is considered that mitigation will be needed in the form of additional passing bay works which aren't currently proposed. It is noted that two-way HGV passage is not possible over the railway bridge, although passing points exist either side with a 193m inter-visibility as indicated. This is acceptable but assurance is sought that this sightline is still achievable when considering the vertical alignment over the structure. It is noted that tracking checks are not included for the length north of the railway</p>	<p>good visibility between passing places.</p> <p>Drawing PL301 has now been prepared and is included in Annex K of ES Volume 3, Appendix 13-1: Transport Assessment (Rev 3) [EN010168/APP/6.3] submitted at Deadline 3. This demonstrates vertical visibility on the length of intervisibility to the north of Fosse Lodge.</p> <p>Drawing SP54 has been updated to include additional tracking for the length north of the railway bridge on Inset 3 and is included in Annex K of ES Volume 3 Appendix 13-1 Transport Assessment (Rev 3) [EN010168/APP/6.3] submitted at Deadline 3.</p>

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			bridge on Inset 3, so this needs to be.	
WCD1-108	Transport and Access	ES Volume 3 Appendix 13-1 Transport Assessment (Rev 2) [REP1-057 and REP1-059]	12.22. Drawing SP55 shows the northern length of Fosse Way. It is again noted that HGV tracking checks are incomplete on Inset 1. This is also the case on Inset 2, so a long length south of the junction with Farhill Lane. This needs to be completed to allow a complete review of the HGV passing opportunities on this length of Fosse Way.	Drawing SP55 has been updated to include additional tracking for Inset 1 and 2 and is included in Annex K of ES Volume 3 Appendix 13-1 Transport Assessment (Rev 3) submitted at Deadline 3.
WCD1-109	Noise and Vibration	ES Volume 3 Appendix 14-4 Noise Modelling (Rev 2) [REP1-061]	13. 6.3 ES Volume 3 Appendix 14-4 Noise Modelling (Rev 2) [REP1-061] 13.1. Although the noise calculations indicate that predicted sound levels at sensitive receptors remain unchanged, Tables 8 and 9 of ES Volume 3, Appendix 14-4: Noise Modelling [REP1-061] show that the modelled baseline	Please see the Applicant's response to WDC1-067.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			monitoring data has been revised. In particular, the thresholds for LOAEL and SOAEL have been increased for the operational and maintenance phases at 16 sensitive receptors, purportedly " <i>to accurately relate to the typical background sound levels.</i> "	
WCD1-110	Noise and Vibration	ES Volume 3 Appendix 14-4 Noise Modelling (Rev 2) [REP1-061]	13.2. Table 14-23 of Chapter 14: Noise and Vibration [REP1-021] further confirms that, as a consequence of these increased thresholds, the number of daytime sensitive receptors falling between LOAEL and SOAEL has decreased from 37 to 28.	Please see the Applicant's response to WDC1-068.
WCD1-111	Noise and Vibration	ES Volume 3 Appendix 14-4 Noise Modelling (Rev 2) [REP1-061]	13.3. However, the meaning of " <i>accurately relate</i> " in this context is unclear. Furthermore, the justification for amending the modelled baseline monitoring data at this stage of the application	Please see the Applicant's response to WDC1-069.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			process is not explained and warrants clarification.	
WCD1-112	Ecology and Biodiversity	ES Volume 3 Appendix 9-1 Ecological Baseline Report (Rev 2) [REP1-083] Habitat Surveys	<u>Habitat Surveys</u> 14.1. Under the heading 'Habitat Surveys', Paragraph 2.6.5 stipulates that condition assessments were undertaken for the Solar PV Sites and the cable route corridor. However, as has been raised as an issue by Wiltshire Council, most recently in paragraph 6.62 – 6.64 of the council's Written Representation [REP1-138], complete condition assessment sheets have not in fact been provided for the habitats assigned a condition in the submitted Biodiversity Net Gain (BNG) Metric. This issue is discussed in detail in the council's Written Representation, however, the omission of condition assessment sheets alongside the metric constitutes a deviation from The Statutory Biodiversity Metric	The Applicant notes this comment. A response to the Council's Written Representation (WC-067) on this matter was provided at Deadline 2 in 9.22 Applicant's Response to Written Representations [REP2-039] . As stated within the response, raw data including condition assessments, can be provided as QGIS shapefiles, if requested; the Applicant has contacted the Council's Ecology Officer in this regard in May 2026 and will aim to send the files across as soon as possible.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			User Guide (Last updated: 3 July 2025). Furthermore, the absence of condition assessment sheets has meant that the council's Ecology Officer has not been able to wholly verify the condition of the habitats.	
WCD1-113	Ecology and Biodiversity	ES Volume 3 Appendix 9-1 Ecological Baseline Report (Rev 2) [REP1-083] Previously Un-surveyed Area in the Cable Route Corridor	<u>Previously Un-surveyed Area in the Cable Route Corridor</u> 14.2. It is recognised that the updated report details that approximately 10.57 ha of land within the CRC has not been subject to habitat survey due to access constraints on account of it comprising wooded railway embankments. The report specifies that the precautionary principle has therefore been applied and that on the basis of a desk study and from visual observations from adjacent and nearby land during the field survey, the approximate 10.57 ha of land not surveyed has been assigned as 'Lowland Mixed	The Applicant welcomes the Council's comment supporting the application of the precautionary principle in areas of un-surveyed land within the Cable Route Corridor.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			Deciduous Woodland' and has been evaluated as being of District Importance. This approach is supported by the council.	
WCD1-114	Ecology and Biodiversity	ES Volume 3 Appendix 9-1 Ecological Baseline Report (Rev 2) [REP1-083] Other Neutral Grassland	Other Neutral Grassland 14.3. In respect of the Solar PV Sites, it is recognised that Paragraph 3.2.30 has been updated and clarity is now provided in respect of an issue previously raised by the council as it now states: " <i>None of the other neutral grassland habitat present within the Solar PV Sites was evaluated as being representative of any Priority Habitat grassland types.</i> "	The Applicant notes this comment regarding the presence of Priority Habitat grassland types within the Solar PV Sites.
WCD1-115	Ecology and Biodiversity	ES Volume 3 Appendix 9-1 Ecological Baseline Report (Rev	14.4. Paragraph 3.2.45 has been updated to specify that one field (CRF114) and a small number of field margins and road verges comprising other neutral grassland (ONG) were recorded in the CRC. It has also been updated to state	The Applicant notes this comment regarding the extent of other neutral grassland (ONG) habitat within areas of previously un-surveyed land within the Cable

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
		2) [REP1-083] Other Neutral Grassland	that ONG has been recorded over 3.06 ha of land, whereas the previous iteration of the report stated that ONG was recorded over 15.44 ha of land. In addition, clarity is now provided in respect of an issue previously raised by the council as Paragraph 3.2.48 now states: <i>"None of the other neutral grassland habitat present within the Cable Route Corridor was evaluated as being representative of any Priority Habitat grassland types."</i>	Route Corridor, including Priority Habitat grassland types.
WCD1-116	Ecology and Biodiversity	ES Volume 3 Appendix 9-1 Ecological Baseline Report (Rev 2) [REP1-083] Ponds	14.5. It is noted that new text has been added to Paragraph 3.2.81 . However, it is unclear why it has omitted reference to the presence of great crested newt (GCN), a European Protected Species (EPS) as well as toads, rather than just toads, given that the evaluation pertains to the Solar PV Sites and the CRC and GCN presence has been identified in some of the	The Applicant notes the Council's comment regarding the omission of reference to the presence of great crested newts (GCN) in Paragraph 3.2.81 of ES Volume 3, Appendix 9-1: Ecological Baseline Report (Rev 2) [REP1-083] . Consideration is given to the presence of GCN in the preceding Paragraphs 3.2.78 and 3.2.80 ,

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			ponds surveyed within the Solar PV Sites. In addition, the equivalent discussion in the updated ES Chapter 9 [REP1-015], such as in Table 9-7, does mention GCN as well as toads and so it is not apparent why there is an inconsistency across the two documents and why Appendix 9-1 [REP1-083] only mentions the presence of toad, which is not afforded as great a level of protection as GCN. Omitting reference to GCN in the context of ponds is a notable omission, and potentially inaccurately conveys the impression that the ponds are of lower ecological value to fauna than they actually are, especially as GCN has in fact been identified within the Solar PV Sites.	including reference to ES Volume 3, Appendix 9-5: Great Crested Newt Survey Report [APP-202] . GCN survey results are also transparently reported in the relevant 'Amphibian' section of ES Volume 3, Appendix 9-1: Ecological Baseline Report (Rev 2) [REP1-083] . The Applicant therefore does not agree that reference to GCN has been omitted in the context of pond habitats within the Order Limits and maintains that the evaluation provided in Paragraph 3.2.81 accurately reflects the conditions on site and value of pond habitats present.
WCD1-117	Ecology and Biodiversity	ES Volume 3 Appendix 9-1 Ecological Baseline	14.6. It is noted that Paragraph 3.3.100 now puts forward a rationale setting out why specific survey for white-clawed crayfish	The Applicant notes this comment although confirms this rationale was set out in the original DCO Application submission (within

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
		Report (Rev 2) [REP1-083] White-Clawed Crayfish	(WCC) has not been undertaken which states: " <i>These features are anticipated to be retained and protected as part of the Scheme.</i> "	Paragraph 3.3.94 of ES Volume 3, Appendix 9-1: Ecological Baseline Report [APP-198] and is not a new change.
WCD1-118	Ecology and Biodiversity	ES Volume 3 Appendix 9-1 Ecological Baseline Report (Rev 2) [REP1-083]	14.7. As detailed in Paragraph 3.3.100 of Appendix 9-1 Ecological Baseline Report [REP1-083], suitable habitat for WCC exists at the Gauze Brook and Gabriel's Well watercourses in Lime Down D and E, as well as a small number of wet ditches directly connected to these watercourses, and therefore presence has been assumed in Appendix 9-1 and ES Chapter 9. The assumption of presence shouldn't preclude proper consideration of the requirements set out in Natural England's standing advice relating to WCC, and whether the proposed avoidance and mitigation is sufficient, as well as whether a	The Applicant notes this comment. The rationale for not undertaking specific detailed surveys for white-clawed crayfish is set out in Paragraphs 3.3.100 and 3.3.102 of ES Volume 3, Appendix 9-1: Ecological Baseline Report (Rev 2) [REP1-083] , with the main rationale being that suitable habitat is limited across the Order Limits, and furthermore any such suitable habitat will be predominantly retained. With reference to the three new permanent culverts at 'wet' ditches at Lime Down D, a description of the habitats at each location is provided with ES Volume 3, Appendix 9-9 Watercourse Crossing Schedule

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			<p>mitigation licence could even be required to permit some works, especially in light of the three new circa 6m wide permanent accesses for culverts proposed across 'wet' ditches at Lime Down D.</p>	<p>[REP1-126] and those within Lime Down D are labelled OW22, OW29 & OW30 in Table 1 of this document. As described in Paragraph 3.2.7 of ES Volume 3, Appendix 9-1: Ecological Baseline Report (Rev 2) [REP1-083], ditches are classified as 'wet' ditches if they were considered likely to retain water for more than 4 months of the year. This includes ditches which are in fact dry for large parts of the year, for instance ditches which may regularly inundate with water over the typical wetter winter months, but which regularly dry out during the summer. For each of the crossing points in Lime Down D, the habitat descriptions clearly describe how the ditch at each location appears to be regularly dry and vegetated with predominantly coarse grasses and ruderal vegetation, indicative of ditches which regularly dry out. This habitat is not suitable for</p>

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				white-clawed crayfish, which are reliant on waterbodies which permanent standing or running water, and as such white-clawed crayfish are highly unlikely to be impacted by the creation of new permanent culverts described in Paragraph 9.10.304 of ES Volume 1, Chapter 9: Ecology and Biodiversity (Rev 2) [REP1-015] .
WCD1-119	Ecology and Biodiversity	ES Volume 3 Appendix 9-1 Ecological Baseline Report (Rev 2) [REP1-083]	14.8. Given the scope of proposed works, especially at Lime Down D where suitable habitat for WCC exists, it is considered that the rationale for the lack of any dedicated survey is somewhat weak as there could still be adverse impacts on the species, if present, despite the mitigation put forward. Also, it is possible that undertaking targeted survey may have led to the conclusion that further mitigation and compensation over and above that proposed, and possibly even a	The Applicant notes this comment. The rationale for not undertaking specific detailed surveys for white-clawed crayfish is set out in Paragraphs 3.3.100 and 3.3.102 of ES Volume 3, Appendix 9-1: Ecological Baseline Report (Rev 2) [REP1-083] , with the main rationale being that suitable habitat is limited across the Order Limits, and furthermore any such suitable habitat will be predominantly retained. Where suitable habitat for white-clawed crayfish may be impacted in discrete and localised

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			<p>mitigation licence may be necessary to permit some of the work depending on survey results, however this is not known as a survey has not been conducted and has not been discussed in the DCO application documents.</p>	<p>locations, for instance for temporary crossing of ditches or watercourses within the Cable Route Corridor, the Applicant has committed to adopting mitigation measures designed to avoid impacts as far as reasonably possible as described in Paragraph 9.12.46 of ES Volume 1, Chapter 9: Ecology and Biodiversity (Rev 2) [REP1-015]. These measures are described in, and secured by, Method Statement 14 of the Outline Ecological Protection and Mitigation Strategy (EPMS) (Rev 2) [REP1-106]. Such measures include pre-commencement inspections by a suitably qualified Ecological Clerk of Works (EcoCoW) who will oversee works affecting impacted habitat. As set out in Paragraph 14.3.2 of the Outline EPMS [REP1-106], any requirement for further avoidance/mitigation measures</p>

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				and indeed any requirement for licensing will be evaluated by the EcoCoW. It is therefore the Applicant's view that the assessment with regards to white-clawed crayfish in ES Chapter 9 [REP1-015] is robust.
WCD1-120	Ecology and Biodiversity	ES Volume 3 Appendix 9-1 Ecological Baseline Report (Rev 2) [REP1-083]	<p>15. 7.8 Biodiversity Net Gain Assessment Report (Rev 2) [REP1-089]</p> <p>15.1. The issues raised in Wiltshire Council's Written Representation [REP1-138] regarding the BNG submissions should be read alongside this response as a number of the issues raised in the former still stand and have not been addressed as a result of the submission of 7.8 Biodiversity Net Gain Assessment Report (Rev 2) [REP1-089] and Biodiversity Net Gain Assessment Appendix Statutory Biodiversity Metric</p>	The Applicant notes this comment, and responses to the Council's comments regarding Biodiversity Net Gain are provided in the relevant responses below (comments WCD1-121 to WCD1-129).

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			Calculation (Rev 2) [REP1-091 and REP1-093].	
WCD1-121	Ecology and Biodiversity	ES Volume 3 Appendix 9-1 Ecological Baseline Report (Rev 2) [REP1-083] Baseline Habitats	Baseline Habitats 15.2. The BNG Assessment Report and Statutory BNG Metric have been revised to account for the inclusion of information collated through habitat survey for the area of the CRC that had previously not been subject to survey. It is acknowledged that it hasn't been possible to survey the entire 17 ha that had previously not been surveyed, because part of this area comprises railway embankments and therefore not accessible for reasons of health and safety. It is not clearly stipulated or quantified in the BNG Assessment Report, however, the size of the remaining area within the CRC that has not been surveyed for the aforementioned reason. This is despite it being clearly set out in Paragraph 2.6.7 of Appendix 9-1	The Applicant notes this comment regarding the remaining habitat within the Cable Route Corridor not subject to habitat survey due to access constraints. The extent of this habitat is quantified in Paragraph 1.3.44 of 7.8 Biodiversity Net Gain Assessment Report (Rev 2) [REP1-089] along with the precautionary assumptions made regarding the habitat type and condition of such habitat. Nevertheless, suitable text has been added to an updated version of 7.8 Biodiversity Net Gain Assessment Report (Rev 3) [EN010168/EXAM/7.8] , submitted at Deadline 3, to provide additional clarification.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			Ecological Baseline Report (Rev 2) [REP1-083] which stipulates: "Approximately 10.57 ha of land within the Cable Route Corridor has not been subject to ecological survey. All un-surveyed land comprises wooded railway embankments which have not been surveyed due to access constraints."	
WCD1-122	Ecology and Biodiversity	ES Volume 3 Appendix 9-1 Ecological Baseline Report (Rev 2) [REP1-083] Baseline Habitats	15.3. The reason for this omission within the BNG Assessment Report is unclear given that the report should contain all relevant information for completeness and transparency and should also be consistent with other submitted documents.	The Applicant notes this comment and has addressed the matter in the above response (to comment WCD1-121).
WCD1-123	Ecology and Biodiversity	ES Volume 3 Appendix 9-1 Ecological Baseline Report (Rev	15.4. In respect of the approach taken in the BNG Assessment Report and BNG Metric to the un-surveyed areas, this is set out in Paragraph 1.2.18 and Wiltshire	The Applicant welcomes Wiltshire Council's comment supporting the precautionary approach taken to classification of habitats within un-

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
		2) [REP1-083] Baseline Habitats	Council is supportive of the approach taken. Paragraph 1.2.18 states: <i>"Areas such as railway corridors (including tracks, embankments and woodland strips along their boundaries) were not possible to access due to health and safety concerns / access consents. The habitats in these areas have therefore been assumed based on a combination of aerial imagery, visual observations from adjacent land, and professional judgement using the precautionary principle. These habitats will be retained with no change. In all such cases the baseline habitat has been assigned as the high distinctiveness habitat type 'Woodland – lowland mixed deciduous woodland' in 'Good' condition."</i>	surveyed areas of the Cable Route Corridor.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
WCD1-124	Ecology and Biodiversity	ES Volume 3 Appendix 9-1 Ecological Baseline Report (Rev 2) [REP1-083] Other Neutral Grassland	<i>Other Neutral Grassland</i> 15.5. In respect of the other neutral grassland (ONG) within the CRC, previously, the BNG Assessment Report stipulated that 81.37% was of Good condition (including all assumed habitat). In Paragraph 1.3.29 of the Rev 2 BNG Assessment Report [REP1-089], the reference to ONG in Good condition in the CRC has been deleted and the percentage of ONG in Moderate condition has been amended from 17.84% to 92.73%. Table 4 of the report indicates that the area of ONG within the CRC was specified as 11.42 ha (9.29 ha assumed) in the last iteration of the report and has been amended to 3.06 ha.	The Applicant notes this comment and has addressed this matter in the below responses to comments WCD1-125 to WCD1-128.
WCD1-125	Ecology and Biodiversity	ES Volume 3 Appendix 9-1 Ecological Baseline Report (Rev	15.6. It is assumed that the 81.37% of ONG which had previously been assessed as being in Good condition, included areas that had been subject to field survey and	Of the other neutral grassland (ONG) habitat identified within the Cable Route Corridor during field surveys and presented within 7.8

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
		2) [REP1-083] Other Neutral Grassland	wasn't entirely comprised of areas of assumed habitat that hadn't been surveyed. If this is the case, it is unclear why the revisions to the BNG Assessment Report and metric following the habitat survey of previously un-surveyed areas has resulted in what appears to be a recategorisation of ONG previously recorded as Good condition to Moderate condition. This issue is a concern to the council and clarification and further information on this matter is sought.	Biodiversity Net Gain (BNG) Assessment Report (Rev 2) [REP1-089] , none comprised ONG in good condition. All ONG habitat assessed as being of Good condition in the previous iteration of the BNG Assessment Report [APP-273] comprised the 9.29 ha of assumed ONG habitat within previously un-surveyed areas. As such the Applicant confirms that none of the ONG previously assessed as being of Good condition included areas that had been subject to field survey at that time. No recategorisation of habitat condition has occurred for ONG habitat surveyed and assessed within the first iteration of the BNG Assessment Report [APP-273] . The resulting changes in percentage values presented in BNG Assessment Report (Rev 2) [REP1-089] reflect the reduction in extent of ONG habitat within the

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				<p>Cable Route Corridor, following completion of habitat surveys in previously un-surveyed areas, explained below for clarity.</p> <p>Prior to completion of habitat surveys within the Cable Route Corridor, the total area of ONG habitat, including 9.29 ha of assumed habitat, comprised 11.42 ha. All assumed ONG habitat was classified as being of Good condition on a precautionary basis, and constituted approximately 81.3% of the total area, as presented within the first iteration of the BNG Assessment Report [APP-273].</p> <p>Following completion of surveys, the total area of ONG habitat confirmed as present within the Cable Route Corridor comprised the following areas:</p> <p>Moderate Condition – 2.8406ha total</p>

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				<ul style="list-style-type: none"> • 2.007 ha (CRF114); • 0.2564 ha (CRF130 margin); and • 0.5471 ha (CRF138 margins). • 0.0301 ha (CRF110 margin). <p>Poor Condition – 0.2227 ha total</p> <ul style="list-style-type: none"> • 0.1440 ha (CRF100 margin); and • 0.0787 ha (CRF101 margin). <p>Of the 3.0633 ha of ONG habitat present within the Cable Route Corridor, 2.8406 ha in Moderate condition constitutes 92.73% of the total area, and 0.2227 ha in Poor condition constitutes 7.27% of the total area, as stated within BNG Assessment Report (Rev 2) [REP1-089].</p>
WCD1-126	Ecology and Biodiversity	ES Volume 3 Appendix 9-1 Ecological	<i>Modified Grassland</i> 15.7. In terms of the modified grassland baseline habitat, it is	The Applicant notes this comment regarding the extent of modified grassland habitat within the Order

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
		Baseline Report (Rev 2) [REP1-083] Modified Grassland	noted that the respective areas in hectares and percentages have been revised to incorporate the data collated for the areas subject to survey in the CRC which had previously not been surveyed, and to reflect the habitat and habitat condition assigned to the 10.57 ha of railway embankment within the CRC that cannot be accessed. For the reasons already detailed in the council's Written Representation [REP1-138], however, it has not been possible for the council's Ecology Officer to comprehensively check and verify either the baseline information or the projected post-development habitat calculations at this stage.	Limits. As above, responses to Wiltshire Council's Written Representations [REP1-138] on this matter were provided at Deadline 2 in 9.22 Applicant's Response to Written Representations [REP2-039] . This includes rationale of the Minimum Mappable Unit (MMU) adopted for the Scheme, as well as justification for consolidating habitat parcels for the purposes of the Statutory Biodiversity Metric (Rev 2) [REP1-093] and the BNG Assessment Report (Rev 2) [REP1-089] in response to the comment on this matter. Consolidation of data within the Metric precludes assignment of individual parcel references between mapping and the Metric. Further rationale is also provided on why it was not considered proportionate to provide each condition assessment individually for submission, and instead a

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				summary of the condition assessment scores for each specific habitat type is provided in the BNG Assessment Report [REP1- 089] .
WCD1-127		ES Volume 3 Appendix 9-1 Ecological Baseline Report (Rev 2) [REP1-083] BNG Metric Results	<u>BNG Metric Results</u> It is noted that there is an estimated slight increase in the projected area habitat units and hedgerow units and a slight decrease in projected watercourse units compared to the calculations in the last iteration of the BNG Assessment Report and Statutory BNG Metric submitted, but that ultimately it has still been calculated that there will be an overall BNG increase of more than 10% in terms of area habitats, hedgerows and watercourses. Nonetheless, due to the reasons and limitations already discussed in the council's Written Representation [REP1-138], the council cannot verify or corroborate	The Applicant notes this comment regarding the proposed increase in biodiversity units across the Scheme. As above, responses to Wiltshire Council's Written Representations [REP1-138] on this matter were provided at Deadline 2 in 9.22 Applicant's Response to Written Representations [REP2-039] . This includes rationale of the Minimum Mappable Unit (MMU) adopted for the Scheme, as well as justification for consolidating habitat parcels for the purposes of the Statutory Biodiversity Metric (Rev 2) [REP1-093] and the BNG Assessment Report (Rev 2) [REP1-089] in response to the comment on this matter.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			these calculations at the current time.	Consolidation of data within the Metric precludes assignment of individual parcel references between mapping and the Metric. Further rationale is also provided within the response on why it was not considered proportionate to provide each condition assessment individually for submission, and instead a summary of the condition assessment scores for each specific habitat, hedgerow and watercourse type is provided in the BNG Assessment Report [REP1-089] .
WCD1-128	Ecology and Biodiversity	ES Volume 3 Appendix 9-1 Ecological Baseline Report (Rev 2) [REP1-083] Botanical Quadrat Data	Botanical Quadrat Data 15.9. Annex A comprises botanical quadrat data. Although habitat survey has now been conducted for a proportion of the 17 ha of the CRC that had not been surveyed previously, it is noted that there are no tracked changes in Table A5: Botanical Quadrat Data for 'Medium, High and Very High	The Applicant notes this comment. Botanical quadrats were employed during the habitat survey of previously un-surveyed land within the Cable Route Corridor. The Applicant recognises that the omission of this data in 7.8 Biodiversity Net Gain Assessment Report (Rev 2) [REP1-089] submitted at Deadline

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			<p>Distinctiveness' Grassland Types – Cable Route Corridor or in Table A15: Botanical Quadrat Data for 'Low Distinctiveness' Grassland Types – Cable Route Corridor in Annex A. It is therefore assumed that the use of botanical quadrats was not employed during the habitat survey of the previously un-surveyed areas of the CRC.</p>	<p>1 represents an oversight, and quadrat data for these areas has been included within a revised version of the report at Deadline 3 (7.8 Biodiversity Net Gain Assessment Report (Rev 3) [EN010168/APP/7.8]).</p>
WCD1-129	Ecology and Biodiversity	Biodiversity Net Gain Assessment Appendix Statutory Biodiversity Metric Calculation (Rev 2) [REP1-091 and REP1-093]	<p>16. 7.9 Biodiversity Net Gain Assessment Appendix Statutory Biodiversity Metric Calculation (Rev 2) [REP1-091 and REP1-093]</p> <p>The revised Statutory Biodiversity Metric has been reviewed alongside the Biodiversity Net Gain Assessment Report (Rev 2) [REP1-089]. Therefore, combined comments have been provided under the heading of the BNG Assessment Report above.</p>	<p>The Applicant notes this comment and responses to the Council's comments regarding Biodiversity Net Gain are provided in the relevant responses above to comments WCD1-125 to WCD1-128.</p>

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
WCD1-130	Consultation and Engagement	Outline Construction Environmental Management Plan (Rev 2) [REP1-096]	<p>17.1. Paragraph 2.1.1 indicates that a Community Liaison Group will be established, as part of the roles and responsibilities for the Community Liaison Officer. The council considers that the group should continue throughout construction and for the first six years of scheme operation and also be resumed for the decommissioning phase [RR-4934]. Therefore, the council does not agree with the insertion of "<i>the first anniversary of the date of</i>". The council also considers that reference to the Community Liaison Group should be included within Section 2.14.</p>	<p>The Applicant confirms the commitment to the Community Liaison Group is secured by the drafting of Requirement 4 and through the Outline Construction Environmental Management Plan (CEMP) [REP2-019] (at paragraph 2.1.1) by Requirement 13 of Schedule 2 to the Draft Development Consent Order (DCO) [REP1-007].</p> <p>The Applicant considers one year post-construction to be sufficient time for any residual community engagement matters following construction to be addressed through the Community Liaison Group. The drafting of Requirement 4 confirms this is a <u>minimum</u> committed timeframe unless otherwise with the relevant planning authority. The Applicant does not agree that six years (to which this is the first reference made by Wiltshire Council) is</p>

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				<p>necessarily proportionate, particularly given the commitment for a dedicated community contact to remain in-post during the entirety of the Scheme's operation – as secured through the Outline Operational Environmental Management Plan [REP2-021] by Requirement 14 of Schedule 2 to the Draft DCO [REP1-007].</p> <p>The Applicant will update the drafting of the Outline CEMP for Deadline 3 to explicitly reference the Community Liaison Group at Sections 2.14 and 3.13.</p>
WCD1-131	Cultural Heritage	Outline Construction Environmental Management Plan (Rev 2) [REP1-096]	17.2. Table 6: Cultural Heritage has been updated in relation to landscape mitigation. The additional text relating to monitoring and replanting simply requires compliance with the requirements for replanting etc. in the Landscape and Ecological Management Plan (LEMP) to ensure that the already proposed	Landscape mitigation and enhancement measures are detailed in the Outline LEMP [APP-283] . The preparation, approval and implementation of the detailed LEMP, substantially in accordance with the Outline LEMP [APP-283] , is secured through Requirement 7 in Schedule 2 of the Draft DCO [REP1-007] . These

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			landscape mitigation is effectively implemented. It does not allow for any review of the performance of the mitigation and whether it is achieving the required benefits or provision for amendment or adaptive management should this be found to be required.	<p>requirements set out a framework for the planting, management and monitoring of landscaping mitigation, which is proposed as part of embedded mitigation for built heritage assets, with scope for adaptive management over the lifetime of the Scheme informed by monitoring outcomes. Table 6 of the Outline CEMP [REP2-019] has been updated to ensure monitoring for heritage purposes is undertaken in line with the Outline LEMP [APP-283].</p> <p>The Applicant will continue to discuss this matter with Wiltshire Council and where appropriate update management plans accordingly.</p>
WCD1-132	Construction and Decommissioning	Outline Construction Environmental Management	17.3. Furthermore, whilst the guidance to the contractor to undertake works as far away from the assets as reasonably practicable is welcomed, the update is advisory in nature and	While the Applicant notes the Council's comments regarding the use of compound areas, the Applicant highlights that construction activities across the Scheme, including those

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
		Plan (Rev 2) [REP1-096]	does not secure any certainty in respect of the impacts from construction compound areas. It cannot therefore be considered as providing any additional mitigation of the potential harm.	associated with temporary compounds and cable installation works, would be temporary and reversible in nature and would not result in permanent harm to the significance or setting of any heritage assets. The update to the Outline CEMP [REP2-019] has been made to minimise any temporary visual effects where practicable.
WCD1-133	Construction and Decommissioning	Outline Construction Environmental Management Plan (Rev 2) [REP1-096]	17.4. It is noted that the number of assets which have potential to be affected by the passage of traffic is relatively limited and that the management plans also allow for making good of any physical damage caused. On this basis, it is agreed that there is no requirement for an overall before and after condition survey for heritage assets.	The Applicant notes this comment.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
WCD1-134	Construction and Decommissioning	Outline Construction Environmental Management Plan (Rev 2) [REP1-096]	17.5. The final update to this section of Table 6 , refers back to the update made to the OCTMP [REP1-112] and, whilst welcomed, it is unclear that it will secure mitigation of the potential impact to the character and appearance of the Conservation Area.	<p>Table 6 of the Outline CEMP [REP2-019] and Outline CTMP [REP1-112] have been updated to ensure the design of highway improvement works to the track to the southwest of Rodbourne Road (Works Number 8b) needed to facilitate permanent access to Lime Down Site E (Work Nos. 1 to 6 and 9 to 10) will be undertaken in consultation with the Wiltshire Council Conservation Officer.</p> <p>As such the Applicant considers the character of Rodbourne Conservation Area to be appropriately safeguarded through the Outline CEMP [REP2-019] which will be secured through Requirement 13 of the DCO. Management plans secured by the DCO will be approved by the relevant planning authority (i.e. Wiltshire Council).</p>

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
WCD1-135	Construction and Decommissioning Hydrology, Flood Risk and Drainage	Outline Construction Environmental Management Plan (Rev 2) [REP1-096]	17.6. The 7.25 Outline Water Resources Strategy [APP-290] submitted with the DCO application states that there is a viable water supply for the Scheme to meet its water demands. Notwithstanding this, carbon emissions and water resources reduction is an impact of the project that is possible to mitigate and will become more important as climate change has an impact on availability of water. Therefore, from a climate resilience perspective (e.g. drought), the Applicant should explore opportunities for rainwater harvesting for non-potable uses on site (such as vehicle and solar panel washdown), where feasible. This should be considered alongside the overall drainage and SuDS strategy, with particular focus on buildings and site infrastructure, and subject to agreement with the Environment Agency in relation to water quality	<p>The Applicant notes Wiltshire Council's comment.</p> <p>The Outline Water Resources Strategy [APP-290] demonstrates that a viable water supply is available for the Scheme, and the Applicant does not rely on rainwater harvesting to meet its construction, operational or decommissioning water requirements.</p> <p>The Applicant agrees that opportunities to reduce potable water demand should be considered where practicable. The Applicant has updated the Outline CEMP (Rev 4) [EN010168/APP/7.12] to include a commitment that the detailed CEMP will consider opportunities for rainwater harvesting for appropriate non-potable construction uses, including vehicle washdown, where feasible.</p>

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			<p>and pollution control. The council considers that any such measures should be secured through the CEMP/OEMP as appropriate.</p>	<p>Where relevant to operation, the Applicant has also updated the Outline OEMP (Rev 4) [EN010168/APP/7.13] at Deadline 3 to include a commitment that the detailed OEMP will consider opportunities for rainwater harvesting for appropriate non-potable operational uses, including occasional panel cleaning, where feasible.</p> <p>Any rainwater harvesting would need to be considered alongside the detailed drainage design, SuDS strategy, water quality controls and operational requirements for the relevant part of the Scheme. It must not compromise SuDS performance, firewater containment, pollution control, or the sealed and isolatable drainage principles for BESS and substation infrastructure. Where relevant, the approach would be subject to</p>

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				<p>agreement with the Environment Agency in relation to water quality and pollution control.</p> <p>This is offered as a resource efficiency and climate resilience measure. It is not required to make the Scheme acceptable in flood risk, drainage or water resources terms.</p>
WCD1-136	Other Environmental Matters: Waste	Outline Operational Environmental Management Plan (Rev 2) [REP1-098]	<p>18. 7.13 Outline Operational Environmental Management Plan (Rev 2) [REP1-098]</p> <p>18.1. Paragraph 2.11.2 states that <i>"any waste components (e.g. faulty or damaged Solar PV Panels, batteries, cables, connectors and mounting structures) would also be removed and recycled as far as practical and in accordance with legislation and guidance applicable at the time"</i>. It is suggested that recycling is a topic that an Innovation Forum could cover, taking advantage of developments</p>	<p>The Applicant notes this comment and would consider participation in such a forum if one was established and if the Applicant was invited to join.</p> <p>Please see the more detailed response to question SE1.10 in the Applicant's Response to the Examining Authority's First Written Questions [EN010168/EXAM/9.29] provided at Deadline 3.</p>

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			in good practice and technology, and working with others in the sector to develop regional or national solutions.	
WCD1-137	Other Environmental Matters: Waste Climate Change	Outline Operational Environmental Management Plan (Rev 2) [REP1-098]	18.2. Furthermore, the Monitoring Requirements in Table 1: Climate Change in relation to the 'Greenhouse Gas emissions from the operational maintenance activities required during operation of the Scheme' and in Table 15: Materials and Waste do not include anything about monitoring recycling, reducing pollution, minimising waste, using lower carbon forms of transport and other measures listed in the Mitigation sections. It is suggested that the Monitoring Requirements of the Operational Environmental Management Plan relate to the mitigation measures.	As stated in Table 15: Materials and Waste of Outline OEMP [REP2-021] <i>"Materials requiring removal from the Order limits during operation would be transported using licensed carriers and records kept, detailing the types and quantities of waste moved and the destinations of this waste, in accordance with the relevant regulations."</i> Detailed GHG and waste monitoring requirements will be outlined in the Waste Management Strategy and OEMP.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
WCD1-138	Landscape and Visual	Outline Operational Environmental Management Plan (Rev 2) [REP1-098]	18.3. From a landscape and visual perspective, the council considers that this is a high-level document, which provides limited detailed information and has not addressed the more detailed issues by the council.	The Applicant notes this comment. The Outline OEMP [REP2-021] is secured by Requirement 14 of Schedule 2 of the Draft DCO [REP1-007] .
WCD1-139	Cultural Heritage	Outline Operational Environmental Management Plan (Rev 2) [REP1-098]	18.4. It is noted that Table 6: Cultural Heritage has been updated in relation to landscape mitigation. The additional text relating to monitoring and replanting simply requires compliance with the requirements for replanting etc. in the Landscape and Ecological Management Plan (LEMP) to ensure that the already proposed landscape mitigation is effectively implemented. It does not allow for any review of the performance of the mitigation and whether it is achieving the required benefits or provision for amendment or adaptive	Please see response to WCD-131.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			management should this be found to be required.	
WCD1-140	Cultural Heritage	Outline Operational Environmental Management Plan (Rev 2) [REP1-098]	18.5. The other update to this section of Table 6, refers back to the update made to the OCTMP [REP1-112] and, whilst welcomed, it is unclear that it will secure mitigation of the potential impact to the character and appearance of the Conservation Area.	Please see response to WCD-134.
WCD1-141	Noise and Vibration	Outline Operational Environmental Management Plan (Rev 2) [REP1-098]	18.6. The council notes the proposed amendments to Table 8, which provide additional detail on: <ul style="list-style-type: none"> • The locations where monitoring will be undertaken • The timescales relating to the location and frequency of monitoring • The frequency with which monitoring data will be submitted to the local authority, and 	The Applicant notes, and agrees with, this comment.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			<ul style="list-style-type: none"> The timescales within which the developer will undertake further maintenance or mitigation where review indicates that plant noise levels have exceeded acceptable levels as identified in the ES. 	
WCD1-142	Noise and Vibration	Outline Operational Environmental Management Plan (Rev 2) [REP1-098]	18.7. However, the Outline Environmental Management Plan should also include a map or plan clearly identifying the precise locations of the proposed monitoring points in proximity to the BESS units. In addition, each monitoring location should be assigned a defined maximum noise threshold, aligned with the noise levels predicted by the modelling presented in the ES. Exceedance of these thresholds should trigger specific and enforceable corrective actions to address any identified issues. In the absence of such provisions, there is no clear	The Applicant has responded to this point within item 3.10.8 of 8.2 Statement of Common Ground with Wiltshire Council [REP2-025] , and the matter is under discussion.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			mechanism to ensure that the noise levels committed to within the ES will be achieved in practice.	
WCD1-143	Hydrology, Flood Risk and Drainage	Outline Operational Environmental Management Plan (Rev 2) [REP1-098]	18.8. The 7.25 Outline Water Resources Strategy [APP-290] submitted with the DCO application states that there is a viable water supply for the Scheme to meet its water demands. Notwithstanding this, carbon emissions and water resources reduction is an impact of the project that is possible to mitigate and will become more important as climate change has an impact on availability of water. Therefore, from a climate resilience perspective (e.g. drought), the Applicant should explore opportunities for rainwater harvesting for non-potable uses on site (such as vehicle and solar panel washdown), where feasible. This should be considered alongside the overall drainage and SuDS strategy, with particular	<p>The Applicant notes Wiltshire Council's comment. This point is also addressed in the Applicant's response to WCD1-135.Outline Water Resources Strategy [APP-290] demonstrates that a viable water supply is available for the Scheme, and the Applicant does not rely on rainwater harvesting to meet its construction, operational or decommissioning water requirements.</p> <p>The Applicant agrees that opportunities to reduce potable water demand should be considered where practicable. The Applicant has updated the Outline CEMP (Rev 4) [EN010168/APP/7.12] at Deadline 3 to include a commitment that the detailed CEMP will consider opportunities for rainwater</p>

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			<p>focus on buildings and site infrastructure, and subject to agreement with the Environment Agency in relation to water quality and pollution control. The council considers that any such measures should be secured through the CEMP/OEMP as appropriate.</p>	<p>harvesting for appropriate non-potable construction uses, including vehicle washdown, where feasible.</p> <p>The Applicant has also updated the Outline OEMP (Rev 4) [EN010168/APP7.13] at Deadline 3 to include a commitment that the detailed OEMP will consider opportunities for rainwater harvesting for appropriate non-potable operational uses, including occasional panel cleaning, where feasible.</p> <p>Any rainwater harvesting would need to be considered alongside the detailed drainage design, SuDS strategy, water quality controls and operational requirements for the relevant part of the Scheme. It must not compromise SuDS performance, firewater containment, pollution control, or the sealed and isolatable drainage principles for</p>

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				<p>BESS and substation infrastructure. Where relevant, the approach would be subject to agreement with the Environment Agency in relation to water quality and pollution control.</p> <p>This is offered as a resource efficiency and climate resilience measure. It is not required to make the Scheme acceptable in flood risk, drainage or water resources terms.</p>
WCD1-144	<p>Climate Change</p> <p>Other Environmental Matters: Materials and Waste</p>	<p>Outline Operational Environmental Management Plan (Rev 2) [REP1-098]</p>	<p>Furthermore, the 7.3 Design Approach Document [APP-268] mentions the Applicant's design principles that "<i>Projects are functional and fit for purpose, adaptable and able to respond to innovative new technologies, with built-in resilience to climate change</i>" and the 'scheme specific design principles' number 4 states "<i>The Scheme design will retain a degree of flexibility to enable it to adapt over time, be functional and</i></p>	<p>An Innovation Forum could be explored as part of the Community Liaison Group which will be set up prior to construction and will continue through until the first anniversary of the date of the final commissioning of the Scheme as a formal forum for local issues to be raised.</p> <p>Please see the more detailed response to question SE1.10 in the Applicant's Response to the</p>

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			<p><i>fit for purpose, and respond to innovative and new technologies as well as building resilience to climate change.</i>" In order to adhere to good practice and guidance throughout the time of operation, it is suggested that an Innovation Forum is set up, with an opportunity to enable flexibility over the scheme's lifetime and the ability to evolve with new innovations and best practice. It is also suggested that recycling is a topic that an Innovation Forum could cover, as per comment above.</p>	<p>Examining Authority's First Written Questions [EN010168/EXAM/9.29]</p> <p>Furthermore, the Community Benefit Fund (CBF) could provide a mechanism to fund related projects. As stated in the Planning Statement [REP2-017], the CBF does not form part of the DCO application and this funding is not required to mitigate the impacts of the Scheme.</p>
WCD1-145	Consultation and Engagement	Outline Operational Environmental Management Plan (Rev 2) [REP1-098]	<p>18.10. In the council's Relevant Representation [RR-4934], the council indicated that it considered that the Community Liaison Forum should continue during the first six years of scheme operation. It is noted that this has not been reflected in this document. There is also no mention either that the</p>	<p>Please refer to the response to WCD1-019.</p>

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			Forum would operate during the first year of operation, as currently specified within the draft DCO [REP1-007] and Outline Construction Environmental Management Plan [REP1- 096].	
WCD1-146	Climate Change	Outline Decommissioning Strategy (Rev 2) [REP1-100]	<p>19. 7.14 Outline Decommissioning Strategy (Rev 2) [REP1-100]</p> <p>19.1. Paragraph 2.1.3 states “<i>All Solar PV Panels, mounting structures, cabling, inverters, transformers, switchgear, BESS Area, substations and access tracks would be removed from within the Solar PV Sites and recycled or disposed of in accordance with good practice and market conditions at that time</i>” and Table 1: Climate Change places an emphasis on recycling in order to address greenhouse gas emissions. However, the</p>	<p>The Outline Decommissioning Strategy [REP1-100] has been updated at Deadline 3 with the following text: <i>The detailed Decommissioning Environmental Management Plan shall include procedures for monitoring and recording the implementation of decommissioning mitigation measures, including waste management and material recovery, recycling and disposal routes, sustainable transport measures where adopted, and management of climate-related risks during decommissioning activities.</i></p>

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			Monitoring Requirements in relation to the 'Greenhouse Gas emissions from decommissioning traffic and equipment' do not include anything about monitoring recycling, reducing pollution, minimising waste, using lower carbon forms of transport and other measures listed in the Mitigation section. It is suggested that the Monitoring Requirements of the Decommissioning Strategy relate to the mitigation measures.	
WCD1-147	Construction and Decommissioning Consultation and Engagement	Outline Decommissioning Strategy (Rev 2) [REP1-100]	19.2. Paragraph 2.10.3 indicates that the Community Liaison Group will be re- established for the decommissioning phase. Wiltshire Council welcomes this commitment as it was previously requested by the council in its Relevant Representation [RR-4934]. However, clarity is required as to when the “decommissioning phase” commences. The council considers that the Applicant should	The Applicant confirms that the establishment of the Community Liaison Group for decommissioning is in paragraph 2.10.3 of the Outline Decommissioning Strategy [REP1-100] which is secured by Requirement 20 of the Draft DCO [REP1-007] . To ensure the establishment of the Community Liaison Group is undertaken ahead of

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			take steps to establish the forum from the point that it notifies the planning authority that it intends to decommission any part of the authorised development (i.e. no later than 12 months prior), and the group must be established at least 6-months prior to any decommissioning activity commencing. The council also notes that Requirement 4 in the draft DCO [REP1-007] should be updated to reflect that the group will operate during the decommissioning phase.	decommissioning, the Applicant has updated Requirement 20 in Schedule 2 to the draft DCO to require that the community liaison group is re-established to meet at least 6 months before the intended date of decommissioning, so that local issues can inform the decommissioning plan submitted for approval. The Outline Decommissioning Strategy has also been updated to confirm that the community liaison group will continue to meet until decommissioning of that part of the authorised development has been completed.
WCD1-148	Landscape and Visual	Outline Decommissioning Strategy (Rev 2) [REP1-100]	19.3. With respect to landscape and visual matters, very little information is given regarding the landscape and visual effects of decommissioning. There is no detail on how this will be undertaken without incurring further adverse landscape and	At decommissioning, other than the buried cabling, all infrastructure would be removed. Although an adverse effect will be experienced during the process of decommissioning, once decommissioning is completed, the adverse effect would be ceased.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			<p>visual effects. Additionally, there is a concern as to what happens to the embedded landscaping and mitigation undertaken and which, as has been highlighted in Relevant Representation responses, may not be appropriate to the area to reinstate the rural agricultural landscape to its current baseline state.</p>	<p>The reinforced landscape would have the ability to absorb short term decommissioning activities.</p> <p>At decommissioning, land within the Scheme would be returned back to landowner's control. It is assumed at decommissioning the equivalent of the current day landscape protection policies/regulations will exist to ensure retention of the landscape features.</p> <p>Therefore, as infrastructure is removed, there would be an overall benefit to the character of the area with landscape mitigation retained providing long term benefit towards the legacy landscape.</p>
WCD1-149	Other Environmental Matters:	Outline Site Waste Management	<p>20. 7.16 Outline Site Waste Management Plan (Rev 2) [REP1-102]</p>	<p>Other waste from construction of fencing, internal tracks, substations and field stations, construction compounds and other supporting infrastructure mentioned in</p>

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
	Materials and Waste	Plan (Rev 2) [REP1-102]	20.1. It is noted in paragraph 1.1.3 that a waste component is " <i>Other waste from construction of fencing, internal tracks, substations and field stations, construction compounds and other supporting infrastructure</i> ". In short, not just PV Module and Module Support packaging waste allowed for in the HGV generation figures.	<p>paragraph 1.1.3 of the Outline Site Waste Management Plan (Rev 2) [REP1-102] includes the following from Table 3:</p> <ul style="list-style-type: none"> • Hazardous waste (e.g. chemicals, batteries, solvents, oils, oily rags aerosols etc.), • Excavated soil (e.g. that deemed to be unsuitable for refill and compaction) and • Construction material wastage. <p>An allowance for the above has been made within the movements associated with general construction activities within HGV trip generation figures presented in Annex E of ES Volume 3, Appendix 13-1: Transport Assessment [REP1-057 and REP1-059]. The calculations also include buffer for a further 50% uplift in all HGV construction trips.</p>

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
WCD1-150	Other Environmental Matters: Materials and Waste Transport and Access	Outline Site Waste Management Plan (Rev 2) [REP1-102]	20.2. 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 (10m tippers). However, no bespoke allowance is made in the HGV traffic estimates. See also separate comment on Annex E to the Transport Assessment [REP1-057 and REP1-059]. Waste quantities stated for plastic, paper and cardboard packaging are very small in comparison to the stated excavated spoil waste.	For the purpose of the waste assessment outlined in 6.1 Environmental Statement Volume 1, Chapter 20: Other Environmental Matters [APP-072] , the 139,666 m ³ of excavated soil is deemed to be waste. Waste quantities stated for plastic, paper and cardboard packaging do not correlate to excavated soil. It has been assumed that any excavated material will remain 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. While it is anticipated that most of the spoil from the construction of access tracks etc. will remain on site, the calculations at Annex E of ES Volume 3, Appendix 13-1: Transport Assessment [REP1-057 and REP1-059] allow for general construction activities, including

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				the removal of spoil, other construction waste and the installation and removal of construction compounds.
WCD1-151	Other Environmental Matters: Materials and Waste Transport and Access	Outline Site Waste Management Plan (Rev 2) [REP1-102]	20.3. Paragraph 1.4.4 further states " <i>Excavated material reuse of suitable excavated materials on-site would be via a Materials Management Plan (MMP), developed post-consent in accordance with the Contaminated Land: Applications in Real Environments Definition of Waste: Development Industry Code of Practice (CL:AIRE DoW CoP) (Ref 14), exemption, or environmental permit</i> ". However, the quantum of spoil set out in Table 3 is stated as being unsuitable for reuse, so presumably this will fall outside of the MMP and require export by HGVs from site.	Excavated material suitable for reuse is not included in Table 3 of Outline Site Waste Management Plan (Rev 2) [REP1-102] since it would not be classed as a waste. It has been assumed that any excavated material will remain 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. While it is anticipated that most of the spoil from the construction of access tracks etc. will remain on site, the calculations at Annex E of ES Volume 3, Appendix 13-1: Transport Assessment [REP1-057 and REP1-059] allow for general construction activities, including the removal of spoil, other

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				construction waste and the installation and removal of construction compounds.
WCD1-152	Arboriculture	Outline Ecological Protection and Mitigation Strategy (Rev 2) [REP1-106]	<p>20. 7.19 Outline Ecological Protection and Mitigation Strategy (Rev 2) [REP1-106]</p> <p>21.1. Paragraph 2.3.3 indicates that Tree Protection Fencing will be installed in accordance with British Standard 5837:2012. The council considers that this should also indicate that it should be in accordance with an approved Tree Protection Plan.</p>	<p>The Applicant notes this comment and confirms that Detailed Tree Protection Plans (TPPs) will be prepared in accordance with BS 5837:2012 and submitted for approval prior to the commencement of development. The TPPs will provide site-specific details of protective fencing locations, specifications and ground protection measures for all retained trees and hedgerows. Arboricultural mitigation is secured through the Outline Construction Environmental Management Plan (CEMP) [REP2-019] and the Outline OEMP [REP2-021], which are certified documents secured by Requirements 13 and 14 of the DCO and subject to approval by Wiltshire Council.</p>

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
WCD1-153	Arboriculture Ecology and Biodiversity Transport and Access	Outline Ecological Protection and Mitigation Strategy (Rev 2) [REP1-106]	21.2. It is noted that Paragraph 2.3.8 states that Biodiversity Protection Fencing (BPF) will be installed a minimum of 15m from all woodland, hedgerows, lines of trees and designated sites. Further details need to be provided regarding the relocation of the access track and access points to the north of North Bincombe Wood, which is located within the 15m buffer in Lime Down Site E.	The Applicant notes this comment. Following design discussions and taking Wiltshire Council comments into consideration, the Outline CEMP [REP2-019] were updated to include a 15m buffer for all works from North Bincombe Wood. The access road adjacent to North Bincombe Wood is no longer being used and a new construction access is to be constructed. Final alignment of the access track is to be confirmed following further design and engineering discussions.
WCD1-154	Transport and Access	Outline Construction Traffic Management Plan (Rev 2) [REP1-112]	22. 7.22 Outline Construction Traffic Management Plan (Rev 2) [REP1-112] 22.1. In previous Wiltshire Council comments [RR-4934], it was noted that "The future need for a 'detailed 'CTMP is accepted, but what may be preferably needed is separate CTMPs for the different Lime Down areas, although it may be possible	The Applicant makes note of this comment.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			to combine these plans where works / signage needs are concurrent and use the same proposed construction access route". Paragraph 1.3.2 has now been reworded as follows: " <i>Final CTMPs and Final Operational Environmental Management Plan (OEMP) including traffic measures needed for scheduled replacements in substantial accord with this Outline CTMP, will be approved by Wiltshire Council and South Gloucestershire Council, as the local planning and highway authorities, prior to construction commencing. This will include for an option for separate Final CTMPs to be prepared for each Solar PV Site and the Cable Route Corridor</i> ". This would seem to cover off the point raised and provides this flexibility.	
WCD1-155	Transport and Access	Outline Construction	22.2. Paragraph 2.1.5 states that " <i>During the construction phase,</i>	The use of Banksmen to manage movements at construction access

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
		Traffic Management Plan (Rev 2) [REP1-112]	<p><i>banksmen will be deployed at each access whenever construction vehicles are accessing or egressing the Order Limits. This will ensure the safe movement of construction vehicles in and out of the Solar PV Sites and will overcome any instances where the achievable visibility is below guidance, which is a factor at a small number of access locations".</i></p> <p>For the avoidance of doubt, the use of bankmen will not be accepted as a substitute for providing the requisite visibility splays at the proposed access junctions where the Applicant has land control under the DCO to do so. It may be necessary to employ temporary traffic control in other situations during the construction phase where visibility standards cannot be met. Safe egress should not rely on an operative stepping into the carriageway to establish</p>	<p>points is a common and widely accepted practice on construction sites to overcome any instances where the achievable visibility is below guidance, which is a factor at a small number of access locations.</p> <p>The use of bankmen will limit any requirement for extensive and unnecessary hedgerow removal for what will be a temporary construction phase.</p>

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			whether opposing vehicles are present.	
WCD1-156	Transport and Access	Outline Construction Traffic Management Plan (Rev 2) [REP1-112]	22.3. Sub-Section 2.3 Detailed Design still states in part that "Prior to carrying out any work to the public highway, the detailed design of such works must be submitted to the highway authority for technical approval". This goes on to say that this will include in part a construction programme for the works, detailed technical drawings, CDM documentation, Stage 1-2 RSA and details of the proposed contractor. However, as previously noted, the council does not consider that the OCTMP or a final CTMP to be the appropriate mechanism for the technical approval of permanent highway works. This is not considered a substitute for 'requiring' bespoke highway agreements where necessary under Article 15 of the DCO for all works undertaken	The applicant makes note of this comment. The Outline CTMP (Rev 2) [REP1-112] will be updated once Protective Provisions are agreed. Please also refer to WCD1-025, WCD1-12, and WCD1-030.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			<p>within the public highway, where such agreements would normally subsume the technical approval requirement of all drawings and allied documentation. However, the preferred approach to this, which is a matter under discussion with the Applicant, is to include all these technical approval requirements within bespoke Wiltshire Council Protective Provisions in Schedule 15 to the DCO. Once these Protective Provisions are agreed and written in, then it would simply be necessary to additionally reference these in the OCTMP in revising paragraph 2.3.1, for example as follows:</p> <p><i>“Prior to carrying out any work to the public highway, the detailed design of such works and all necessary supporting documentation must be submitted to the highway authority for technical approval in full</i></p>	

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			<i>accordance with the Wiltshire Council 'Protective Provisions' set out in Schedule 15 to the DCO".</i>	
WCD1-157	Transport and Access	Outline Construction Traffic Management Plan (Rev 2) [REP1-112]	22.4. Paragraph 2.3.2 has been added to respond to concerns regarding the potential for impact on the Rodbourne Conservation Area: " <i>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.</i> " 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	Please see response to WCD-134.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			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.	
WCD1-158	Transport and Access	Outline Construction Traffic Management Plan (Rev 2) [REP1-112]	22.5. Section 3: Construction Vehicle Trip Generation is drawn from the Transport Assessment (TA) [REP1-057 and REP1-059]. The council's Highways Development Management Officer has commented in depth on this in reviewing Annex E of the TA. Suffice to say, any revisions to predicted HGV volumes made necessary by changes needed to component or materials quantity assumptions would need to be	The Applicant makes note of this comment. No changes have been made to the predicted HGV volumes.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			amended in this part of the OCTMP.	
WCD1-159	Transport and Access	Outline Construction Traffic Management Plan (Rev 2) [REP1-112]	22.6. Paragraph 3.2.9 states that a shuttle bus will be used for workers to travel to and from the site. It is suggested that the shuttle buses should be Ultra Low Emission Vehicles. This is not mentioned in the draft plan, but the council's Climate Officer considers this should be an option that is considered and can be flexible over time to adjust to the latest low emission option according to developments in technology, feasibility of charging and cost.	The Applicant makes note of this comment and has updated the Outline CEMP (Rev 4) [EN010168/APP/7.12] to Deadline 3 to provide for the use of Ultra Low Emissions Vehicles for the Shuttle Buses where reasonably practical.. However, the use of such vehicles will depend on reasonable availability and viability. The Applicant can therefore not commit to the exclusive use of Ultra Low Emissions Vehicles for Shuttle Buses.
WCD1-160	Transport and Access	Outline Construction Traffic Management Plan (Rev 2) [REP1-112]	22.7. Sub-Section 4.6: Highway Improvement Areas remains unchanged from the first iteration. As such, previous council comments [RR-4934] remain applicable. As noted previously and now based on the review of swept path drawings in Annexes J and K to the Transport Assessment	See responses to WCD1-100 to WCD1-108. As set out in the Outline CTMP [REP1-112] , pre-construction, interim and post-construction Road Condition Surveys will be undertaken to repair any damage caused to the highway and verges

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			[REP1-057 and REP1-059], the council's Highways Development Management Officer has concerns that the identified extent of HIAs is still insufficient and may lead to passage issues for HGVs along some of the minor roads excluded. This could lead to verge damage or potentially highway safety issues if conflicts result in a need for lengthy vehicle reversing movements to a suitable passing point.	during the construction period. The details of these surveys will be confirmed as part of the Final CTMPs.
WCD1-161	Transport and Access	Outline Construction Traffic Management Plan (Rev 2) [REP1-112]	22.8. Section 5: Abnormal Loads considers AIL deliveries and proposed routes, with a more detailed AIL assessment provided in Appendix D. Table 6 Abnormal Load Movements states vehicle movements of 120 tonnes would be required for the delivery of transformers. The council's Arboricultural Officers consider that this will have a long-term negative impact on this Protected Ancient Woodland, should the access track	The Applicant notes this comment. Following design discussions and taking Wiltshire Council comments into consideration, the Outline Construction Environmental Management Plan (OCEMP) [REP1-096] has been updated to include a 15m buffer for all works from North Bincombe Wood. The access road adjacent to North Bincombe Wood is no longer being used and a new construction access is to be constructed within

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			adjacent to North Bincombe Wood, located within the 15m buffer in Lime Down Site E be used. Therefore, to prevent any impact, the council considers that the access track and access points should be located outside the 15m buffer.	the adjacent solar PV areas under the Work no.5A (ii) as defined in the Draft Development Consent Order [REP1-007] . Final alignment of the access track is to be confirmed following further design and engineering discussions.
WCD1-162	Transport and Access	Outline Construction Traffic Management Plan (Rev 2) [REP1-112]	22.9. Sub-Section 6.6 Vehicle Movement has now been revised and additionally includes the following statements " <i>Drivers will receive training and be made aware of the routes to each access in advance of driving to the Site. Delivery drivers will therefore be required to follow the routes and will not be permitted to use any alternative routes</i> " and " <i>The requirements of the DCO and Final CTMPs are legally binding and measures to enforce drivers to use construction routes will be set out in the Final CTMPs. Any drivers</i>	The Applicant makes note of this comment.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			<i>not following construction routes will receive retraining".</i>	
WCD1-163	Transport and Access	Outline Construction Traffic Management Plan (Rev 2) [REP1-112]	22.10. This is welcomed given the concern raised in the Wiltshire Council Written Representation [REP1-138] about HGV access from the east to the Lime Down Solar Park Sites A-C areas. As noted in this document, this is because the prescribed route westwards to M4 Junction 18 and then back eastwards along the B4040 / B4039 to Grittleton is considerably longer than exiting at M4 Junction 17 and using either 'The Street' through Hullavington to get to Grittleton or the Lime Down Solar Park Site D route beyond Bradfield Cottages to Fosse Way via Norton. Given the significant reduction in mileage with exiting at M4 Junction 17, it is considered there could be a considerable incentive for HGV drivers seeking to access the Lime Down Solar	<p>The Applicant makes note of this comment.</p> <p>Further details on monitoring and enforcement have been included at Section 6.14 of the update to Outline CTMP (Rev 2) [REP1-112] submitted at Deadline 3.</p> <p>Final agreement and detail on possible sanctions which could be applied to non-compliance after all suggested procedures set out in the updated Outline CTMP are exhausted will be included within the detailed and agreed in the Final CTMPs.</p>

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			<p>Park Sites A-C from this direction to do it. 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.</p>	
WCD1-164	Transport and Access	Outline Construction Traffic Management Plan (Rev 2) [REP1-112]	<p>22.11. Sub-Section 6.1.2 Road Condition Survey has now been amended to include a requirement for highway condition surveys at 6-monthly intervals during the construction phase, as opposed to simple pre-construction and post construction highway condition surveys, which is welcomed. It now</p>	<p>The Applicant notes the inclusion of a requirement to undertake highway condition surveys at 6-monthly intervals is welcomed and agreed.</p> <p>The wording 'reasonably be attributable' is considered appropriate. If traffic is extraordinary as considered by Wilshire</p>

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			<p>additionally states in paragraph 6.12.1 that the purpose is <i>“to identify any additional defects that can reasonably be attributable to construction activities at the Site. Any identified highways defects or carriageway structural failures resulting from construction activities associated with the Site will be corrected to the satisfaction of the local highway authority, either on the completion of the Construction Phase or, if required for safety reasons, during the Construction Phase”</i>. This again is a welcome addition to the OCTMP, although the wording ‘reasonably be attributable’ is of concern as, in the view of the Council, the level of increased HGV trafficking needed along a lot of the minor roads over the two year construction will be wholly extra-ordinary as defined by s59 of the Highways Act. To refer in part to the definition here, this refers to traffic that is so</p>	<p>Council, damaged caused along these routes by construction traffic will be covered. The wording has been included to ensure the applicant is not liable for any damage clearly caused by other users along these routes.</p>

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			exceptional in quality or quantity, or so unusual in ordinary occurrence, that it causes damage to the road beyond what is common. It is not defined by a specific vehicle type, but rather by the damage it causes and how it differs from the average traffic on that specific road.	
WCD1-165	Transport and Access	Outline Construction Traffic Management Plan (Rev 2) [REP1-112]	<p>22.12. In view of the above and, as set out in the Wiltshire Council Written Representation [REP1-138], the Council preference would be a formal s59 Agreement (Highways Act 1980) included as a DCO Requirement to cover highway damage liability, so not something the Applicant 'might' be prepared to entertain or agree to. As noted in the representation, this would be expected to cover the following as a minimum, some of which is now alluded to in the latest OCTMP draft:</p> <ul style="list-style-type: none"> The required network extent of comprehensive 	<p>The Applicant makes note of this comment.</p> <p>The agreement to undertake road condition surveys is set out in the Outline CTMP [REP1-112]. The preparation, approval and implementation of the final CTMPs, substantially in accordance with the Outline CTMP, are secured through Requirement 15 of Schedule 2 of the Draft Development Consent Order [REP1-007]. Therefore, a formal s59 Agreement (Highways Act 1980) included as a DCO</p>

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			<p>'independent' highway pre-condition surveys. Road lengths considered as a necessary 'minimum' by Wiltshire Council have been set out in its Local Impact Report [REP1-137].</p>	<p>Requirement to cover highway damage liability is not required.</p> <p>The Outline CTMP has been updated and submitted at deadline 3 to allow for maintenance works to be undertaken prior to construction. However, the Highway Authority will only be allowed to recover any additional costs incurred, over and above its existing responsibility to maintain, in a steady state, the road(s) in question.</p>
WCD1-166	Transport and Access	Outline Construction Traffic Management Plan (Rev 2) [REP1-112]	<ul style="list-style-type: none"> Agreement to do some pre-emptive highway works if necessary if the said precondition surveys reveal defects which could lead to early failure with the level of HGV construction traffic envisaged. 	See response to WCD1-165.
WCD1-167	Transport and Access	Outline Construction Traffic	<ul style="list-style-type: none"> Linked to the above, a mechanism to do necessary repairs at no cost to the 	See response to WCD1-165.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
		Management Plan (Rev 2) [REP1-112]	council during the construction / decommissioning phase. This would require details of remedial works proposed to be firstly approved by the council, and the completed works subject to an inspection regime.	
WCD1-168	Transport and Access	Outline Construction Traffic Management Plan (Rev 2) [REP1-112]	<ul style="list-style-type: none"> Agreement to return the roads covered and used for HGV construction trafficking to 'at least' as good a condition as they were at outset after the construction / decommissioning phase. 	See response to WCD1-165.
WCD1-169	Transport and Access	Outline Construction Traffic Management Plan (Rev 2) [REP1-112]	22.14. In terms of the extents provisionally set out in paragraph 6.12.2 , it is considered the length of Fosse Way serving as the construction access route to Lime Down areas A-C should additionally be included. It remains unclear as to whether Alderton Road should be, as this will be	The length of Fosse Way serving as the construction access route to Lime Down areas A-C is included in the updated Outline CTMP (Rev 4) [EN010168/APP/7.12] submitted at Deadline 3.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			notably altered by the now proposed HIA works set out in Annex E to the Transport Assessment [REP1-057 and REP1-059].	
WCD1-170	Consultation and Engagement	Outline Construction Traffic Management Plan (Rev 2) [REP1-112]	23.1. The initial draft Statement of Common Ground between Wiltshire Council and the Applicant will be submitted into examination at Deadline 2.	The Applicant makes note of this comment.
WCD1-171	Noise and Vibration Air Quality	Outline Construction Traffic Management Plan (Rev 2) [REP1-112]	23.2. However, the council has noted that the List and Status of SoCGs within Table 3 in the Statement of Commonality for Wiltshire Council does not reflect the current position. Noise and vibration should not be marked as 'Green' or 'Agreed', as it remains 'Under Discussion' and should therefore be represented as 'Amber'. However, Air Quality should be 'Green' instead of 'Amber'. It is considered that this was a simple highlighting error by	The Applicant notes the error in the 8.1 Statement of Commonality regarding the status of Noise and Vibration and Air Quality and this was updated for Deadline 2 [REP2-023].

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			the Applicant, and the council asks that this is remedied in this document's next iteration.	
WCD1-172	Glint and Glare Battery Safety	Outline Construction Traffic Management Plan (Rev 2) [REP1-112]	23.3. The council also notes that its SoCG indicates that Glint and Glare and BESS fire suppression remain 'Under Discussion' and therefore the Statement of Commonality should be updated accordingly.	The Applicant notes the omission of the status of agreement for Glint and Glare and BESS fire suppression in 8.1 Statement of Commonality [REP2-023] and this will be updated for Deadline 3.
WCD1-173	Consultation and Engagement	Outline Construction Traffic Management Plan (Rev 2) [REP1-112]	23.4. As the same status for items in relation to Wiltshire Council was contained within the Statement of Commonality (Rev 2) [REP1A-010], the comments above apply to that submission as well.	The Applicant notes the comment and has responded above to specific points raised.
WCD1-174	Climate Change	Applicant's Response to Relevant Representations – Part 2	24. 9.3 Applicant's Response to Relevant Representations – Part 2 (Rev 2) [REP1-117] 24.1. The Applicant's response to RR-1503 at CC-31 states "The overall assessment concludes that	As set out in the EN-1 paragraph 5.3.1, " <i>in light of the vital role energy infrastructure plays in the process of economy-wide decarbonization, the Secretary of State must accept that there are likely to be some residual</i>

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
		(Rev 2) [REP1-117]	<i>the impact of embodied carbon from the Scheme during the construction phase is negligible and in line with the UK Carbon budget.</i> Wiltshire Council does not agree that the embodied carbon is negligible.	<p><i>emissions from the construction and decommissioning of energy infrastructure.</i></p> <p>The Applicant notes Wiltshire Council's comment. The term "negligible" was used in the context of the Scheme's contribution to national greenhouse gas emissions and carbon budgets, rather than suggesting that embodied carbon emissions are insignificant in absolute terms.</p> <p>The Climate Change Assessment quantifies the greenhouse gas emissions associated with the manufacture, transport, construction, operation, maintenance and decommissioning of the Scheme. These emissions have been assessed in accordance with relevant guidance and represent a finite and unavoidable consequence of delivering</p>

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				<p>nationally significant renewable energy infrastructure.</p> <p>The assessment concludes that, whilst embodied carbon emissions arise during construction, these emissions are proportionate to the scale of the development and do not materially affect the UK's ability to meet its carbon budgets or net zero commitments. Furthermore, when considered alongside the renewable electricity generated by the Scheme over its operational lifetime, the overall effect of the Scheme is a net reduction in greenhouse gas emissions compared with the baseline scenario.</p> <p>Accordingly, the Applicant considers that the assessment provides an appropriate and balanced evaluation of the Scheme's greenhouse gas impacts</p>

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				and its contribution to national decarbonisation objectives.
WCD1-175	Landscape and Visual	Technical Note on Landscape Fabric and Landscape Character [REP1-121]	<p>25. 9.5. Technical Note on Landscape Fabric and Landscape Character [REP1-121]</p> <p>25.1. Following concerns raised in Wiltshire Council's Relevant Representation [RR- 4934] regarding the way 'Landscape Fabric' components and landscape character receptors have been included and assessed within the Landscape and Visual Impact Assessment (LVIA), as presented in ES Volume 1, Chapter 8 Landscape and Visual [APP-060], the Applicant has prepared this additional technical note owing to the Applicant's view that the council's landscape team has misunderstood the Applicant's approach to assessment of</p>	The Applicant notes this comment.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			<p>landscape fabric components. At Paragraph 4.1.1 the Technical Note states <i>'The LVIA in ES Volume 1 Chapter 8 [APP-060] has assessed Landscape Fabric and Landscape Character independently as two separate receptors. Landscape Fabric relates only to land within the Order Limits of the Scheme and refers only to the physical elements and features within each of the five Lime Down Solar Sites and the physical changes they undergo.'</i></p>	
WCD1-176	Landscape and Visual	Technical Note on Landscape Fabric and Landscape Character [REP1-121]	<p>25.2. The council agrees with the advised approach but highlights to the ExA that assessment of landscape fabric should include consideration of effects to existing natural and manmade fabric components, alongside effects arising from the introduction of new fabric components (natural and manmade) within the DCO limits.</p>	<p>The Applicant maintains its position that the effects on the man-made elements of the landscape are fully considered in the independent Landscape Character Assessments undertaken on the 1 km Local Study Area, the 2km Wider Study Area and the Outer 5km Study Area as set out in ES Volume 3, Appendix 8-3-2-2</p>

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			There is no misunderstanding by the council in this regard. The council maintains its view that there is a failure to include any man-made or built landscape fabric components within the landscape assessment.	Landscape and Visual Assessment Sheets (Significant) [APP-191] and further explained in the Technical Note on Landscape Fabric and Landscape Character [REP1-121] .
WCD1-177	Landscape and Visual	Technical Note on Landscape Fabric and Landscape Character [REP1-121]	25.3. At Paragraph 4.1.2 the Technical Note states ' <i>By treating Landscape Fabric as a separate Landscape Receptor, the approach allows the physical landscape benefits of the Scheme (such as new hedgerows and meadows) at the Site level to be quantified without affecting the separate assessment on Landscape Character.</i> ' The council considers the assessment of landscape fabric components cannot be limited to natural landscape components only, or those only capable of potentially resulting in positive effects within the DCO site areas. It is the council's view that the	The definition of Landscape Fabric was included in the LVIA Scoping and PEIR reports and the LVIA Methodology in ES Volume 3, Appendix 8-1 Landscape and Visual Impact Assessment Methodology [APP187] at section 1.6 on Landscape Receptors is clear about the approach of the assessment on Landscape Fabric as a separate receptor. Please see response below regarding the physical changes to Landscape Fabric as a result of the Scheme (WCD1-178).

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			assessment of Landscape fabric is not complete and does not give a true picture of the physical change effects likely for landscape fabric. The Technical Note provides no additional evidence that the effects have been adequately or accurately assessed, and the council maintains its view that it does not agree with the Applicant's approach or findings in this respect.	
WCD1-178	Landscape and Visual	Technical Note on Landscape Fabric and Landscape Character [REP1-121]	25.4. To illustrate the above points further, while the lengths of new or strengthened existing hedgerows and meadow planting areas are quantified within the assessment as tangible beneficial effects, the lengths of the existing hedgerow network requiring removal is not quantified. Also not considered or quantified as tangible and physical changes to the fabric of the site areas within the DCO limits include physical urbanising changes to the	The Applicant recognises the potential for loss of hedgerows and trees within the Solar PV Sites is limited as existing hedgerow gaps have been utilised for access points wherever possible during both construction and operation and maintenance. A small number of new, permanent (for the duration of the Scheme) gaps need to be created to facilitate access to particular fields/parts of the Solar PV Sites including providing

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			<p>local road network (to accommodate necessary highway mitigations); the introduction of kilometres of new site access roads and internal access tracks replacing existing farmland. The physical introduction of Solar PV, BESS and Substation infrastructure components will represent new tangible urbanising components and features connected with the proposed land use change.</p>	<p>access for Abnormal Indivisible Loads (AIL), totalling approximately 327 m in length. 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 %), and new planting will be implemented to ensure that any losses are compensated for. The vast majority of hedgerows within the Solar PV Sites were classified as being 'Important' as shown in the TPO and Hedgerow Plan [EN10168/APP/2.7]. A Hedgerow Removal Plan showing anticipated permanent hedgerow losses is provided in the Outline EPMS [EN10168/APP/7.19].</p> <p>The physical introduction of Solar PV, BESS and Substation infrastructure components and features connected with the proposed land use change has been included in the assessment</p>

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				of Landscape character as set out in ES Volume 3, Appendix 8-3-2-2 Landscape and Visual Assessment Sheets (Significant) [APP-191] and further explained in the Technical Note on Landscape Fabric and Landscape Character [REP1-122] .
WCD1-179	Landscape and Visual Cumulative and In-Combination Effects	Technical Note on Intra Project Cumulative Visual Effects [REP1-122]	<p>26. 9.6 Technical Note on Intra Project Cumulative Visual Effects [REP1-122]</p> <p>26.1. While the council welcomes the Technical Note has been provided, it only refers to visual issues and not landscape character effects. The Technical Note does not address the fundamental issues relating to the establishment of either cumulative visual or landscape effects. Cumulative effects are exactly that, an accumulation of effects from two or more sites or, in this case, project areas. They are assessed</p>	<p>Intra Project Landscape and Visual Effects were fully assessed in the LVIA in ES Volume 1 Chapter 8 [APP-060] and ES Volume 3, Appendix 8-3-2-2 Landscape and Visual Assessment Sheets (Significant) [APP-191].</p> <p>The Applicant responded to section 8.22 of the Relevant Representations from Wiltshire Council, which stated "An assessment of cumulative visual effects of Sites A-E must be undertaken.... The Technical note [REP1-122] explains where the visual assessment was undertaken</p>

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			at a high level but should be assessed separately from the individual components of the view or the landscape. They cannot be determined by simply averaging the impacts of individual components. Paragraphs 2.2.4 and 2.2.5 bring in 'inter cumulative' sites, the council has no idea where this has arisen from and why it is relevant to Intra project cumulative effects.	and summarises the results to demonstrate the limited scheme effects. The Technical note identified seven Private Receptors; nine Public Receptors; and six Transport Receptors where more than one Lime Down Site would be visible and of these receptors there is 1 Private Receptor; 4 Public Receptors and 1 Transport Receptor where Significant effects were recorded. In all cases, the effect of the secondary site is less than the primary Site.
WCD1-180	Landscape and Visual Cumulative and In-Combination Effects	Technical Note on Intra Project Cumulative Visual Effects [REP1-122]	26.2. Paragraph 2.3.6 is confused and although representative viewpoints are very useful for defining the broader visual amenity, specific views are also extremely important and can affect how cumulative developments are perceived from key viewpoints of high value and sensitivity.	The Applicant notes this comment.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
WCD1-181	Landscape and Visual Cumulative and In-Combination Effects	Technical Note on Intra Project Cumulative Visual Effects [REP1-122]	26.3. Section 4: Significant Intra Project Cumulative Visual Effects states that that the intra project cumulative visual effects have been robustly assessed, however the council would disagree and finds that the Technical Note provides no additional evidence that the effects have been adequately or accurately assessed and will maintain its view that it does not agree with the Applicant's methodology or findings in this respect.	The Applicant notes this comment and respectfully disagrees with the WC's position on this matter.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
WCD1-182	Landscape and Visual Cumulative and In-Combination Effects	Technical Note on Cumulative Sequential Visual Effects [REP1-123]	<p>27. 9.7 Technical Note on Cumulative Sequential Visual Effects [REP1-123]</p> <p>27.1. The submission of a Technical Note referring to the potential sequential cumulative effects of the proposals has been provided, and it is acknowledged that it has assessed three key inter project routes within the study area. However, the Technical Note only covers the inter-project cumulative effects and does not mention the intra-project sequential cumulative effects about which the council is particularly concerned and that the Technical Note has completely disregarded, despite these potential effects having been specifically mentioned at paragraph 8.23 of Wiltshire Council's Relevant Representation - RR-4934].</p>	<p>All individual visual receptors included in the LVIA have been assessed for potential sequential and in combination visual effects. This included an assessment of the four Recreational Routes which pass through the Scheme (The Macmillan Way; The White Walls Way (Stage 3); Sherston Walk 2; and The Fosse Way).</p> <p>These routes all utilise a combination of PRow and Public Highway, and as such are made up of lots of individual sections of various footpaths, bridleways, roads etc. as identified within Table 8-23 of the LVIA.</p> <p>Sequential Effects for users of these Recreational Routes are not considered to be any greater than those effects identified for the individual sections as set out within ES Volume 3, Appendix 8.3 ES</p>

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				<p>LVIA Assessment Sheets [APP-191].</p> <p>Additionally, a Technical Note on Cumulative Sequential Visual Effects [REP1-122] was produced by the Applicant to directly assess the inter project sequential visual effects on the Fosse Way, the A429 and the A350 routes within the Cumulative 10km Study Area. This assessed the sequential visibility of the Lime Down Scheme (intra project sequential cumulative effects as set out in Technical Note on Intra Project Cumulative Visual Effects in [REP1-122] against existing Solar Schemes (Baseline) and the identified Cumulative Development Sites (CD Sites) which are the Renewable Schemes contained within the Short List (refer to ES Volume 1, Chapter 21: Cumulative and In-Combination Effects [APP-073]).</p>

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
WCD1-183	Landscape and Visual Cumulative and In-Combination Effects	Technical Note on Cumulative Sequential Visual Effects [REP1-123]	27.2. Therefore, the Council does not accept that Sequential Cumulative Effects have been adequately assessed and thus cannot agree to the content and assessments made in the Technical Note.	The Applicant notes this comment and respectfully disagrees with the WC's position on this matter.
WCD1-184	Ecology and Biodiversity	ES Volume 3 Appendix 9-9 Watercourse Crossing	28. 9.10 ES Volume 3 Appendix 9-9 Watercourse Crossing Schedule [REP1-126] 28.1. It is noted that Paragraph 1.1.4 indicates that the locations of	The Applicant notes Wiltshire Council's comment. The proposed watercourse crossing locations in ES Volume 3, Appendix 9-9: Watercourse

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
		Schedule [REP1-126]	<p>the 35 proposed watercourse crossings identified across the Scheme are indicative only and that final locations will be determined at the detailed design stage. Whilst the council recognises the need for some flexibility in order to respond to conditions on the ground, the proposed locations should be relatively refined at this stage in the council's view in order to suitably inform the review and determination of the DCO application. As such, it is considered that any subsequent changes to proposed watercourse crossing locations at the final design stage should be kept to a minimum.</p>	<p>Crossing Schedule [REP1-126] are considered sufficiently defined for the DCO application. The Schedule identifies the proposed crossings, indicative methods and relevant controls.</p> <p>The Applicant agrees that any changes to crossing locations at detailed design should be kept to the minimum reasonably practicable. The detailed design process allows for refinement to respond to ground conditions, utilities, ecology, land drainage and construction requirements. It does not allow unconstrained relocation of crossings.</p> <p>Final crossing locations and methods will remain within the assessed design parameters and will be controlled through the Outline CEMP [REP2-019], the Water Framework Directive Assessment [REP1-094], the relevant FRA & Drainage</p>

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				Strategy [REP1-037 to REP1-054] , and any relevant consents or approvals.
WCD1-185	Ecology and Biodiversity	ES Volume 3 Appendix 9-9 Watercourse Crossing Schedule [REP1-126]	28.2. Table 1: Watercourse Crossing Details includes a column titled 'Preferred Crossing Methodology'. Whilst it is appreciated that the confirmed method to be implemented will depend on the view of, and consent being granted by, the respective regulatory authority, such as the Environment Agency, it would have been provided more certainty of intent regarding proposals if the title of the column had instead been 'Proposed Crossing Methodology'.	The Applicant notes this comment. Final crossing methods will be subject to detailed design although will remain within the assessed design parameters and will be controlled through the Outline CEMP [REP2-019] , the Water Framework Directive Assessment [REP1-094] , the relevant FRA & Drainage Strategy [REP1-037 to REP1-054] , and any relevant consents or approvals.
WCD1-186	Ecology and Biodiversity	ES Volume 3 Appendix 9-9 Watercourse Crossing Schedule [REP1-126]	28.3. Although Table 1 includes a 'Crossing Ref' column, it would have been helpful if each of the features detailed within the Solar PV Sites had also included details of the respective Solar PV Site, namely A, B, C etc, rather than just	The Applicant agrees with this comment. An updated version of ES Volume 3, Appendix 9-9 Watercourse Crossing Schedule [REP1-126] has been submitted at Deadline 3. Table 1 now identifies within which of the respective Solar

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			stipulating 'Solar PV Sites' in the 'Location' column.	PV Sites each watercourse crossing point is located.
WCD1-187	Ecology and Biodiversity	ES Volume 3 Appendix 9-9 Watercourse Crossing Schedule [REP1-126]	28.4. The document does not include plans that correspond with the crossing references detailed in Table 1. Furthermore, although Paragraph 1.1 specifies that the document should be read in conjunction with a list of other documents provided therein, it omits a clear explanation regarding which plans illustrate the crossing references cited in Table 1 and which should therefore be reviewed alongside the document. As such, it isn't evident from a review of the Watercourse Crossing Schedule, exactly where each of the described features is located within the Order Limits, which in turn has frustrated the review process. It has therefore not been possible for the council's Ecology Officer to comprehensively review and appraise the proposed	The Applicant notes this comment. The proposed watercourse crossing locations in ES Volume 3, Appendix 9-9: Watercourse Crossing Schedule [REP1-126] include grid reference information pertaining to the location of each proposed crossing location. However, the Applicant agrees that plans illustrating crossing points would be helpful, and plans have now been prepared accordingly and will be provided at Deadline 3 (ES Volume 2, Figures 9-9 Watercourse Crossing Schedule (Rev 1) [EN010168/EXAM/9.38]).

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			methods in the context of the Scheme.	
WCD1-188	Socio-Economics, Recreation and Tourism	Foxley Road Nurseries Comments on Relevant Representations [REP1-162]	<p>29. Foxley Road Nurseries Comments on Relevant Representations [REP1-162]</p> <p>Wiltshire Council have asked the Applicant to implement schemes that are hoped will further mitigate the economic impact of the solar park scheme. These include the provision of a visitor centre to help tourism and a compensation scheme for businesses that can show a reduction in income of over 10% during the construction and decommissioning periods and for one extra year after each event.</p>	Please see the response to comment reference WCWR-007.
WCD1-189	Landscape and Visual	ES Volume 3 Appendix 8-1 Landscape and Visual Impact Assessment Methodology	<p>30. 6.3 ES Volume 3 Appendix 8-1 Landscape and Visual Impact Assessment Methodology (Rev 2) [REP1A-007]</p> <p>30.1. The council notes this revision. While the single revision included at page 60 (sub-page 3)</p>	The Applicant confirms that this was a wording error in the Visualisation Methodology and no changes were made to the photomontages.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
		(Rev 2) [REP1A-007]	confirms its purpose is to provide further clarity regarding how the ground level is defined within the 3D modelling visualisations, it appears that the ground level assumptions used in relation to the methodology employed in the production of visual representation of the BESS, 132KV and 400KV substations infrastructure parameter boxes have been changed from that originally stated. It is not clear if this was just an error in the stated methodology employed which has now been corrected, or if the visualisations updated in Figure 8-14 Baseline Photography and Photomontages [REP1-033 , REP1-034 and REP1-035] have been revised as a consequence of this, or require further revision. Further clarification is required from the Applicant.	
WCD1-190	Cultural Heritage	ES Technical Addendum to	31. 9.20. ES Technical Addendum to Chapter 12	The Applicant notes this comment.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
		Chapter 12 Cultural Heritage – Bradfield Manor Visualisations (Rev 1) [REP1A-014]	Cultural Heritage – Bradfield Manor Visualisations (Rev 1) [REP1A-014] 31.1. Annex A includes the visualisations from Bradfield Manor previously requested by Historic England. These are taken from the first floor of the Grade I Manor, one looking north-west across the southern part of Site D, and the other looking north-east. The images give some indication of the likely impact of the proposed installation on the designed views from the first-floor parlour windows and allow assessment of the potential for the proposed mitigation to limit the harm caused in this respect.	
WCD1-191	Cultural Heritage	ES Technical Addendum to Chapter 12 Cultural	31.2. The visualisations indicate that the impact from the appearance of the solar panels within the designed views from the	The Applicant notes this comment. The Applicant submitted 9.20 ES Technical Addendum to Chapter 12 Cultural Heritage - Bradfield

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
		Heritage – Bradfield Manor Visualisations (Rev 1) [REP1A-014]	first-floor windows of the C17 rear parlour addition to the building will be relatively modest as the panels are at some distance (details will not be perceived). Some harm will, however, occur to the significance of the building as a result of the incongruous and industrialised appearance of the uniform extent and colour of panels within the otherwise rural agricultural landscape. Taking into account that the ability to appreciate the rural character of the landscape in the deliberately designed views from the parlour relate to only one element of the significance of the building as a whole, the harm to significance overall will be modest.	Manor Visualisations [REP1A-014] at Deadline 1A, which included the visualisations as requested by Wiltshire Council and Historic England. The Technical Addendum [REP1A-014] supports the results of the assessment of harm on Bradfield Manor Farmhouse. ES Volume 1, Chapter 12: Cultural Heritage [APP-064] , supported by ES Volume 3, Appendix 12-1: Heritage Statement [APP-219] , identified that there was a potential for a moderate / minor adverse effect, which is not significant (less than substantial harm at the lower end in NPPF terms).
WCD1-192	Cultural Heritage	ES Technical Addendum to Chapter 12 Cultural Heritage – Bradfield	31.3. The visualisations suggest that the potential for impact from the installation on views to the north-west will be greater than from those to the north-east, where	While the Applicant notes that there is a higher potential for panels to be visible in the wider landscape to the north-east of Bradfield Manor (i.e. in parts of Fields D7-D12), it should be noted

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
		Manor Visualisations (Rev 1) [REP1A-014]	panels viewed will be at greater distance.	that these would be long-distance views experienced within the wider agricultural landscape. Such views would be distinct from those available from the immediate environs of the Manor.
WCD1-193	Cultural Heritage	ES Technical Addendum to Chapter 12 Cultural Heritage – Bradfield Manor Visualisations (Rev 1) [REP1A-014]	31.4. The submitted visualisations suggest that the additional landscape mitigation proposed to the southern boundary of fields D3 and D5 should, at maturity, be largely successful in providing screening of the solar panels to the north-west during the summer months, including those further away on the elevated ground i.e. D20 and 21. There may be limited and filtered views available during the winter months through the trees but the landscaping will still provide a level of mitigation. The panels to the north-east will be visible but not prominent, being in the distance and filtered by the	The Applicant agrees that proposed landscape mitigation to enhance the boundaries of fields D3 and D5 will be sufficient, including during winter months when there may be some limited and filtered views. The Applicant also agrees that mitigation is sufficient for panels to the north-east of the asset (i.e. Fields D7 to D12) given the distance from the asset and landscape mitigation proposed.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			enhancement of the existing hedgerow and hedgerow trees.	
WCD1-194	Cultural Heritage	ES Technical Addendum to Chapter 12 Cultural Heritage – Bradfield Manor Visualisations (Rev 1) [REP1A-014]	31.5. The submitted Addendum is helpful in providing confidence in the council's previous agreement that the harm to Bradfield Manor resulting from the scheme will be less than substantial at the lower end of the scale, albeit that the council's Conservation Officer would give this slightly more weight than the Applicant team as a result of the high significance of the asset, the designed nature of the views under consideration within this study and the likelihood that the proposed woodland belt mitigation will take some time to mature and provide effective screening.	<p>The Applicant notes that addendum has been enabled Wiltshire Council to confidently identify that there will be less than substantial harm to the asset.</p> <p>As stated in Paragraph 5.9.33 of NPS EN-1 <i>"Where the proposed development will lead to less than substantial harm to the significance of the designated heritage asset, this harm should be weighed against the public benefits of the proposal"</i>. The public benefits of the scheme are detailed in ES Volume 1, Chapter 5: Energy Need, Legislative Context and Energy Policy [APP-057].</p>
Wiltshire Council Comments on Written Representations				

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
WCWR-001	Cultural Heritage	Historic England Written Representation	<p>1. Historic England Written Representation [REP1-152]</p> <p>1.1. This representation refers to the 9.20 ES Technical Addendum to Chapter 12 Cultural Heritage – Bradfield Manor Visualisations (Rev 1) [REP1A-014] submitted by the Applicant at Deadline 1A. The council agrees with the representation and the conclusion reached.</p>	<p>The Applicant notes that Wiltshire Council agrees with the conclusion of Historic England Written Representation [REP1-152], and that the proposed development “would cause a small degree of harm to its heritage significance”.</p>
WCWR-002	Landscape and Visual	Stop Lime Down Written Representation	<p>1. Stop Lime Down Written Representation [REP1-167 to REP1-188]</p> <p>2.1. The council generally concurs with the landscape and visual points raised. However, the view expressed in Paragraph 3.5.5 [REP1-167] that the landscape sensitivity decreases from west to east is considered too simplistic as it does not take account of localised variations in value and</p>	<p>The LVIA Methodology in ES Volume 3, Appendix 8-1 [APP-187] uses a four-point scale for Landscape Value and Susceptibility as shown in Table 8.1.1.6: Matrix for Determining Landscape Sensitivity. The judgements on Landscape Value, Landscape Susceptibility and the combined judgement on Sensitivity made in the LVIA in ES Volume 1,</p>

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			<p>susceptibility to change. The council agrees Paragraph 3.5.6 Visual Receptor Sensitivity and the view expressed that the Applicant has conflated landscape fabric with landscape character.</p>	<p>Chapter 8: Landscape and Visual [APP-060] and defined in detail within ES Volume 3, Appendix 8-3-2-2 Landscape and Visual Assessment Sheets (Significant) [APP-191] are as follows:</p> <p>The CNL as a designated landscape is recognised as High Value, High Susceptibility and High Sensitivity. Recognising that that the Scheme is not within the CNL itself but that Lime Down Sites A, B and C are within its setting, landscape character within the 1 km and 2km Study Areas have been assessed as High Value, Medium Susceptibility and High to Medium Sensitivity. Sites D and E within the 1km and 2km Study Areas are assessed as Medium Value, Medium Susceptibility and Medium Sensitivity. The applicant considers that this does take</p>

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				<p>account of localised landscape variations,</p> <p>Within the 5km Study Area, in recognition that much of the area is influenced by the CNL Sites A, B and C are assessed as High Sensitivity with Sites D and E as Medium Sensitivity.</p> <p>This concurs with the Stop Lime Down assessment, that the sensitivity of the landscape falls across the site from west to east.</p> <p>Regarding Visual Receptor Sensitivity, the LVIA assesses all visual receptors within the CNL as High Value. The Applicant agrees with Stop Lime Down that the occupation or activity of people experiencing the view at a given location determines susceptibility as set in Table 8.1.1.10: Visual Receptor Susceptibility to Change of the LVIA Methodology in ES Volume 3 Appendix 8-1 [APP-</p>

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				<p>187]. As such this takes account of the localised variations in visual amenity.</p> <p>The Applicant has assessed Landscape Fabric and Landscape Character as two separate receptors and does not consider the assessment to be conflated. A technical note to clarify how landscape fabric and landscape character is considered within the assessment has been submitted at Deadline 1 [REP1-121].</p>
WCWR-003	Landscape and Visual	Stop Lime Down Written Representation	<p>2.2. The council considers that Paragraph 3.8.16 makes a valid point regarding the double counting of mitigation measures, and one that the council has mentioned previously within its Relevant Representation [RR-4934] alongside the potential for mitigation to be inappropriate (across the project area not just the setting of the Cotswolds National Landscape).</p>	<p>A technical note to clarify how landscape fabric and landscape character is considered within the assessment has been submitted at Deadline 1 [REP1-121]. No changes are proposed to the assessment methodology and this technical note is intended to provide clarification regarding the LPA's concerns surrounding the application of the methodology.</p>

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
WCWR-004	Landscape and Visual Cumulative and In-Combination Effects	Stop Lime Down Written Representation	2.3. The council also agrees with issues relating to visual amenity in Paragraph 3.10 and Cumulative Effects in Paragraph 3.12 .	The Applicant Notes this comment and considers that these points have been responded to in the Applicant's Response to Stop Lime Down Written Representation Appendix B Landscape and Visual Report [REP2-044] .
WCWR-005	Landscape and Visual Arboriculture	Stop Lime Down Written Representation	2.4. Furthermore, the council agrees with the points made about over-reliance on existing vegetation providing screening throughout the whole operational lifespan of development in Paragraph 7.5 . The future management of 3rd party hedgerows and woodland over the very large project area would reasonably and foreseeably include periodic hedgerow reductions cutting / laying, harvesting timber from managed woodland, or tree loss through disease or climatic effect etc.	The Applicant Notes this comment and considers that these points have been responded to in the Applicant's Response to Stop Lime Down Written Representation Appendix B Landscape and Visual Report [REP2-044] .

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
WCWR-006	Landscape and Visual	Stop Lime Down Written Representation	2.5. Overall, from a landscape and visual perspective the council agrees with the findings of the SLD report which largely mirror the council's concerns.	The Applicant notes this comment.
WCWR-007	Socio-Economics, Recreation and Tourism	Stop Lime Down Written Representation	2.6. With respect to economic impacts, Wiltshire Council have asked the Applicant to implement schemes that are hoped will further mitigate the economic impact of the solar park scheme. These include the provision of a visitor centre to help tourism and a compensation scheme for businesses that can show a reduction in income of over 10% during the construction and decommissioning periods and for one extra year after each event.	<p>Wiltshire Council has raised these matters through the Statement of Common Ground process being undertaken with the Applicant [REP2-025]. The Applicant has committed to mitigation measures to reduce adverse economic effects through the Outline SSCEP [REP1-108], which is secured by Requirement 18 in Schedule 2 to the Draft DCO [REP1-007]. The Applicant confirms that these measures would have to be submitted in detail to Wiltshire Council for their approval to discharge that requirement ahead of construction commencing.</p> <p>The Applicant considers a renewable energy themed visitor centre or hub may be worth exploring with Wiltshire Council, if more widely requested by local</p>

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				<p>stakeholders. For the avoidance of doubt, the Applicant would not be seeking to build a premises or "centre", but would seek the use of existing local facilities where required, with funding provided through the Community Benefit Fund. The Applicant is able to discuss these matters further through dialogue with Wiltshire Council.</p> <p>The Applicant does not consider the requirement for compensation to be paid to businesses as a result of changes in income levels to be proportionate or directly measurable, particularly in the presence of other non-controllable or macro-economic factors which may influence year-on year income to tourism, leisure and retail businesses.</p>
WCWR-008	Scheme Description and DCO Process	Appendix A (Planning Position Statement)	<p>Appendix A (Planning Position Statement) [REP1-169]</p> <p>2.7. It is considered that this document provides a useful</p>	<p>The Applicant notes this comment. Section 3 of the Applicant's Response to Written Representations [REP2-039] (page 366) sets out that the</p>

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			summary of the scheme and potential issues.	Applicant has considered the contents of Appendix A (Planning Position Statement) [REP1-169] in providing responses to the issues raised, noting that it in part summarises the technical appendices provided by consultants working on behalf of Stop Lime Down.
WCWR-009	Landscape and Visual Cumulative and In-Combination Effects	Appendix B (Landscape and Visual Impact Report)	Appendix B (Landscape and Visual Impact Report) [REP1-170] 2.8. This is a highly detailed document which largely follows the concerns raised by the council and other parties in respect of landscape and visual issues. Of particular interest is the section on Cumulative Effects, which builds on the concerns that the council and other interested parties have highlighted and agrees with the Wiltshire Council stance that the cumulative effects have not been properly addressed and that they have been downplayed significantly, having failed to deal	The Applicant disagrees with this point and reaffirms that cumulative effects have been assessed in accordance with the relevant legislation, national planning policy, local planning policy and guidance as listed within ES Volume 1, Chapter 21: Cumulative and In Combination Effects [APP-073] , pages 1-5. The Applicant has responded to comments relating to cumulative effects in detail in on page 806-807 and page 870-871 of the Applicant's Response to Relevant Representations [PDA-009] , where it is explained that full and extensive engagement,

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			<p>with cumulative landscape effects, or sequential intra project visual effects.</p>	<p>consideration, assessment and reporting of intra- and inter-project cumulative effects has been undertaken with the conclusions set out within ES Volume 1, Chapter 21: Cumulative and In-Combination Effects [APP-073].</p> <p>For clarity, the cumulative effects associated with the Scheme have already been assessed and reported within the ES. The Planning Statement [REP2-017] was updated in regard to cumulative effects due to a previous oversight. The updated document reflects the assessment already undertaken and is consistent with the ES.</p> <p>Intra Project Landscape and Visual Effects were fully assessed in the LVIA in ES Volume 1 Chapter 8 [APP-060] and ES Volume 3, Appendix 8-3-2-2 Landscape and Visual Assessment Sheets (Significant) [APP-191].</p>

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				<p>All individual visual receptors included in the LVIA have been assessed for potential sequential and in combination visual effects. This included an assessment of the four Recreational Routes which pass through the Scheme (The Macmillan Way; The White Walls Way (Stage 3); Sherston Walk 2; and The Fosse Way).</p> <p>These routes all utilise a combination of PRow and Public Highway, and as such are made up of lots of individual sections of various footpaths, bridleways, roads etc. as identified within Table 8-23 of the LVIA.</p> <p>Sequential Effects for users of these Recreational Routes are not considered to be any greater than those effects identified for the individual sections as set out within ES Volume 3, Appendix 8.3 ES LVIA Assessment Sheets [APP-191].</p>

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				<p>Additionally, a Technical Note on Cumulative Sequential Visual Effects [REP1-122] was produced by the Applicant to directly assess the sequential visual effects on the Fosse Way, the A429 and the A350 routes within the Cumulative 10km Study Area. This assessed the sequential visibility of the Scheme against existing Solar Schemes (Baseline) and the identified Cumulative Development Sites (CD Sites) which are the Renewable Schemes contained within the Short List (refer to ES Volume 1, Chapter 21: Cumulative and In-Combination Effects [APP-073]).</p>
WCWR-010	Cultural Heritage	Appendix C (Heritage and Archaeology Report)	<p>Appendix C (Heritage and Archaeology Report) [REP1-171]</p> <p>2.9. In Paragraphs 3.7 to 3.10, Marrons express the view that the Fosse Way has been under assessed. The route of the former</p>	<p>The Applicant agrees with Wiltshire Council that the Scheme will not impact on the significance of the Fosse Way.</p>

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			<p>Roman road has been heavily impacted by later development and exists as a landscape feature that will remain in the landscape following the completion of the scheme. Wiltshire Council Archaeology Service (WCAS) considers that there is no direct impact on the Roman road itself, which has already been heavily impacted by modern road construction. It's relationship to the archaeological sites identified by the geophysical survey will remain unchanged if the solar farm is constructed, as the heritage assets to the southeast of the road are sub-surface features, so there will be no visual impact to their relationship, which is purely spatial. Those sites impacted by development will be preserved by record, knowledge which will add to understanding of the landscape. Overall, WCAS consider that construction will result in a</p>	

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			negligible effect level of significance.	
WCWR-011	Cultural Heritage	Appendix C (Heritage and Archaeology Report)	2.10. With respect to Paragraph 3.11 , WCAS agree that the 6.3 Environmental Statement Volume 3, Appendix 12-8 Cultural Heritage Impact Assessment Tables [APP-232] have a degree of inconsistency regarding areas of 'non-intrusive construction methodology'.	See response to WCWR-012
WCWR-012	Cultural Heritage	Appendix C (Heritage and Archaeology Report)	2.11. Furthermore, WCAS agree that the use of concrete feet or piles do not eliminate the impact on below ground remains (Paragraph 3.12).	<p>The Applicant considers concrete feet or an alternative low impact or non-intrusive construction methodology to be suitable mitigation options for archaeological assets.</p> <p>As stated in paragraph 2.10.109 of NPS EN-3 below ground impacts of solar is generally limited. Section 4 of recently published Archaeology and Solar Farms Good Practice Guide (https://www.archaeologists.net/sites/default/files/2026-04/Archaeology-and-Solar-Farms-</p>

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				<p>GPG---FINAL-2026-04-14.pdf), which was prepared by the Association of Local Government Archaeological Officer, Chartered Institute for Archaeologist, Fame, Historic England and Solar Energy UK, details the impacts of solar arrays on buried archaeological remains (typically less than 1% of the land parcel) and states: <i>“Archaeologically, the impact of one metal support is limited and unlikely to harm the archaeological interest of most archaeological features either singularly or cumulatively (i.e., make it hard for the future investigation of the site to take place once the solar array is removed).”</i> Section 2.9 of guide states the mitigation options should balance archaeological sensitivity with relative impact: <i>“Depending upon the relative significance of the archaeological remains, it may be acceptable to install panel arrays directly over an archaeological site where the impact from panel supports will not</i></p>

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				<p><i>affect the ability to understand the site in the future". Paragraph 2.6.3 reiterates this stating "inserting panel supports along sections of large ditches may cause only minimal disturbance".</i></p> <p>As stated in Paragraph 12.9.9 of ES Volume 1, Chapter 12: Cultural Heritage [APP-064] concrete feet are acknowledged by Historic England as a suitable mitigation option in its Advice Note concerning renewable energy and the historic environment, which also refers to planning guidance published by Building Research Establishment (BRE) and supported by Cornwall Council.</p> <p>As such the Applicant considers it appropriate to consider a range of low impact or non-intrusive construction methodologies to mitigate archaeological remains. For features identified within Lime Down where such mitigation is proposed, solar mounts are</p>

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				unlikely to harm the archaeological interest of buried features.
WCWR-013	Cultural Heritage	Appendix C (Heritage and Archaeology Report)	2.12. In Paragraph 3.20 , Marrons consider that Strip, Map and Record (SMR) excavation of sites C13-01, F46-01 and O48-01, as preservation by record, will mitigate harm, not eliminate it to a low magnitude of effects. However, the WCAS consider that excavation of an archaeological site to CIFA and WCAS standards will substantially reduce the effect of impact upon archaeological sites of Local and Regional importance (as is the case with sites identified within the proposed development to date). This assumption is the basis for all mitigation works carried out in Wiltshire ahead of construction.	The Applicant agrees with Wiltshire Council that Strip, Map and Record (SMR) excavation of sites is a well-established method of mitigation for archaeological sites and is in line with appropriate industry standards and guidance.
WCWR-014	Cultural Heritage	Appendix C (Heritage and Archaeology Report)	2.13. With respect to the conclusion in Paragraph 3.21 , WCAS consider that the completion of SMS excavations of site D24-01 and the full publication	The Applicant notes this comment. As detailed in ES Volume 1, Chapter 12: Cultural Heritage [APP-064] , supported by Volume 3 Appendix 12-8 Cultural Heritage Impact Assessment Tables [APP-232] , following

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			of the results will result in a negligible effect.	completion of the proposed mitigation (SMS excavation) the Applicant has identified a neutral effect.
WCWR-015	Cultural Heritage	Appendix C (Heritage and Archaeology Report)	2.14. WCAS share the concerns expressed by Marrons in Paragraphs 3.22 to 3.25 regarding what mitigation will be proposed in the event that Horizontal Directional Drilling (HDD) will not be possible. WCAS are awaiting a response from the Applicant regarding whether HDD will be deployed near to the Pillow Mound site.	As stated in Paragraph 7.3.4 of ES Volume 3, Appendix 12.6 Archaeological Mitigation Strategy [APP-230] , if the final design does not allow for trenchless cabling techniques (such as HDD), a Strip, Map and Sample will be employed. HDD is currently proposed in land to the west of the Scheduled Pillow mound 280m south west of Surrendell Farm (NHLE: 1018610).
WCWR-016	Cultural Heritage	Appendix C (Heritage and Archaeology Report)	2.15. With respect to Paragraph 4.6 , WCAS agree that the impacts of the scheme have not been fully assessed, particularly regarding the cable route, although it is accepted that the archaeological contractors commissioned by the Applicant to carry out the work have been hampered by access issues. However, WCAS does not	Interim trial trenching reports were submitted as part of the DCO Application (ES Volume 3, Appendix 12-5 Interim Evaluation Trial Trenching Reports Part 1–5 [APP-225 to APP-229]) and full trial trenching reports will be submitted, in advance of determination of the

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			<p>consider that the level of impacts stated by the Applicant are too low. Furthermore, WCAS agrees that the present mitigation measures are not sufficient to mitigate the impact of the proposals and that these measures need to be expanded, both in relation to scoping out sites and in the need to excavated areas of archaeological significant that will be impacted by development. This is as stated within the council's Local Impact Report [REP1-137].</p>	<p>Application by the Secretary of State.</p> <p>An interim geophysical survey report of the Cable Route Corridor was submitted as part of the DCO Application (ES Volume 3, Appendix 12-4b Archaeological Geophysical Survey Report – Cable Route Corridor [APP-224]) and a full report covering the geophysical survey of the Cable Route Corridor will be submitted, in advance of determination of the Application by the Secretary of State. However, regardless of the later submission of these reports, there is sufficient information to assess the impacts of the Scheme and to inform PINS' recommendation.</p> <p>An Outline Archaeological Mitigation Strategy was submitted as part of the DCO Application (ES Volume 3, Appendix 12-6: Outline Archaeological Mitigation Strategy [APP-230])</p>

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				<p>and will be updated as required with the results of outstanding works.</p> <p>The Applicant considers the mitigation measures proposed to be sufficient to mitigate the impact of the Scheme and in line with appropriate standards and guidance. The Applicant will continue to discuss this matter with WCAS.</p>
WCWR-017	Transport and Access	<p>Appendix D (Transport Report)</p> <p>Section 2: Impact on Rural Lanes</p>	<p>Appendix D (Transport Report) [REP1-172]</p> <p><u>Section 2: Impact on Rural Lanes</u></p> <p>2.16. This part of the report focuses on the impact of the construction vehicle trafficking, notably HGVs, on the rural lanes forming parts of the construction routes to Lime Down areas A-C and Lime Down area D. This considers the 'sensitivity' of the impacts and the ability of vehicles to pass, so the highway safety implications. Wiltshire Council has already raised safety and</p>	<p>The Applicant makes note of this comment.</p> <p>Regarding comments on sensitivity, the increase in expected levels of daily HGV flows is assessed by means of the 'magnitude of impact' variable. This is then assessed against the receptor sensitive which is a separate variable based on the Sensitivity Definitions provided in Table 13-3 of ES Volume 1, Chapter 13-</p>

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			operational concerns about the ability of two HGVs, or even an HGV / car, to pass along some of the narrow rural roads proposed for access to the Lime Down PV sites, so these concerns are shared. Notwithstanding this, the council's Highways Development Management (HDM) Officer makes comments against some of the SLD points raised in dialogue below. In doing so in an HDM capacity, the comments are focused on the Solar Farm PV sites and not the temporary highway works at specific locations along the cable route corridor and access needed to these.	<p>1: Transport and Access [REP1-019].</p> <p>As per ISEP Guidance, caution needs to be observed when applying the specified thresholds as very low baseline flows are unlikely to experience impacts even with high percentage changes in traffic.</p> <p>The Applicant addresses the ability of two vehicles passing in its response to WCD1-100 to WCD1-108 submitted at Deadline 3 in response to Wiltshire Council's Comments on submissions received at deadlines 1 and 1A [REP2-048].</p>
WCWR-018	Transport and Access	Appendix D (Transport Report) Section 2: Impact on Rural Lanes	2.17. Paragraph 2.8 makes the point that a carriageway width of 5.5m is needed to 'just' allow passage of two HGVs (MfS), albeit at a very low speed. It is further stated that at widths of less than 5.5m, HGVs will be required to mount adjacent verges of footways or potentially reverse to a sufficient	See the Applicant's responses to WCD1-100 to WCD1-108 submitted as part of this document in response to Wiltshire Council's Comments on submissions received at deadlines 1 and 1A [REP2-048].

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			point where passage is possible. The highway safety and damage implications of this are already fully recognised by the council and have been made clear in both its Relevant Representation [RR-4934] and follow-up Written Representation [REP1-138] .	
WCWR-019	Transport and Access	Appendix D (Transport Report) Section 2: Impact on Rural Lanes	2.18. Paragraph 2.9 makes the point that whilst it is possible to include passing places for HGVs, these must be of sufficient length (25m) to allow this, whilst there must be suitable inter-visibility between adjacent passing points. This is all supported. The first issue of the Transport Assessment [APP-233] included no swept path passage assessments for two opposing HGVs on any of the narrow minor roads being proposed for construction access, or indeed any proposals for passing places. However, the latest Revision 2 of the Transport Assessment [REP1-057] and [REP1-059] now includes passing	See the Applicants responses to WCD1-100 to WCD1-108 submitted as part of this document in response to Wiltshire Council's Comments on submissions received at deadlines 1 and 1A [REP2-048] .

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			<p>place proposals for Alderton Road in Annex I, whilst Appendix K includes the swept path analyses for two opposing HGVs. The council has commented in depth on the content of both these new appendices in reviewing the latest DCO documents submitted by the applicant at Deadline 1 (see separate submission at Deadline 2). Those comments are not reiterated here but the council would make the point that the passing place proposals along Alderton Road are very 'high level' and would require a lot more detail for technical approval. Furthermore, it is considered there is need for passing place mitigation on some of the other rural roads which is still not being proposed.</p>	
WCWR-020	Transport and Access	Appendix D (Transport Report)	<p>2.19. Paragraph 2.12 cites the HS2 'Design Approach' for rural road widths, where a 6.8m carriageway width is deemed desirable where buses and HGVs are likely to meet each other on a</p>	<p>The Applicant makes note of this comment. Annex K of ES Volume 3 Appendix 13-1 Transport Assessment (Rev 2) [REP1-057 and REP1-059] demonstrates opportunities where two HGVs can</p>

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
		Section 2: Impact on Rural Lanes	regular basis. Whilst the council's Highways Development Management Officer would not argue with the desirability of this, achieving this level of width upgrade along lengths of the minor roads proposed for construction access to the Lime Down PV sites is likely to be challenging, although in the work submitted to date the Applicant has provided little information on the typical existing widths along the rural lanes forming parts of the proposed construction routes. It is probable a 6.0m width would be deemed acceptable by the Council where HGV passing place upgrades are to be proposed and significant constraints upon improving on this width further exist.	pass along the proposed construction routes. It is noted in Wiltshire Council's Comments on submissions received at deadlines 1 and 1A [REP2-048] that a width 5.5 metres is acceptable. See the Applicant's response to WCD1-100 to WCD1-108 submitted at Deadline 3 in response to Wiltshire Council's Comments on submissions received at deadlines 1 and 1A [REP2-048] .
WCWR-021	Transport and Access	Appendix D (Transport Report)	2.20. In Paragraph 2.21 the point is made that the Applicant dismisses quite high percentage increases in HGV flows on some of the minor rural roads, simply on the basis that the existing HGV flows	The Applicant makes note of this comment. The Applicant maintains that where baseline flows are low, any change in traffic flow will result in a large percentage change, but this

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
		Section 2: Impact on Rural Lanes	are low without considering the absolute level of increase in HGV flows. This view is supported, as the resultant hourly frequency in 2-way HGV movements during the 9:30am-4:30pm period identified for deliveries is a significant factor. Taking Alderton Road as an example, the predicted 'peak' increase of 50 2-way HGV movements would relate to a frequency of circa 7-8 HGVs per hour during the working day, or a movement every 7-8 minutes. This does not appear to be an insignificant effect or impact on Grittleton when the level of movement frequency is considered. The fact that the existing daily HGV flow is only 20 seems immaterial.	will unlikely lead to a significant effect if the absolute numbers are considered low. One additional vehicle every 7 to 8 minutes is not considered significant. Particularly given there will be no additional HGV movements outside of the proposed delivery times specified at Section 3.4 of the Outline CTMP [REP1-112] .
WCWR-022	Transport and Access	Appendix D (Transport Report)	2.21. Paragraphs 2.23-2.24 discuss the proposed 'Booking System' for HGV deliveries, so timing of arrivals and departures. The Applicant's assertion that this will create a situation whereby "it is	See Applicant's response to WCD1-105 submitted as part of this document in response to Wiltshire Council's Comments on submissions received at deadlines 1 and 1A [REP2-048] .

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
		Section 2: Impact on Rural Lanes	unlikely that HGVs will cross each other on the local highway network" is challenged and rebutted. This and the reasoning given is supported by the Council. It has always been the Council's view that this cannot be assumed despite best endeavors by the site management staff. As such, passage opportunities for opposing HGVs on all the minor roads being used for construction must be deemed adequate and, where lacking, appropriate mitigation measures proposed and put in place.	
WCWR-023	Transport and Access	Appendix D (Transport Report) Section 2: Impact on Rural Lanes	2.22. Paragraph 2.33 makes the point that the Applicant's passage assessment as set out in Annex H of the first issue Transport Assessment [APP-233] is deficient, as it only considers the ability of an HGV and a car to pass, and so is not a 'reasonable' worst case. This point was also made in Wiltshire Council's Relevant Representation [RR-4934] . However, Annex K to	See Applicant's response to WCD1-100 to WCD1-108 submitted as part of this document in response to Wiltshire Council's Comments on submissions received at deadlines 1 and 1A [REP2-048] .

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			the Revision 2 document [REP1-057 and REP1-059] now includes swept path passage analyses for two 16.5m articulated HGVs. The council has commented on the content of this new Annex K separately in reviewing the latest Transport Assessment - May 2026 (see separate submission at Deadline 2).	
WCWR-024	Transport and Access	Appendix D (Transport Report) Section 2: Impact on Rural Lanes	2.23. Paragraph 2.37 makes the point that the Highway Improvement Areas (HIA) do not include most of the length of the Fosse Way that is to be used, much of the road to Sherston north-west of the Fosse Way, the road east of Hullavington and roads around Grittleton, so failing to offer any opportunity for mitigation measures to improve 2-way HGV passage. This same point has been raised by the Council when reviewing the 'Works Plan' drawings [REP1-005].	See Applicant's response to WCD1-100 to WCD1-108 submitted as part of this document in response to Wiltshire Council's Comments on submissions received at deadlines 1 and 1A [REP2-048] .

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
WCWR-025	Transport and Access	Appendix D (Transport Report) Section 3: Review of Access Points	<u>Section 3: Review of Access Points</u> 2.24. In Paragraph 3.3 it is stated "There are many instances where drivers leaving the sites do not have sufficient visibility to approaching vehicles to be able to safely pull out onto the highway. There are 24 instances where the Applicant is proposing the use of a banksman to overcome these visibility deficiencies. An alternative approach would be to remove roadside vegetation and trees to improve visibility." Extracts from Appeal decisions are then included where Inspectors dismissed the use of banksmen as a substitute to providing appropriate visibility. Access locations considered particularly problematic are then set out in Paragraph 3.4 , most of which appear to be temporary construction accesses along the cable route corridor.	See Applicant's response to WCD1-155 submitted as part of this document in response to Wiltshire Council's Comments on submissions received at deadlines 1 and 1A [REP2-048] .

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
WCWR-026	Transport and Access	Appendix D (Transport Report) Section 3: Review of Access Points	2.25. Wiltshire Council would support this view. In the latest OCTMP issued at Deadline 1 [REP1-112] it is also stated in paragraph 2.1.5 that "During the construction phase, banksmen will be deployed at each access whenever construction vehicles are accessing or egressing the Order Limits. This will ensure the safe movement of construction vehicles in and out of the Solar PV Sites and will overcome any instances where the achievable visibility is below guidance, which is a factor at a small number of access locations". The Council response to this is, for the avoidance of doubt, the use of bankmen will not be accepted as a substitute to providing the requisite visibility splays at the proposed access junctions where the Applicant has land control under the DCO to do so. It may be necessary to employ temporary traffic control in other situations during the construction phase where visibility standards	See Applicant's response to WCD1-155 submitted as part of this document in response to Wiltshire Council's Comments on submissions received at deadlines 1 and 1A [REP2-048] .

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			cannot be met. In short, safe egress should not rely on an operative stepping into the carriageway to establish whether opposing vehicles are present.	
WCWR-027	Transport and Access	Appendix D (Transport Report) Section 4: Underestimate of HGV Trip Generation	<u>Section 4: Underestimate of HGV Trip Generation</u> 2.26. This part of the report addresses the expected HGV trip generation and expressly makes the case that the Applicant's forecast of expected HGV volumes over the construction period are seriously underestimated. The SLD conclusion in Table 4 is that, in their view, the more realistic estimate is 65,813 HGV movements over the two-year period, as opposed to the 26,086 HGV movements being predicted in the Transport Assessment, so a 152% uplift.	See Applicant's response to WCD1-063 and WCD1-081 to WCD1-087 submitted as part of this document in response to Wiltshire Council's Comments on submissions received at deadlines 1 and 1A [REP2-048] .
WCWR-028	Transport and Access	Appendix D (Transport Report)	2.27. In making Highways Development Management comments on the latest Transport Assessment (Revision 2) - May	The Applicant makes note of this comment. See Applicant's response to WCD1-063 and WCD1-081 to WCD1-087

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
		Section 4: Underestimate of HGV Trip Generation	2026 [REP1-057 and REP1-059], the council has raised similar concerns over some of the underlying assumptions which support the Transport Assessment HGV prediction in Table 13-12. In doing so, the council are seeking clarity from the Applicant on this, and indeed some validation or 'proving' where data for other solar farms exist. Table 2 in the SLD report, which shows the typical HGV/ha ratios for PV Module / Mounting Structure deliveries at other solar array sites, is of concern, as what is assumed for Lime Down is clearly less than any of the other comparison sites by a considerable margin. Similarly, Table 3 shows that the assumed number of HGV deliveries for Module Supporting Structures expressed as a percentage of those needed for the PV Modules is well below that assumed elsewhere.	submitted within this document at Deadline 3 in response to Wiltshire Council's Comments on submissions received at deadlines 1 and 1A [REP2-048] .

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
WCWR-029	Transport and Access	Appendix D (Transport Report) Section 4: Underestimate of HGV Trip Generation	2.28. The SLD report identifies concerns with all the following in respect of HGV deliveries: · The number of PV Modules assumed (598,260) related to the total area of the site containing modules (Work No 1) of 748ha. Based on SLD calculations this pre-supposes that only 38.6% of the said area would be occupied by modules, which does seem low.	See Applicant's response to WCD1-082 submitted within this document at Deadline 3 in response to Wiltshire Council's Comments on submissions received at deadlines 1 and 1A [REP2-048] .
WCWR-030	Transport and Access	Appendix D (Transport Report) Section 4: Underestimate of HGV Trip Generation	· Module Mounting Structures.	See Applicant's response to WCD1-083 submitted within this document in response to Wiltshire Council's Comments on submissions received at deadlines 1 and 1A [REP2-048] .
WCWR-031	Transport and Access	Appendix D (Transport Report)	· Waste disposal.	See Applicant's response to WCD1-085 submitted within this document in response to Wiltshire Council's Comments on

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
		Section 4: Underestimat e of HGV Trip Generation		submissions received at deadlines 1 and 1A [REP2-048].
WCWR-032	Transport and Access	Appendix D (Transport Report) Section 4: Underestimat e of HGV Trip Generation	· Substation / BESS works, and notably concrete foundation depths / areas.	See Applicant's response to WCD1-086 submitted at Deadline 3 in response to Wiltshire Council's Comments on submissions received at deadlines 1 and 1A [REP2-048].
WCWR-033	Transport and Access	Appendix D (Transport Report) Section 4: Underestimat e of HGV Trip Generation	· Access trackways.	See Applicant's response to WCD1-087 submitted within this document in response to Wiltshire Council's Comments on submissions received at deadlines 1 and 1A [REP2-048].
WCWR-034	Transport and Access	Appendix D (Transport Report) Section 4: Underestimat	· Construction compounds and allowance.	See Applicant's response to WCD1-087 submitted within this document in response to Wiltshire Council's Comments on submissions received at deadlines 1 and 1A [REP2-048].

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
		e of HGV Trip Generation		
WCWR-035	Transport and Access	Appendix D (Transport Report) Section 4: Underestimate of HGV Trip Generation	· Treatment of topsoil.	See Applicant's response to WCD1-150 submitted within this document in response to Wiltshire Council's Comments on submissions received at deadlines 1 and 1A [REP2-048] .
WCWR-036	Transport and Access	Appendix D (Transport Report)	2.29. The Wiltshire Highways (HDM) team have also discussed elements of this with Railton TPC Ltd in meetings prior to the SLD Written Representation being submitted. This has been taken into account by the council in reaching its own position and stated points of concern with the Applicant's estimate of HGV movements expected over the construction period.	The Applicant makes note of this comment. See Applicant's response to WCD1-063 and WCD1-081 to WCD1-087 submitted within this document in response to Wiltshire Council's Comments on submissions received at deadlines 1 and 1A [REP2-048] .
WCWR-037	Transport and Access	Appendix D (Transport Report)	<u>Section 5: Magnitude of Impact of Construction Traffic</u> 2.30. In Paragraph 5.1 it is stated "The Applicant provides a table	See Applicant's response to WCD1-088 submitted within this document in response to Wiltshire Council's Comments on

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
		Section 5: Magnitude of Impact of Construction Traffic	showing the assignment of construction vehicles associated with the solar array sites but does not provide a flow diagram representing this spatially". A flow diagram is thus included as Appendix 5 to the report. However, Annex F in the latest Transport Assessment [REP1-057 and REP1-059] does now include HGV flow diagrams for the average day and 'peak' day. Separate comment has been made on the content of this Annex F in the council's submission on comments on submissions at Deadlines 1 and 1A, so the council's Highways Development Management Officer does not comment on Appendix 5 to the Appendix D Transport Report (SLD) [REP1-172]. However, mindful of the ongoing queries concerning the predicted number of HGV deliveries, it would seem premature to comment in detail on any HGV link flow diagrams at this time.	submissions received at deadlines 1 and 1A [REP2-048].

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
WCWR-038	Transport and Access	Appendix D (Transport Report) Section 7: Impact of Vulnerable Road Users	<u>Section 7: Impact of Vulnerable Road Users</u> 2.31. In Paragraph 7.3 it is stated "The Applicant makes an assumption, based on a lack of infrastructure that NMU flows are low. It is suggested there have been observations, but no information is provided as to where and when these observations were made and for how long." This view is generally supported, but the council is equally aware that the level of general NMU usage of the rural lanes in the area could be quite seasonal or, for example, more prevalent during the weekends than on a typical weekday. Notwithstanding this, it is considered and agreed that a more robust assessment on NMU usage should have been undertaken where sections of the lanes proposed for HGV construction access are very narrow, or where the road edges lack any verges so requiring pedestrians to remain	The Applicant confirms that discussions are being undertaken with both the British Horse Society (Wiltshire Access Team) and Wiltshire Bridleway Society, by way of Statements of Common Ground (see drafts submitted at Deadline 2 [REP2-034] and [REP2-035]). These discussions have included understanding the use of the highway by non-motorised user (NMU) (particularly equestrian users) and discussing the scope and appropriateness of mitigation measures to protect vulnerable highway users. Whilst the Applicant is confident that the existing proposed mitigation measures are robust, should requests for further or amended mitigation measures be requested, these can be set out in the Outline CTMP [REP1-112] , and thus secured by Requirement 15 of Schedule 2 to the Draft DCO [REP1-007] .

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			<p>within the carriageway. In the case of cyclists or equestrians this would potentially remain the case anyway, with horse riders likely to be particularly impacted by the presence of HGVs. In the case of the latter, simple consultation with equestrian groups would have quickly established the rural lanes commonly used by horse riders.</p> <p>Paragraph 7.4 makes the same point so "No comment is made on whether equestrians use the network that is affected by construction traffic".</p>	<p>A review of local trip generators and amenities was undertaken in preparation of the Environmental Statement, and it was concluded that there are no material trip generators in the vicinity of the construction routes. A plan has been provided showing that trip generators are limited to the Flying Monk Cafe and Taproom at Hullavington and The Vine Tree public house at Norton. Walking and cycling trips in this area are therefore likely to primarily be for recreational purposes, with Bradfield Wood, Surrendell Wood and West Park Wood being common attractors, as well as the villages / hamlets themselves, such as Hullavington, Corston and Norton.</p> <p>To establish the likely potential for pedestrian movements along the construction route at Bradfield Cottages, an assessment of residential trip rates (from the</p>

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				<p>TRICS database) has been undertaken to establish the potential for walking trips associated with Hullavington. The National Travel Survey (NTS) which includes recreational and leisure trips (ref. 0409a) has been examined, to determine the proportion of those trips that are for leisure or recreational purposes, which results in a total of 68 walking trips per day. Further, the NTS (ref. 0308) shows that 69% of all walking trips are less than 1 mile in length and 94% are less than 2 miles in length. There would therefore be a very low chance of any pedestrian trips from further afield (such as Corston) affecting this route. The distance for a round trip from Hullavington to the nearest trip generator (Flying Monk Cafe and Taproom) that may affect Bradfield Cottages is in excess of 1 mile. Therefore, there is a maximum potential of 25% of the</p>

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				<p>walking trips associated with Hullavington that could affect this route, which equates to a total of 17 walking trips per day. It should also be noted that the distance for a round trip from the northern to the southern end of Hullavington is in itself in excess of 1 mile, and a proportion of the trips over 1 mile would also not affect Bradfield Cottages.</p> <p>With regard to cycle trips, ATC surveys were undertaken on Bradfield Cottages in January 2024. These showed that the existing cycle movements was 10 per day, with 4 during the proposed delivery hours of the site. The analysis is not restricted to January surveys but also includes bank holiday peaks.</p> <p>Based on the information set out above, it remains the case that the</p>

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				<p>number of pedestrian and cycle movements is not significant and the effect of the proposed development will not be material with regard to NMU delay, amenity, severity or safety.</p> <p>NMU surveys have been undertaken which show that there are up to 10 pedestrians and 26 cyclists on Fosse Way during the proposed delivery hours. There were no equestrians recorded during these hours.</p> <p>It should be noted that the above counts on Fosse Way were recorded on bank holiday Monday 25th May 2026, when NMU flows would be expected to be higher than on a typical day, and the site would not typically operate on a bank holiday. By comparison, the surveys showed 3 pedestrians and 8 cyclists on Fosse Way on</p>

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				<p>average across the delivery hours from Tuesday to Friday.</p> <p>From a review of the survey data, it is also noted that a number of movements were undertaken concurrently, such that there were 4 groups of pedestrians and 17 groups of cyclists on Fosse Way.</p> <p>The combined peak number of pedestrians and cyclists in a single hour was recorded as 12 on Fosse Way.</p> <p>Again, on review of the survey data, there were 2 groups of pedestrians and 3 groups of cyclists on Fosse Way.</p> <p>Based on the above, there is no significant existing usage by NMUs.</p>

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
WCWR-039	Transport and Access	Appendix D (Transport Report) Section 8: Impact on Villages	<u>Section 8: Impact on Villages</u> Hullavington 2.32. The report considers that given the level of construction traffic predicted to use the road east of Hullavington and Bradfield Cottages to access Lime Down area D, it is possible that drivers could seek alternative routes to avoid delays and risks resulting from the significantly increased HGV usage of this route. As such, the potential use of The Street and Hill Hayes Lane as a diversion route is identified, which could result in increased traffic through Hullavington.	The Applicant makes note of this comment.
WCWR-040	Transport and Access	Appendix D (Transport Report) Section 8: Impact on Villages	2.33. Whilst the use of part of The Street and Hill Hayes Lane could be used by light vehicle traffic as an avoidance Route, long lengths of Hill Hayes Lane have a narrow carriageway where passage for two cars is only possible at occasional passing places. It thus seems unlikely this would be a very	The Applicant makes note of this comment.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			attractive diversion route for many drivers, as meeting any opposing vehicles could result in similar delay issues in achieving 2-way passage. Whilst another diversion option could involve continuing along The Street to Grittleton and then turning north along Alderton Road / Fosse Way, this would simply lead to conflicts with HGV construction traffic associated with Lime Down areas A-C.	
WCWR-041	Transport and Access	Appendix D (Transport Report) Section 8: Impact on Villages	Grittleton 2.34. The expected changes in 2-way HGV movements and the resultant hourly frequency between 9:30am and 4:30pm along Alderton Road through Grittleton associated with the construction of the solar farm PV sites (A-C) would reasonably be considered 'High Sensitivity' based on the ISEP 'Severance' criteria alone. It is accepted The Street through Grittleton will be an even more sensitive part of the village to any increased trafficking by HGVs. The	The Applicant makes note of this comment. Regarding comments on sensitivity, the increase in expected levels of daily HGV flows is assessed by means of the 'magnitude of impact' variable. This is then assessed against the receptor sensitive which is a separate variable based on the Sensitivity Definitions provided in Table 13-3 of ES Volume 1, Chapter 13-

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			<p>cable route access drawing for this area (Figure 13-12-1) does show the intended HGV access to the cable route access points 101 and 102 via The Street, and the establishment of a large compound east of Grittleton. Further access points off Neeld Court exist to the south (103 and 104). In the SLD Transport Report it is stated that "The Applicant predicts 16 HGV movements per day through Grittleton based on an assumption that HGV movements would be spread evenly across all cable access points" and "the route through Grittleton is likely to receive far more than the average for all cable access points since it provides access to a compound". The further point is made that the creation of the compound itself will generate additional HGV movements whilst "The compound at Grittleton is also likely to be particularly important since it is likely to provide the only access to the cable route north of Grittleton</p>	<p>1: Transport and Access [REP1-019].</p> <p>As per ISEP Guidance, caution needs to be observed when applying the specified thresholds as very low baseline flows are unlikely to experience severance even with high percentage changes in traffic.</p> <p>The Applicant addresses the ability of two vehicles passing in its response to WCD1-100 to WCD1-108 of this document in response to Wiltshire Council's Comments on submissions received at deadlines 1 and 1A [REP2-048].</p> <p>The Applicant's response in relation to movements along The Street in Grittleton are provided in a Technical Note [EN010168/EXAM/9.34] submitted at Deadline 3 in response to Appendix D of SLD's Transport Report.</p>

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			as far as the avoidance area west of Surrendal Farm". All these factors do suggest that the simple 'averaging' approach used by the Applicant to estimate HGV movements expected at each cable route access point is not likely to be applicable here. As such, the council would support the view that the HGV impact along The Street through Grittleton is being underestimated and so potentially flawed.	
WCWR-042	Transport and Access	Appendix D (Transport Report) SUMMARY	SUMMARY 2.35. Many of the highway concerns set out in the Stop Lime Down (SLD) Written Representation have already been voiced by the council in its own Relevant Representation [RR-4934] , Local Impact Report [REP1-137] and Written Representation [REP1-138] . The council has raised similar concerns over some of the underlying assumptions which support the Transport Assessment HGV prediction in	The Applicant makes note of this comment. Regarding trip generation calculations see the Applicant's response to WCD1-063 and WCD1-081 to WCD1-087 in this document in response to Wiltshire Council's Comments on submissions received at deadlines 1 and 1A [REP2-048] . With regard to the passing of two HGV's see the Applicant's response to WCD1-100 to WCD1-

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			<p>Table 13-12 of the Transport Assessment, this including the latest Revision 2 issued in May 2026 [REP1-057 and REP1-059]. In doing so, the council is also seeking clarity from the Applicant on this, and indeed some validation or 'proving' where data for other solar farms exist. Wiltshire Council has also consistently raised safety and operational concerns about the ability of two HGVs, or even an HGV / car, to pass along some of the narrow rural roads proposed for access to the Lime Down PV sites, so these concerns are shared. The first issue of the Transport Assessment, on which the SLD Written Representation comments are based, included no swept path passage assessments for two opposing HGVs on any of the narrow minor roads being proposed for construction access, or indeed any proposals for passing places. However, the latest Revision 2 of the Transport Assessment [REP1-057 and</p>	<p>108 in this document in response to Wiltshire Council's Comments on submissions received at deadlines 1 and 1A [REP2-048].</p>

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			<p>REP1-059] now includes passing place proposals for Alderton Road in Annex I, whilst Appendix K includes the swept path analyses for two opposing HGVs. The council has commented in depth on the content of both these new appendices in reviewing the latest DCO documents submitted by the Applicant at Deadline 1 (see separate submission also submitted at Deadline 2). The passing place proposals along Alderton Road are very 'high level' and would require a lot more detail for Wiltshire Council technical approval. Furthermore, it is considered there is need for passing place mitigation on some of the other rural roads which is still not being proposed.</p>	
WCWR-043	Transport and Access	Appendix D (Transport Report) SUMMARY	2.36. The SLD Written Representation asserts that "No evidence is provided to support the assertion of low NMU flows". This view is generally supported, but the council is equally aware that the	See the Applicant's Technical Note entitled Applicant's Response to Stop Lime Down Written Representation Appendix D Transport Report [EN010168/EXAM/9.34] submitted

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			level of general NMU usage of the rural lanes in the area could be quite seasonal or, for example, more prevalent during the weekends than on a typical weekday. Notwithstanding this, it is considered and agreed that a more robust assessment on NMU usage should have been undertaken where sections of the lanes proposed for HGV construction access are very narrow, or where the road edges lack any verges so requiring pedestrians to remain within the carriageway. In the case of cyclists or equestrians this would potentially remain the case anyway, with horse riders likely to be particularly impacted by the presence of HGVs.	at Deadline 3 in response to Appendix D of SLD's Transport Report in relation to NMUs.
WCWR-044	Transport and Access	Appendix D (Transport Report) SUMMARY	2.37. With regards to the specific impact on villages, the council would concur with the SLD view that the HGV trafficking impact of the cable route works on The Street in Grittleton could be underestimated. The establishment	See the Applicant's Technical Note titled Applicant's Response to Stop Lime Down Written Representation Appendix D Transport Report [EN010168/EXAM/9.34] submitted at Deadline 3 in response to

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			<p>of the large compound east of Grittleton does suggest that the simple 'averaging' approach used by the Applicant to estimate HGV movements expected at each cable route access point is not likely to be applicable here. Furthermore, it would be expected that additional HGV trafficking would be needed in creating the compound itself. With regards to potential diversionary traffic impacts through The Street in Hullavington, and along Hill Hayes Lane, however the council does not consider that this is a substantive risk. Whilst the use of part of The Street and Hill Hayes Lane could be used by light vehicle traffic as an avoidance Route, long lengths of Hill Hayes Lane have a narrow carriageway where passage for two cars is only possible at occasional passing places. It thus seems unlikely this would be a very attractive diversion route for many drivers, as meeting any opposing vehicles could result</p>	<p>Appendix D of SLD's Transport Report in relation to traffic impacts on The Street in Grittleton and in relation to the compound.</p>

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			in similar delay issues in achieving 2-way passage. Whilst another diversion option could involve continuing along The Street to Grittleton and then turning north along Alderton Road / Fosse Way, this would then simply lead to conflicts with HGV construction traffic associated with Lime Down areas A-C.	
WCWR-045	Human Health	Appendix I1 (Human Health Impacts of Lime Down Solar Park)	<p>Appendix I1 (Human Health Impacts of Lime Down Solar Park) [REP1-180]</p> <p>2.38. The proposed development raises notable concerns for public health and community wellbeing. The most significant issue identified is the potential impact on community identity and culture, which could lead to frustration, stress, anxiety, and associated mental health challenges for residents. These risks are particularly linked to poor community engagement during the construction phase, with similar concerns persisting through</p>	<p>Wiltshire Council has raised these matters through their Local Impact Report and the Statement of Common Ground process being undertaken with the Applicant [REP2-025]. The Applicant has responded in full to these comments in The Applicant's Response to the Local Impact Report [REP2-038] (Section 8 and Table 16-8).</p> <p>The Applicant has directly assessed the impacts on community culture and identity as an indicator for mental health and wellbeing, as a result of changes to the visual rural character of the</p>

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			operational and decommissioning stages. To mitigate the impact on mental health and wellbeing, Wiltshire Council recommends enforceable requirements, including a comprehensive communication strategy with measurable outcomes and an Outline Decommissioning Strategy addressing community identity and resilience. These measures aim to safeguard wellbeing and ensure effective engagement throughout the project lifecycle. The communication strategy should be carried out in line with the Suffolk County Council NSIP Guidance.	<p>affected communities, and the extent to which these communities connect to their surroundings, sense of place, and each other. The assessment also considers community resilience and influence on their surroundings in parallel, based on understanding how mental wellbeing is tied to the quality and quantity of engagement and influence in changes to the built and natural environment around them. The assessment in ES Volume 1, Chapter 18: Human Health [APP-070] finds no greater than a long-term minor adverse effect to community culture and identity, or to community resilience and influence, which are therefore not considered significant effects.</p> <p>Design and visual mitigation measures to reduce impacts on rural community identity and culture are secured by through the Design Principles and Parameters [REP1A-008],</p>

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				<p>Outline LEMP [APP-283], and Outline CEMP (Rev 4)[EN010168/APP/7.12] by Requirements 5, 7, and 13 of Schedule 2 to the Draft DCO [REP1-007]. The provision and establishment of the Community Liaison Group to ensure community influence is maintained is secured through Requirement 4 of Schedule 2 to the Draft DCO [REP1-007].</p> <p>The specific role and responsibilities of the Community Liaison Manager are defined in the Outline CEMP (Rev 4) [EN010168/APP/7.12], Outline OEMP [REP2-021] and Outline Decommissioning Strategy [REP1-100], secured respectively by Requirements 13, 14, and 20 of Schedule 2 to the Draft DCO [REP1-007].</p> <p>The Applicant therefore considers the wording of the relevant Requirements in Schedule 2 is sufficiently robust to ensure</p>

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				community engagement and mental health and wellbeing is safeguarded at all phases within the Scheme lifetime. In terms of the Applicant's position on how best to embed the principles of the Suffolk County Council guidance into community engagement, please see the Applicant's Response to FWQ HW1.1.
WCWR-046	Human Health	Appendix I1 (Human Health Impacts of Lime Down Solar Park)	2.39. It should be noted that the proposals will significantly impact the amenity of the countryside including public rights of way, recreational space, general environmental change and interferences with character of the area. There are also numerous concerns about other environmental issues such as noise, vibration, pollution, fire risks, flooding, construction traffic, and the mental impact from the detriment caused. Public Health recognise and share the concerns about the mental health impact from the range of stressors from	<p>Wiltshire Council has raised these matters through their Local Impact Report and the Statement of Common Ground process being undertaken with the Applicant [REP2-025]. The Applicant has responded in full to these comments in The Applicant's Response to the Local Impact Report [REP2-038] (Section 5 and Table 8-2 with respect to PRoWs and public protection).</p> <p>The Applicant is confident the assessment in ES Volume 1, Chapter 18: Human Health [APP-070], covers a comprehensive set of receptors to identify effects to</p>

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			the proposals. Although the mitigations are primarily sought by environmental controls and adjustments from other departments, Public Health strongly support all protections and mitigations to protect the mental health of the local population.	physical and mental health and wellbeing, including those derived from other technical matters assessed in the ES. The Applicant confirms that mitigation measures at each major phase of development are secured through the Outline CEMP [REP2-019] , Outline OEMP [REP2-021] and Outline Decommissioning Strategy [REP1-100] , secured respectively by Requirements 13, 14, and 20 of Schedule 2 to the Draft DCO [REP1-007] .
WCWR-047	Soils and Agriculture	Appendix K2 (Soil Site Report)	<p>Appendix K2 (Soil Site Report) [REP1-185]</p> <p>2.40. The council considers this report to provide a comprehensive assessment of the soil properties and capacities in the site. One area that may need further investigation by the Applicant is that due to the high clay content, the ground is more likely to move between wet and dry times, having an impact on foundations.</p>	The Applicant notes this comment. Ground investigation will be undertaken prior to the commencement of the construction phase, which will investigate the geotechnical properties of soils in relation to the proposed development. The Applicant can confirm that elements such as the potential for "shrink-swell" in clay-rich soils will be considered in this exercise and that this information

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				will be used to refine foundation design.
WCWR-048	Site Selection	Appendix L (Site Selection and Alternative Sites Assessment)	<p>Appendix L (Site Selection and Alternative Sites Assessment) [REP1-186]</p> <p>2.41. The council considers that an important point has been made in this document, specifically that although the Applicant states that the scheme is 'landscape led', which the council disputes, the Applicant refers to the selection as by 'willing landowners', thus putting environmental considerations as secondary.</p>	<p>The Applicant notes this comment. Section 3 of the Applicant's Response to Written Representations [REP2-039] submitted at Deadline 2 provides a response to the points made within Appendix L (Site Selection and Alternative Sites Assessment) [REP1-186]. This response includes the submission of the Technical Note on Site Selection [REP2-043] which has been prepared in response to specific comments made by Stop Lime Down in relation to site selection.</p> <p>In relation to the point on willing landowners, as stated in the Applicant's Response to Written Representations [REP2-039], ES Volume 1, Chapter 4: Alternatives and Design Evolution [APP-056] and ES Volume 3, Appendix 4-1: Site Selection Assessment Report [APP-185] detail the staged</p>

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				<p>approach to site selection undertaken by the Applicant. This includes consideration of a range of planning, environmental and operational factors. Although the availability of large-scale land holdings was a consideration, it was not the only consideration in the site selection process.</p> <p>Furthermore, as stated in the Applicant's Response to Written Representations [REP2-039], the Applicant does not agree that the Scheme is not landscape led. The Applicant has undertaken an extensive and genuine consultation process with both the CNL Board and Officers from Wiltshire County Council (WCC) throughout the pre-application and Examination process to inform an iterative and landscape led approach to design resulting in a landscape scheme that is substantive and responds to Nature Recovery Strategies and guidelines within published Landscape Character documents.</p>

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				The Scheme has been iteratively refined in response to consultation feedback, including the removal of panels from sensitive parcels such as those along the Fosse Way, additional viewpoint testing, expanded visualisations and refinement of mitigation proposals.
WCWR-049	Socio-Economics, Recreation and Tourism	Dermot Farrington and January Farrington Written Representations	<p>Dermot Farrington [REP1-202 to REP1-204] and January Farrington [REP1-214 to REP1-216] Written Representations</p> <p>3.1. As a result of these and other similar comments from equine businesses, Wiltshire Council have added a requirement into its Statement of Common Ground asking the Applicant to undertake an economic impact assessment on the equine sector within the affected area.</p>	<p>The Applicant has responded in full to written representations by Dermot Farrington and January Farrington in The Applicant's Response to Written Representations [REP2-039] (pg.1296-1393, 1549-1614).</p> <p>The Applicant has responded on matters raised in regard to the economic impact to West Park Farm, and is confident in the assessment outcomes that no significant adverse effect to this facility is anticipated (as assessed in ES Chapter 16: Socio-Economics, Tourism and Recreation [APP-068] and the supporting ES Volume 3, Appendix 16-2 Tourism and</p>

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				<p>Recreation Receptor Tables [APP-241]). The Applicant is furthermore confident that the measures for accessing skills and employment support measures as secured through the Outline SSCEP [REP1-108], secured by Requirement 18 in Schedule 2 to the Draft DCO [REP1-007], are sufficient. The Applicant is undertaking a further economic impact assessment on specific equine businesses likely to be directly affected by the Scheme and any indirect effects therefrom, in response to the Examining Authority' First Written Question, no. SE1.9 [PD-010]. The Applicant's assessment will be published for Deadline 4. This is being provided to support the scope of economic assessment already undertaken for submission of the DCO application.</p>

3 The Applicant's responses to statutory consultees, undertakers and notable parties with whom the Applicant is seeking to undertake a Statement of Common Ground

3.1 Environment Agency

Table 3-1: [REP2-049](#)

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
Comments on submissions received at deadlines 1 and 1A				
EA-012	REP1-008 3.1 Draft Development Consent Order (Rev 2)	Disapplying Flood Risk Activity Permits	Under Discussion We are discussing the request to disapply Flood Risk Activity Permits with the applicant.	The Applicant notes this response.
EA-013	REP1-008 3.1 Draft Development Consent Order (Rev 2)	Requirement 13 Construction environmental management plan (CEMP)	Under Discussion- document has not been updated to include the Environment Agency as a consultee.	The Applicant confirms that the Draft Development Consent Order (Rev 3) [EN010168/APP/3.1] has been updated at Deadline 3 to include the Environment Agency as a consultee in respect of Requirement 13 (Construction environmental management plan).
EA-014	REP1-008	Requirement 14	Under Discussion- document has not been updated to include the	The Applicant confirms that the Draft Development Consent

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
	3.1 Draft Development Consent Order (Rev 2)	Operational environmental management plan (OEMP)	Environment Agency as a consultee.	Order (Rev 3) [EN010168/APP/3.1] has been updated at Deadline 3 to include the Environment Agency as a consultee in respect of Requirement 14 (Operational environmental management plan).
EA-015	REP1-008 3.1 Draft Development Consent Order (Rev 2)	Requirement 17 Soil Management	Agreed for the Environment Agency not to be a consultee.	The Applicant notes that this issue is agreed.
EA-016	Fisheries	Fish species protection	Agreed REP1-106 7.19 Outline Ecological Protection and Mitigation Strategy (Rev 2) The additional text in paragraph 6.4.1 now addresses Relevant Rep EA-016.	The Applicant notes that this issue is agreed.
EA-017	Fisheries, Biodiversity and	Watercourse Crossings	Agreed REP1-126 9.10 ES Volume 3 Appendix 9-9 Watercourse	The Applicant notes that this issue is agreed

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
	Geomorphology		Crossing Schedule has been provided. We defer to the LLFA for comments on the ordinary watercourses, but note it would be preferable for some micro-siting of the open-cut trench to avoid the bankside vegetation in the OW3 crossing.	
EA-018	Fisheries, Biodiversity and Geomorphology	Commitments register: mitigation	Agree REP1-106 7.19 Outline Ecological Protection and Mitigation Strategy (Rev 2) has been updated.	The Applicant notes that this issue is agreed
EA-019	Fisheries, Biodiversity and Geomorphology	Ecological assessments	Agree REP1-016 6.1 ES Volume 1 Chapter 9 Ecology (Rev 2) has been updated.	The Applicant notes that this issue is agreed
EA-020	Fisheries, Biodiversity and Geomorphology	Aquatic invertebrates	Agree REP1-016 6.1 ES Volume 1 Chapter 9 Ecology (Rev 2) has been updated.	The Applicant notes that this issue is agreed

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
EA-021	Fisheries, Biodiversity and Geomorphology	Watercourse buffers	<p>Under Discussion</p> <p>We note the differences in watercourse buffers but would prefer to see at least a 10 metre buffer. There is a discrepancy in watercourse buffer distances where staff are to wash plant and vehicles as a biosecurity measures. Table 5 (oCEMP) states the minimum buffer is 10m whereas Section 15.3.1 (oEPMS) states the minimum buffer is 15m.</p> <p>There is inconsistency in REP1-018 6.1 ES Volume 1 Chapter 11 Hydrology, Flood Risk and Drainage (Rev 2) Table 11-2 says "Following consultation with the Environment Agency, a precautionary 10 m stand-off will be applied", however section 11.9.2 on page 42 still says "Eight metre buffers from infrastructure will be established around watercourses". Additionally, APP-283 Outline Landscape and</p>	<p>The Applicant confirms that the Application documents do not apply a single minimum 10 m buffer to all watercourses and ditches. Different buffers are applied to different features and activities, based on their sensitivity, function and regulatory context.</p> <p>The 8 m buffer is retained for lower sensitivity ditches and watercourses where no higher sensitivity criteria are triggered. These features are identified in ES Volume 3, Appendix 9-8: CONFIDENTIAL Schedule of Protective Ecological Buffers [APP-205]. For Main Rivers, this also aligns with the Environment Agency's flood risk activity permitting threshold for activities within 8 m of the bank of a non-tidal Main River, flood defence structure or culvert, where relevant.</p>

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			<p>Environmental Management Plan (OLEMP) has not been updated.</p>	<p>The wider ecological buffer approach is set out in ES Volume 1, Chapter 9: Ecology and Biodiversity [REP1-015]. Where higher sensitivity features are present, larger buffers are applied. This includes 10 m buffers where specified in the ecological buffer criteria, and 15 m buffers for more sensitive habitats or where required for specific activities.</p> <p>For the specific biosecurity measure relating to staff, plant and vehicle washdown, the Applicant will retain the more precautionary 15 m stand-off set out in Outline Ecological Protection and Mitigation Strategy [REP1-106]. Outline Construction Environmental Management Plan [REP2-019] will be reviewed and updated where required so this activity-specific stand-off is consistently reflected.</p>

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				<p>The relevant Application documents will be reviewed and updated where required to clarify that the 8 m, 10 m and 15 m buffers apply to different features and activities.</p> <p>This is a document consistency update and does not alter the conclusions of the assessment.</p>
EA-022	Water Framework Directive	Groundwater Bodies	<p>Under Discussion</p> <p>Resolved in principle. PDA-009 EA-022: a plan will be produced, but this has not yet been supplied. We have not identified where proportionate signposting has been added to Chapter 11. We will be able to resolve this when we have seen the plan and proportionate signposting.</p>	<p>The Applicant notes the Environment Agency's comment. A Groundwater Bodies Plan (Rev 1) [EN010168/EXAM/9.39] has been provided at Deadline 3. ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage (Rev 3) [EN010168/APP.6.1] has also be updated to include proportionate signposting to the plan and the updated Water Framework Directive Assessment [REP1-095].</p>

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
EA-023	Groundwater and Contaminated Land	Piling	<p>Under Discussion</p> <p>This has not been answered in REP1- 028 6.1 ES Volume 1 Chapter 19 Ground Conditions (Rev 2). In 19.11.4, 19.11.6 and 19.11.7 the applicant refers to preliminary risk summary "EN010168/EXAM/9.X". This has not been supplied, and we have no further information so we cannot comment if it is likely to be sufficient for us to resolve this issue.</p>	<p>The Applicant confirms that the BESS and Substation – Preliminary Geotechnical Risk Register [REP1-128] was submitted to the Examination Library at Deadline 1. The Applicant has corrected the missing reference number in ES Volume 1, Chapter 19: Ground Conditions (Rev 3) [EN010168/APP.6.1] at Deadline 3.</p>
EA-024	Groundwater and Contaminated Land	Battery Energy Storage System (BESS) foundation solution	<p>Under Discussion</p> <p>An update to Chapter 3 has not been supplied and we are not aware of an answer to this elsewhere. In the oCEMP the applicant commits to produce a piling risk assessment (Table 5) or foundation works risk assessment (Table 13), but these are only proposed for the substation and not the BESS. The applicant</p>	<p>The Applicant can confirm that appropriate piling risk assessment will be undertaken on both substation and BESS sites and the Outline CEMP (Rev 4) [EN010168/APP/7.12] has been updated to reflect this at Deadline 3.</p>

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			confirms in PDA-009 that "Where foundations are penetrative, the final design will ensure that the containment system remains effective and continuous". However, we have not seen anything which explains how that will be achieved or commits to achieving it.	
EA-025	Groundwater and Contaminated Land	Fire water supply and storage within the Outline Battery Safety Management Plan (oBSMP)	Agree with explanation given in PDA- 009 EA-025. Where hydrants are to be used, the applicant must obtain agreement from the local water supplier. Where tanks are to be used, the applicant will need to ensure a suitable supplier is sought and that refilling of tanks can be done if the water is used. Tanks and hydrants must be maintained to ensure operability.	The Applicant confirms that firefighting water will be supplied from dedicated on-site firefighting water storage and will not rely on direct supply from the local mains water network during an incident. As set out in ES Volume 3, Appendix 11-6: Flood Risk Assessment and Drainage Strategy - Lime Down D / BESS [REP1-047] , the BESS Area will contain a minimum of two firefighting water storage units of no less than 228,000 litres, capable of delivering 1,900 litres per minute for four hours. Any

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				<p>hydrant points or fire service connections would be supplied from that on-site storage.</p> <p>The firefighting water requirement will be fully assessed at the detailed design stage based upon analysis of Large Scale Fire Testing (LSFT) of the BESS design plus any additional BESS fire and explosion test data by an independent Fire Protection Engineer, water storage volumes will be agreed with D&WFRS during detailed design.</p> <p>The tanks will be filled before operation and the stored firefighting water volume will be maintained during operation. The detailed filling, refilling, inspection and maintenance arrangements will be confirmed in the final Battery Safety Management Plan once the water volume and number of hydrants has been agreed with D&WFRS, secured by</p>

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				Requirement 6: Battery Safety Management Plan of the Draft Development Consent Order [REP1-007] .
EA-026	Groundwater and Contaminated Land	Ground infrastructure will be left in-situ following the decommissioning phase	Agree REP1-101 7.14 Outline Decommissioning Strategy (Rev 2) paragraph 2.1.3 has been updated to clarify the proposal for foundations at decommissioning. This is acceptable in principle. However, the applicant must ensure that reinforced concrete caps, bentonite slurry, and any other products used are certified as causing no harm to the environment. Best practice guidance at the time of decommissioning should be followed. This may require total removal of the foundations and cables, or other remediation of the land.	The Applicant notes this and will ensure that best practice in relation to environmental protection will be applied in both the material selection and the decommissioning techniques applied.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
EA-027	Groundwater and Contaminated Land	Suitable mitigation where groundwater may be encountered.	<p>Under Discussion</p> <p>REP1-018 6.1 ES Volume 1 Chapter 11 Hydrology, Flood Risk and Drainage (Rev 2) REP1-028 6.1 ES Volume 1 Chapter 19 Ground Conditions (Rev 2)</p> <p>Chapter 11 Table 11-1 ID 3.5.4 has not been updated. Chapter 11 Section 11.10, Appendix 11-1 and Chapter 19, which are referenced in ID 3.5.4, do not appear to have been updated with any relevant information. Discussion of requirements around dewatering in the oCEMP have not been updated. However, ground investigation works are committed to in the REP-097 7.12 Outline Construction Environmental Management Plan (Rev 2). Completion of this, and subsequent detailed assessment of conditions, should be sufficient to resolve the issue. For completeness, we would like to see relevant chapters or</p>	<p>The Applicant notes the Environment Agency's comment.</p> <p>For completeness, ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage (Rev 3) [EN010168/APP/6.1], Chapter 19: Ground Conditions (Rev 3) [EN010168/APP/6.1], ES Volume 3, Appendix 11-1: Flood Risk Assessment and Drainage Strategy Covering Report (Rev 3) [EN010168/APP/6.3] and the Outline CEMP (Rev 4) [EN010168/APP/7.12] have been updated to signpost to the pre-commencement ground investigation and subsequent detailed assessment required where groundwater may be encountered.</p>

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			supporting documents updated as relevant with additional information.	
EA-028	Groundwater and Contaminated Land	Per-and poly fluoroalkyl substances (PFAS) based materials	Agree PDA-009 EA-028 response, and REP1- 018 6.1 ES Volume 1 Chapter 11 Hydrology, Flood Risk and Drainage (Rev 2) Table 11-1, ID 3.5.11 states PFAS will not be used unless no other option is available.	The Applicant notes that this matter is agreed.
EA-029	Groundwater and Contaminated Land	Licensed groundwater abstractions	Under Discussion An update to Appendix 19-10 has not been supplied. However, upon receipt and review of the added information we are likely to be able to resolve this.	The Applicant has committed to undertake reasonable efforts to identify all private water supplies. ES Volume 3, Appendix 19-10: Private Water Supply Correspondence with Wiltshire Council [APP-256] relates to correspondence received from Wiltshire CC and no update to the information they can provide is anticipated, but other avenues (including direct stakeholder engagement) are be pursued to

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				obtain additional information if available.
EA-030	Groundwater and Contaminated Land	Thermal implications of cables	<p>Under Discussion</p> <p>The applicant has confirmed in REP1- 028 6.1 ES Volume 1 Chapter 19 Ground Conditions (Rev 2) Table 19- 6, that "Cables will be selected in order to minimise thermal loss considering available guidance from the EA." In February 2026 we sent additional guidance on thermal impacts to the applicant as requested.</p> <p>This set out our expected approach to considering thermal impacts, including conditions for when further desk-based assessment will be required. The applicant does not appear to have referenced or otherwise considered this guidance. The applicant has not provided commentary on whether all conditions can be discounted, and,</p>	<p>The Applicant confirms that the guidance provided by the EA will be followed in relation to the assessment of impacts related to thermal loss from cables and that commitment has been reflected in ES Volume 1, Chapter 19 Ground Conditions (Rev 3) [EN010168/APP/6.1] and associated technical appendices updated at Deadline 3.</p>

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			if not, the outcomes of the assessment. The proposed mitigation is too vague to give us reassurance that thermal impacts on groundwater receptors has been appropriately mitigated.	
EA-031	Groundwater and Contaminated Land	The Battery Energy Storage System (BESS) Area drainage outfall automatically self-actuating valves	Agree REP1-111 7.21 Outline Battery Safety Management Plan (Rev 2) 5.5.8 confirms manual override as a secondary control.	The Applicant notes that this issue is agreed.
EA-032	Groundwater and Contaminated Land	Ground conditions	Under Discussion The applicant's response is acceptable, providing that the ground investigation scope is sufficient for the scale of the scheme and anticipated ground conditions. A period of groundwater monitoring, in accordance with	The Applicant confirms that the scope of ground investigation will be appropriate for the scale of the development, the anticipated ground conditions and the Conceptual Site Model as understood prior to intrusive investigation. Ground investigation will be designed and executed in

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			relevant British Standard guidance for site investigations, is strongly recommended.	line with BS10175 and other appropriate guidance documents. This commitment has been updated within the Outline CEMP (Rev 4) [EN010168/APP/7.12] provided at Deadline 3. It is anticipated that this will include measurement and sampling of groundwater. The Applicant would be happy to discuss the ground investigation design with the EA once prepared to ensure that it meets expectations.
EA-033	Groundwater and Contaminated Land	Discovery and Inspection Strategy	Agree The narrative given in PDA-009 EA- 033 is sufficient to reassure us the applicant has considered this appropriately.	The Applicant notes that this matter is agreed.
EA-034	Groundwater and Contaminated Land	Inconsistency in the walkover surveys carried out.	Under Discussion We note some changes made to the relevant documents, but some inconsistencies remain. For example, in Table 4 of both Appendix 19-1 and Appendix 19-4,	Walkovers were undertaken by Delta Simons in 2024 have now been superseded and reference to them will be removed. Therefore, the Applicant can confirm that all walkovers were conducted by

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			<p>it still states that a site walkover was carried out by Delta Simons on 31 January 2024.</p> <p>However, Section 1.2.16 of both appendices states that "A site walkover of Lime Down A was carried out between 1st and 2nd May 2025."</p> <p>We acknowledge that there may have been multiple site walkovers, but this is not explained in the text or PDA-009 EA-034. This is a minor issue, and we do not expect it to affect the outcomes of the assessments, but it remains unresolved.</p>	<p>Geosyntec in May 2025 with some follow up visits required where access could not be gained first time round (June-July 2025). The applicant has updated ES Volume 3, Appendices 19-1, 19-4 and 19-5 (Rev 3) [EN010168/APP/6.3] to clarify this matter at Deadline 3 of Examination.</p>
EA-035	Groundwater and Contaminated Land	Soil contamination during the operational phase.	<p>Under Discussion</p> <p>REP1-028 6.1 ES Volume 1 Chapter 19 Ground Conditions (Rev 2) Paragraph 19.11.12 has not been updated. We have not identified the relevant update in the REP1-099 7.13 Outline Operational Environmental</p>	<p>The Applicant apologises for these amendments being overlooked. The Outline OEMP (Rev 4) [EN010168/APP/7.13] and ES Volume 1, Chapter 19: Ground Conditions (Rev 3) [EN010168/APP/6.1] have been updated to reflect this and will be</p>

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			<p>Management Plan (Rev 2). We request the applicant directs us to where the relevant changes have been made, or this will remain unresolved. In the REP1-115 7.26 Commitments Register (Rev 2), the applicant still only commits to a discovery and inspection strategy as construction and decommissioning.</p>	<p>submitted at Deadline 3. The Applicant does not propose to update the Commitment Register as it is not a secured document.</p>
EA-036	Groundwater and Contaminated Land	Groundwater risks have not been appropriately assessed.	<p>Under Discussion</p> <p>We have noted confirmation in REP1- 028 6.1 ES Volume 1 Chapter 19 Ground Conditions (Rev 2) and the REP1-097 7.12 Outline Construction Environmental Management Plan (Rev 2) that a ground investigation will be completed.</p> <p>However, an outline scope and limitations of this in the submitted documents is still not clearly set out. We note the clarification of the scope in PDA-009 EA-036. This</p>	<p>The Applicant confirms that a ground investigation will be undertaken considering the anticipated ground conditions and the Conceptual Site Model as understood prior to intrusive investigation. This will include investigation and consideration of groundwater receptors.</p> <p>The Applicant would be happy to discuss the ground investigation design with the EA once prepared to ensure that it meets expectations.</p>

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			appears acceptable in principle, and we will resolve this issue. However, the applicant should be aware that if we are not satisfied with the scope, methodology and interpretation of the investigation results, we may request further works pre- commencement before we can agree that risks to controlled waters have been adequately assessed and mitigation is appropriate.	
EA-037	Groundwater and Contaminate d Land	Storage and management proposals for batteries have not been provided.	Agree We note the updates made to REP1- 111 7.21 Outline Battery Safety Management Plan (Rev 2) 4.3.16 and 4.3.17. This outline methodology appears acceptable. Note that if there is a damaged battery which might be causing harm to the environment then we expect there to be a control which prevents it causing further harm while the risk assessment is undertaken. We note clarification of	The Applicant notes that this issue is agreed.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			the wording in chapters 3 and 20, and that these will not be updated at this time.	
EA-038	Groundwater and Contaminated Land	Mitigation proposals managing risks to groundwater have not been adequately addressed.	<p>Under Discussion</p> <p>As we previously stated, it would be beneficial for the cable route construction method statement to reference the breakout contingency procedure, or explicitly direct readers to review it in the oCEMP. We don't feel this is clearly presented in the current reference to the oCEMP and use of method statements (Appendix 3-2 paragraph 1.5.5).</p>	<p>The Applicant has updated ES Volume 3, Appendix 3-2: Cable Route Construction Method Statement (Rev 2) [EN010168/APP/6.3] to include the breakout contingency procedure at Deadline 3.</p>
EA-039	Groundwater and Contaminated Land	No Preliminary Risk Assessments (PRAs) for the interconnecting corridors between the	<p>Under Discussion</p> <p>In PDA-009 EA-039 the applicant states: "Further clarity has been added to the Preliminary Risk Assessments to explain the coverage of the interconnecting cable corridors". We have not identified where this is given. For example, the map and site</p>	<p>The Applicant acknowledges that there are some areas where interconnecting corridors are no longer directly referenced. The Applicant can confirm that these have been incorporated into consolidated PRA study areas and distances to external receptors,</p>

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
		main solar panel areas.	description in Table 2 of each report still do not clearly explain the coverage of the study area.	sources, etc, have been updated accordingly.
EA-040	Groundwater and Contaminated Land	Maps and data searches in appendices 19-1, 19-2 and 19-5 are not complete or specific to those sites	Under Discussion See response to EA-039. We have noted some changes to the reports, but these do not appear to resolve this issue.	The Applicant notes that there have been changes to the Order Limits since due to revisions to the scheme which have reduced the size of the study area. Where this is the case, distances to sources, receptors, etc, outside of the PRA study areas have been revised to reflect the new Order Limits, which lie within the study area included in the original maps and data searches. Therefore, a revised search area for environmental data is not required, as agreed in meeting with the EA 02/06/2026.
EA-041	Groundwater and Contaminated Land	The PRA reports do not refer to the proposed Discovery and	Agree We felt that specific reference to the discovery and inspection strategy for risks to controlled waters would be valuable in the discussion of the PRAs. We are	The Applicant notes that this matter is agreed.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
		Inspection Strategy	aware of the proposed discovery and inspection strategy, which is secured in the oCEMP, and will resolve this issue.	
EA-042	Groundwater and Contaminated Land	PRA- off-site vehicle repair garage	Agree The updates do not directly answer our query, but we are satisfied that this potential source is not of significant concern.	The Applicant notes that this matter is agreed.
EA-043	Groundwater and Contaminated Land	Unclear whether ground investigation to confirm the conceptual model is proposed to be carried out for several parts of the Proposed Development.	Agree We are satisfied that a pre-commencement ground investigation is secured in the REP1-097 7.12 Outline Construction Environmental Management Plan (Rev 2) (Table 13). However, we note that our comments in Additional Narrative have not been directly addressed in the response. See also our comments on other issues regarding the scope of this work.	Noted. As above, the Applicant confirms that a ground investigation will be undertaken considering the anticipated ground conditions and the Conceptual Site Model as understood prior to intrusive investigation.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
EA-044	Groundwater and Contaminated Land	Justification for selecting the distances beyond which off site contamination sources would not be significant.	Agree The applicant has not provided any supporting information, and we consider that hydrogeological risks can extend beyond 250m. However, given other discussions and mitigation addressed elsewhere, we are satisfied that this issue can be resolved.	The Applicant notes that this matter is agreed.
EA-045	Groundwater and Contaminated Land	Monks Park Mine	Under Discussion We have reviewed the REP1-130 9.14 Cable Route Corridor Mining Risk- Technical Memorandum . We note in section 6.2.4 there is a commitment to obtain geoenvironmental samples to be analysed for a range of relevant contaminants of potential concern. We support this proposal. Other discussion of contamination or the potential risk to controlled waters is not addressed, and we have identified no relevant updates to Chapter 19 or Appendix 19- 8	The Applicant notes the EA comments regarding considerations for possible future mine remediation works. The Applicant will ensure that where remediation is required, that full consideration will be given to the comments raised and any other environmental or regulatory considerations associated with such works. Potential risks to controlled waters associated with this section of the scheme are addressed in ES Volume 3, Appendix 19-8: Cable

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			<p>which specifically address this issue. The potential for treatment and ground stabilisation of mine workings is discussed as Section 7. If mine workings requiring stabilisation are flooded and mine water is not pumped dry, the introduction of stabilisation materials could be construed as discharge direct to groundwater for which there would be need for risk assessment. This may need a permit. Many cement-based grouts contain PFA, and some may be prohibited. If displacing groundwater in tunnels, grout may have high barium content. Any pumping may require a permit for abstraction and discharge after treatment. Pumping may also cause localised subsidence in some cases.</p>	<p>Corridor Southwest Desk Study (Rev 3) [EN010168/APP/6.3] but this has been reviewed and updated at Deadline 3 to ensure that the assessment is accurate and updates made if required.</p>
EA-046	Groundwater and	No drainage strategies are provided for	<p>Under Discussion</p> <p>We have reviewed REP1-125 9.9 Firewater Containment and</p>	<p>The Applicant notes the Environment Agency's comment.</p>

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
	Contaminated Land	the proposed 400kV and 132kV Substations.	<p>Drainage Strategy- Lime Down Substation and this has provided some clarity. Many elements will need to be agreed during detailed design in due course. In paragraph 2.4.4 it states “[the oOEMP] confirms that retained firewater will be subject to inspection, testing and controlled disposal.” We have not identified this information in the oOEMP, so this is not resolved. The fate of retained water is discussed in paragraph 5.2.1 and 5.2.2. As noted, the testing suite and sampling protocol can be agreed as part of a post-incident management procedure. In order to minimise delays after a fire event, we strongly recommend that an outline procedure be produced prior to operation. If the applicant proposes to release captured water to the environment, a relevant discharge permit should be obtained from the Environment Agency. It can take approximately</p>	<p>The Applicant welcomes the Environment Agency's acknowledgement that the Firewater Containment and Drainage Strategy - Lime Down Substation [REP1-125] provides further clarity.</p> <p>The Applicant agrees that an outline post-incident management procedure for retained firewater should be prepared prior to operation. This will be secured through the detailed Operational Environmental Management Plan, approved under Requirement 14 of the Draft DCO [REP1-007].</p> <p>The procedure will address inspection, sampling, testing, temporary storage, treatment where required, tankering or controlled disposal of retained firewater. Retained water would not be discharged to the environment unless the relevant environmental</p>

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			4 months for these permits applications to be processed and approved. The contained water must be stored appropriately during this time.	<p>permit or regulatory approval is in place.</p> <p>The Applicant has updated the Outline OEMP (Rev 4) [EN010168/APP.7.13] at Deadline 3 to provide clearer signposting to this requirement and to the post-incident management principles set out in [REP1-125].</p> <p>The Applicant does not consider that this affects the containment design principles set out in [REP1-125]. It is a post-incident operational management matter.</p>
EA-047	Groundwater and Contaminated Land	Present the SuDS options with consideration of the need for sealed drainage.	<p>Agree</p> <p>The requested information is now clearly presented in REP1-111 7.21 Outline Battery Safety Management Plan (Rev 2) paragraph 5.5.8 and REP1-048 6.3 ES Volume 3 Appendix 11-6 Flood Risk Assessment and</p>	The Applicant welcomes the Environment Agency's confirmation that this matter is agreed.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			Drainage Strategy Lime Down D (Rev 2) paragraph 3.5.8.	
EA-048	Groundwater and Contaminated Land	Table 4: SuDS Mitigation Indices is blank.	<p>Under Discussion</p> <p>Partially resolved. The table has been updated in REP1-048 6.3 ES</p> <p>Volume 3 Appendix 11-6 Flood Risk Assessment and Drainage Strategy Lime Down D (Rev 2), however it states there will be no shut-off valve or isolation system. In Appendix 11-6 paragraphs 1.9.4, 3.2.2 and elsewhere, and oBSMP paragraph 5.5.8, the applicant confirms that the BESS drainage arrangement will have isolation valves. While the isolation system might not be in use during normal operation, we expect an acknowledgement in this table that one will be present.</p>	<p>The Applicant notes the Environment Agency's comment.</p> <p>ES Volume 3, Appendix 11-6: Flood Risk Assessment and Drainage Strategy - Lime Down D / BESS (Rev 3) [EN010168/APP/6.3] has been updated at Deadline 3 so Table 4 clarifies that emergency shut-off valve / isolation measures are provided for firewater and accidental spill containment only, and are not relied upon for routine surface water quantity management or standard SuDS water quality treatment.</p>
EA-049	Flood Risk Assessment	Functional Floodplain	<p>Under Discussion</p> <p>It appears some of the solar PV panel supports are within areas of</p>	<p>The Applicant notes the Environment Agency's comment and welcomes the confirmation that the floodplain storage and flow</p>

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
		(Flood Zone 3b).	<p>functional floodplain within Lime Down D and Lime Down E2. In revision 2 (May 2026) of the updated Flood Risk Assessment and Drainage Strategy the applicant describes how the panelled areas are not expected to give rise to a material loss of floodplain storage or material obstruction of flood flow routes. This seems reasonable based on the volumetric calculations and associated level estimates provided for Lime Down D and Lime Down E2.</p> <p>We note that the applicant has undertaken further modelling for Lime Down E2 and will delineate Flood Zone 3b based on this modelling. We await this information before taking a final view on this matter.</p>	<p>route assessment for Lime Down D and Lime Down E2 appears reasonable. The updated Lime Down E2 modelling and Flood Zone 3b delineation will be provided in ES Volume 3, Appendix 11-8: Flood Risk Assessment and Drainage Strategy - Lime Down E2 [REP1-051] at Deadline 4.</p>
EA-050	Flood Risk Assessment	Fencing must not inhibit	Under Discussion	The Applicant notes the Environment Agency's comment. The relevant documents will be

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
		flood flow routes.	Section 2.3.15 page 17 within the updated REP1-048 6.3 ES Volume 3 Appendix 11-6 Flood Risk Assessment and Drainage Strategy Lime Down D (Rev 2) notes that any fencing within areas of flood interaction will be permeable to both water and debris passage and will not impede flood flow routes. This is welcomed although we would ask that more specificity is provided. Please can the applicant provide details on the type of fencing that will be used in terms of mesh spacing and how blockage risk will be managed. Mesh spacing should be as wide as possible to reduce blockage risk. There should be a commitment within the Operational Environmental Management Plan to ensure any debris is removed from fencing following floods.	updated to confirm that fencing within areas of flood interaction will use a permeable specification that allows floodwater and debris passage. Mesh spacing and blockage management will be confirmed at detailed design. The Outline OEMP (Rev 4) [EN010168/APP/7.13] has also been updated at Deadline 3 to include post-flood inspection and removal of debris from fencing, where safe and practicable.
EA-051	Flood Risk Assessment	No assessment	Under Discussion	The Applicant notes the Environment Agency's comment.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
		of the impacts the construction phase of the development will have on flood risk.	The applicant needs to undertake additional assessment of the impact the construction phase may have on the floodplain capacity and flow routes. Additionally, additional mitigation commitments may needed. For example, there should be no storing of materials and/or construction compounds within flood zone 3b and where practicable outside of the 1 in 100 year extent.	The Outline CEMP (Rev 4) [EN010168/APP/7.13] has been updated at Deadline 3 to confirm that construction compounds, material storage and stockpiles will not be located within Flood Zone 3b and, where practicable, will be located outside the 1 in 100 year flood extent. The FRA appendices will also be updated to confirm that construction-phase works will maintain floodplain capacity and flood flow routes.
EA-052	Flood Risk Assessment	It is not clear what freeboard allowances are proposed.	Under Discussion Within the updated Flood Risk Assessment and Drainage Strategy REP1-048 6.3 ES Volume 3 Appendix 11-6 Flood Risk Assessment and Drainage Strategy Lime Down D (Rev 2) and REP1-052 6.3 ES Volume 3 Appendix 11-8 Flood Risk Assessment and Drainage Strategy Lime Down E2 (Rev 2) (May 2026) paragraph 2.3.8	The Applicant notes the Environment Agency's comment. ES Volume 3, Appendix 11-6: Flood Risk Assessment and Drainage Strategy - Lime Down D / BESS (Rev 3) [EN010168/APP/6.3] and ES Volume 3, Appendix 11-8: Flood Risk Assessment and Drainage Strategy - Lime Down E2 (Rev 3) [EN010168/APP/6.3] have been updated at Deadline 3 to clarify the

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			<p>notes that electrical infrastructure including inverter, transformers, and substation, will either be located outside of modelled flood extents or raised above a minimum freeboard of 0.6 metres above the design flood level. This is welcomed, however, there doesn't appear to be a value assigned to the freeboard applied above the design flood level for the solar PV panels. For Lime Down E, paragraph 2.3.13 states that these will be above the design flood level with an appropriate freeboard allowance.</p> <p>Paragraph 2.3.13 within the Flood Risk Assessment for Lime Down D/BESS states that for both fixed and tracker panels all sensitive electrical equipment mounted on the Solar PV Panels will be elevated so that there is not less than 0.6 metres of freeboard above the design flood level. For clarity, the applicant should confirm what</p>	<p>freeboard position. Sensitive electrical equipment mounted on the Solar PV Panels will be set no less than 0.6 m above the design flood level, including climate change. The lowest leading edge of the panel itself is not sensitive electrical equipment and may sit lower depending on the final fixed or tracker arrangement.</p>

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			the freeboard will be to the lowest leading edge of the respective solar panels. The applicant should make a commitment to ensure there is a 0.6 metre freeboard above the design flood level for the solar panels themselves. If a freeboard of less than 0.6 metres is being adopted for the Solar PV panels, then the applicant should provide clear justification as to why this is reasonable and clarify what the minimum freeboard will be.	
EA-053	Flood Risk Assessment	Hydraulic model files for the Gauze Brook have not been reviewed.	Under Discussion The applicant has now provided the model files and we are reviewing them.	The Applicant notes that the Environment Agency is reviewing the Gauze Brook hydraulic model files. The Applicant will continue to engage with the Environment Agency on any model review comments.
EA-054	Flood Risk Assessment	It is not clear how the analysis extent area of 275,000m ²	Agreed. The applicant has addressed this within updated REP1-048 6.3 ES Volume 3 Appendix 11-6 Flood	The Applicant welcomes the Environment Agency's confirmation that this matter is agreed.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
		has been derived.	<p>Risk Assessment and Drainage Strategy Lime Down D (Rev 2).</p> <p>The applicant has provided a map which shows the analysis extent in figure 8 of the updated Flood Risk Assessment. The analysis extent is calculated as being 222,530m². As part of this review this extent/map was georeferenced and the area checked. This confirms an analysis extent of 222,530m² for the area of panels that intersect the flood extent.</p> <p>The estimated level change of 0.00052mm based on the volume lost and area of inundation has been calculated correctly.</p>	
EA-055	Flood Risk Assessment	Impacts of the solar panel support frames on flood flow conveyance is not discussed.	<p>Under Discussion</p> <p>Within the updated Flood Risk Assessment and Drainage Strategy Lime Down D and Lime Down E2 paragraph 2.3.28 notes that the solar panel supports comprise discrete widely space</p>	The Applicant notes the Environment Agency's comment and welcomes the confirmation that the conveyance assessment appears reasonable. The Applicant will continue to engage with the

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
		Lime Down D/BESS	<p>elements with a negligible cumulative footprint relative to floodplain area. The applicant describes how they would not materially impact floodplain conveyance or flow paths.</p> <p>Although not referenced this is generally supported by the sensitivity testing on Mannings roughness within the hydraulic model which shows the effects from increased floodplain roughness are generally contained within the order limits for the development where roughness is increased. Whilst this appears reasonable, we have received the model files and are currently reviewing them. This will help us to form a view on flood flow conveyance impacts</p>	Environment Agency while the hydraulic model files are reviewed.
EA-056	Flood Risk Assessment	It is not clear how the analysis extent area of	<p>Agreed</p> <p>The applicant has addressed this within REP1-052 6.3 ES Volume 3</p>	The Applicant welcomes the Environment Agency's confirmation that this matter is agreed.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
		175,580m ² has been derived.	<p>Appendix 11-8 Flood Risk Assessment and Drainage Strategy Lime Down E2 (Rev 2).</p> <p>The applicant has provided a map which shows the analysis extent in figure 8 of the updated Flood Risk Assessment. The analysis extent is calculated as being 50,735m². This is reduced from the previous analysis extent of 175,500m². As part of this review this extent/map was georeferenced and the area checked.</p> <p>This confirms an analysis extent of 50,735m² for the area of panels that intersect the flood extent. The estimated level change of 0.000041mm based on the volume lost and area of inundation has been calculated correctly.</p>	
EA-057	Flood Risk Assessment	Impacts of the solar panel support frames on flood flow	<p>Under Discussion</p> <p>Within the updated Flood Risk Assessment and Drainage Strategy Lime Down D and Lime</p>	The Applicant notes the Environment Agency's comment and welcomes the confirmation that the conveyance assessment appears reasonable. The Applicant

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
		conveyance is not discussed. Lime Down E2	<p>Down E2 paragraph 2.3.28 notes that the solar panel supports comprise discrete widely space elements with a negligible cumulative footprint relative to floodplain area. The applicant describes how they would not materially impact floodplain conveyance or flow paths.</p> <p>Although not referenced this is generally supported by the sensitivity testing on Mannings roughness within the hydraulic model which shows the effects from increased floodplain roughness are generally contained within the order limits for the development where roughness is increased. Whilst this appears reasonable, we have received the model files and are currently reviewing them. This will help us to form a view on flood flow conveyance impacts</p>	will continue to engage with the Environment Agency while the hydraulic model files are reviewed.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
EA-058	Outline Decommissioning Strategy	No clear commitment to the production of an outline or detailed Decommissioning Environmental Management Plan.	Agreed We note that we will be a consultee on requirement 20 Decommissioning and restoration; where the detailed strategy will be assessed.	The Applicant confirms that, as per Requirement 20 (Decommissioning and restoration) of the Draft DCO [REP1-007] no decommissioning works can take place until Wiltshire Council, as the relevant planning authority, has approved a decommissioning plan for those works in consultation with the Environment Agency.
EA-059	Cable Route Construction Method Statement	Cable Route Construction Method Statement	Under Discussion PDA-009 EA-059. The applicant states Table 5 of the REP1-097 7.12 Outline Construction Environmental Management Plan (Rev 2) will be updated to reference the discovery and inspection strategy. We have not identified this addition to the table. The updated Appendix 3-2 Cable Route Construction Method Statement has not been supplied	The Applicant has updated ES Volume 3, Appendix 3-2: Cable Route Construction Method Statement (Rev 2) [EN010168/APP/6.3] to include the reference to the Discovery and Inspection Strategy at Deadline 3.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			so we cannot comment on changes made therein.	
EA-060	Biodiversity Net Gain	Trading Rules	Agree with applicant's response PDA- 009 EA-060	The Applicant notes that this issue is agreed.
EA-061	Biodiversity Net Gain	Full Biodiversity Net Gain Metric has not been provided.	Agree- no comments on document provided at Deadline A.	The Applicant notes that this issue is agreed.
EA-062	Outline Landscape and Ecological Management Plan	Planting strategy misses opportunities to enhance the environment.	Agree- with applicant's response PDA- 009 EA-062.	The Applicant notes that this issue is agreed.
EA-063	Water Framework Directive Assessment	Change the description from "Supports Good" to "Not High" and possibly add	Agree REP1-095 7.11 Water Framework Directive Assessment (Rev 2) has been updated.	The Applicant welcomes the Environment Agency's confirmation that this matter is agreed.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
		an explanation.		
EA-064	Water Framework Directive Assessment	The assessment does not identify or discuss Groundwater Dependent Terrestrial Ecosystems (GWDTEs)	Agree The REP1-095 7.11 Water Framework Directive Assessment (Rev 2) has been updated to include GWDTEs (paragraphs 5.1.7 to 5.1.10 and Table 7). The applicant must ensure that any dewatering, if required, does not impact the GWDTE.	The Applicant welcomes the Environment Agency's confirmation that this matter is agreed. Any dewatering, where required, will be managed through the detailed construction controls secured by the Outline CEMP [REP2-019] to avoid impacts on GWDTEs.
EA-065	Water Framework Directive Assessment	Subsurface infrastructure such as the Cable Corridor could impact the status of WFD Groundwater Bodies and should not be excluded	Agree The relevant sections have been updated and provide suitable assessment and mitigation.	The Applicant welcomes the Environment Agency's confirmation that this matter is agreed.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
		from assessment.		
EA-066	Outline Battery Safety Management Plan	Provide details of the products to be used in the proposed liquid cooling systems, and the means by which it will be contained, captured and disposed.	<p>Agree</p> <p>We acknowledged that the final design of the system has not yet been decided. We look forward to reviewing pollution control protocols prior to finalisation of the BSMP under requirement 6 Battery safety management.</p>	The Applicant notes that this issue is agreed.
EA-067	Outline Battery Safety Management Plan	Provide more detail about the inspection and maintenance frequency and protocols for key controls at	<p>Agree</p> <p>We acknowledged that the final design of the system has not yet been decided. We look forward to reviewing the maintenance protocols prior to finalisation of the BSMP under requirement 6 Battery safety management.</p>	The Applicant notes that this issue is agreed.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
		the BESS site.		
EA-068	Outline Battery Safety Management Plan	No details are provided of the proposed testing suite or sampling protocol for potentially contaminated	<p>Agree</p> <p>We have reviewed the REP1-124 9.8 Firewater Containment and Drainage Strategy – Lime Down D Battery Energy Storage System supplied at Deadline 1, with consideration to other documents previously submitted. Information relevant to this issue is given in paragraphs 5.2.1 and 5.2.2. As noted, the testing suite and sampling protocol can be agreed as part of a post-incident management procedure. In order to minimise delays after a fire event, we strongly recommend that an outline procedure be produced prior to operation. If the applicant proposes to release captured water to the environment, a relevant discharge permit should</p>	<p>The Applicant notes the Environment Agency's comment and welcomes confirmation that the testing suite and sampling protocol can be agreed as part of a post-incident management procedure. The Applicant will update the relevant firewater containment documentation to confirm that an outline post-incident procedure will be prepared prior to operation. This will address inspection, sampling, testing, temporary storage, disposal and any permitting requirements for retained firewater.</p>

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			be obtained from the Environment Agency. It can take approximately 4 months for these permits applications to be processed and approved. The contained water must be stored appropriately during this time. In 3.5.2 it states there is an intention to "not rely on long-duration passive storage" of retained water. It is not clear how this will be achieved while any testing and permit application is completed. See also our response to PDA-009 EA-046.	
EA-069	Outline Battery Safety Management Plan	It is not clear whether the proposed lining of the drainage system at the BESS would be impermeable.	Agree PDA-009 EA-069. The response is acceptable. See also PDA-009 EA-047.	The Applicant welcomes the Environment Agency's confirmation that the response is acceptable.
EA-070	Outline Construction	Water Quality Mitigation	Under Discussion	The Applicant notes the Environment Agency's comment.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
	Environmental Management Plan	Measures are insufficient	<p>Water Quality Mitigation Measures associated with Vehicle washdown, concrete laying, foul water strategy and drilling fluid have been resolved due to updates to: REP1-018 6.1 ES Volume 1 Chapter 11 Hydrology, Flood Risk and Drainage (Rev 2); REP1-097 7.12Outline Construction Environmental Management Plan (Rev 2) REP1-101 7.14 Outline Decommissioning Strategy (Rev 2).</p> <p>However, REP1-097 7.12Outline Construction Environmental Management Plan (Rev 2) Table 5 and Table 13 need to be consistent with mitigation measures about fuel, oil and chemical storage.</p> <p>There are currently inconsistencies, and Table 5 is lacking detail. The storage of fuel, oil and chemical should be on impermeable surfaces, with appropriately sized bunding</p>	<p>The Outline CEMP (Rev 4) [EN010168/APP/7.12] has been updated at Deadline 3 so Table 5 and Table 13 are consistent on fuel, oil and chemical storage. The updates will confirm that such materials will be stored on impermeable surfaces, within appropriately sized bunded and covered areas, with rainwater management and oil separation included where required.</p>

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			capacity, but also be covered to reduce contamination from accumulated rainwater. Where necessary, a valve to drain rainwater may be necessary. Oil separators could also be used.	
EA-071	Outline Site Waste Management Plan	No inclusion that waste will be assessed in accordance with Waste Technical Guidance WM3	Agree REP1-103 7.16 Outline Site Waste Management Plan (Rev 2) Paragraph 1.2.6 considered to be acceptable.	The Applicant notes the Environment Agency's comment.
Informatives / advice to applicant				
EA-072	Permitting	Permitting Informative	Agreed	The Applicant notes this is agreed.
EA-073	Flood Risk Assessment	Compensatory flood storage	Under Discussion Whilst we recognise it is uncertain at this stage if it isn't feasible to	The Applicant notes the Environment Agency's comment. The substation within Lime Down C1 will be sequentially located

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			<p>sequentially locate the substation within Lime Down C1 outside of the mapped surface water flow route an assessment of the impact is required to ensure flood risk isn't increased elsewhere and if it is appropriate mitigation (compensatory storage) needs to be put in place to ensure the development satisfies paragraph 5.8.12 within the overarching National Policy Statement for Energy.</p> <p>Therefore, if "where feasible" is included there would need to be acknowledgement that further assessment and potentially compensatory storage may be required.</p>	<p>outside the mapped flood flow route where practicable. Where this is not practicable at detailed design stage, further flood risk assessment will be undertaken to confirm that flood risk is not increased elsewhere and, where required, appropriate mitigation, including compensatory storage, will be provided. This will be secured through Requirement 5: Detailed Design Approval, with any associated drainage measures secured through Requirement 11: Surface and Foul Water Drainage where relevant. The commitment has been reflected in the updated ES Volume 3, Appendix 11-4: Flood Risk Assessment and Drainage Strategy - Lime Down C1 (Rev 3) [EN010168/APP/6.3] provided at Deadline 3.</p>
EA-074	Outline Landscape	Herbicide use	Under Discussion- the Outline Landscape and Ecological	The Outline LEMP (Rev 2) [EN010168/APP/7.18] has been

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
	and Ecological Management		Management has not been updated.	updated at Deadline 3 to account for the outstanding comment relating to requirement for an Environment Agency permit where herbicide use is proposed within proximity of watercourses.
EA-075	Outline Ecological Protection and Mitigation Strategy	Improvements to document	Agreed REP1-106 7.19 Outline Ecological Protection and Mitigation Strategy (Rev 2) has been updated.	The Applicant notes that this issue is agreed.
EA-076	Firewater Drainage	Detail of fire water management. A standalone drainage plan is strongly recommended.	Agreed The strategies have been submitted, and we have given comment elsewhere. NOTE: the applicant states here that "ES Volume 1, Chapter 3 The Scheme [APP-055] will be updated to signpost to the standalone drainage strategy report(s)". Elsewhere in PDA-009, the	The Applicant notes that this matter is agreed. ES Volume 1, Chapter 3: The Scheme [APP-055] is not proposed to be updated because it is not a secured document and therefore, signposting to the Firewater Containment and Drainage Strategy – Lime Down D Battery Energy Storage System [REP1-124] and the Firewater

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			<p>applicant has stated that Chapter 3 will not be resubmitted at this time (for example, see EA-037 and EA-079).</p> <p>When the chapter is reissued, all changes discussed in PDA-009 should be included.</p>	<p>Containment and Drainage Strategy – Lime Down Substation [REP1-125] will not be included in ES Volume 1, Chapter 3: The Scheme [APP-055].</p>
EA-077	BESS and Substation Drainage	Proposed drainage layout for the BESS and 400kv Substation development.	<p>Agreed</p> <p>The explanation given in PDA-009 EA- 077 is acceptable.</p>	<p>The Applicant welcomes the Environment Agency's confirmation that this matter is agreed.</p>
EA-078	Lime Down E Desk Study	former RAF airfield at Hullavington.	<p>Agree</p> <p>REP-074 6.3 ES Volume 3 Appendix 19-5 Lime Down E Desk Study (Rev 2) has been updated with relevant commentary.</p>	<p>The Applicant notes that this matter is agreed.</p>
EA-079	Outline Battery Safety	Battery replacements	<p>Agree</p>	<p>The Applicant notes this comment.</p>

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
	Management Plan		The explanation given in PDA-009 EA- 079 is acceptable.	
EA-080	Intrusive Ground Investigations	Intrusive Ground Investigations	Agree See our comments on the applicant's responses to other issues surrounding the scope of the proposed ground investigation.	The Applicant notes that this matter is agreed.
EA-081	Decommissioning	Decommissioning of cables	Agree The explanation given in PDA-009 EA- 081 is acceptable.	The Applicant notes that this matter is agreed.
EA-082	Ground Investigations	Purpose, scope and extent of ground investigations	Agree See our comments on the applicant's responses to other issues surrounding the scope of the proposed ground investigation.	The Applicant notes that this matter is agreed.
EA-083	Battery Safety Management Plan	Manual isolation of BESS systems	Agree	The Applicant notes that this matter is agreed.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
EA-084	Battery Safety Management Plan	Battery storage infrastructure should not be delivered to site before all firewater containment arrangements are installed and commissioned.	Agree The explanation given in PDA-009 EA- 084 is acceptable.	The Applicant notes that this matter is agreed.
EA-085	Battery Safety Management Plan	Emergency Response Plan	Agree REP1-111 7.21 Outline Battery Safety Management Plan (Rev 2) paragraph 5.4.1 addresses this.	The Applicant notes that this matter is agreed.
EA-086	Foundation Design	Piling Risk Assessment references	Agree The explanation given in PDA-009 EA- 086 is acceptable.	The Applicant notes that this matter is agreed.
EA-087	Commitments Register	Horizontal Directional Drilling	Agree	The Applicant notes that this matter is agreed.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			REP1-115 7.26 Commitments Register (Rev 2) has been amended.	
EA-088	Commitments Register	Siting of construction compounds and stockpiles	Agree REP1-115 7.26 Commitments Register (Rev 2) has been amended.	The Applicant notes that this matter is agreed.
EA-089	Commitments Register	Plant maintenance	Agree REP1-115 7.26 Commitments Register (Rev 2) has been amended.	The Applicant notes that this matter is agreed.
EA-090	Commitments Register	Breakout contingency procedures	Agree REP1-115 7.26 Commitments Register (Rev 2) has been amended.	The Applicant notes that this matter is agreed.
EA-091	Commitments Register	Per- and polyfluoroalkyl substances (PFAS)	Agree - see EA-028	The Applicant notes that this matter is agreed.
EA-092	Commitments Register	BESS and substation	Agree	The Applicant notes that this matter is agreed.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
		drainage infrastructure	REP1-115 7.26 Commitments Register (Rev 2) has been amended.	
EA-093	Commitments Register	Hydrological risk assessment	Agree See our comments on the applicant's responses to other issues surrounding the scope of the proposed ground investigation.	The Applicant notes that this matter is agreed.

3.2 National Highways

Table 3-2: [REP2-050](#)

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
Comments on submissions received at deadlines 1 and 1A				
NH-001	Description and DCO Process	Introduction	<p>1 INTRODUCTION</p> <p>1.1 This document is submitted for Deadline 2 on behalf of National Highways ("NH") in respect of an application by Lime Down Solar Ltd (the "Applicant") for an order granting development consent for the Lime Down Solar Project ("DCO"). The Applicant seeks development consent for proposed authorised development described in Schedule 1 of the draft DCO ("Authorised Development"). This document sets out NH's comments on Document PDA-009 entitled The Applicant's Response to Relevant Representations (Part 1) (EXAM/9.1) submitted by the Applicant at Deadline 1A in so far as those responses relate to NH's</p>	The Applicant notes this comment.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			Relevant Representations [RR-3426].	
NH-002	Description and DCO Process	Introduction	<p>2 NH'S COMMENTS ON THE APPLICANT'S COMMENTS ON NH'S RELEVANT REPRESENTATIONS (TABLE 3-5 PAGES 633- 749 OF PDA-009)</p> <p>2.1 Where it was considered appropriate to do so, NH's comments on the Applicant's comments on NH's Relevant Representations have already been set out in NH's Written Representation [REP1-154]. The position is, therefore, just summarised below to assist the ExA on where matters stand. NH's Written Representation [REP1-154] should be referred to for full details of the outstanding matters. NH does not seek to respond to all matters at this stage, given that negotiations are ongoing. However, NH reserves the right to respond further should issues remain unresolved following discussions.</p> <p>2.2 NH's comments on the Applicant's Comments on NH's</p>	The Applicant notes this comment and provides responses to the three key matters identified by National Highways below [NH-003 to NH-014] .

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			Relevant Representations can broadly be divided into three key areas: (1) technical matters, (2) land and book of reference issues (3) response on DCO (including Articles, Requirements, Discharge of Requirements and Protective Provisions).	
NH-003	Construction and Decommissioning	Directional Drilling	Technical Matters 2.3 Discussions with National Highways technical teams about the geotechnical specification for directional drilling in relation to Works 5a are still underway. Any proposed directional drilling under NH's network will require compliance with The Design Manual for Roads and Bridges ("DMRB") Chapter CD622 (Managing Geotechnical Risk).	Noted and agreed that Any proposed directional drilling under NH's network will require compliance with The Design Manual for Roads and Bridges ("DMRB") Chapter CD622 (Managing Geotechnical Risk).
NH-004	Description and DCO Process	Book of Reference	Land and Book of Reference Issues 2.4 Detruncked Roads (Plots 13-005 to 13-016, 20-001 to 20-003):- There are a significant number of plots where NH originally noted that	In the most recent submission of the Book of Reference [REP 1-012] , the Applicant identified that National Highways registered address had been updated since DCO submission, which is reflected

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			the roads had been detrunked and transferred to the Local Highway Authority (LHA). The Applicant has confirmed it will update the Book of Reference to remove NH's listed interests however the latest Book of Reference [REP 1-012] still shows NH's interest but in orange font.	as a change in orange in the latest BoR. The Applicant undertook a HMLR refresh of titles affecting plots 13-005 to 13-016, and 20-001 to 20-003, and established that the National Highways interests needed to remain within the plots due to the registered titles affecting those plots not being updated. The Applicant can confirm that once the registered titles affecting those plots have a new edition identifying the LHA as the proprietor, then the National Highways interests will be removed. At this time, the LHA have been captured as the Highway Authority, whilst National Highways have been identified as a registered title interest.
NH-005	Description and DCO Process	Side Roads Order Plots	2.5 Side Roads Order Plots (Plots 21-004 to 21-007): For plots forming part of a Side Roads Order for the M4 scheme, NH confirms that the LHA is responsible, not NH, given the Side Road Order.	Prior to the most recent submission of the Book of Reference [REP 1-012] , the Applicant undertook a HMLR refresh of titles affecting plots 21-004 to 21-007, and established that the National

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			<p>Accordingly, for these plots, provided works are not in the subsoil, NH have no interest. If works are in the subsoil then agreement by way of an easement is required from NH. The Applicant is requested to provide NH details confirming the depth of the works.</p>	<p>Highways interests needed to remain within the plots due to the registered titles affecting those plots not being updated. The Applicant can confirm that once the registered titles affecting those plots have a new edition identifying the LHA as the proprietor, then the National highways interests will be removed. The Applicant hasn't removed any legal interests within the subsoil of highways to ensure it is presenting all interests in Part 1 of the Book of Reference [REP 1-012], even where the works may only affect the operational highways. The Applicant cannot definitively confirm that works would not extend into the subsoil, however this information would be provided to National Highways once confirmed at detailed design stage. This position is captured in the updated SoCG between the Applicant and National Highways.</p>

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
NH-006	Description and DCO Process	Outstanding Information Requests	2.6 Outstanding Information Requests: Several plots are included in the Book of Reference as a consequence of drainage and gully apparatus, easements, and conveyances. In relation to these plots, NH's position is that the additional information requested is still required. Full details are set out in NH's Written Representations [REP1-154].	<p>The Applicant acknowledges the request for information from National Highways.</p> <p>After further review, the Applicant has identified the easement listed in plot 13-09 should not be classed as a NH interest, and as such, the Applicant will amend the interest within the BoR at the next submission during examination.</p> <p>Within the Book of Reference [APP-4.3], the Applicant has included NH interests against apparatus after conducting research into utilities and apparatus within the Order Land during pre-application. The Applicant commissioned a third-party utility report, via Atkins Utility, who have access to multiple statutory undertakers' data spatially, which was shared to the Applicant. As such, there are no supporting documents such as an easement or register, however the Applicant can share the relevant utility line</p>

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				data with NH to aid their identification of interests.
NH-007	Description and DCO Process	Protective Provisions	DCO 2.7 Protective Provisions:- The Protective Provisions on the face of the order are not yet agreed, and an updated draft of the Protective Provisions is awaited. NH has provided a full set of proposed protective provisions at Appendix 1 to its Relevant Representation and has set out 3 detailed justifications for each provision (paragraphs 1 through to 21 of the proposed protective provisions). The Applicant's response to NH's Relevant Representations indicates that it is "progressing discussions" on the Protective Provisions and that draft Protective Provisions are already included in the DCO (Part 5 of Schedule 15). In response, and whilst discussions are progressing, NH maintains the draft Protective Provisions included in the Order are not agreed and that its own proposed Protective Provisions (at	As noted protective provisions for the protection of National Highways are included at Part 5 of Schedule 15 (Protective provisions) to the Draft Development Consent Order [REP1-007] . As noted at Issue Specific Hearing 1 (see page 17 and 18 of the Written Summary of the Applicant's Oral Submissions and Responses at Issue Specific Hearing 1 and Responses to Action Points [REP1A-012]), related entities of Island Green Power are promoting a number of other solar DCOs at varying stages of the consenting process, namely Green Hill Solar Farm. As the Applicant is a subsidiary of Island Green Power, where possible it is seeking a consistent approach with statutory undertakers to protective provisions across its projects. This

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			Appendix 1 of NH's Relevant Representation [RR- 3426]) should be adopted.	<p>includes protective provisions for the benefit of National Highways.</p> <p>This approach has been agreed with National Highways and the same form of protective provisions as agreed with National Highways in respect of the Green Hill Solar Farm were included in the Draft Development Consent Order [REP1-007] at Deadline 1.</p> <p>It is the Applicant's understanding that these are now agreed and, subject to agreement of a number of project specific points, the Applicant and National Highways will enter into a Side Agreement containing the agreed protective provisions.</p>
NH-008	Description and DCO Process	DCO Articles	2.8 Articles:- NH's extensive concerns regarding individual DCO articles (Articles 8, 10, 11, 12, 16, 17, 19, 20, 21, 24, 25, 27, 29, 30, 31, 32, 33, 34, 38, 40, 41, 42, and 47) as set out in its Relevant Representations [RR-3426] remain outstanding. NH's concerns are re-	<p>The Applicant notes this comment. The cross-referencing error in Article 41 has been corrected in the updated draft DCO provided at Deadline 3.</p> <p>The TPO trees listed in Schedule 12 are those trees or groups of</p>

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			<p>iterated in summary in section 4.1 of NH's Written Representations [REP1-154]. In relation to Article 41 it is noted that the cross referring error to Part 4 of Schedule 12 has not been corrected in the latest draft of the DCO [REP1-007]. Reference should be made to Part 3 not Part 4. In addition, it is noted that TPO7 is not referred to in Schedule 12 but is adjacent to the SRN. The Applicant is requested to review Schedule 12 in light of the TPO and Hedgerow Plan (sheet 9 of 23). It is noted that the Applicant has not responded on these points and has not updated the latest draft of the DCO [REP1-007].</p>	<p>trees where the Applicant will need to carry out works to those trees. N/TPO7 is adjacent to the M4 motorway, which will be crossed using trenchless techniques. The trees, being adjacent to the highway, will also be crossed using trenchless techniques. As there is no requirement for works to these trees, the power to do so is not included in the DCO and they have not been listed in Schedule 12.</p> <p>The Applicant confirms that it is seeking to agree the form of protective provisions for National Highways, which will address NH's remaining concerns.</p>
NH-009	Description and DCO Process	Protective Provisions	<p>2.9 The Applicant's response to NH's Relevant Representations [PDA -009] consistently refers to ongoing discussions on the Protective Provisions. Whilst this is the position, the Protective Provisions on the face of the order are not yet agreed and an updated</p>	<p>The Applicant refers National Highways to the response given at NH-007.</p>

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			draft of Protective Provisions is awaited.	
NH-010	Description and DCO Process	Protective Provisions	2.10 Requirements:- NH seeks not merely to be consulted but to review and agree the relevant documents and plans before Requirements are discharged, to ensure no adverse impact on the Strategic Road Network (SRN). The Applicant's response is that NH will already be a consultee where it is the relevant highway authority (Requirements 15 and 16), and that the Protective Provisions in Part 5 of Schedule 15 adequately protect NH's interests. The Applicant has stated that the management plans with the potential to impact the SRN are already captured. Discussions on the form of Protective Provisions are ongoing. NH's position is, however, as follows:	The Applicant notes this comment. NH will be appropriately consulted under Requirements 15 and 16 and has approval rights under the Protective Provisions.
NH-011	Description and DCO Process	Requirement 3	2.11 Requirement 3 (Approved Documents and Plans):- NH raises a specific concern that	The modification made to the draft DCO on the Green Hill Solar Farm was to update the definition of

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			<p>amendments to approved documents are left to the planning authority to assess, without NH being consulted. NH points to a precedent from the Green Hill Solar Farm DCO examination (same Applicant), where it was agreed that any body consulted on the original approval must be re-consulted on amendments. NH seeks the same amendment for the Lime Down DCO which would mean that in relation to an application made under requirement 3 to amend an approved document, any body or authority that was required to be consulted in relation to the approval of that approved document is required again to be consulted. The inclusion of such wording would mean that should an application be made to amend the CTMP, highways authorities are consultees and would need to be consulted. This change alone however does not meet NH's concerns regarding certified</p>	<p>"requirement consultee" in Schedule 16 to include, for applications made under Requirement 3 to update an approved document, any consultee in relation to the original approval of that document. This update was included in the draft DCO submitted at Deadline 1.</p> <p>The Applicant is confident that this approach is preferable to listing National Highways as a consultee within Requirement 3, as this would mandate consultation with National Highways on any amendment to any approved document, whether or not National Highways was consulted on the original document, and irrespective of whether the proposed amendments relate to any part of the Scheme near or capable of affecting the strategic road network.</p> <p>The update made to Schedule 16 not only ensures that National Highways will be consulted on amendments to documents that</p>

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			documents being amended and hence NH also require to be a named consultee in Requirement 3 itself.	may affect it, but ensures that any named consultee is properly consulted on changes to documents they have a confirmed interest in.
NH-012	Description and DCO Process	Consultee Status	<p>2.12 Other Requirements Where NH Seeks Consultee Status: NH seeks to be consulted on a wide range of Requirements relating to its statutory function, including:</p> <ul style="list-style-type: none"> • Requirement 5 – Details of Works Nos. 1, 2, 3 and 5a (amendments as per Relevant Representations). • Requirement 7 – Landscape and ecological management plan – NH requires the opportunity to review the landscape and ecological management plan, arboricultural assessment/tree protection measures, and any replanting proposals in respect of NH's soft estate. 	<p>The Applicant does not consider it appropriate for NH to be a mandatory consultee on the Requirements listed. NH will be consulted in relation to the detailed construction traffic management plan where they are the relevant highway authority, under Requirements 15, 16 and 20.</p> <p>There is only limited interaction between the Scheme and the SRN, and the nature of NH's concerns are such that they can be adequately addressed through Protective Provisions.</p> <p>National Highways' solicitors have confirmed agreement in principle with the draft Side Agreement and form of protective provisions subject to further discussion between the parties on a select</p>

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			<ul style="list-style-type: none"> • Requirement 8 – Ecological protection and mitigation strategy. • Requirement 10 – Means of enclosure near the SRN - NH requires the opportunity to review the details for reasons of safety, liability, maintenance, and compliance with DfT Circular 01/2022). • Requirement 11 – Surface Water Drainage Scheme – NH requires an opportunity to review to protect SRN drainage infrastructure, ensure plans accord with DfT Circular 01/2022, to prevent any discharge into SRN systems and to ensure no new third party drainage connections are permitted. • Requirement 13 – CEMP, to ensure safeguards for the SRN. • Requirement 14 – Operational Environmental 	<p>number of outstanding points. Negotiations in respect of these points remain ongoing.</p>

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			<p>Management Plan - NH requires the opportunity to review the operational environmental management plan to ensure the management of long-term environmental risks associated with the site and ongoing protection of the SRN</p> <ul style="list-style-type: none"> • Requirement 15 – Final Construction Traffic Management Plan (not just the outline). NH's consultee role as relevant highway authority is understood to have been agreed however we are unable to identify the corresponding change in the latest dDCO [REP1-007]. • Requirement 16 – Public rights of way and permissive paths. NH's consultee role as relevant highway authority is understood to have been agreed however we are unable to identify the 	

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			<p>corresponding change in the latest dDCO [REP1-007].</p> <ul style="list-style-type: none"> Requirement 20 – Final Decommissioning Strategy (not just the outline). NH's consultee role as relevant highway authority is understood to have been agreed and a change has been made to the dDCO [REP1-007].in this regard. 	
NH-013	Description and DCO Process	Schedule 16	2.13 Schedule 16 (Discharge of Requirements): It is noted that the latest dDCO [REP1-007] includes the change NH requires.	The Applicant notes this comment and confirms that the change requested was included in the Draft Development Consent Order [REP1-007] submitted at Deadline 1.
NH-014	Transport and Access	Requirement 15	2.14 Traffic and Transport: NH accepts that no further capacity assessment of the SRN is required but maintains its position on the need for the CTMP under Requirement 15 and the rationale for its proposed changes to that Requirement.	The Applicant confirms that Requirement 15 (Construction traffic management plan) of Schedule 2 (Requirements) to the Draft Development Consent Order [REP1-007] provides that a construction traffic management plan must be approved by Wiltshire Council as relevant planning

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				<p>authority in consultation with National Highways (as relevant highway authority) prior to the commencement of the authorised development.</p> <p>A minor clarificatory change was made to Requirement 15 at Deadline 1 (to ensure consultees were included in the same sub-paragraph) and no further changes are currently being considered. The Applicant welcomes ongoing engagement with National Highways should any further changes be required in the future.</p>

3.3 Stop Lime Down

Table 3-3: [REP2-051](#)

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
Comments on submissions received at Deadline 1 and 1A				
SLD-001	Scheme Description and DCO Process	Introduction	<p>1. Introduction</p> <p>1.1.1. This document and the attached papers comprise Stop Lime Down's (SLD('s)) Deadline 2 submission. In this document SLD considers the documents submitted by the Applicant at Deadline 1 and Deadline 1A, and consider documents submitted by other parties at Deadline 1.</p>	The Applicant notes this comment, detailed responses on the points raised are provided below.
SLD-002	Scheme Description and DCO Process	Introduction	<p>1.1.2. This document has been produced with the input of SLD's legal and expert advisors. In addition to this document, a number of SLD's expert advisors have produced papers which appear as Appendices to this document, to which the attention of</p>	The Applicant notes and has read Appendix A (planning Position Statement) [APP-169] and Appendix B Landscape and Visual Impact Report) [APP-170] prepared by Carly Tinkler on behalf of SLD.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			<p>the Examining Authority (ExA) is drawn. These are:</p> <ul style="list-style-type: none"> • Landscape – Carly Tinkler – Landscape Comments on Deadline 1/1A Material – Appendix A • Traffic and Transport – Railton TPC Ltd (Bruce Bamber) – Transport Comments on Deadline 1 Submissions – Appendix B • Noise/Vibration Impacts – Ian MacArthur – Deadline 1 Updated Documents – Appendix C • Flooding/Hydrology – Professor Richard Skeffington – Comment on Deadline 1 Hydrology Documents – Appendix D • Ground Conditions and Contamination – Professor Richard Skeffington – 	<p>The Applicant notes this comment and has read Appendix B on 'Traffic and Transport'. A Technical Note response has been submitted at Deadline 3 to address this.</p> <p>The Applicant notes and has read Appendix C on noise vibration.</p> <p>The Applicant notes the hydrology, flood risk and drainage paper prepared by Professor Richard Skeffington at Appendix D.</p> <p>The Applicant has provided a detailed response to Appendix E in SLD-045.</p>

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			Comment on Ground Conditions, Contamination and HDD Risks – Appendix E	
SLD-003	Scheme Description and DCO Process	Introduction	1.1.3. In commenting on Written Representations (WR(s)) and the Local Impact Report (LIR) submitted at Deadline 1, SLD has refrained from extensive repetition of points and/or identification of agreement. Such agreement will be apparent from reading SLD's WR alongside those submissions. However, where it will assist, SLD has provided comments on such documents. In addition, SLD will provide relevant further comment as appropriate once the Applicant's own comments on such documents become available.	The Applicant notes the approach adopted by SLD and welcomes the proportionate stance on commentary.
SLD-004	Scheme Description and DCO Process	Introduction	1.1.4. This written submission uses the document reference for the tracked change version of documents where multiple versions	The Applicant notes the use of the tracked change document numbers.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			of the document exist in the Document Library.	
SLD-005	Scheme Description and DCO Process	Introduction	<p>1.1.5. The structure of this document is as follows:</p> <ul style="list-style-type: none"> • Comments on the Applicant's documents submitted at Deadline 1; • Comments on documents submitted by other parties at Deadline 1; and, • Comments on the Applicant's documents submitted at Deadline 1A. 	The Applicant notes this comment, detailed responses on the points raised are provided below [SLD-009 to SLD-018].
SLD-006	Consultation and Engagement	Introduction	1.1.6. SLD welcome any questions that the ExA or any other party (including the Applicant) may have about this submission. SLD will continue to take steps to assist the ExA and advance its case, throughout the remainder of the Examination.	The Applicant notes this comment.
SLD-007	Scheme Description	Introduction	1.1.7. Aside from this submission, SLD is also engaged in producing	The Applicant notes this comment and confirms its intention to

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
	and DCO Process		a draft Statement of Common Ground (SoCG) to resubmit to the Applicant for its further consideration. The Applicant and SLD are now expecting that a draft will be submitted to the Examination at Deadline 3. SLD consider that this provides opportunity for it to identify any further common ground arising from the Applicant's comments on its WR (noting the more limited opportunities for the parties to engage so far), which will be of further assistance. SLD welcomes further engagement with the Applicant.	engage with SLD in regard to the Statement of Common Ground.
SLD-008	Scheme Description and DCO Process	Introduction	1.1.8. This submission has not been produced with the use of AI. Expert reports address the use of AI where appropriate.	The Applicant notes this comment.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
SLD-009	Scheme Description and DCO Process	DCO Documents	<p>2. Comments on the Applicant's documents submitted at Deadline 1</p> <p>2.1. DCO Documents</p> <p>2.1.1. SLD note the following documents which have been provided at Deadline 1</p> <ul style="list-style-type: none"> • Draft Development Consent Order [REP1-008]. • Explanatory Memorandum [REP1-012]. • Schedule of Changes to the Draft DCO [REP1-132]. <p>2.1.2. SLD has the following comments in respect of the draft DCO submitted at Deadline 1.</p>	The Applicant notes this comment, detailed responses on the points raised are provided below.
SLD-010	Scheme Description	Schedule 2, Req 2(2)	<u>Schedule 2, Req 2(2)</u>	Please refer to response WCD1-018 in the Applicants Response to Deadline 2 Submissions

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
	and DCO Process		2.1.3. SLD welcomes the introduction of provisions in Schedule 2, Req 2(2) that provides for a written scheme to be submitted to Wiltshire Council (the Council) setting out the phasing for the Scheme. However, SLD note that there is no requirement for the Council to approve that written scheme. It is apparent from the Explanatory Memorandum at para 5.2.8 that the Applicant intends this as a mechanism to provide only information to the Council. SLD consider that a wording requiring approval by the Council should be included.	[EN010168/EXAM/9.30] document which confirms why requiring approval of the phasing would not meet the tests for Requirements under section 120(2)(a) of the Planning Act 2008.
SLD-011	Scheme Description and DCO Process	Schedule 2, Req 2(2)	<u>Schedule 2, Req 2(2)</u> 2.1.4. As was explored at ISH1, a concern related to the draft DCO is that the text currently provides considerable flexibility for the Applicant to choose when different parts of the Scheme are brought forward. Given the provisions in	Please refer to response WCD1-018 in [Response to Wiltshire comments], which confirms why requiring approval of the phasing would not meet the tests for Requirements under section 120(2)(a) of the Planning Act 2008.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			<p>the draft DCO securing final commissioning and decommissioning, the ability to bring forward different parts of the Scheme at different times risks the operational phase for the development being well in excess of the 60 years on which the Scheme has been assessed. While SLD accept that some flexibility to bring forwards different parts of the Scheme at different time should be provided (to manage for the normal construction process), this must be properly controlled to manage the lifetime of the Scheme in aggregate. For that reason, SLD consider that the Council should maintain control through formal approval of the written scheme for timetabling how the Scheme is brought forwards.</p>	<p>In terms of the suggestion that the Scheme could operate "well in excess of the 60 years", that is not correct. Requirement 20 of the Draft DCO [REP1-007] requires decommissioning to occur no later than 60 years following the date of final commissioning of the relevant part. This allows a staged approach to decommissioning of the Scheme (in the same manner that parts of the Scheme can become operational in stages), but prevents any one part of the Scheme from operating for more than the 60-year period.</p>
SLD-012	Scheme Description	Schedule 2, Req 2(2)	2.1.5. This is a point that SLD also addresses in its WR in Section 16.	The Applicant notes this comment.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
	and DCO Process			
SLD-013	Scheme Description and DCO Process	Schedule 2, Req 20	<p><u>Schedule 2, Req 20</u></p> <p>2.1.6. SLD note the changes that have been made to the draft DCO relating to decommissioning. SLD consider that these changes re-emphasise the point that the draft DCO appears to permit the operational life of the Scheme in aggregate to extend well in excess of the 60 years provided for. This was a concern raised at ISH1. It is noted that the new wording makes clear that the Battery Energy Storage System (BESS) and the 400kV substation could be operational and in place for a substantially longer period than 60 years. The reasons provided in the Schedule of Changes appears to envisage this as the purpose for the changes.</p>	<p>The Applicant notes this comment. Requirement 20 requires that the generating station (Work No. 1) is decommissioned a maximum of 60 years after the date of final commissioning. The associated development connected to the generating station must also be decommissioned in the same timeframe. It is not plausible that the Scheme could remain commissioned for a significant period of time beyond the 60-year lifespan as decommissioning is connected to the cessation of commercial use of the generating station.</p>

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
SLD-014	Scheme Description and DCO Process	Schedule 2, Req 20	2.1.7. SLD remain of the view set out in the table at Section 16.2 of its WR and made at ISH1 that text should be included to ensure that the decommissioning provisions do not result in an operational lifetime of the Scheme materially departing from the 60 years provided for in the application and described as part of the Environmental Statement (ES). SLD consider that a mechanism to secure the operational lifetime of the Scheme should be included. That might be achieved through a longstop date for the operational stage of the Scheme, or through a requirement to build out the entire Scheme within a set period of time once development on any part is commenced (which could be managed as part of an approval mechanism adopting the amendment to Schedule 2, Req 2(2) above).	Please refer to SLD-013. It is well precedented that for projects with a limited lifespan, decommissioning is tied to the date of final commissioning. This is to be preferred as it enables the Scheme, as Critical National Priority infrastructure, to provide the maximum contribution possible to the transition to Net Zero. It would not be appropriate for the Order to provide a fixed date of decommissioning as this could artificially reduce the lifespan of the Scheme, in direct conflict with the priority need for the energy generation of the Scheme.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
SLD-015	Scheme Description and DCO Process	Schedule 16	<p><u>Schedule 16</u></p> <p>2.1.8. SLD note the changes introduced in Schedule 16 to modestly increase the amount of time available to the Council to discharge various requirements. SLD note that the Applicant states that this step has been taken "following comments from Wiltshire Council". SLD will await review of the comments the Council make in respect of these changes, however SLD remain concerned that insufficient time is given to the Council to address matters given the size and scope of the Scheme (and, as a result, SLD maintains the points it made in respect of Schedule 16 in its WR in Section 16).</p>	<p>Please refer to WCD1-032 in the Applicants Response to Deadline 2 Submissions [EN010168/EXAM/9.30] document, which explains why ten weeks is an appropriate timescale for consideration of applications to discharge the requirements.</p>
SLD-016	Landscape and Visual	Deadline 1 landscape documents	<p>2.2. Landscape</p> <p>2.2.1. SLD note the following documents which have been provided/updated at Deadline 1:</p>	<p>The Applicant confirms the stated landscape documents were provided at Deadline 1. The Applicant also updated ES Volume 2, Figures 3-4-1 to 3-4-5.2</p>

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
		submitted by the Applicant	<ul style="list-style-type: none"> • Technical Note on Landscape Fabric and Landscape Character [REP1-121]. • Technical Note on Intra Project Cumulative Effects [REP1-122]. • Technical Note on Cumulative Sequential Visual Effects [REP1-123]. • Construction Routes in the Cotswold National Landscape Technical Note May 2026 Rev 1 [REP1-131]. 	Landscape and Ecology Mitigation Plan (Rev 2) [REP1-029 to REP1-032] and Figures 8-14 Baseline Photography and Photomontages (Part 1 to 3) [REP1-033 to REP1-035] at Deadline 1.
SLD-017	Landscape and Visual	Expert review of Deadline 1 landscape material	2.2.2. Appendix A to this document is a paper prepared by Carly Tinkler which comments on the documents provided by the Applicant at Deadline 1 which addresses landscape issues.	The Applicant notes Appendix A prepared by Carly Tinkler on behalf of SLD.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
SLD-018	Ecology and Biodiversity	Deadline 1 ecology and biodiversity documents submitted	<p>2.3. Ecology</p> <p>2.3.1. SLD note the following documents which have been provided/updated at Deadline 1:</p> <ul style="list-style-type: none"> • ES Volume 1, Chapter 9: Ecology [REP1-016]. • Baseline Habitats Map – CRC [REP1-036]. • Ecological Baseline Report [REP1-084]. • Biodiversity Net Gain Assessment Report [REP1-090]. • Biodiversity Net Gain Assessment Appendix Statutory Biodiversity Metric Calculation [REP1-092]. • Biodiversity Net Gain Assessment Metric Calculation Excel [REP1-093]. 	<p>The Applicant confirms the stated Ecology and Biodiversity documents were provided at Deadline 1. The Applicant also submitted ES Volume 3, Appendix 9-9: Watercourse Crossing Schedule [REP1-126] at Deadline 1 which is relevant to both ecology and hydrology.</p>

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			<ul style="list-style-type: none"> Outline Ecological Protection and Mitigation Strategy [REP1-107]. 	
SLD-019	Ecology and Biodiversity	Additional surveys to be reviewed against baseline concerns	<p>2.3.2. Among other things, Appendix E of SLD's Written Representation [REP1-173] raised concerns in respect of the quality of the baseline evidence which had been submitted by the Applicant. SLD therefore welcomes the completion of additional surveys over the Cable Route Corridor and the surveys completed in respect of aquatic invertebrates and aquatic macrophytes, which have been summarised in the updated Baseline Report and Chapter 9. A detailed review of this additional information will be completed by SLD's ecologist to consider the extent to which these surveys resolve concerns in SLD's paper at Appendix E to its WR and whether any issues can be offered for agreement in the draft SoCG.</p>	The Applicant notes this comment and awaits further responses from Stop Lime Down's ecologist on these matters.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
SLD-020	Ecology and Biodiversity	Outstanding ecology concerns	2.3.3. Otherwise, the other concerns raised in Appendix E of SLD's Written Representation are not overcome by any of the new information provided.	The Applicant notes this comment. Detailed responses to concerns raised in Appendix E of Stop Lime Down's Written Representation have been provided at Deadline 2 in 9.22 Applicant's Response to Written Representations [REP2-039] .
SLD-021	Transport and Access	Deadline 1 transport and access documents	<p>2.4. Transport</p> <p>2.4.1. SLD note the following documents which have been provided/updated at Deadline 1:</p> <ul style="list-style-type: none"> • ES Volume 1, Chapter 13: Transport and Access [REP1-020]. • ES Volume 3, Appendix 13-1: Transport Assessment (Part 1) [REP1-058]. • ES Volume 3, Appendix 13-1: Transport Assessment (Part 2) [REP1-060]. 	The Applicant confirms the stated Transport and Access documents were provided at Deadline 1.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			<ul style="list-style-type: none"> Outline Construction Traffic Management Plan [REP1-113]. Construction Routes in the Cotswolds National Landscape Technical Note [REP1-131]. 	
SLD-022	Transport and Access	Expert review of transport documents	2.4.2. Appendix B to this document is a paper prepared by Railton TPC Ltd which comments on the documents provided by the Applicant at Deadline 1 which address transport issues.	The Applicant makes note of this comment.
SLD-023	Transport and Access	HGV movements	2.4.3. In summary, Railton TPC Ltd concludes that although more detail has been provided regarding the generation of HGV movements during construction, the additional detail does not overcome the concern that the overall number of HGV movements has been underestimated.	The Applicant makes note of this comment. A Technical Note response has been submitted at Deadline 3 to address comments made in Appendix B on Trip Generation.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
SLD-024	Noise and Vibration	Deadline 1 noise and vibration documents	<p>2.5. Noise and Vibration</p> <p>2.5.1. SLD note the following documents which have been provided/updated at Deadline 1:</p> <ul style="list-style-type: none"> • ES Volume 1, Chapter 14: Noise and Vibration [REP1-022]. • ES Volume 3, Appendix 14-4: Noise Modelling [REP1-062]. 	The Applicant confirms the stated Noise and Vibration documents were provided at Deadline 1.
SLD-025	Noise and Vibration	Expert review of noise and vibration material	2.5.2. Appendix C to this document is a paper prepared by Ian MacArthur of Clarke Saunders Acoustics which comments on the documents provided at Deadline 1 which address noise and vibration issues.	<p>The Applicant notes this paper and provides the following clarifications.</p> <p>The 3 dB penalty applied to the rating level is to reflect the situation described in Section 9.2 of BS4142 where sound features are not tonal, impulsive or intermittent but could otherwise be readily distinctive against the residual acoustic environment.</p> <p>The points raised around SOAEL have been responded to in detail in</p>

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				<p>9.22 The Applicant's Response to Written Representations [REP2-039] SLD-215 to SLD-245.</p> <p>With respect to night-time HDD works, Section 1.3 of ES Appendix 3-2 Cable Route Construction Method Statement [APP-183] clarifies the avoidance areas and that the start and end points will be determined at the detailed design stage. With the noise mitigation measures listed in paragraph 14.9.7 of ES Volume 1, Chapter 14 Noise and Vibration [REP1-021], which are identical to those listed in Table 8 of the 7.12 Outline Construction Environmental Management Plan [REP2-019], significant effects from noise and vibration are avoided even if night-time works are required.</p>
SLD-026	Hydrology, Flood Risk and Drainage	Deadline 1 hydrology	2.6. Hydrology, Flood Risk and Drainage	The Applicant confirms the stated Hydrology, Flood Risk and

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
		and drainage documents	<p>2.6.1. SLD note the following documents which have been provided/updated at Deadline 1:</p> <ul style="list-style-type: none"> • ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [REP1-018]. • Flood Risk Assessment and Drainage Strategy Covering Report [REP1-038]. • Flood Risk Assessment and Drainage Strategy A [REP1-040]. • Flood Risk Assessment and Drainage Strategy B [REP1-042]. • Flood Risk Assessment and Drainage Strategy C1 [REP1-044]. • Flood Risk Assessment and Drainage Strategy C2 [REP1-046]. 	Drainage documents were provided at Deadline 1.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			<ul style="list-style-type: none"> • Flood Risk Assessment and Drainage Strategy D [REP1-048]. • Flood Risk Assessment and Drainage Strategy E1 [REP1-050]. • Flood Risk Assessment and Drainage Strategy E2 [REP1-052]. • Flood Risk Assessment and Drainage Strategy CRC [REP1-054]. • Water Framework Directive Assessment [REP1-095]. • Firewater Containment and Drainage Strategy – Lime Down D BESS [REP1-124]. • Firewater Containment and Drainage Strategy – Lime Down Substation [REP1-125]. 	

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			<ul style="list-style-type: none"> Watercourse Crossing Schedule [REP1-126]. 	
SLD-027	Hydrology, Flood Risk and Drainage	Expert review of hydrology and flooding material	2.6.2. Appendix D of this document is a paper prepared by Professor Richard Skeffington which comments on the documents provided by the Applicant at Deadline 1 which address hydrology and flooding issues. In summary, Professor Skeffington observes that:	The Applicant notes the hydrology, flood risk and drainage paper prepared by Professor Richard Skeffington at Appendix D. Responses to the specific hydrology, flood risk and drainage points raised are provided below.
SLD-028	Hydrology, Flood Risk and Drainage	Changes to site-specific flood risk assessments	2.6.2.1. Minimal changes have been made to the site-specific FRAs and covering report;	The Applicant does not agree that the Deadline 1 updates were limited or inadequate. The updates were targeted to the issues raised through Examination and consultation, including updates to the Flood Risk Assessment and Drainage Strategy Covering Report [REP1-038] , the site-specific FRA and drainage strategies, notably Lime Down D / BESS [REP1-048] , Lime Down E2 [REP1-052] and the Cable Route Corridor [REP1-054] ,

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				together with the Water Framework Directive Assessment [REP1-095] , the Firewater Containment and Drainage Strategy – Lime Down D Battery Energy Storage System [REP1-124] , the Firewater Containment and Drainage Strategy – Lime Down Substation [REP1-125] and the Watercourse Crossing Schedule [REP1-126] .
SLD-029	Hydrology, Flood Risk and Drainage	Firewater containment	2.6.2.2. The Firewater Containment Report does not address the credible worstcase scenario of a BESS fire taking more than 4 hours to extinguish;	The Applicant does not agree that the firewater containment strategy fails to address a credible scenario. The firewater supply approach is set out in the Outline Battery Safety Management Plan [REP1-110] , which references NFCC guidance and confirms provision of firefighting water storage exceeding the minimum two-hour supply referenced in that guidance. The four-hour provision is not intended to preclude a longer

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				<p>incident response. The BESS firewater containment principles are set out in the Firewater Containment and Drainage Strategy – Lime Down D Battery Energy Storage System [REP1-124], with supporting drainage storage principles in ES Volume 3, Appendix 11-6: Flood Risk Assessment and Drainage Strategy - Lime Down D / BESS [REP1-048]. Measures to support extended incident response, including firewater supply resilience, replenishment arrangements, circulation or recirculation where appropriate, and tanker support, will be considered through detailed design and engagement with the Fire and Rescue Service.</p> <p>As stipulated in Section 5.3.2 of the OBSMP [REP1-111]: <i>“The firefighting water requirement will be fully assessed at the detailed</i></p>

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				<p><i>design stage based upon analysis of Large Scale Fire Testing (LSFT) of the BESS design plus any additional BESS fire and explosion test data by an independent Fire Protection Engineer, water storage volumes will be agreed with D&WFRS during detailed design."</i></p> <p>Section 5.3.3 of the OBSMP [REP1-110] confirms: <i>"If an internal BESS water based fixed suppression system (automatic or dry pipe) is integrated in the BESS enclosures a separate water supply and water containment system will be integrated. Any process water from the suppression system will be contained and subjected to the same accredited testing and characterisation regime as firewater runoff before any discharge or off-site removal."</i></p> <p>If firefighters are applying water fog or spray patterns to adjacent BESS</p>

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				<p>enclosures or deploying defensive spray plates that form a water curtain between the affected enclosure and adjacent BESS these "boundary cooling" tactics would likely be applied intermittently in 15-minute application periods with temperature changes measured between application periods.</p> <p>The peak fire load for most current BESS designs when at 100% State of Charge (SOC) lasts for 1-3 hours and the rest of the fire, another 4-8 hours, would be at a lower intensity which reduces the impact of the fire. The maximum Peak Heat Release Rate (PHRR) occurs when propagation rate of battery cells is at peak level and decays to a smaller steady fire that is burning through fewer battery cells / modules and BESS system combustible materials and emitting</p>

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				<p>significantly lower levels of flame / heat flux.</p> <p>Most current BESS systems are designed to safely burn out without internal fire suppression systems (to remove the risk of stranded energy in the battery systems), Large Scale Fire Testing (LSFT) must be conducted to demonstrate that loss will be safely limited to one container without the intervention of fire fighters. Most of these BESS enclosures integrate LFP prismatic cells and have demonstrated fire propagation does not occur to other BESS enclosures at distances ranging from 15cm – 100cm to adjacent or back-to-back BESS enclosures with spacing of 3-3.5 metres across from the next row / block of BESS enclosures.</p> <p>These current BESS designs integrate high levels of thermal insulation to prevent a fire from</p>

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				<p>spreading to adjacent BESS enclosures. The insulation is designed to ensure that external heat from a BESS fire does not increase internal temperatures of adjacent BESS to critical levels i.e. <100C.</p> <p>Real world, worst-case scenario BESS fires have involved fires that have generally consumed two BESS enclosures i.e. fire has propagated from one BESS to another BESS unit. The worst-case propagation of four BESS enclosures occurred in Lyme, New York which involved battery systems integrating NMC pouch cells in air cooled modules, these battery systems will not be considered for the Scheme.</p> <p>These worst-case real-world incidents have involved legacy BESS systems which had not undertaken LSFT, many systems</p>

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				<p>were not NFPA 855 or UL 9540 compliant.</p> <p>Because the illustrative current BESS design utilised for Outline BSMP [REP1-110] drafting and fire emission modelling demonstrated that a fire did not propagate during Large Scale Fire Testing (LSFT) then the Applicant has demonstrated that the loss of a single BESS enclosure is a credible worst-case event for the safety and risk assessment documentation submitted for the DCO.</p>
SLD-030	Hydrology, Flood Risk and Drainage	Watercourse crossing schedule	2.6.2.3. It is unclear whether the Watercourse Crossing Schedule is exhaustive and the Schedule would benefit from an accompanying map; and	The Applicant notes the comment. The Watercourse Crossing Schedule [REP1-126] identifies the proposed watercourse crossings known at this stage, including the proposed crossing method. An accompanying plan has been provided at Deadline 3 to

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				support review of the crossing locations: Watercourse Crossing Figure [EN010168/EXAM/9.38] . Detailed crossing locations will be confirmed at detailed design stage, within the controls set out in the Outline CEMP [REP1-096] , the Cable Route Construction Method Statement [APP-074] and the Watercourse Crossing Schedule [REP1-126] .
SLD-031	Hydrology, Flood Risk and Drainage	Water Framework Directive Assessment	2.6.2.4. The Water Framework Directive Assessment is lacking in necessary detail.	The Applicant does not agree that the Water Framework Directive Assessment [REP1-095] lacks necessary detail. The assessment has been updated to address relevant surface water bodies, groundwater bodies, Groundwater Dependent Terrestrial Ecosystems and subsurface infrastructure, including the Cable Route Corridor. Further proportionate signposting will be provided in ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [REP1-018]

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				where agreed through ongoing engagement with the Environment Agency.
SLD-032	Hydrology, Flood Risk and Drainage	Unresolved hydrology concerns	2.6.3. Ultimately, it is concluded that the additional documents provided by the Applicant do not alter any of the concerns raised and conclusions reached in Appendices F1, F2, and F3 of SLD's Written Representation.	The Applicant does not agree that the hydrology, flood risk and drainage concerns remain unresolved. The matters raised by SLD have been addressed through the updated Deadline 1 documents, including the FRA and drainage strategy suite [REP1-038 to REP1-054] , the Water Framework Directive Assessment [REP1-095] , the firewater containment strategies [REP1-124 and REP1-125] , and the Applicant's Examination responses. Where further clarification is required, this is being progressed through the relevant response line items and engagement with the statutory consultees.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
SLD-033	Soils and Agriculture	Changes made to the soils and agriculture chapter	<p>2.7. Soils and Agriculture</p> <p>2.7.1. SLD note the following documents which have been provided/updated at Deadline 1:</p> <ul style="list-style-type: none"> • ES Volume 1, Chapter 17: Soils and Agriculture [REP1-026]. • ES Volume 3, Appendix 17-1: ALC and Soil Resource Survey Report [REP1-064]. 	The Applicant confirms the stated Soils and Agriculture documents were provided at Deadline 1.
SLD-034	Soils and Agriculture	Changes made to the soils and agriculture chapter	2.7.2. SLD notes the changes which have been made to Chapter 17, Soils and Agriculture, at Deadline 1, including the following:	The Applicant notes this comment.
SLD-035	Soils and Agriculture	Updated receptor sensitivity criteria for agricultural land	2.7.2.1. The criteria for determining receptor sensitivity in Table 17-3 has changed. For example, the sensitivity for Grades 1 and 2 land has gone from "high" to "very high".	The Applicant confirms that the descriptor associated with each sensitivity category has changed. This is to fully align with IEMA (now ISEP) guidance (IEMA, 2022. A New Perspective on Land and Soil in Environmental Impact Assessment), as requested Natural

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				England during the consultation process. The first revision of ES Volume 1, Chapter 17: Soils and Agriculture [REP1-025] used sensitivity headers that were consistent across all other Chapter assessments, but that differed from the IEMA guidance. The original sensitivity categories of High, Medium, Low and Negligible have been renamed as Very High, High, Medium and Low, but the respective levels have not changed. Although the words in the table header are different, the sensitivity levels are the same and the assessment remains the same.
SLD-036	Soils and Agriculture	Updated magnitude of change criteria for agricultural land	2.7.2.2. The criteria for determining magnitude of change in Table 17-4 has also changed, e.g. "high" impact is now defined as loss of 20 ha of agricultural land or more, rather than 50 ha or more previously.	The Applicant confirms that the area thresholds associated with each magnitude category have changed. This is to fully align with IEMA (now ISEP) guidance (IEMA, 2022. A New Perspective on Land and Soil in Environmental Impact Assessment) The first revision of

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				<p>ES Volume 1, Chapter 17: Soils and Agriculture [REP1-025] used an adaptation of the guidance to account for the long-term temporary change of use of agricultural land rather than a permanent loss. As explained in Chapter 17, the IEMA guidance does not fully encompass temporary loss of agricultural land use at the scale of the Scheme. Professional judgement was utilised to adapt the magnitude criteria, however the assessment was updated at Deadline 1 to revert to the criteria as noted in the IEMA guidance, at the request of Natural England during consultation.</p> <p>Although the criteria have been amended, the assessment remains the same.</p>
SLD-037	Soils and Agriculture	Changes to significance matrix for	2.7.2.3. The effects of those changes are seen in the significance matrix (Table 17-5).	The Applicant confirms that the descriptor of sensitivity in the significance matrix header has

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
		agricultural land effects	For example, Grade 3a land was medium sensitivity with major/moderate significance of effect; now it is high sensitivity with major/moderate significance of effect.	changed. Refer to the response to comment SLD-035 above which details the reasons for the amendment to the sensitivity terminology The assessment remains the same.
SLD-038	Soils and Agriculture	Changes to BMV and non-BMV land totals	2.7.2.4. The land affected by the Scheme has changed. In Table 17.6, the amount of BMV land has declined from 240 to 210 ha in the solar PV sites compared to Revision 1, and the non-BMV has declined from 477 to 446 ha. No explanation has been provided for this change.	ES Volume 1, Chapter 17: Soils and Agriculture [EN010168/APP/6.3 (Rev 3)] and ES Volume 3, Appendix 17-1: Agricultural Land Classification and Soil Resources Report [EN010168/APP/6.3 (Rev 3)] have been re-submitted for Deadline 3 with the correct measurements of ALC areas per Solar PV Site and per element. New measurements were derived for Revision 2 based on the most up-to-date design and scheme data, which enabled the breakdown of areas by element, however this calculation omitted areas within the Solar PV Sites that are not allocated as a specific

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				<p>element, for example the grass strips between arrays.</p> <p>The overall assessment is unchanged.</p>
SLD-039	Soils and Agriculture	Changes to Grade 2 and Grade 3a land figures	2.7.2.5. Grade 2 has declined from 30.8 ha to 30.2 ha, but Grade 3a from 209.3 ha to 179.9 ha. These figures derive ultimately from the survey by Reading Agricultural Consultants, whose report has also been amended.	Refer to response to SLD-038 above.
SLD-040	Soils and Agriculture	Discrepancy between ES and ALC report figures	2.7.2.6. The ALC Tables in the Reading Report (Appendix 17-1) has been amended, but only to add in null values which were omitted before (Grade 1 and Grade 5 are always zero). So Table 7 in Appendix 17-1 still gives the same values for Grade 2 of 30.8 ha and Grade 3a of 209.3 ha. There is thus a discrepancy with the ES which needs to be addressed.	<p>Refer to response to SLD-038 above.</p> <p>ES Volume 1, Chapter 17: Soils and Agriculture [EN010168/APP/6.1 (Rev 3)] and ES Volume 3, Appendix 17-1: Agricultural Land Classification and Soil Resources Report [EN010168/APP/6.3 (Rev 3)] have been re-submitted for Deadline 3 with the correct measurements of</p>

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				ALC areas per Solar PV Site and per element.
SLD-041	Soils and Agriculture	Cable Route agricultural land figures	<p>2.7.3. It is unclear where the values are derived from for the Cable Route, as they do not appear to come from the Reading Report. The percentage of BMV has apparently declined from 75% in Rev1 to 53% in Rev 2. The reason for this reduction appears to be the inclusion of more non-agricultural land to the denominator in Rev 2. The figures in the respective Tables 17-7 are:</p> <ul style="list-style-type: none"> • Grade 1: Revision 1 – 0.0 ha; Revision 2 – 0.0 ha • Grade 2: Revision 1 – 10.2 ha (5% agricultural); Revision 2 – 10.8 ha (4% agricultural) • Grade 3a: Revision 1 – 144.6 ha (71% agricultural); 	Refer to response to SLD-040 above.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			<p>Revision 2 – 178.0 ha (62% agricultural)</p> <ul style="list-style-type: none"> • Grade 3b: Revision 1 – 44.7 ha (22% agricultural); Revision 2 – 62.8 ha (22% agricultural) • Grade 4: Revision 1 – 3.3 ha (2% agricultural); Revision 2 – 34.4 ha (12% agricultural) • Grade 5: Revision 1 – 0.0 ha; Revision 2 – 0.0 ha • Total Agricultural: Revision 1 – 202.8 ha (100% agricultural); Revision 2 – 286.0 ha (100% agricultural) • Non-Agricultural: Revision 1 – -; Revision 2 – 79.8 ha • Total: Revision 1 – 202.8 ha; Revision 2 – 365.8 ha 	

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
SLD-042	Soils and Agriculture	Cable Route Corridor area	2.7.4. Accordingly, the land within the CRC has become larger, a significant portion of which is due to the inclusion of the construction compounds (34 ha), which are predominantly on BMV land (3a). Additional Grade 4 and Grade 3b land has been identified.	<p>The Applicant agrees that the area measurements have been amended.</p> <p>All ALC areas have been re-measured for inclusion in updates to ES Volume 1, Chapter 17: Soils and Agriculture [EN010168/APP/6.1 (Rev 3)] and ES Volume 3, Appendix 17-1: Agricultural Land Classification and Soil Resources Report [EN010168/APP/6.3 (Rev 3)] for Deadline 3.</p>
SLD-043	Soils and Agriculture	Clarification requested	2.7.5. SLD would welcome clarification on the reason these changes have been made, so that further comment can be provided as appropriate.	<p>Refer to response to SLD-038 above.</p> <p>All ALC areas have been re-measured for inclusion in updates to ES Volume 1, Chapter 17: Soils and Agriculture [EN010168/APP/6.1 (Rev 3)] and ES Volume 3, Appendix 17-1: Agricultural Land Classification and Soil Resources Report</p>

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				[EN010168/APP/6.3 (Rev 3)] for Deadline 3.
SLD-044	Ground Conditions and Contamination	Deadline 1 ground conditions documents	<p>2.8. Ground Conditions and Contamination</p> <p>2.8.1. SLD note the following documents which have been provided/updated at Deadline 1:</p> <ul style="list-style-type: none"> • ES Volume 1, Chapter 19: Ground Conditions [REP1-028]. • BESS and Substation – Preliminary Geotechnical Risk Register [REP1-128]. • Cable Route Avoidance Areas – Preliminary Geotechnical Risk Register [REP1-129]. • Cable Route Corridor Mining Risk – Technical Memorandum [REP1-130]. 	The Applicant confirms the stated Ground Conditions and Contamination documents were provided at Deadline 1. The Applicant also updated ES Volume 3, Appendices 19-1 to 19-8 [REP1-065 to REP1-080] at Deadline 1.
SLD-045	Ground Conditions	Expert review of ground	2.8.2. Appendix E to this document is a paper prepared by Professor	The Applicant welcomes the comments provided by Professor

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
	and Contamination	conditions and contamination material	Richard Skeffington which comments on the documents provided by the Applicant at Deadline 1 which address ground conditions and contamination issues.	Richard Skeffington on the Geotechnical Risk Registers [REP1-128 & REP1-129] and the Mining Risk documents [APP-255 & REP1-126] . The document correctly notes the risks and limitations that we identified in those assessments and that ground investigation prior to the construction phase will be required to fully understand the risks to receptors and confirm appropriate mitigations. Please note that a commitment to ground investigation is secured via the Outline CEMP [REP2-019] , as is a commitment to undertaken Foundation Works Risk Assessment, in line with the Environment Agency and CL:AIRE guidance on <i>Piling and Penetrative Ground Improvement Methods on Land Affected by Contamination: Guidance on Pollution Prevention</i> . Potential risks to all receptors will

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				<p>be fully considered through this process</p> <p>Addressing the numbered items in the document specifically:</p> <p>3 & 4. Prof. Skeffington notes that the risk to the Chalfield Oolite Principal Aquifer is noted as "minor". This assessment is based on the information currently available, which Prof. Skeffington notes is from "a borehole some distance away" and as is noted, the risk will be updated when additional information is generated through ground investigation. Foundations which interact with the Principal Aquifer will be avoided where possible, but if unavoidable foundation design and selected piling technologies will prioritise the protection of groundwater resources.</p> <p>5. Prof. Skeffington correctly notes HDD avoidance areas cross a</p>

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				<p>variety of obstacles including roads, railways and water courses. It should be noted that there are also locations where cables will be placed in roadways, i.e. across bridges, rather than directly through the ground using trenchless techniques. Prof. Skeffington notes that some of HDD avoidance areas are "quite large" and it should be noted that these will be refined prior to the construction phase, allowing a more accurate assessment of risk to be undertaken.</p> <p>6. The applicant notes the stated distances to residential receptors and confirms that they will be considered as receptors in detailed risk assessments associated with HDD avoidance areas, though noting that human health risks associated with HDD and human health are primarily related to the presence of private water supplies.</p>

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				<p>The applicant will review Crossing 2 as per Prof. Skeffington's comment on the proximity to Gauze Brook.</p> <p>7. The applicant acknowledges Prof. Skeffington's observation regarding the risks associated with drilling fluid breakout at Gauze Brook and Pudding Brook. The purpose of the document is to identify areas of risk to inform subsequent ground investigation. Further investigation and risk assessment will be undertaken at detailed design to ensure that appropriate techniques are deployed at each location in relation to managing potential environmental risks.</p> <p>8. Prof. Skeffington notes that the Chalfield Oolite aquifer may be intercepted by HDD in some locations. The applicant agrees with this and would note that the purpose of the risk register</p>

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				<p>document is to better understand this risk. Prof. Skeffington also notes the uncertainty created by the distance to some of the boreholes used in the assessment. This uncertainty is acknowledged in the document and is why ground investigation will be undertaken in these areas prior to the construction phase to ensure that these risks are properly understood and managed.</p> <p>9 & 10. Prof. Skeffington notes the presence of extensive shallow mine workings below the part of the scheme. The intention of the mining assessments is to understand the potential risks to the scheme and nearby receptors. These documents describe a potential risk and as such, ground investigation and additional risk assessment will be undertaken prior to construction in order to fully quantify that risk and mitigate if</p>

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				<p>required. Micro-routing of the cable route will be undertaken if demonstrated to be beneficial. It should be noted that the mine workings are understood to be at closest ~30m bgl and only trenching from surface (and no structures) is anticipated in the area above the mine workings, making direct interaction with mine workings highly unlikely.</p> <p>The Applicant acknowledges the observation that heat generated by underground cables could affect evaporation of water at the ground surface, and that under drought conditions crop survival may be affected. ES Volume 3, Appendix 17-1: Agricultural Land Classification and Soil Survey Report [REP1-063] demonstrates in Table 1 the agro-climatic conditions at representative locations within the Order Limits, including in the Cable Route</p>

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				Corridor. The climate is generally wet. Most of the soils identified in the surveys, and those mapped where surveys were not able to be undertaken, have clayey topsoils, which tend to have better water retention than coarser soil textures. The risk of crop losses due to drought stress as a direct consequence of additional evaporation caused by heat from buried cables is therefore considered to be negligible.
SLD-046	BESS	Deadline 1 BESS safety documents	<p>2.9. BESS</p> <p>2.9.1. SLD note the following documents which have been provided/updated at Deadline 1:</p> <ul style="list-style-type: none"> ES Volume 3, Appendix 3-1: Substations and Battery Energy Storage System Description [REP1-082]. 	The Applicant confirms the stated BESS documents were provided at Deadline 1.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			<ul style="list-style-type: none"> Outline Battery Safety Management Plan [REP1-111]. 	
SLD-047	BESS	BESS fire testing, emissions and health effects	<p>2.9.2. SLD's experts have reviewed the above updated papers produced by the Applicant. They remain concerned about the content and information provided about large scale fire testing and resultant air emissions (particularly at the micro- and nano-particulate level), and the concerns set out in Appendix I2 of SLD's Written Representation remain. Understanding the validation, emissions, and the effect of those emissions on health is important.</p>	<p>Please refer to 9.25 Applicant's Detailed Response to Stop Lime Down Deadline 1 Submission on BESS Fire Emissions [REP2-042], which provides a comprehensive response to the matters set out in Stop Lime Down's Written Representation, Appendix I2 (Air Pollution Modelling from a BESS Fire at Lime Down) [REP1-181], including consideration of large-scale fire testing, emissions (including particulate matter), and potential health effects.</p> <p>Calculating emissions from scaling cell-level emission data to a full BESS system does not account for enclosure-scale combustion, thermal containment, venting, or dispersion; this is a typical error made in academic research where</p>

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				access to batteries is limited and tested batteries bear no relation to cells and modules integrated into BESS systems.
SLD-048	BESS	BESS fire suppression systems	2.9.3. It is noted in the Substation and Battery Energy Storage System Description on p.3 that both a BESS water based fixed suppression system and/or a Thermal Runaway Propagation Prevention system is described as "optional". This issue re-emphasises that the BESS design plans to make such management systems optional, with an alternative being to allow the batteries to simply burn out. This is a point emphasising the importance of the matters identified by SLD in Appendix I2 on fire testing and air emissions. It is also noted that there are various interpretations of "Thermal Runaway Propagation Prevention" system and the Applicant is invited	As specified and defined in the Outline Battery Safety Management Plan (OBSMP) [REP1-110] Section 4.1.32: <i>"If a BESS fire protection direct injection (unit or rack) system without applicable codes and standards or Thermal Runaway Propagation Prevention (TRPP) system (engineered to directly access cells within battery modules) is integrated within each BESS enclosure, this will conform to NFPA 855 (Ref 3) standards and be tested to a minimum of UL 9540A (Ref 6) protocols or through significant scale third party fire and explosion testing. The direct injection or TRPP system will be capable of operating effectively in conjunction with a gas</i>

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			<p>to provide further detail as to what such a system will involve.</p>	<p><i>exhaust/ventilation system to minimise deflagration risks. The system design must be capable to control or fully suppress a fire, without the direct intervention of D&WFRS. Fire suppression system performance will be benchmarked against free burn testing. An independent Fire Protection Engineer specialising in BESS will review all UL 9540A test results plus any additional fire and explosion test data which has been provided and validate the suppression system design."</i></p> <p>TRPP systems are defined in NFPA 855 (2026), and suppression performance must be validated through UL 9540A testing. Systems must be tested and validated in a specific individual BESS design i.e. it cannot be integrated into a different BESS battery system without full UL 9540A testing.</p>

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				<p>TRPP designs are commercially sensitive therefore details cannot be shared in the public domain without the permission of the BESS manufacturer and TRPP OEM.</p> <p>Suppressions systems will only be considered if fully tested as described above and deemed necessary from LSFT testing results. If a BESS system has only partially been consumed in a thermal runaway scenario, then there are significant difficulties and safety concerns to discharge, decommission, and transport the BESS from site.</p>
SLD-049	Planning	Deadline 1 Planning Statement	<p>2.10. Planning</p> <p>2.10.1. SLD note the following document which has been provided/updated at Deadline 1:</p> <ul style="list-style-type: none"> • Planning Statement [REP1-088]. 	<p>The Applicant confirms the stated Planning documents were provided at Deadline 1.</p>

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
SLD-050	Planning	Cotswolds National Landscape policy note	2.10.2. A number of changes have been made at Deadline 1, including the production of a new Appendix E titled "Cotswolds National Landscape Policy and Guidance Accordance Note". Given a number of these changes relate to the Cotswolds National Landscape, and the Board have opportunity to comment at the next deadline, SLD will work with its experts to continue reviewing this document. For Deadline 2, and noting much of the dispute turns on the opposing parties' positions on the underlying effects of the Scheme, to which policy is applied, the following points are made.	The Applicant notes this comment. For clarity, no changes have been made to the Scheme at Deadline 1. Documents such as the Planning Statement [REP2-017] which includes the referenced Appendix E, have been updated and new documents prepared solely to provide additional supporting information and technical evidence.
SLD-051	Planning	National Landscape policy tests	2.10.3. From para 8.3.210 the Planning Statement deals with the tests for construction within and close to National Landscapes in paras 5.10.32 and 5.10.33 of NPS EN-1. SLD disagrees with the approach adopted by the Applicant	The Applicant notes this comment. Please refer to section 3 of the Applicant's Response to Written Representations [REP2-039] (page 366) which sets out that the Applicant has considered the contents of Appendix A (Planning

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			<p>to these tests, primarily because SLD disagrees with the harms identified in the respect of the Scheme, considers that there has been a failure properly to mitigate and avoid, and as a result the policy test is not met. Without rehashing points, Appendix L to SLD's Written Representation [REP1-186] (site selection) is apposite to that limb of the test concerning siting of the Scheme, and Appendix A to SLD's Written Representation [REP1-169] (planning) is apposite to the weighing of the detrimental effects of the Scheme on the environment, landscape and recreational opportunities. It is not considered that the tests for development both in a National Landscape, and in the setting of a National Landscape, have been met.</p>	<p>Position Statement) [REP1-169] in providing responses to the issues raised, noting that it in part summarises the technical appendices provided by other consultants working on behalf of Stop Lime Down. Section 3 of the Applicant's Response to Written Representations [REP2-039] (pages 370 and 371) also sets out that the Applicant has considered the contents of Appendix L (Site Selection and Alternative Sites Assessment) [REP1-186] in providing responses to the issues raised. The Technical Note on Site Selection [REP2-043] provides further analysis of the points raised.</p> <p>In terms of application of the mitigation hierarchy, the Applicant has provided a response in pages 677 to 680 of the Applicant's Response to Written Representations [REP2-039]</p>

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				<p>which in set out that the Applicant maintains that the mitigation hierarchy has been correctly applied. In terms of site selection, the process set out in ES Volume 3, Appendix 4-1 Site Selection Assessment Report [APP-185] reflects how the mitigation hierarchy has been applied. In order to avoid or prevent an adverse effect, all constraints were removed from the area of search, in order to ascertain if an unconstrained site could be identified; this is Step 1 of the process. Following site selection, embedded mitigation measures in the form of buffers between receptors and solar infrastructure were identified from an early stage in order to reduce and minimise impacts. Table 4-1 of ES Volume 1, Chapter 4: Alternatives and Design Evolution [APP-056] sets out the buffers that were applied, such as 15m from all hedgerows</p>

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				<p>and woodland and 30m from major watercourses.</p> <p>Furthermore, in terms of the application of the mitigation hierarchy in the environmental assessments undertaken, ES Volume 1, Chapter 6: EIA Methodology [APP-058] explains that where significant effects have been identified, the Applicant has sought to avoid, reduce and mitigate those effects through embedded mitigation and where necessary, additional mitigation. The effects on the Cotswolds National Landscape and its Special Qualities are set out in a standalone assessment in ES Volume 3, Appendix 8-6 Assessment of Effects on the Cotswolds National Landscape and its Special Qualities ES Chapter [APP-197]. The Scheme has been designed as far as practicable, to avoid and reduce</p>

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				<p>impacts and effects on the Cotswolds National Landscape through the process of embedding measures into the Scheme design, thereby applying the mitigation hierarchy. Tables 7 and 8 of ES Volume 3, Appendix 8-6 Assessment of Effects on the Cotswolds National Landscape and its Special Qualities ES Chapter [APP-197] sets out a range of embedded mitigation measures, principally comprising offsets and buffers and specific landscape design parameters. These include retention and enhancement of the existing landscape framework to gap up existing hedgerows and provide new tree lines to increase age and species diversity. The embedded mitigation also includes new planting to both mitigate the visual effects of the Scheme and provide landscape benefits including the re-establishment of historic</p>

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				<p>hedgerows within the setting of the CNL, new areas of native woodland, trees, scrub and grassland, new planting within riparian corridors to enhance rivers and wetland, as well as the restoration of dry-stone walls and creation of new/reestablishment of historic ponds.</p> <p>Paragraphs 8.3.211 to 8.3.227 of the Planning Statement [REP2-017] explain how the tests relating to need, the cost and scope of developing all or part of a Scheme elsewhere, and detrimental effects on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated, have been met.</p>
SLD-052	Planning	Land Use Framework	2.10.4. From para 3.253 the Applicant has updated the Planning Statement text on food security, referring to the new Land Use Framework. As SLD recognised in its Written	As stated within paragraph 8.3.258 of the Planning Statement [REP2-017] , the Land Use Framework accepts that around 2% of the Utilised Agricultural Area could be used to meet renewable

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			<p>Representation, development on agricultural land and BMVAL is not prohibited. That accords with the position reflected in the Land Use Framework.</p> <p>However, that does not change or detract from the importance of a preference for development not to be sited on land that is BMVAL. SLD does not consider the Land Use Framework makes any material difference to the proper approach to the agricultural and soils issues in the context of the value placed on BMVAL.</p>	<p>objectives in 2050. The Framework accepts that there is inherent uncertainty in forecasting the electricity mix to 2050 and this land use figure for renewables could be over 2%. However, this still represents a very small proportion and on that basis the Scheme is not considered to compromise the nation's food security. Nevertheless, ES Volume 1, Chapter 17: Soils and Agriculture [REP1-025] identifies that the majority of agricultural land affected is not Best and Most Versatile (BMV) land, with two-thirds of the Solar PV Sites being in Subgrade 3b and Grade 4, which is not considered to be among the Best and Most Versatile agricultural land. There is no land of Grade 1 present within the Solar PV Sites or in the Cable Route Corridor. Land of Grade 2 quality is present in the east of the Solar PV Sites and amounts to</p>

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				<p>approximately 4% of the Solar PV Sites area, and land of Subgrade 3a accounts for approximately 29%.</p> <p>Furthermore, ES Volume 3, Appendix 4-1: Site Selection Assessment Report [APP-185] details the Applicant's approach to site selection, explaining how brownfield land, industrial land, previously developed land and lower grade agricultural land were considered in accordance with policy.</p>
SLD-053	Planning	Planning Statement	<p>2.10.5. SLD notes the changes at paras 8.3.404, 8.3.405, and 9.4.16 to explore the further cumulative effects now included in the Planning Statement. While SLD does not accept the Applicant goes close to far enough in recognising such effects, it is a small step in the right direction to recognise the particular flaws of this Scheme.</p>	<p>The Applicant disagrees with this point and reaffirms that cumulative effects have been assessed in accordance with the relevant legislation, national planning policy, local planning policy and guidance as listed within ES Volume 1, Chapter 21: Cumulative and In Combination Effects [APP-073], pages 1-5.</p>

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				<p>The Applicant has responded to comments relating to cumulative effects in detail in on page 806-807 and page 870-871 of the Applicant's Response to Relevant Representations [PDA-009], where it is explained that full and extensive engagement, consideration, assessment and reporting of intra- and inter-project cumulative effects has been undertaken with the conclusions set out within ES Volume 1, Chapter 21: Cumulative and In-Combination Effects [APP 073].</p> <p>For clarity, the cumulative effects associated with the Scheme have already been assessed and reported within the ES. The Planning Statement [REP2-017] was updated in regard to cumulative effects. The updated document reflects the assessment already undertaken and is consistent with the ES.</p>

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
SLD-054	Planning	Cotswolds National Landscape	<p>2.10.6. As to the new Annex E to the Planning Statement, this document primarily pulls together assessments and conclusions from elsewhere in the Applicant's ES and applies them to various publications related to the Cotswolds National Landscape. As a result, SLD has commented upon and criticised much of the underlying evidence produced by and information advanced by the Applicant. Most pertinently, these issues are dealt with in detail in SLD's Appendix B to its Written Representation [REP1-170] (landscape) and Appendix D to its Written Representation [REP1-172] (traffic). In addition SLD's landscape and visual expert has commented on this new document in Appendix A to these submissions.</p>	<p>The Applicant notes and has read Appendix A prepared by Carly Tinkler on behalf of SLD.</p> <p>Please refer to section 3 of the Applicant's Response to Written Representations [REP2-039] (page 366) which sets out that the Applicant has considered the contents of Appendix A (Planning Position Statement) [REP1-169], noting that it in part summarises the technical appendices provided by other consultants working on behalf of Stop Lime Down.</p> <p>In addition, please refer to the Applicant's Response to Stop Lime Down Written Representation Appendix B Landscape and Visual Report [REP2-044] which is a standalone document prepared in response to the points raised in Appendix B (Landscape and Visual Impact Report) [REP1-170].</p>

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				<p>Applicant's Response to Stop Lime Down Written Representation - Appendix D Transport Report [EN010168/EXAM/9.34] submitted at Deadline 3 provides a response to the points raised in Appendix D (Transport Report) [REP1-172].</p>
SLD-055	Planning	Cotswolds National Landscape	<p>2.10.7. As SLD has maintained in its Written Representation, underpinned by the evidence of its experts, it is not considered that the mitigation hierarchy has been properly applied in respect of the Cotswolds National Landscape. There are significant negative effects which apply to that National Landscape. The assertions to the reverse by the Applicant are not accepted, nor is any suggestion that the Climate Change Strategy for the Cotswolds National Landscape (nor the Cotswolds National Landscape Board's Renewable Energy Position</p>	<p>The Applicant notes and has read Appendix A prepared by Carly Tinkler on behalf of SLD.</p> <p>In terms of application of the mitigation hierarchy, the Applicant has provided a response in pages 677 to 680 of the Applicant's Response to Written Representations [REP2-039] which in set out that the Applicant maintains that the mitigation hierarchy has been correctly applied. In terms of site selection, the process set out in ES Volume 3, Appendix 4-1 Site Selection Assessment Report [APP-185] reflects how the mitigation</p>

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			<p>Statement) can outweigh the clear and significant conflict with the policies and guidance protecting that most valuable landscape area and its setting.</p>	<p>hierarchy has been applied. In order to avoid or prevent an adverse effect, all constraints were removed from the area of search, in order to ascertain if an unconstrained site could be identified; this is Step 1 of the process. Following site selection, embedded mitigation measures in the form of buffers between receptors and solar infrastructure were identified from an early stage in order to reduce and minimise impacts. Table 4-1 of ES Volume 1, Chapter 4: Alternatives and Design Evolution [APP-056] sets out the buffers that were applied, such as 15m from all hedgerows and woodland and 30m from major watercourses.</p> <p>Furthermore, in terms of the application of the mitigation hierarchy in the environmental assessments undertaken, ES Volume 1, Chapter 6: EIA</p>

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				<p>Methodology [APP-058] explains that where significant effects have been identified, the Applicant has sought to avoid, reduce and mitigate those effects through embedded mitigation and where necessary, additional mitigation.</p> <p>The effects on the Cotswolds National Landscape and its Special Qualities are set out in a standalone assessment in ES Volume 3, Appendix 8-6 Assessment of Effects on the Cotswolds National Landscape and its Special Qualities ES Chapter [APP-197]. The Scheme has been designed as far as practicable, to avoid and reduce impacts and effects on the Cotswolds National Landscape through the process of embedding measures into the Scheme design, thereby applying the mitigation hierarchy. Tables 7 and 8 of ES Volume 3, Appendix 8-6</p>

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				<p>Assessment of Effects on the Cotswolds National Landscape and its Special Qualities ES Chapter [APP-197] sets out a range of embedded mitigation measures, principally comprising offsets and buffers and specific landscape design parameters. These include retention and enhancement of the existing landscape framework to gap up existing hedgerows and provide new tree lines to increase age and species diversity. The embedded mitigation also includes new planting to both mitigate the visual effects of the Scheme and provide landscape benefits including the re-establishment of historic hedgerows within the setting of the CNL, new areas of native woodland, trees, scrub and grassland, new planting within riparian corridors to enhance rivers and wetland, as well as the restoration of dry-stone walls and</p>

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				<p>creation of new/reestablishment of historic ponds.</p> <p>Furthermore, please refer to Appendix E: Cotswolds National Landscape Policy and Guidance Accordance Note of the Planning Statement [REP2-017] which includes an assessment of the Scheme's compliance with the relevant Cotswolds National Landscape policy and guidance documents.</p>
SLD-056	Planning	Cotswolds National Landscape	2.10.8. SLD will provide further comment as appropriate having regard to the comments of the CNLB and its experts' input.	The Applicant notes this comment.
SLD-057	Scheme Description and DCO Process	Introduction to documents submitted by other parties	<p>3. Documents submitted by other parties at Deadline 1</p> <p>3.1.1. In the reports attached to this submission, SLD's experts have commented upon a number of the WRs submitted at Deadline</p>	The Applicant notes this comment.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			1. That information is not repeated here. Below SLD first address the Council's submissions, before moving on to a review of some of the other WRs submitted.	
SLD-058	Scheme Description and DCO Process	The Local Impact Report	<p>3.2. The Local Impact Report [REP1-137]</p> <p>3.2.1. As will be apparent reviewing the LIR alongside SLD's WR, the Council and SLD share a large number of concerns about the Scheme. To avoid simply repeating the contents of the LIR, SLD does not go through that document identifying all points of agreement. While SLD's Planning Experts in Appendix A to its WR do not focus on the position in respect of local development planning, SLD consider that the extent of the non-compliance identified by the Council with those local development plan documents further contributes to the reasons</p>	<p>Please refer to the Applicant's Response to the Local Impact Report [REP2-038] submitted at Deadline 2, which provides a response to the points raised within the Local Impact Report [REP1-137].</p> <p>Section 3 of the Applicant's Response to Written Representations [REP2-039] (page 366) sets out that the Applicant has considered the contents of Appendix A (Planning Position Statement) [REP1-169], noting that it in part summarises the technical appendices provided by other consultants working on behalf of Stop Lime Down.</p>

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			to refuse development consent in this case.	Furthermore, the Scheme's compliance with local planning policy is set out in Appendix B of the Planning Statement [REP2-017] .
SLD-059	Scheme Description and DCO Process	The Local Impact Report	3.2.2. In its WR in Section 16, SLD also noted that it is likely that the Council will come forward with requirements to be added to the DCO. SLD notes and welcomes those which the Council has included (along with the s.106 contributions which have also been identified). Without going through the full list, SLD draw attention to the following requirements which it considers are particularly important to be added to the draft DCO. In doing so, SLD have not focused on those suggested requirements which appear to overlap substantially with some of the requirements already included in the draft DCO as submitted at	The Applicant notes this comment. It reminds SLD that section 120(2)(a) of the Planning Act 2008 confirms that DCO Requirements are equivalent to planning conditions and must therefore meet the applicable tests, namely that a planning condition must be necessary, relevant to planning, relevant to the development permitted, enforceable, precise, and reasonable in all other respects.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			Deadline 1. The emphasis is on new additional requirements.	
SLD-060	Socio-Economics, Recreation and Tourism	The Local Impact Report	<p>3.2.3. In respect of socio-economics:</p> <p>3.2.3.1. SLD supports the requirement for a comprehensive business survey (LIR, p. 205) recording the impacts of the Scheme so that targeted business support can be provided to those most affected by the Scheme.</p>	<p>The Applicant has responded in full to matters of socio-economics in Wiltshire Council's LIR in The Applicant's Response to the Local Impact Report [REP2-038] (section 16).</p> <p>The Applicant has assessed the likely economic impacts on affected business sectors in ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068] and considers the requirement to conduct a comprehensive business survey would be disproportionate to the scale of the Scheme. The Applicant furthermore considers that the measures set out in the Outline SSCEP [REP1-108] are already sufficient to safeguard directed business support to sectors most affected by the Scheme. This is secured by</p>

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				Requirement 18 of Schedule 2 to the Draft DCO [REP1 007] .
SLD-061	Socio-Economics, Recreation and Tourism	The Local Impact Report	3.2.3.2. SLD consider that a requirement for a "business response plan" (LIR p. 202) to be particularly important to partially mitigate effects of the Scheme. This is because the Scheme, by virtue of its scale and impacts, is likely to have significant effects on the local population and economy, which will be wideranging and diffuse in nature.	<p>The Applicant has responded in full to matters of socio-economics in Wiltshire Council's LIR in The Applicant's Response to the Local Impact Report [REP2-038] (section 16).</p> <p>The Applicant considers the requirement to produce a specific business response plan is already suitably covered by the measures set out in the Outline SSCEP [REP1-108]. The Applicant has sought to ensure that these are already sufficient to safeguard directed business support to sectors most affected by the Scheme. Accordingly, such a business response plan is already secured by Requirement 18 of Schedule 2 to the Draft DCO [REP1-007].</p>

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
SLD-062	Socio-Economics, Recreation and Tourism	The Local Impact Report	<p>3.2.4. In respect of public rights of way (PRoWs):</p> <p>3.2.4.1. SLD consider the requirement for a “pre-condition survey” (LIR p.209) an important mechanism to ensure that the requirements in the draft DCO to return (e.g.) PRoWs to their condition prior to temporary closure pursuant to Article 12(7) of the draft DCO are practically enforceable.</p>	<p>The Applicant notes this comment. As set out in the Outline CTMP [REP1-112], pre-construction, interim and post-construction Road Condition Surveys will be undertaken to repair any damage caused to the highway and verges during the construction period. The details of these surveys will be confirmed as part of the Final CTMPs.</p>
SLD-063	Socio-Economics, Recreation and Tourism	The Local Impact Report	<p>3.2.4.2. SLD consider the requirement for “detailed design... showing regular passing bays” on bridleways and unclassified roads to be a key mechanism to mitigate the significant negative effects of the Scheme on highway safety (particularly for active travel users on such routes). For the avoidance of doubt, SLD does not consider this comes close to avoiding the significant adverse effect identified,</p>	<p>The Applicant makes note of this comment and will be submitting further detail of passing places at Deadline 4 further to the requests of the Examining Authority.</p> <p>The Applicant maintains that the suggested widening shown presented in the updated Transport Assessment submitted at Deadline 3 is suitable to accommodate the construction traffic movements associated with The Scheme.</p>

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			but considers this a necessary step were the draft DCO to be granted.	
SLD-064	Socio-Economics, Recreation and Tourism	The Local Impact Report	3.2.5. SLD also note the payment suggested in respect of improvements of PRowS outside of the redline area of the Scheme; while such payments should be introduced, SLD consider they can only ever be a partial mitigation of effects on PRow outside of the redline area, and do not mitigate the significant effects that SLD considers the PRow within and immediately abutting the redline area for the Scheme will experience.	<p>The Applicant confirms that any improvements to PRowS outside the Order Limits would be financed through the Community Benefit Fund, which is separate from the DCO process, and therefore have not been considered as mitigation for the purpose of the ES.</p> <p>The Applicant instead has sought to ensure mitigation for PRow users within and near to the Scheme's Order Limits has been secured through the Design Principles and Parameters [REP1A-008], Outline LEMP [APP-283], Outline CTMP [REP1-112], and Outline PROWPPMP [REP1-104]. These are secured by Requirements 5, 7, 15, and 16 respectively in Schedule 2 of the Draft DCO [REP1-007].</p>

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
SLD-065	Glint and Glare	The Local Impact Report	<p>3.2.6. In respect of landscape and visual requirements:</p> <p>3.2.6.1. SLD agree with the Council that a condition controlling glint and glare should be included within the draft DCO (LIR p.216). The ExA will be aware that SLD consider there is a significant negative effect from glint and glare in EIA terms, and such a condition would go some of the way to mitigating that effect.</p>	<p>ES Volume 3, Appendix 20-4: Solar Photovoltaic Glint and Glare Assessment [APP-261] has considered potential impacts of glint and glare using worst-case assumptions including 100% PV coverage within the solar panel areas and consideration of options for both fixed south facing and single axis tracking panels. As such, the assessment is deemed to be comprehensive and the final design and layout would not result in any impacts exceeding those within the current assessment. It is not considered necessary for the assessment to be updated following detailed design and the proposed embedded mitigation is considered sufficient to mitigate any potentially significant glint and glare impacts.</p> <p>The Outline CEMP [REP1-096] contains mitigation measures in respect of glint and glare. As per</p>

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				Requirement 13 (Construction environmental management plan) of Schedule 2 (Requirements) to the Draft DCO [REP1-007] , no part of the authorised development may commence until a construction environmental management plan for that part has been submitted to and approved by Wiltshire Council. These measures are therefore already secured by Requirement.
SLD-066	Socio-Economics, Recreation and Tourism	The Local Impact Report	3.2.6.2. SLD consider the requirement for PRoW condition checks included in "Community access, interpretation and PRoW condition" an important addition to the draft DCO (LIR p.218).	Provision of a detailed Public Rights of Way and Permissive Paths Management Plan, substantially in accordance with the Outline PRoWPPMP [REP1-104] is secured through Requirement 16 of the Draft DCO [REP1-007] . This document would need to be provided to, and approved by the local planning authority (Wiltshire Council) in advance of commencement on any part the Scheme. The Applicant

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				therefore considers the wording of Requirement 16 in Schedule 2 of the Draft DCO [REP1-007] is sufficiently robust to ensure management of PRoWs and access to the countryside is safeguarded. However, if Wiltshire Council require additional commitments to be made to the Outline PRoWPPMP [REP1-104] , the Applicant is able to discuss any additions or amended measures through agreement of the Statement of Common Ground, a first draft of which is submitted at Deadline 2 [EN010168/EXAM/8.2] .
SLD-067	Landscape and Visual	The Local Impact Report	3.2.6.3. SLD consider the requirement for a "Landscape Phasing" plan, extending to advance planting and habitat creation, to be important given the scale of the Scheme (LIR p.219).	The Applicant notes this comment. The landscape planting, including when planting will be carried out, as well as provision for monitoring and maintenance, will be set out in the detailed Landscape and Ecological Management Plan (Rev 2) [EN010168/APP/7.18] , to be approved under Requirement 7

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				in Schedule 2 to the draft Development Consent Order [REP1-007] . This is therefore already secured by Requirement.
SLD-068	Landscape and Visual	The Local Impact Report	3.2.6.4. A lighting requirement in line with "Lighting" (LIR p.220) should be included (among other things, to properly control landscape and ecological impacts).	Measures for the control of lighting is set out in section 2.6 of the Outline Construction Environmental Management Plan [REP2-019] , and section 2.7 of the Outline Operational Environmental Management Plan [REP2-021] . Control of lighting is therefore already secured by Requirements 13 and 14 in respect of both the construction and operational phases.
SLD-069	Hydrology, Flood Risk and Drainage	The Local Impact Report	3.2.6.5. The ExA will be aware that SLD consider a significant issue with the Scheme is the effect of water run-off from panels onto land below. SLD consider that a "Vegetation Management Plan" as suggested by the Council (LIR	The Outline Landscape and Ecological Management Plan [APP-283] provides for grassland creation and establishment beneath and around Solar PV panels, and subsequent long-term management and monitoring of the established grassland sward. The

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			p.221) would be beneficial in this regard.	<p>measures to manage vegetation are therefore already secured within the Outline LEMP and Requirement 7 in Schedule 2 to the draft Development Consent Order REP1-007].</p> <p>Erosion of soil due to water run-off from panels is acknowledged and addressed in ES Volume 1, Chapter 17: Soils and Agriculture [REP1-025] at paragraphs 17.10.17 to 17.10.19, which confirms that the issue has been considered in the assessment of likely effects on soil resources. The chapter concludes While it is possible that intense rainfall events may result in some soil erosion, the effect would likely be less pronounced compared with land under conventional arable cultivation.</p>

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
SLD-070	Construction and Decommissioning	The Local Impact Report	3.2.6.6. SLD note that a decommissioning requirement is included. While one is already present in Schedule 2 of the draft DCO, SLD consider that the Council intend to include a more rigorous condition requiring more detail and (important) more rigid requirements on when decommissioning must occur and why. SLD welcome such a change as SLD consider that how and when decommissioning is undertaken is a key concern related to the DCO (and is a point that it has raised previously in Section 16 of its WR).	Please refer to SLD-013 and SLD-014.
SLD-071	Cultural Heritage	The Local Impact Report	3.2.7. In respect of built heritage, SLD consider the specific condition relating to highway improvements and site access southwest of Rodbourne (LIR p.224) to be a relevant requirement to assist in mitigating the effects identified by	ES Volume 1, Chapter 12: Cultural Heritage [APP-064] , supported by Appendix 12-1: Heritage Statement [APP-219] , has assessed the potential impact of the scheme on Rodbourne Conservation Area, and where required appropriate mitigation has

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			<p>the Council and SLD on that heritage asset.</p>	<p>been proposed (see Section 12.9 of ES Volume 1, Chapter 12: Cultural Heritage [APP-064] for embedded mitigation). There are ongoing discussions between the Applicant and Wiltshire Council regarding highway improvement works to the access track (Works Number 8B) [REP1-007] to Lime Down E, which is located to the south of Rodbourne Conservation Area. The Applicant has updated the Outline CEMP [REP2-019] (submitted at Deadline 1 [REP1-096]) to include provision that the Wiltshire Council Conservation Officer should be consulted on the approval of design for the access Works Number 8B [REP1-007]). Accordingly, proportionate mitigation is secured by Requirement 13 in Schedule 2 to the draft Development Consent Order [REP1-007].</p>

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
SLD-072	Human Health	The Local Impact Report	3.2.8. In respect of public health, SLD welcome both of the requirements provided by the Council (LIR p.224). There is no doubt that there are significant concerns about the resilience of the community to host the Scheme. While SLD do not consider that effect can be mitigated (for the reasons set out in its WR), SLD do consider that these requirements are a necessary and appropriate step.	<p>The Applicant has responded in full to comments made by Wiltshire Council's Local Impact Report in The Applicant's Response to the Local Impact Report [REP2-038] (Section 8 and Table 16-8).</p> <p>The Applicant considers the wording of the relevant Requirements in Schedule 2 of the Draft Development Consent Order [REP1-007] and in the outline management plans are sufficiently robust to ensure community engagement and wellbeing is safeguarded at all phases within the Scheme lifetime. That notwithstanding, the Applicant is in continued engagement with the Council on these matters though the Statement of Common Ground with Wiltshire Council [REP2-025].</p>

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
SLD-073	Hydrology, Flood Risk and Drainage	The Local Impact Report The Local Impact Report	3.2.9. As is apparent from the detailed submissions that SLD has made in respect of flood risk and drainage, SLD has significant concerns that the Scheme will increase the likelihood of flooding for those further downstream well beyond the limits of the Scheme. SLD support the Council as LLFA applying further requirements in the DCO to control flood effects (from LIR p.225), albeit it is noted that such controls remain insufficient to fully mitigate the concerns that SLD have.	<p>The Applicant does not agree that the Scheme would increase the likelihood of flooding downstream or beyond the Order Limits. This assertion is not supported by the submitted flood risk and drainage evidence.</p> <p>The Applicant has responded in detail to Wiltshire Council LLFA's flood risk and drainage submissions in the Applicant's Response to the Local Impact Report [REP2-038] and the relevant LLFA response tables. Those responses explain why the Council's requested additional flood controls and field-scale modelling are not technically justified for the panelled areas.</p> <p>The assessment in ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [REP1-017] and the FRA & Drainage Strategy suite [REP1-037 to REP1-054] demonstrates that the Scheme</p>

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				<p>would not materially increase runoff or downstream flood risk. The panelled areas remain permeable, rainfall will continue to drain to ground, and the principal construction-stage runoff risk, soil compaction, is controlled through the Outline CEMP [REP2-019] and Outline SRMP [APP-280].</p> <p>Runoff from formal impermeable infrastructure is assessed and managed through the site-specific drainage strategies, with detailed drainage design secured through Requirement 11: Surface Water Drainage within the Draft DCO [REP1-007].</p>
SLD-074	Soils and Agriculture	The Local Impact Report	3.2.10. In respect of agriculture, SLD agree with the Council that the soils hosting the Scheme require careful monitoring for issues related to compaction (and other effects) (LIR p.233). As such, SLD consider that a monitoring requirement as suggested by the	The Outline Soil Resources Management Plan (SRMP) [APP-280] confirms that monitoring requirements will be set out in the detailed SRMP, which is secured by Requirement 17 in Schedule 2 of the Draft DCO [REP1-007] .

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			Council should be included within the DCO.	
SLD-075	Ecology and Biodiversity	The Local Impact Report	<p>3.2.11. In respect of ecology:</p> <p>3.2.11.1. SLD agree with the Council that there should be a plan to monitor both habitats and BNG over the life of the scheme (LIR p.238).</p>	<p>The Applicant notes this comment. The Outline Landscape and Ecological Management Plan [APP-283] contains an outline ecological monitoring strategy for the lifespan of the Scheme, which includes a habitat survey, botanical quadrats, and soil survey, as well as surveys for protected / notable species. Long-term monitoring set out within this strategy will ensure habitat creation, enhancement and management proposals for the Scheme are delivered in accordance with detailed LEMP and will fulfil requirements relating to delivery of BNG.</p> <p>The preparation, approval and implementation of the detailed LEMP, substantially in accordance with the Outline LEMP [APP-283], is secured through Requirement 7 in Schedule 2 of the Draft DCO</p>

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				[REP1-007] and will be legally binding. A detailed ecological monitoring strategy will be secured through the detailed LEMP. As the host authority, Wiltshire Council will be consulted on the monitoring strategy and the detailed LEMP must be agreed with the Council as part of the Requirement.
SLD-076	Ecology and Biodiversity	The Local Impact Report	3.2.11.2. SLD consider that a firmer requirement in respect of lighting, such as the "Lighting Strategy" requirement included in the LIR (LIR p.239) is appropriate. That is in particular in respect of the effects on bats. This pairs with the other requirement on lighting already referred to above.	Measures for the control of lighting is set out in Section 2.6 of the outline Construction Environmental Management Plan [REP2-019] , Section 4 of the outline Ecological Protection and Mitigation Strategy [REP1-106] and Section 2.7 of the outline Operational Environmental Management Plan [REP2-021] . Control of lighting is therefore already secured by Requirements 13 and 14, in the Draft DCO [REP1-007] , in respect of both the construction and operational phases.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
SLD-077	Ecology and Biodiversity	The Local Impact Report	3.2.12. In respect of s.106 contributions, SLD agree that it is important that payments to secure monitoring by the Council are included, and welcomes those payments suggested in respect of ecology (LIR p.243-4).	The Applicant is currently considering the request for additional financial contributions towards ecological monitoring in relation to the Scheme and the appropriate mechanism for securing such monitoring fees. The Applicant will seek to agree a consistent approach to monitoring across all aspects of the Scheme with Wiltshire Council.
SLD-078		The Council's WR	3.3. The Council's WR [REP1-138] 3.3.1. As set out above, SLD has refrained from extensive repetition and identification of agreement with the Council's position, which broadly aligns with SLD. Such agreement will be apparent from reading SLD's WR alongside the Council's WR.	The Applicant notes the approach adopted by SLD and welcomes the proportionate stance on commentary.
SLD-079	Landscape and Visual Impact	The Council's WR	3.3.2. On Landscape and Visual Impact:	The Applicant notes this comment. The LVIA has undertaken an Assessment of Effects of the

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			<p>3.3.2.1. The Council recommend (p. 12, para 5.7) that all proposed solar development be removed from the area between the Fosse Way and the CNL boundary to maintain its high value and the relationship between the unspoilt landscapes of the CNL through which the Fosse Way passes. SLD agrees that this is necessary, at a minimum, to reduce the longer-term impacts on the CNL.</p>	<p>Scheme within the Setting of the CNL. Please see Appendix 8-6 Assessment of Effects on the Cotswolds National Landscape and its Special Qualities ES Chapter [APP-197].</p> <p>The Scheme has been designed sensitively to avoid harm to the CNL. Following the mitigation hierarchy, avoidance measures have been the primary way of avoiding harm. These measures are set out in Section 8.9 of the LVIA as presented in ES Volume 1, Chapter 8: Landscape and Visual [APP-060] and include:</p> <ul style="list-style-type: none"> • the removal of panels within the setting of the CNL in Sites A, B and C where there is a strong visual relationship between the CNL and the Scheme. This includes: • Site A: The northern part of fields A1, A11 and A12;

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				<ul style="list-style-type: none"> • Site B: B12; and • Site C: C1, C6, C8, part of C9 and the majority of C10. • Panels in C2, C3 and C4 which are not on the boundary of the CNL, but are where significant visual effects on receptors within the CNL were recorded at PEIR were subsequently removed from the Scheme following Statutory Consultation.
SLD-080	Landscape and Visual Impact	The Council's WR	3.3.2.2. The distance of Lime Down Solar Park Sites B and D from Norton means that the Scheme will "effectively dominate" the village to the north, south, and west. SLD agrees that the sites proposed should be reconsidered in light of the potential dominance of solar panels on the village setting (pp. 13-14, paras 5.10-5.11)	The visual effects of the Scheme on the village of Norton (Receptor RS008)) has been assessed in ES Volume 1, Chapter 8: Landscape and Visual [APP-060] . These receptors are assessed in Appendix 8-3-1: Visual Assessment Sheets (Not carried through to the ES Assessment) [APP-189] . No significant effects were recorded due to the distance to infrastructure from the receptors

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				<p>and the fact that the village is nestled within a valley.</p> <p>The LVIA in ES Volume 1, Chapter 8: Landscape and Visual [APP-060] recognises that there will be Moderate Adverse (Significant) effects on the character of the landscape within the 1km Study Area which includes the village of Norton during construction and Year 1 as a result of the Scheme and the change from agricultural land to a solar infrastructure.</p>
SLD-081	Ecology and Biodiversity	The Council's WR	3.3.3. On Ecology and Biodiversity, the Council note that under the current draft of the DCO, the Applicant has total flexibility to remove every listed hedgerow within the Order Limits as the Applicant has identified every such hedgerow within the Hedgerow Plan [APP-011]. While Article 40 requires hedgerow removal to be in accordance with that set out in	The assessment of effects of hedgerows presented in ES Volume 1, Chapter 9: Ecology and Biodiversity [REP1-015] has been undertaken using precautionary worst-case assumptions, including the reasonably anticipated maximum extent of temporary and permanent hedgerow removal. A reasonable estimate of calculated permanent

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			<p>the Landscape and Ecological Management Plan, it would be possible for the Applicant to include additional hedgerow removal within the Final LEMP, relying on such flexibility. SLD agrees that the Applicant could have, and ought to specify minimum and maximum extents of hedgerow removal (p. 20, para 6.11) for the assessment of the reasonable worst case scenario.</p>	<p>and temporary hedgerow removal requirements are set out in ES Volume 1, Chapter 9: Ecology [REP1-015] (Paragraphs 9.10.137 to 9.10.138). As described, the proportion of hedgerow loss relative to the total extent of existing hedgerows listed is relatively small for both the Solar PV Sites (less than 1% of hedgerows to be removed) and the Cable Route Corridor (approximately 3.5% of hedgerows to be removed).</p> <p>While Schedule 12 (Hedgerows to be removed) to the Draft DCO [REP1-007] does list every hedgerow where removal may be required, this is subject to Article 40(4) which provides that the undertaker may only remove the hedgerows listed to the extent set out in the Ecological Protection and Mitigation Strategy. The Outline Ecological Protection</p>

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				<p>and Mitigation Strategy [REP1-106] is in turn secured by Requirement 8 within Schedule 2 (Requirements) and, as such, breach of these measures would be an offence. This approach is required in advance of detailed design in order to allow the Applicant flexibility within the parameters set by the Outline EPMS [REP1-106]. The final EPMS and, by extension, the extent of removal in respect of the hedgerows listed in Schedule 12, will be subject to the approval of Wiltshire Council in consultation with the relevant statutory nature conservation body. The Applicant intends to include a clarificatory footnote within Schedule 12 in the next iteration of the Draft DCO [REP1-007].</p> <p>Please also refer to DCO1.27 in the Applicant's Response to the Examining Authority's First</p>

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				Written Questions [EN010168/EXAM/9.29].
SLD-082	Transport and Access	The Council's WR	3.3.4. On Highways, the Council calls for a s.59 Highways Act 1980 agreement to be included as a DCO requirement to cover highway damage liability, as a consequence of likely damage to the narrow roads within and around the Scheme (p. 44, para 9.3). SLD agrees that the Applicant should be required to repair and reinstate any damage which will be caused to the local road network during the construction phase.	Section 59 of the Highways Act 1980 provides for the recovery of excess expenses in the cost of maintaining the highway due to "extraordinary traffic". The Applicant does not consider that the traffic associated with the construction of the Scheme is extraordinary. In any event, the Outline Construction Traffic Management Plan [REP1-112] provides for road traffic condition surveys and rectification of any damage caused by construction traffic. The Applicant is therefore already bound by Requirement 15 in Schedule 2 to the draft Development Consent Order [REP1-007] to rectify any damage to the highways.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
SLD-083	Climate Change and Energy Need	The Council's WR	3.3.5. The Council's concerns in respect of the carbon footprint of the Scheme echo concerns raised in SLD's WR on climate change considerations. In particular, the independent review commissioned by the University of Exeter Centre for Energy and the Environment observes that the Applicant's Chapter 7 on Climate Change of the Environmental Statement [APP-059] likely underestimates the scheme's embodied and lifecycle carbon emissions and relies on unrealistic assumptions about future grid decarbonisation. It shows that, even over its full lifetime, the project does not save enough carbon through the electricity it generates to make up for the carbon emissions created during its construction and operation, when compared against expected future electricity grid emissions (p. 51, para 11.14). This mirrors conclusions reached by the	The Applicant has prepared a Climate Response to Wiltshire Council Appendix B of Written Rep and SLD Appendix J1 [EN010168/EXAM/9.33] .

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			University of Derby in Appendix J2 to SLD's WR which observed that the Scheme does not offset its whole-life carbon within the 60-year operational lifespan (applying the future grid emissions scenario).	
SLD-084	Socio-Economics, Recreation and Tourism	Other Written Representations	<p>3.4.Other Written Representations</p> <p>3.4.1. To be proportionate, SLD does not here provide comments on all of the written representations which have been provided by public bodies and members of the public. However, the following are underscored as evidence of the diffuse effects of the scheme on local businesses (a point of importance raised in SLD's WR at pp. 92-96, at para 11.3):</p>	The Applicant notes this comment, detailed responses on the points raised are provided below.
SLD-085	Socio-Economics, Recreation and Tourism	Other Written Representations	<p>REP 1-162 Foxley Road Nurseries</p> <p>The WR notes that the number of customers will be greatly reduced as a consequence of excessive</p>	The Applicant has responded in full to written representations by Foxley Road Nurseries in The Applicant's Response to Written

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			<p>traffic on local narrow roads nearby and likely impact on staff.</p>	<p>Representations [REP2-039] (pg.929-940).</p> <p>The Applicant has sought to ensure that the measures set out in the Outline CTMP [REP1-112], as secured by Requirement 15 in Schedule 2 of the Draft DCO [REP1-007], are sufficient to ensure no significant adverse effects to driver delay from HGV movements from the Scheme are anticipated during construction. For example, customers and staff of Foxley Road Nurseries would not be materially affected, as unrestricted access from the A429 to the east would remain available throughout the construction period. Furthermore, the section of Foxley Road on which the nursery is located does not form part of the proposed construction traffic route.</p>

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
SLD-086	Socio-Economics, Recreation and Tourism	Other Written Representations	<p>REP 1-163 Grittleton Sevington and Leigh Delamere Village Hall and Recreation Ground</p> <p>The WR considers that even with the mitigations proposed by the Applicant, the financial viability of the village hall will be threatened.</p>	<p>The Applicant has responded in full to written representations by Grittleton, Sevington and Leigh Delamere Village Hall and Recreation Ground in The Applicant's Response to Written Representations [REP2-039] (pg.809-814).</p> <p>The Applicant has sought to ensure that the mitigation measures proposed (most pertinently the Outline CTMP [REP1-112], as secured by Requirement 15 in Schedule 2 of the Draft DCO [REP1-007]), and the temporary nature of the proposed impacts, are sufficient to ensure no significant adverse effect to the financial viability of the Village Hall are incurred. These measures include controlling and co-ordinating construction HGV movements, including implementing a HGV booking system to reduce traffic impacts in</p>

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				Grittleton village, and using the Community Liaison Group to ensure any information or concerns are appropriately conveyed between residents, businesses, and the Applicant and site operators.
SLD-087	Socio-Economics, Recreation and Tourism	Other Written Representations	<p>REP 1-195 Alicia Hawker</p> <p>Ms. Hawker's WR notes the likely impact of the Scheme on her equine business, particularly relating to hacking routes. There is concern that her livelihood will be lost, alongside the 2 fulltime staff and 4 part-time staff she employs.</p>	<p>The Applicant has responded in full to written representations by Alicia Hawker in The Applicant's Response to Written Representations [REP2-039] (pg.1634-1644).</p> <p>The Applicant has sought to ensure that mitigation measures proposed to protect equestrian highway and PRoW users, set out in the Outline CTMP [REP1-112] and Outline PROWPPMP [REP1-104] as secured by Requirements 15 and 16 respectively in Schedule 2 of the Draft DCO [REP1-007], are sufficient to ensure no significant adverse effect to equestrian safety on hacking</p>

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				<p>routes, or on the business at Alicia Hawker Eventing Ltd. is anticipated. The Applicant recognises the vulnerability of horses with riders as highway users, and as such, the mitigation measures proposed include having set construction HGV routes to ensure that HGVs associated with the Scheme are not encountered elsewhere on the highway network, having passing places on narrower HGV construction routes that can be used as refuges for equestrians, training for HGV drivers to be wary of horses on the highway and know how to respond accordingly, and speed limits and banksmen present where HGV are to use or cross PRowS.</p>
SLD-088	Socio-Economics, Recreation and Tourism	Other Written Representations	<p>REP1-196 Andrew Pivars Mr. Pivars WR notes the likely impact of the Scheme on his business as a farrier. It notes that there are strict practicing standards</p>	<p>The Applicant has responded in full to written representations by Andrew Pivars in The Applicant's Response to Written</p>

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			<p>set out for the protection of equine animals and owners which requires a safe working area, free of distractions. Any increase in traffic congestion raises animal welfare concerns.</p>	<p>Representations [REP2-039] (pg.1749-1765).</p> <p>The Applicant has sought to ensure that the mitigation measures proposed (most pertinently the Outline CTMP [REP1-112], as secured by Requirement 15 in Schedule 2 of the Draft DCO [REP1-007]), are sufficient to ensure no significant adverse effect to the ability for Mr Pivars to travel to clients as part of his business. The Applicant is furthermore committed to ensuring that the Scheme design and construction management measures, as secured in the Design Principles and Parameters [REP1A-008], and Outline CEMP [REP2-019] by Requirements 5 and 13 respectively in Schedule 2 of the Draft DCO [REP1-007], are sufficient to ensure no significant adverse effects to neighbouring</p>

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				equestrian facilities are likely to be incurred during the Scheme's construction. The Applicant has also committed to keeping communities informed about on-site activities through the Community Liaison Group, as secured by Requirement 4 in Schedule 2 of the Draft DCO [REP1-007] , which would include informing equestrian facilities, stable yards and stud farms of timings of noisy onsite activities. This would allow these facilities to engage with the Applicant to ensure timings of noisy works are understood, and a safe working environment for farriers can be created wherever most practical within facility.
SLD-089	Socio-Economics, Recreation and Tourism	Other Written Representations	REP 1-197 Dr. Annemarie Farrington Dr. Farrington outlines particular risks to horses as a consequence of the Scheme. It is noted that the	The Applicant has responded in full to written representations by Dr. Farrington in The Applicant's Response to Written

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			<p>Scheme presents a material risk of clinically significant respiratory compromise in horses bred and managed for elite thoroughbred performance, and likely effects on pregnant mares.</p>	<p>Representations [REP2-039] (pg.1780-1790).</p> <p>An assessment of the effects of construction activities on air quality is provided in ES Volume 1, Chapter 15: Air Quality [REP2-008]. The assessment concludes that, with embedded mitigation measures in place (as secured in the Outline CEMP [REP2-019] by Requirement 13 in Schedule 2 of the Draft DCO [REP1-007]) construction-phase air quality effects as a result of the Scheme, including potential health effects from increased exposure to particulates, would not be significant for any receptors within the relevant study areas. Whilst the Applicant acknowledges that horses have more sensitive respiratory systems than humans, the Applicant is confident that proposed dust suppression measures and emergency</p>

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				responses to smoke plumes, are sufficient to ensure horses are also not likely to be significantly affected by construction activities.
SLD-090	Socio-Economics, Recreation and Tourism	Other Written Representations	<p>REP1-202, REP 1-203, REP 1-204 Dermot Farrington</p> <p>Mr. Farrington's detailed WR discusses the likely impact of the Scheme on his equine bloodstock company. It is noted that the Company can no longer guarantee long-term positions as a consequence of the development of this scale. The young foals which are reared at Mr Farrington's farm are more likely to be spooked by unexpected noises and movements, which will increase as a consequence of the Scheme.</p>	<p>The Applicant has responded in full to written representations by Dermot Farrington in The Applicant's Response to Written Representations [REP2-039] (pg.1548-1614).</p> <p>The Applicant has committed to ensuring that the Scheme design and construction management measures, as secured in the Design Principles and Parameters [REP1A-008], and Outline CEMP [REP2-019] by Requirements 5 and 13 respectively in Schedule 2 of the Draft DCO [REP1-007], are sufficient to ensure no significant adverse effects to neighbouring equestrian facilities are likely to be incurred during the Scheme's construction, due to embedded</p>

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				offsets to neighbouring uses. While foals may be more reactive to noise and movements, the Applicant expects that if in paddocks or fields, foals will be with their mothers who would have a more calming influence on them. Furthermore, it is anticipated that while horses may take note of and observe noise and movements on the Scheme, these are not necessarily perceived as a threat, and horses would react more so to sudden noises than new or novel visual and auditory stimuli (Winther Christensen, Keeling, & Lindstrøm Nielsen, 2005 ^[1]).
SLD-091	Socio-Economics, Recreation and Tourism	Other Written Representations	REP 1-198 Ashton Hawker Representing a long-established family farming business. The Scheme proposes to purchase land which Mr. Hawkers owns and a hundred acres which he rents. The business will be affected by the reduction in local availability of	The Applicant has responded in full to written representations by Ashton Hawker in The Applicant's Response to Written Representations [REP2-039] (pg.1253-1261). The Applicant confirms that that the final easement area

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			grain and straw. This increases the farm's carbon footprint, as well jeopardising the business' ability to fulfil its supply contracts.	temporarily affected by the Scheme would be 5-9 acres, temporarily for the construction of the cable route corridor. The Applicant confirms the rest of the land would still be available for agricultural purposes while the land used for the Scheme would be restored following completion of cable construction activities. This is controlled and secured by the measures in the Outline CEMP [REP2-019] and Outline SRMP [APP-280] by Requirements 13 and 17 respectively in Schedule 2 of the Draft DCO [REP1-007] .
SLD-092	Socio-Economics, Recreation and Tourism	Other Written Representations	REP 1-158 B&W Equine Vets Outlines the likely impacts on B&W's clientele within the vicinity of Lime Down which includes stud clients, professional competition yards, hunting yards, and private yards. It is noted that noise generated by HGVs and infrastructure creates risks to the	The Applicant has responded in full to written representations by B&W Equine Vets in The Applicant's Response to Written Representations [REP2-039] (pg.903-922). The Applicant has sought to ensure that mitigation measures proposed to protect equestrian

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			<p>horses near the Scheme and increases their propensity to act unpredictably. The likely impacts of dust and toxic gas are also noted.</p>	<p>highway and PRow users (such as passing places for refuge, training for HGV drivers, speed limits and banksmen), set out in the Outline CTMP [REP1-112] and Outline PROWPPMP [REP1-104] as secured by Requirements 15 and 16 respectively in Schedule 2 of the Draft DCO [REP1-007], are sufficient to ensure no significant adverse effect to equestrian safety on hacking routes, recognising the vulnerability of horses with riders as highway and PROW users.</p> <p>The Applicant has furthermore committed to mitigation measures to protect equestrian facilities, through ensuring that the Scheme design and construction management measures (such as offsets, dust suppression measures and emergency responses to smoke plumes), are sufficient so no significant adverse effects to neighbouring equestrian</p>

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				<p>facilities are likely to be incurred during the Scheme's construction. These are secured in the Design Principles and Parameters [REP1A-008], and Outline CEMP [REP2-019] by Requirements 5 and 13 respectively in Schedule 2 of the Draft DCO [REP1-007].</p> <p>Furthermore, it is anticipated that while horses may take note of and observe noise and movements on the Scheme, these are not necessarily perceived as a threat, and horses would react more so to sudden noises than new or novel visual and auditory stimuli (Winther Christensen, Keeling, & Lindstrøm Nielsen, 2005^[2])</p> <p>Whilst the Applicant acknowledges that horses have more sensitive respiratory systems than humans, the Applicant is confident that proposed dust suppression measures and emergency responses to smoke plumes, are</p>

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				sufficient to ensure horses are also not likely to be significantly affected by construction activities.
SLD-093	Socio-Economics, Recreation and Tourism	Other Written Representations	<p>REP 1-165 KMT Farming and Consulting on behalf of Mr. and Mrs. Eavis</p> <p>Amongst the detailed representations made, the WR notes that the proposed Scheme would disrupt farming operations across multiple seasons and introduce uncertainty affecting cropping and land-management decisions.</p>	<p>The Applicant has responded in full to written representations by KMT Farming and Consulting in The Applicant's Response to Written Representations [REP2-039] (pg.845-872), and directly to further representations made by Mr. Eavis at 'JRE-001 – JRE-023' in The Applicant's Response to Deadline 2 Submissions [EN010168/EXAM/9.30], submitted at Deadline 3.</p> <p>The Applicant is cognisant of uncertainty resulting from aspects of the Scheme not due to be reconsidered until the detailed design stage, if development consent for the Scheme is given.</p> <p>Loss of agricultural revenue as a result of temporary works to construct the Cable Route Corridor</p>

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				<p>and install construction access routes will be managed through negotiations with the affected owners. The Applicant continues to seek voluntary agreement for the acquisition of land and rights, including temporary rights, needed for the implementation of the Cable Route Corridor and the status of ongoing negotiations with affected owners is recorded in the Land and Rights Negotiation Tracker [REP2-006]. Where there are reasonable and demonstrable damages experienced from the exercising of Project works, appropriate compensation will be available to those entitled under the Compensation Code. The Funding Statement [APP-019] confirms that the Applicant has sufficient funds to provide this compensation.</p>

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
SLD-094	Socio-Economics, Recreation and Tourism	Other Written Representations	<p>REP1-228 Michael Llewellyn Palmer</p> <p>Identifies detrimental impact on farming business. The Scheme will lead to the limited availability of cattle farms in the area which will mean less availability of cow much – a complete fertiliser which Mr. Palmer relies upon for his land. Likewise, Mr. Palmer has a holiday let business and a caravan site which will be affected by the harm caused to historic villages, footpaths, and views.</p>	<p>The Applicant has responded in full to written representations by Michael Llewellyn Palmer in The Applicant's Response to Written Representations [REP2-039] (pg.1717-1728).</p> <p>The Applicant is cognisant of the direct and indirect impacts the Scheme could have on the agriculture and tourism industries locally, and has therefore assessed the likely effect on each in ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068], supported by an assessment of individually affected tourism and recreation receptors (such as conservation areas in local villages and PRowS) ES Volume 3, Appendix 16-2: Tourism and Recreation Receptor Tables [APP-241]. These find no significant adverse effect to either industry during any</p>

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				<p>phase of the Scheme's development.</p> <p>The Applicant seeks to source ways of retaining agricultural workers, providing reskilling opportunities, or providing re-employment to workers in agriculture and tourism-dependent roles, supported by the measures secured in the Outline SSCEP [REP1-108] by Requirement 18 of Schedule 2 to the Draft DCO [REP1-007].</p>
SLD-095	Scheme Description and DCO Process	Written Summary of the Applicant's Oral Submissions and Responses at ISH1 and Responses to Action Points	<p>4. The Applicant's documents submitted at Deadline 1A</p> <p>4.1. Written Summary of the Applicant's Oral Submissions and Responses at ISH1 and Responses to Action Points [REP1A-012]</p>	The Applicant notes this comment.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			4.1.1. In addressing this document SLD focuses on the post hearing submissions made by the Applicant. SLD's comments on what the Applicant said at the time were either made in the hearing or are responded to in its submissions at Deadline 1 and Deadline 1A.	
SLD-096	Scheme Description and DCO Process	Written Summary of the Applicant's Oral Submissions and Responses at ISH1 and Responses to Action Points	4.1.2. Internal page 24: SLD note that the Applicant has now provided an example of the length of an Option Agreement in respect of Site E. (SLD's position in relation to the confidentiality of agreements is set out in Section 16 of its WR). That Option Agreement is said to run for 40 years, with any extension to 60 years requiring further agreement. The Applicant goes on to say that Requirement 20 provides a maximum time during which the Scheme can operate and that there is no obligation to continue the	The Applicant confirms that this is correct. Requirement 20 (Decommissioning and restoration) of Schedule 2 (Requirements) to the Draft Development Consent Order [REP1-007] does not prescribe an obligation on the Applicant to operate the generating station for a minimum amount of time and this is consistent with the approach taken in made solar DCOs to date.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			development for a prescribed or minimum amount of time and that this is consistent with other DCOs to date.	
SLD-097	Climate Change and Energy Need	GHG Emissions	4.1.3. The Applicant then explains that a 60-year period represents a reasonable worst case for the development in GHG terms. That is because, the Applicant states, "the total GHG emissions are predicted to be lower as it is assumed that full replacement of the panels would not take place during the operational phase". However, the Applicant notes this would also reduce the amount of renewable energy generated.	<p>The assessment adopts a 60-year operational lifespan as a reasonable worst-case scenario for the purposes of the lifecycle GHG assessment. This reflects the anticipated operational life of the Scheme and allows the assessment to capture emissions associated with operation, maintenance, component replacement and eventual decommissioning over the full consented period.</p> <p>The statement regarding panel replacement relates specifically to the balance between operational emissions and renewable energy generation over the Scheme lifetime. The assessment assumes replacement of the Solar PV panels once during the operational</p>

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				<p>phase, which results in additional embodied carbon emissions associated with the manufacture, transport and installation of replacement panels. This is a conservative assumption because it increases the total lifecycle GHG emissions attributed to the Scheme.</p> <p>If full panel replacement did not occur, lifecycle GHG emissions would be lower due to the avoidance of these replacement-related emissions. However, electricity generation would also be reduced as panel performance degrades over time, resulting in a lower renewable energy output and a corresponding reduction in the Scheme's carbon-saving benefits.</p> <p>Accordingly, the assessment considers a full 60-year operational period together with panel replacement as an appropriately conservative approach for</p>

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				<p>assessing lifecycle GHG emissions. This ensures that emissions associated with maintaining generation capacity throughout the operational life of the Scheme are accounted for within the assessment.</p> <p>Further clarification is provided in Climate Response to Wiltshire Council Appendix B of Written Rep and SLD Appendix J1 [EN010168/EXAM/9.33] submitted at Deadline 3.</p>
SLD-098	Scheme Description and DCO Process	Written Summary of the Applicant's Oral Submissions and Responses at ISH1 and Responses to Action Points	4.1.4. SLD considers this is an insufficient answer to this issue. In the first place, the Applicant's response is speculative and does not address when such option agreements will be renewed to secure a further 20 years of development. The Applicant's own assessment provides for a reset and replacement at the 30-year mark. At least currently, there is no proper basis for the ExA to	The Applicant refers SLD to the response given at SLD-096.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			conclude that the Applicant will have obtained extensions by then. Indeed, it may be in the commercial interest of landowners to wait until late into the lifetime of the initial leases to explore extension. It may be that the contracts provide for the decision to extend the Option Agreements to be made at a specific point in time; that is information the Applicant could provide if it is the case. However, the ExA cannot assume this, and the ES is not assessed on that basis.	
SLD-099	Scheme Description and DCO Process	Written Summary of the Applicant's Oral Submissions and Responses at ISH1 and	4.1.5. Critically, however, this response is no answer to the problem identified by SLD in its Written Representation in Section 16.3. The current position (using Site E as an example) is that Site E but not the rest of the Scheme may require to be decommissioned at the 40-year mark. In circumstances where mitigation	The Applicant refers SLD to the response given at SLD-096.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
		Responses to Action Points	and enhancement measures are not spread evenly across the Scheme, it is feasible (and indeed a realistic prospect) that part of the Scheme which provides a disproportionate amount of mitigation and enhancement would be decommissioned before the remainder of the Scheme. A failure to assess this scenario is a failure to assess the reasonable worst case.	
SLD-100	Scheme Description and DCO Process	Written Summary of the Applicant's Oral Submissions and Responses at ISH1 and Responses to Action Points	4.1.6. Indeed, the Applicant's position raises another difficult point on the face of the current DCO. Requirement 20 as drafted attaches the decommissioning date the associated development (e.g. contained in Works No.2, which is the BESS) to the date of decommissioning of the last part of Works No.1 to which the associated development relates. That would mean, for example, that only one of the five Lime Down	The GHG assessment presented in the ES has been undertaken on the basis of the assessed Scheme design and intended operation. The assessment assumes that the generating elements of the Scheme, together with the associated infrastructure required for their operation, remain operational throughout the assessed operational lifetime before being decommissioned. The assessment therefore includes

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			<p>sites (or, indeed, only part of one site) would be required to remain operational for the BESS and the 400kV substation to remain in place. Given specifically the environmental effects of the BESS (and, among other things, the GHG emissions concerned with its maintenance), the Scheme could result in a far worse emissions position than that reported in the ES.</p>	<p>operational and maintenance emissions associated with the BESS and electrical infrastructure, together with the renewable electricity generation benefits delivered by the Scheme.</p> <p>The Applicant does not consider that the scenario described represents the intended operational arrangement for the Scheme. The BESS, substations and associated electrical infrastructure are proposed to support the operation of the generating elements of the Scheme and do not constitute a standalone development in their own right. The continued retention of such infrastructure without a meaningful operational generating function would not align with the purpose of the authorised development.</p> <p>In any event, the operational GHG emissions associated with the</p>

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				<p>maintenance and operation of the BESS and substations are a small component of the overall lifecycle assessment. As shown in the ES, the principal sources of lifecycle GHG emissions are associated with the manufacture, transportation and replacement of major components, particularly Solar PV panels and batteries. Consequently, even if a hypothetical scenario were considered whereby part of the generating capacity ceased operation before associated infrastructure was decommissioned, this would not materially alter the overall conclusions of the GHG assessment or the significance conclusions reported in the ES.</p> <p>The Applicant therefore considers that the ES assesses an appropriate and realistic operational scenario and that the</p>

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				conclusions of the GHG assessment remain robust.
SLD-101	Climate Change and Energy Need	Written Summary of the Applicant's Oral Submissions and Responses at ISH1 and Responses to Action Points	4.1.7. Page 54: As was explained in SLD's Written Representation from para 16.3.12, the Applicant helpfully informed SLD and the Council that the solar element of the Scheme benefits from a Gate 2 Phase 1 prioritisation under the NESO connection reforms, and the BESS element of the Scheme benefits from a Gate 1 prioritisation. As the Applicant notes, this means the BESS has an "as yet unconfirmed indicative connection date". The Applicant goes on to say that it "is not aware of any specific impediments to connection, or the timing of delivery / completion of the scheme".	The Applicant notes this comment.
SLD-102	Scheme Description	Written Summary of the Applicant's	4.1.8. For the reasons set out in SLD's Written Representation from para 16.3.12, SLD consider the mismatch between Gate	The Applicant provided further information on grid connection under Item 6 of the Written Summary of the Applicant's Oral

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
	and DCO Process	Oral Submissions and Responses at ISH1 and Responses to Action Points	prioritisation to be a specific impediment, and that this engages the policy in NPS EN-1 para 4.11.12. As SLD go on to explain, if such Gate prioritisation is acceptable to the operation of the Scheme, it also indicates that such development may not be associated development within the requisite guidance.	Submissions and Responses at Issue Specific Hearing 1 and Responses to Action Points [REP1A-012].
SLD-103	Climate Change and Energy Need	Written Summary of the Applicant's Oral Submissions and Responses at ISH1 and Responses to Action Points	4.1.9. Page 55: it is noted that the Applicant has not provided the "aggregate installed capacity (DC)" for the Scheme. SLD consider that it is open to the Applicant to calculate that figure on a reasonable worst-case basis applying the outlines that are proposed to be secured in the Scheme documents. Indeed, given many of the other assessments required as part of the ES, the Applicant will necessarily have had to assess some indicative figure for the number of PV cells and	<p>The installed DC capacity of the Scheme will be dependent on the final detailed design and generating capacity and efficiency of the panels utilised for the Scheme.</p> <p>For the reasons set out in paragraphs 1.4.3 and 1.4.4 of the Explanatory Memorandum [REP1-009], the description of the NSIP at Work No. 1 does not refer to an upper limit on the capacity of the generating station that development consent is being sought for. It is not considered that</p>

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			<p>associated infrastructure to define the DC capacity to be installed. That must also be the case for the Applicant to conclude (as it does on the following page), that it would be within the 2-4 acres per MW described in para 2.10.17 of NPS EN-3. This is necessary to assess the likely significant effects of the Scheme.</p>	<p>imposing an upper limit on generation capacity or overplanting is desirable or necessary. The DCO includes reference to the means by which the parameters of the Scheme will be constrained, the reasonable worst case scenario, and it is on this basis that the Environmental Impact Assessment has been undertaken, as set out in the ES [APP-052 to APP-265] (as updated). As such specifying the DC capacity of the Scheme at this stage, is not necessary to assess the likely significant effects of the Scheme.</p> <p>There is no reason to limit the electrical output capacity of the Scheme provided those parameters of the consent envelope are adequately captured in the DCO. The Applicant is confident that those parameters are adequately secured in the DCO, including the spatial extent</p>

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				<p>of the location of solar panels within the areas shown on the Works Plan [REP1-005].</p> <p>The Work No1 Parcels A to E total approximately 750ha (1,853 acres), of which 480ha (1,186 acres) are proposed to be panels and associated infrastructure. To be within the guidelines (not requirements) set out at Paragraph 2.10.17 of NPS EN-2 (2023), the installed capacity of the Scheme should be between 296MW and 593MW. The Applicant confirms that the capacity deliverable within the parameters of the Scheme lies within this range.</p> <p>There are clear advantages in not imposing an upper limit on capacity. For example, the Applicant may take advantage of technological improvements and innovation that may emerge before construction, which would enable it to still construct the Scheme within</p>

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				<p>the assessed parameters but increase capacity beyond that which is currently anticipated. It is in the public interest and accords with national policy to facilitate efficient and maximum generation from renewable sources, which is explained further in the Statement of Need [REP1-085]. The approach taken has precedent in all of the made Orders for solar NSIPs to date.</p>
SLD-104	Climate Change and Energy Need	Written Summary of the Applicant's Oral Submissions and Responses at ISH1 and Responses to Action Points	4.1.10. Page 56: it is noted that the Applicant "does not propose significant overplanting", but then does not go on to provide a reasonable worst-case assessment of that planting. SLD consider such figures (which should be possible to derive in tandem with the "aggregate installed capacity (DC)" discussed in the previous paragraph) are required to be provided to assess the likely significant effects of the	Please refer to the Applicant's response in row SLD-103 above.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			Scheme. It is correct that para 2.10.55 and fn 92 of NPS EN-3 envisages overplanting. However, per <i>Ross v SSHCLG</i> [2025] EWHC 1183 (Admin), such overplanting must be justified. To provide that justification, and indeed to identify the likely significant effects of the Scheme, it is necessary to provide such information by reference to the amount of overplanting proposed assessed on a reasonable worst-case basis.	
SLD-105	Scheme Description and Energy Need	Written Summary of the Applicant's Oral Submissions and Responses at ISH1 and Responses to Action Points	4.1.11. Page 57 : the Applicant explains the role of the BESS in the Scheme. However, SLD considers it is incumbent on the Applicant to provide more details as to its justification, in light of the BESS portion of the Scheme having only Gate 1 prioritisation. Among other things:	The Applicant notes this comment and has responded to the individual points below.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
SLD-106	Climate Change and Energy Need	Written Summary of the Applicant's Oral Submissions and Responses at ISH1 and Responses to Action Points	4.1.11.1. As the Applicant's position is that the Scheme will not itself provide for significant overplanting, there should in principle be no "waste" in the form of 'clipping' (that is, where the peak output of the Scheme exceeds the grid capacity). Rather, the Scheme could at all times maximise its generation by outputting to the National Grid.	The Applicant agrees that 'clipping' is lower in schemes with lower overplanting. The storage component of the scheme will support the operation of the main solar scheme. Figures 20 to 23 of the Statement of Need [REP1-085] provide illustrations on how the proposed solar and BESS may work together to contribute to a secure, reliable and low-carbon electricity system.
SLD-107	Climate Change and Energy Need	Written Summary of the Applicant's Oral Submissions and Responses at ISH1 and Responses to Action Points	4.1.11.2. The Applicant itself explains that the National Electricity Transmission Network (NETS) at Melksham has "sufficient capacity" and provides "defence-in-depth for system security" concluding "[s]ignificant network constraints in the transmission grid around Melksham are not foreseen during normal conditions".	The Applicant notes this comment.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
SLD-108	Climate Change and Energy Need	Written Summary of the Applicant's Oral Submissions and Responses at ISH1 and Responses to Action Points	4.1.11.3. The Scheme has Gate 1 for its BESS and DESNZ/Ofgem has indicated that there is an oversupply of grid-scale storage (see Appendix F). Even if, which is not accepted, electricity generated by the Scheme requires to be stored, there is ample capacity on the NETS.	<p>Section 6.9 and 6.10 of the Statement of Need [REP1-085] explain that the BESS will support the operation of the main solar scheme and will be able to store energy generated by the main solar scheme and export it to the NETS when it is needed. Further, at times when the BESS is not supporting the operation of the main solar scheme, it may be useful for the BESS to support the national supply and demand balance by importing directly from the grid rather than from the co-located solar. Figures 20 to 23 of the Statement of Need [REP1-085] provide illustrations on how the proposed solar and BESS may work together to contribute to a secure, reliable and low-carbon electricity system.</p> <p>The Statement of Need [REP1-085] explains that lists and registers of schemes in</p>

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				development but not yet operation does not indicate a commitment by or obligation on the promoter to deliver that project at all or, if it does, at a particular generation capacity. It is therefore not the case that "there is ample capacity on the NETS" as the representation states.
SLD-109	Climate Change and Energy Need	Written Summary of the Applicant's Oral Submissions and Responses at ISH1 and Responses to Action Points	4.1.11.4. It should be noted that the BESS is being considered within the framework of the NPSs as a result of its inclusion in the Scheme; s.15 of the Planning Act 2008 excludes "exempt electricity storage". That is distinct to the solar generation itself which is the s.15(2) project which brings the Scheme within the scope of the NPS and the policy position on need therein established.	The Applicant notes this comment.
SLD-110	Climate Change and Energy Need	Written Summary of the Applicant's	4.1.11.5. As a result, the reasoning under "Role of storage capacity of the BESS and its relationship with the generating station" should be	The Government has retained optionality in its project prioritisation framework until there is further clarity on progress

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
		Oral Submissions and Responses at ISH1 and Responses to Action Points	reconsidered, or at least clarified, with this key context in mind.	<p>towards delivering the capacity ranges indicated (Clean Power 2030 Action Plan, p31).</p> <p>Planning for New Energy Infrastructure, the Government's response to its consultation on the 2025 revisions to the energy NPSs (accessible at https://assets.publishing.service.gov.uk/media/69121170bda892e068aa6454/nps-revisions-2025-consultation-government-response.pdf), explains, in relation to the interpretation of the Clean Power 2030 capacity ranges, that:</p> <p><i>“Clean Power 2030 is a milestone that reflects the scale of ambition required to meet our Net Zero 2050 target; it is not a fixed ceiling on technology deployment or project approvals.”</i></p> <p>Because the Clean Power 2030 capacity ranges apply across all projects which require a</p>

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				<p>Transmission Impact Assessment (TIA) to be carried out (this includes all projects greater than 5MW in England and Wales) the Clean Power 2030 capacity ranges cannot constrain either NSIP schemes, or schemes which fall outside of the NSIP framework.</p> <p>Paragraph 3.2.6 of NPS EN-1 (2025) states that: <i>"It is not the government's intention in presenting any of the figures or targets in this NPS to propose limits on any new infrastructure that can be consented in accordance with the energy NPSs"</i></p> <p>The National Policy Statements (NPSs) are important documents which set out national policy for energy infrastructure in England and Wales. They were established against obligations made as part of the Climate Change Act 2008 (CCA 2008).</p>

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				<p>The National Planning Policy Framework (NPPF) does not contain specific policies for nationally significant infrastructure projects. However, NPPF paragraph 5 confirms that national policy statements form part of the overall framework of national planning policy, and may be a material consideration in preparing plans and making decisions on planning applications. They are therefore clearly also relevant to energy generation schemes which are not NSIPs, and it is the Applicant's view that paragraph 3.2.6 of NPS EN-1 (2025) supports the need for the BESS included as associated development to the main solar scheme and would so regardless of the NESO Gate status secured by the BESS as part of NESO's Connections Reform process.</p>

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				For this reason, the Applicant considers that the current policy position is that, the need established by NPS EN-1 applies to all schemes or components of a scheme which currently has a Gate 1 connection agreement, whether or not they are within the scope of NPS EN-1.
SLD-111	Climate Change and Energy Need	Written Summary of the Applicant's Oral Submissions and Responses at ISH1 and Responses to Action Points	4.1.12. As to "Importation of electricity from the grid to the BESS", again further reasoning is required in light of the oversupply or "surplus" of BESS on the National Grid. It is noted that the Statement of Need itself envisages a scheme whereby BESS only has an export connection (para 6.9.6). Given the adverse environmental effects from the perspective of GHG emissions as a result of maintenance of the BESS (given the relatively fixed number of cycles that such BESS can complete before requiring	The GHG assessment presented in the ES Volume 1, Chapter 7: Climate Change [APP-059] considers the efficiency of the BESS to be 85%. By storing predominantly low-carbon energy (e.g. from the Scheme's solar generation) and discharging during peak demand periods, the Scheme would reduce emissions by displacing fossil fuel generation. Paragraph 7.10.67 of the Climate Change chapter evaluates the additional carbon saving of the BESS at approximately 245,696 tCO ₂ e over the Scheme's 60-year

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			<p>replacement), further justification for the BESS is required. In any event, this justification does not constitute an explanation of why the BESS is associated development.</p>	<p>lifespan. It is well established that a solar NSIP can include BESS as associated development as seen in recent made solar DCOs. These include:</p> <ul style="list-style-type: none"> • Cottam Solar Project (EN010133, Made 5 Jan 2024) • Gate Burton Energy Park (EN010131, Made 12 Jan 2024) • Sunnica Energy Farm (EN010106, Made 12 Jan 2024) • Tillbridge Solar Project (EN010142, Made 14 Jan 2025) • West Burton Solar Project (EN010132, Made 24 Jan 2025) • Springwell Solar Farm (EN010149, Made 8 Jan 2025)

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				<p>2026). Paragraph 5 of the Guidance on associated development applications for major infrastructure projects describes four tests for associated development. The tests are:</p> <ul style="list-style-type: none"> • Direct Relationship: The definition of associated development requires a direct relationship between associated development and the principal development. Associated development should therefore either support the construction or operation of the principal development, or help address its impacts. • Subordinate: Associated development should not be an aim in itself but should be subordinate to the principal development.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				<ul style="list-style-type: none"> Not only additional revenue: Development should not be treated as associated development if it is only necessary as a source of additional revenue for the applicant, in order to cross-subsidise the cost of the principal development. This does not mean that the applicant cannot cross-subsidise, but if part of a proposal is only necessary as a means of cross-subsidising the principal development then that part should not be treated as associated development. Proportionate in nature and scale: Associated development should be proportionate to the nature and scale of the principal development.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				<p>In the context of the Scheme, the following points are noted:</p> <p>Direct Relationship: There is a direct relationship between the proposed BESS and the solar array. When energy is generated by the solar array but is not immediately needed, the BESS will store that energy and will export it to the grid when needs are greater. This supports the operation of the Scheme by increasing its effectiveness, reducing the potential for wasted energy, and maximising a key benefit of the Scheme, being the level of carbon free energy sent to the grid.</p> <p>The BESS will also be capable of delivering support to the grid which will increasingly be needed to operate a low-carbon electricity system. This also supports the operation of the Scheme by increasing the security, reliability and flexibility of the system to</p>

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				<p>which it connects and therefore is also demonstrative of a direct relationship between the BESS and the solar array.</p> <p>Subordinate: The BESS is subordinate to the solar array in that the principal benefit of the Scheme, being the generation of carbon free energy, derives from the solar array. The Scheme aims to meet the need for new energy generation on the grid by developing the solar array with a co-located BESS. A standalone BESS development would provide benefits to the energy system but on its own would not generate low-carbon electricity. However, the BESS will store predominantly low-carbon energy and therefore, the BESS is clearly functionally subordinate to the solar array.</p> <p>Further, the BESS would operate in a subordinate fashion to the solar array, in that the output from</p>

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				<p>the solar array would influence how the BESS could operate at any moment in time but the reverse would not be true. However, in practice, how the BESS would operate at any time would also depend on a large number of other factors including national demand, the weather, and the evolving composition of the future GB generation fleet.</p> <p>To illustrate this point, if at a time when the grid needed energy, the sun was shining and the BESS had available charge, the solar array would generate and discharge to the grid. The BESS, however, would not discharge unless spare export capacity to the grid was available, or at a later time became available, for the BESS to export (i.e. when the generation from the solar array reduced to below the connection capacity level).</p>

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				<p>Not only additional revenue: Investing in unsubsidised solar is economically rational on a stand-alone basis and requires no cross-subsidisation financially to justify the cost of the principal development. For example, EN-3 states: "Solar farms are one of the most established renewable electricity technologies in the UK and the cheapest form of electricity generation" (Para 2.10.5). As such, the BESS is not only necessary as a source of additional revenue for the applicant, to cross-subsidise the cost of the principal development, because no cross-subsidisation is necessary for the solar array. The BESS supports the operation of the Scheme by increasing its effectiveness, reducing the potential for wasted energy, and maximising a key benefit of the Scheme, being the</p>

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				<p>level of carbon free energy sent to the grid.</p> <p>Proportionate in nature and scale: The BESS is proportionate to the Proposed Development in nature and scale. This is because:</p> <ul style="list-style-type: none"> • The power capacity of the BESS matches the grid export capacity available to it; • Based on the indicative layout of the solar array and the BESS design parameters, the energy generated by the solar array over the course of a day can regularly exceed the energy storage capacity of the BESS; and • The footprint of the BESS is much smaller than the footprint of the solar array.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
SLD-112	Scheme Description and DCO Process	Written Summary of the Applicant's Oral Submissions and Responses at ISH1 and Responses to Action Points	4.1.13. Page 61 (action point 4): SLD notes that a transmission losses figure of 0.1% has been provided in respect of the 400kV cable. It is explained that such losses will arise on both import and export. However, losses related to transmitting to and from the BESS in particular (including the action of storage) is not provided; SLD consider this should be provided. When stored from the National Grid or from the PV (assuming inversion prior to transmission over the 132kV cables) the electricity requires to be rectified for storing as DC, and then requires to be inverted for transmission to the National Grid. The Applicant is requested to provide those figures also.	<p>The 400kV cable transmits power from the 400kV National Grid Substation at Melksham to the Site 400kV Substation at Lime Down D and losses associated with the transmission of power along that cable, in either direction, have been provided at Action Point 4 of Written Summary of the Applicant's Oral Submissions and Responses at Issue Specific Hearing 1 and Responses to Action Points [REP1A-012].</p> <p>ES Chapter 2 Figure 3.1 Indicative Site Layout Plan [APP-081] shows that the 400kV Substation at Lime Down D is proposed to be located adjacent to the BESS Area.</p> <p>The quantum of any additional losses relating to transmitting between the BESS and the 400kV Substation at Lime Down D are not of significance to the operation or</p>

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				<p>the examination of the Proposed Development.</p> <p>Paragraph 5.11.63 of the Statement of Need [REP1-085] describes that a typical value for the Round Trip Efficiency (RTE) of a BESS, which measures the percentage of energy which has been imported to the BESS which is subsequently available for export, is 88%. This evaluates losses associated with “the action of storage”.</p> <p>Paragraphs 3.2.6 to 3.2.7 of NPS EN-1 (2023) establish the urgent need for new large-scale low-carbon infrastructure (such as the Proposed Development) and explain that the Secretary of State has determined that substantial weight should be given to this need. Further, paragraph 3.2.8 establishes that the Secretary of State is not required to consider separately the specific contribution</p>

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				<p>of any individual project to satisfying the need established in NPS EN-1. The Applicant therefore respectfully suggests that, because line losses relate to the quantum of benefits and therefore the contribution of the Proposed Development to that need, providing calculated figures for the current indicative design will not aid the examination of the Proposed Development.</p> <p>However, detailed calculations of losses associated with transmitting energy from the solar sites to the 400kV Substation will be finalised at the detailed design stage and will be dependent on the transmission technology selected at that time (i.e. multiple 33kV lines, or fewer 132kV lines).</p> <p>However, the Applicant can confirm that there will be losses, as there are with any line-length transmission of energy, between</p>

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				the Solar PV Sites and the 400kV Substation at Lime Down D, however these are all expected to be within industry normal ranges.
SLD-113	Glint and Glare Site Selection and Alternatives	Written Summary of the Applicant's Oral Submissions and Responses at ISH1 and Responses to Action Points	4.1.14. Page 62 (action point 5): SLD note the explanation for tracking panels. However, the case remains that such tracking panels overall have a more significant environmental effect than fixed panels (due to height but also inherent design). As the ExA indicated in its questions, waiting for improved tracker panels is inherently speculative, when the Scheme has already been assessed as acceptable to the Applicant (and is considered by it to be policy compliant) at the time of submission to PINS). As such, the justification that trackers may improve matters in the future is inherently speculative compared to the likely adverse effects currently	The full extent or 'worst-case' effects arising from the Scheme identified and reported in the Environmental Statement (ES) [APP-052 to APP-265 as updated by REP1-015 to REP1-084] . The ES has been undertaken adopting the principles set out in the Planning Inspectorate's Advice Note Nine: Rochdale Envelope. The advice note acknowledges there may be aspects of the Scheme design that are not yet fixed and, therefore, it may be necessary for the Environmental Impact Assessment (EIA) to assess likely worst-case variations to ensure all foreseeable significant environmental effects of the Scheme are considered.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			<p>identified. For that reason, SLD consider (as indicated in Section 16 of its Written Representation) that proper avoidance indicates in favour of requiring 3.5m fixed panels. As to Glint and Glare, SLD has significant concerns about the Applicant's assessment overall in any event as is set out in Appendix G to its Written Representation [REP1-178].</p>	<p>Considering a reasonable worst case is standard practice for EIA in the UK. The ES identifies the worst-case parameters for solar PV panels used for the environmental impact assessment within ES Volume 1, Chapter 3: The Scheme [APP-055] including with respect of the parameters for solar PV panels set out within Table 3.1.</p> <p>In terms of the point raised about solar panels, flexibility for either tracker or fixed panels has been built into the Scheme. In terms of layout, the tracking solar PV modules would be aligned in north-south rows, and the fixed solar panels would be aligned in east-west rows. Each panel type is considered below.</p> <p>Tracker PV Modules</p> <p>Tracker panels are mounted on horizontal axes which run north-</p>

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				<p>south. In the morning the panels face east and they track the sun as it moves across the sky through the course of the day.</p> <p>The maximum height of the highest part of the tracking solar PV modules at its greatest inclination would be 4.5m Above Ground Level (AGL). The maximum height of the highest part of the solar PV modules when horizontal will be 2.5m AGL. Full details are as set out within Table 2-1 Work No.1 Design Parameters and Commitments of the Design Principles and Parameters Document [REP1A-008].</p> <p>The tracking solar PV modules rotate to follow the course of the sun throughout the day, with 'full tilt' (4.5m) occurring at the beginning and at the end of the daylight hours (sun rise and sun set) of each day. Throughout the day, the panels would slowly rotate</p>

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				<p>around the central axis of the module to track the course of the sun and when horizontal sit at 2.5m AGL.</p> <p>Tracker PV modules sit horizontal overnight, and area also programmed to position themselves to optimum orientation for protection in storm or high wind events (still within the 4.5m parameters).</p> <p>Fixed PV Modules</p> <p>Fixed PV Modules are installed in a fixed position, facing broadly south, and are tilted, depending on location and local land topology, to optimise the incident irradiation throughout the day and the year.</p> <p>The maximum height of the highest part of the fixed solar PV modules will be 3.5m. Foundations are most likely to be galvanised steel poles driven into the ground. These will either be piles rammed into a</p>

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				<p>predrilled hole, or a pillar attaching to a steel ground screw. Full details are as set out within Table 2-1 Work No.1 Design Parameters and Commitments of the Design Principles and Parameters Document [REP1A-008].</p> <p>Effects associated with Tracker or Fixed PV Modules</p> <p>The LVIA set out in ES Volume 1, Chapter 8: Landscape and Visual [APP-060] has been undertaken on a Rochdale Envelope Worse Case basis, with a panel height of 4.5m AGL (the uppermost reach of the Tracker PV Modules) used to undertake an assessment of potential effects.</p> <p>As identified above, it is only at sunrise and sunset that the Tracker PV Modules would reach 4.5m AGL, spending the rest of the daylight hours at a height ranging between 2.5m and 4.5m AGL. Key</p>

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				<p>to this range is that there will be a period of the day when the panels are either at, or close to the horizontal plane and closer to 2.5m AGL, and therefore below the height (3.5m AGL) of the Fixed PV Modules.</p> <p>Seasonality is a key factor when considering the position of the Tracker PV Modules. The earlier sunrise occurs and the later that of the sunset, (ie in Summer months) then the earlier in the day that the panels would rotate to a position lower than the Fixed PV Modules and the longer panels would spend horizontal (in summer months the sun is higher in the sky). The converse is recognised for winter months, but the Tracker PV Modules would still track the full course of the sun spending periods of the day either at, or close to the horizontal plane.</p>

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				<p>The height AGL with Fixed PV Modules is constant (3.5m), with no daily variation or seasonality and therefore associated effects are consistent (all be it with the seasonal changes of the host landscape).</p> <p>The Applicant considers that despite the Fixed PV Modules being 'shorter' than the Tracker PV Modules, at 3.5m AGL the difference between the upper extents of the Fixed PV Modules and the Tracker PV Modules (1m) is not so substantive as to overcome the variation provided by the Tracker PV Modules across the course of the day (especially when the sun is at its highest in the sky and the panels are either horizontal or close to it at 2.5m), compared to the constant nature of the Fixed PV Modules.</p> <p>As such, the adverse effects associated with the Fixed PV</p>

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				<p>Modules are considered directly comparable to that of the taller Tracker PV Modules, despite the Tracker PV Modules being taller at the beginning and at the end of the daylight hours.</p> <p>Therefore, for the reasons set out above, it is not considered that from an LVIA perspective one system or the other is likely to result in a greater or lesser level of effect.</p> <p>The Applicant has responded to SLD's concerns regarding the Glint and Glare Study [APP-261] in Applicant's Response to Written Representations [REP2-039].</p>
SLD-114	Construction and Decommissioning	Written Summary of the Applicant's Oral Submissions	4.1.15. As to the suggestion of flexibility in the construction scheme, SLD has responded to this above and in its Written Representation. The approach	The Applicant has responded to this comment in full above in SLD-113.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
		and Responses at ISH1 and Responses to Action Points	described requires to be clarified for the reasons identified.	
SLD-115	Hydrology, Flood Risk and Drainage	Written Summary of the Applicant's Oral Submissions and Responses at ISH1 and Responses to Action Points	4.1.16. In respect of the comments related to Mark Judge, SLD has significant concerns about the Applicant's approach to flood, which is described in its Written Representation and Appendixes F1-4 ([REP1-174] to [RP1-177]).	The Applicant does not agree with SLD's characterisation of the Applicant's approach to flood risk. The concerns raised by SLD repeat matters addressed in the Applicant's response to SLD's Written Representation and in the Applicant's detailed responses to the LLFA's flood risk and drainage position. The assessment in ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [REP1-017] and the FRA and Drainage Strategy suite [REP1-037 to REP1-054] demonstrates that the Scheme would not materially increase flood risk on-site, downstream or beyond the Order Limits. The Applicant's detailed rebuttals to the LLFA

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				explain why field-scale hydraulic modelling of panelled areas is not technically justified. The panelled areas remain permeable, rainfall will continue to drain to ground, and the key construction-stage runoff risk is soil compaction, which is controlled through the Outline CEMP [REP2-019] and Outline SRMP [APP-280] . Runoff from formal impermeable infrastructure is assessed and managed through the site-specific drainage strategies, with detailed drainage design secured through Requirement 11: Surface Water Drainage .
SLD-116	Cultural Heritage	Visualisations	4.2. Visualisations 4.2.1. The Applicant has now provided visualisations from Bradfield Manor in response to Historic England's latest request on 9 January 2026. The two visualisations provided identify the land which would be used for the	ES Volume 1, Chapter 12: Cultural Heritage [APP-064] , supported by ES Volume 3, Appendix 12-1: Heritage Statement [APP-219] , identified that there was a potential for a moderate / minor adverse effect on Bradfield Manor Farmhouse, which

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			panels of the Scheme however do not show the profile of the panels. This has been raised with SLD's heritage consultant.	is not significant (less than substantial harm at the lower end in NPPF terms). The Applicant submitted 9.20 ES Technical Addendum to Chapter 12 Cultural Heritage - Bradfield Manor Visualisations [REP1A-014] at Deadline 1A, which included the visualisations in line with the request by Wiltshire Council and Historic England, which support the results of the assessment of harm on Bradfield Manor Farmhouse. As stated in their representation on the 9 th January Historic England requested visualisations do <i>"not necessarily require the profiles of the individual PV panels themselves to be modelled, more the areas of land visible from the Manor that would include the proposed development."</i>

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
SLD-117	Cultural Heritage	Visualisations	4.2.2. The visuals demonstrate that the Scheme will be visible in the views from the Parlour of the Manor when looking north-west and north-east. However, as the visual do not show the profile of the panels, SLD's expert noted they do not provide the full detail needed to understand the degree of visual impact. For example, due to the height of the panels, it is anticipated that the hedgerows may not be discernible from the Parlour.	See responses to SDL-116 and SDL-118. The Applicant considers the visualisations meet the request from Historic England and Wiltshire Council and are sufficient to understand the full degree of visual impact.
SLD-118	Cultural Heritage	Visualisations	4.2.3. SLD note also that these views are not provided in the winter context and draw the Examiners' attention to the comment of Historic England (in their letter dated 9 April 2026) that states that winter views may reveal more visibility of the development. SLD also note that no methodology which reports the accuracy of the visualisations is provided.	The visualisations have been produced using photographs taken during a site visit with Historic England in May 2025, when access was granted by the property owner. The Applicant considers that while there may be some limited and filtered views during winter months when vegetation is at its lowest, the

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				<p>proposed landscape mitigation is sufficient.</p> <p>ES Volume 1, Chapter 12: Cultural Heritage [APP-064], supported by ES Volume 3, Appendix 12-1: Heritage Statement [APP-219], identified that there was a potential for a moderate / minor adverse effect on Bradfield Manor Farmhouse, which is not significant (less than substantial harm at the lower end in NPPF terms). The Applicant understands that Historic England are in agreement with this assessment stating in their letter dated 9th April [REP1-152], the proposed development would <i>“cause a small degree of harm to its heritage significance”</i>. In their Local Impact Report, Wiltshire Council identified the harm to be less than substantial but at a medium level. As stated in Paragraph 5.9.33 of NPS EN-1</p>

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				<p><i>“Where the proposed development will lead to less than substantial harm to the significance of the designated heritage asset, this harm should be weighed against the public benefits of the proposal”.</i></p> <p>The public benefits of the scheme are detailed in ES Volume 1, Chapter 5: Energy Need, Legislative Context and Energy Policy [APP-057]</p> <p>The visualisations are in line with the request from Historic England and Wiltshire Council (see Historic England Representation on the 9th January). While a method statement for the production of the visualisations has not been produced, the Applicant understands both Historic England and Wiltshire Council are in agreement with the approach taken and the accuracy of the visualisations (see [REP1-152] and [REP2-046]).</p>

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
SLD-119	Scheme Description and DCO Process	Conclusion	<p>5. Conclusion</p> <p>5.1.1. This submission has reviewed the documents submitted by the Applicant at other parties at Deadlines 1 and 1A. SLD's review of that material confirms that, in most cases, the additional information has not resolved the concerns raised by SLD in its Written Representation. SLD will continue to engage constructively throughout the Examination. For all the reasons set out in this submission, and the documents prepared by SLD so far, SLD maintains that development consent should not be granted for the Scheme.</p>	The Applicant notes this comment and has responded in full above.

^[1] Janne Winther Christensen, Linda Jane Keeling, Birte Lindstrøm Nielsen, 2005. Responses of horses to novel visual, olfactory and auditory stimuli. Applied Animal Behaviour Science. Volume 93, Issues 1–2, Pages 53-65

[\[2\]](#) Janne Winther Christensen, Linda Jane Keeling, Birte Lindstrøm Nielsen, 2005. Responses of horses to novel visual, olfactory and auditory stimuli. *Applied Animal Behaviour Science*. Volume 93, Issues 1–2, Pages 53-65

4 The Applicant's responses to parties mentioned in the Book of Reference

4.1 David Alan Walker

Table 4-1: [REP2-052](#)

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
Comments on local impact reports				
DAW-001	Landscape and Visual	Landscape Impact	Appalling desecration of the countryside, excessive scale.	Concerns relating to the scale of the Scheme have been addressed in Applicant Response SS-01 within the Applicant's Response to Relevant Representations (Part 2) [REP1-117] .
DAW-002	Climate Change and Energy Need	Alternative Technologies	Should support small nuclear and North Sea Oil production.	Government's objectives for the UK energy system are to ensure that supplies always remain secure, reliable, affordable and consistent with meeting the UK's legally binding target to cut GHG emissions to net zero by 2050. Section 2.9 of the Statement of Need [REP1-085] describes the Government's Clean Power 2030 Action Plan which sets challenging ranges for the future capacity of operational clean power sources. These include 45-47GW of solar

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				<p>by 2030 and 45-69GW by 2035. Capacity ranges are also included for other clean power sources including nuclear facilities (see also Section 5.6 of the Statement of Need [REP1-085] for further information).</p> <p>Government has established that there is a Critical National Priority for developments like the Scheme because of the national security, economic, commercial and net zero benefits they deliver, and Paragraph 2.10.9 of NPS EN-3 (2023) confirms that solar is a key part of the Government's strategy for low-cost decarbonisation of the energy sector.</p>

4.2 Mr John and Mrs Rosemarie Eavis

Table 4-2: [REP2-054](#)

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
Comments on submissions received at deadlines 1 and 1A				
JRE-001	Description and DCO Process	Introduction	1. Introduction This Written Representation is submitted on behalf of the Owners of Manor Farm which lies between the proposed Rodbourne and Hullavington solar sites either side of the A429. The Farm extends to approximately 415 acres in total and is farmed by the Owners and their family. The main enterprises at Manor Farm are arable and sheep. Please see the attached plan.	The Applicant notes the comments made by the respondent on behalf of the owners of Manor Farm.
JRE-002	Description and DCO Process	Introduction	The land affected is identified within the DCO Book of Reference and Land Plans as parcels: 05-043, 06-001, 06-002, 06-003, 06-004, 06-005 and 06-006. These parcels together comprise a	Through engagement to date, the Applicant is aware of the farming enterprises being carried out over the land identified within the Book of Reference [REP1-011] .

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			substantial and functionally important part of an active agricultural business. Approximately 70 acres are included within the draft DCO that will be subjected to extensive powers for the compulsory acquisition of rights for the Development.	
JRE-003	Description and DCO Process	Introduction	<p>This representation focuses on the principal issues for the Examining Authority and underpins the Owners objection to the Development. These issues are:</p> <ul style="list-style-type: none"> • Inadequate consultation and engagement by the Promoter; • Disproportionate and excessive compulsory acquisition powers sought; • Lack of design maturity and scheme definition; • Failure to genuinely pursue voluntary agreement; 	<p>The Applicant has responded to this exact comment under reference ID KMT-004 on page 849 of the Applicant's Response to Written Representations [REP2-039].</p> <p>The Applicant's response to the respondent's query over adequacy of consultation and engagement can be found in JRE-005 and JRE-007. These responses also serve to cover the respondent's query as to the Applicant's approach to a voluntary agreement, and additional detail regarding the status of these negotiations can be</p>

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			<ul style="list-style-type: none"> • Significant impacts on a viable farming business 	<p>found in the Land and Rights Negotiations Tracker [REP1-246].</p> <p>The full extent or 'worst-case' effects arising from the Scheme identified and reported in the Environmental Statement (ES) [APP-052 to APP-265] as updated by REP1-015 to REP1-084. The ES has been undertaken adopting the principles set out in the Planning Inspectorate's Advice Note Nine: Rochdale Envelope. The advice note acknowledges there may be aspects of the Scheme design that are not yet fixed and, therefore, it may be necessary for the Environmental Impact Assessment (EIA) to assess likely worst-case variations to ensure all foreseeable significant environmental effects of the Scheme are considered. Considering a reasonable worst</p>

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				<p>case is standard practice for EIA in the UK.</p> <p>Each technical chapter of the ES [APP-059 to APP-072 as updated by REP1-015 to REP1-084] has assessed the design of the Scheme based on the likely worst-case scenario for that discipline in order to determine effect significance. Where necessary and appropriate, the technical chapter also sets out mitigation measures that would be implemented as part of the Scheme to address the effects identified.</p> <p>Measures to manage and minimise effects are set out in the outline management plans [APP-277 to APP-287 as updated by as updated by REP1-096 to REP1-113] for the Scheme. The preparation, approval and implementation of detailed management plans, substantially in accordance with the outline plans,</p>

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				<p>are secured through Schedule 2 of the Draft Development Consent Order (DCO) [REP1-007], ensuring that effects associated with the Scheme are appropriately controlled.</p> <p>The Applicant is confident that given the temporary nature of impact to the land being considered, for cable routing and construction access to Lime Down D only, that there would not be a long-term significant adverse effect on this farming business.</p>
JRE-004	Consultation and Engagement	Consultation	2. Inadequate Consultation and Engagement The Promoter has failed to undertake meaningful and proportionate consultation with the Owners, despite the extent of land affected.	The Applicant has responded to this exact comment under reference ID KMT-003 on page 849 of the Applicant's Response to Written Representations [REP2-039] .
JRE-005	Consultation and Engagement	Maps and Plans	In particular: The Owners have not been provided with an anticipated layout for cable routes, highways	In addition to the engagement detailed in the Land Rights and Negotiations Tracker [REP1-246] , the Applicant most recently

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			works, access roads or working areas within the identified parcels.	<p>provided to the respondent's consultant land agent via email, on 20th April 2026, a series of documents and explanatory notes covering:</p> <ul style="list-style-type: none"> • AIL Internal Access Road Cross – Sections from ES Volume 3, Appendix 3-3 Illustrative Drawings [REP1A-004]. • Transport Assessment drawings relating to Solar PV Sites: Access 10 from ES Volume 3, Appendix 13-1 Transport Assessment [REP1-057 and REP1-059]. • Transport Assessment drawings relating to Solar PV Sites: Access 18 from ES Volume 3, Appendix 13-1 Transport Assessment [REP1-057 and REP1-059]. • Extract from project Access Plan [APP-010]. <p>An Indicative working area layout explanatory note was also</p>

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				<p>provided, supplemented by an offer from the Applicant to engage in discussions relating to mitigation measures available to reduce disruption to the existing farming operations.</p> <p>There has been ongoing dialogue between the Applicant's consultant land agent and the respondent's consultant land agent in relation to construction and operational access routes, temporary working areas, and construction logistics. This dialogue has been carried out with direct reference to the Works Plan [REP1-005] in meetings held.</p>
JRE-006	Transport and Access	Construction Access Routes	There has been no clear explanation of construction access routes and working compounds including whether these parcels will be used for primary construction logistics and for what period of time.	As set out in Environmental Statement Volume 1, Chapter 3 The Scheme [APP-055] , Temporary Construction Compounds would comprise temporary portacabins for construction operatives; perimeter security fencing; parking area for construction and workers vehicles;

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				<p>secure compound for storage; temporary hardstanding; wheel washing facilities; temporary gated compound; storage bins for recyclables and other waste; and lighting. The location of the are provided in ES Volume 2, Figure 3-2: Key Construction Phase Features [APP-082].</p> <p>The Applicant has also sought to engage with the respondent and their consultant land agent; the detail of which can be found in JRE-005.</p>
JRE-007	Site Selection and Alternatives	Refinement of Land Take	Engagement has not resulted in any meaningful reduction or refinement of land take since the Promoter presented the initial proposals to the Owners, despite these concerns being raised from the outset.	<p>The Applicant has taken consistent and meaningful steps to engage fully with the Affected Party, providing transparency regarding all the plots in the corridor under the Eavis ownership and does not consider the engagement held to date to be inadequate.</p> <p>Following the engagement to date as set out under reference ID KMT-</p>

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				<p>003 on pages 847 and 848 of the Applicant's Response to Written Representations [REP2-039] the Applicant has held meetings with the Affected Party, alongside their consultant land agent, detailing that feedback has been received and progression made.</p> <p>The Applicant has then taken reasonable measures to mitigate the impact to the Affected Party's land holding through voluntary negotiations and welcomes further engagement.</p>
JRE-008	<p>Site Selection and Alternatives</p> <p>Description and DCO Process</p>	Design Maturity	<p>Given that parcels 05-43 and 06-001 to 06-006 form a continuous corridor between two principal scheme components, a significantly higher standard of engagement would reasonably be expected.</p> <p>The absence of such engagement indicates that the application has been brought forward with</p>	<p>The Applicant has responded to this exact comment under reference ID KMT-004 on page 849 of the Applicant's Response to Written Representations [REP2-039]. In summary, the Applicant has taken consistent and meaningful steps to engage fully with the Affected Party, providing transparency regarding all the plots in the corridor under the Eavis</p>

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			insufficient design maturity, relying instead on wide parameters and extensive powers.	ownership and does not consider the engagement held to date to be inadequate.
JRE-009	Description and DCO Process	Compulsory Acquisition	<p>3. Disproportionate Compulsory Acquisition The extent of land included within the draft DCO limits across the identified parcels is excessive and not justified. The Applicant seeks powers over approximately 70 acres, including rights not only for a cable route but also for:</p> <ul style="list-style-type: none"> • Construction compounds; • Welfare facilities; • Offices; • Temporary and permanent access; • Bell mouth access into site from A429 	<p>The Applicant has responded to this exact comment under reference ID KMT-005 on page 849 of the Applicant's Response to Written Representations [REP2-039].</p> <p>As set out in the Statement of Reasons [APP-018], the Order Limits have been carefully defined to ensure that all land included is no more than is reasonably required for the construction, operation and decommissioning of the Scheme (see section 7.2). The Applicant has undertaken a detailed assessment of land requirements on a plot-by-plot basis and has limited the extent of land sought to that necessary to deliver the Authorised Development (paragraph 7.2.5).</p>

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				<p>The Applicant has also adopted a proportionate approach to the type of powers sought. Where permanent rights are not required, only temporary possession powers are sought (section 5.5), thereby minimising permanent land take. In addition, the use of a wider construction corridor with subsequent narrowing of permanent rights (paragraph 5.5.3) ensures that only the minimum area is retained following construction.</p> <p>Furthermore, the extent of land sought reflects the need to retain flexibility at the detailed design stage, including the micro siting of infrastructure within defined corridors and the ability to respond to ground conditions and environmental constraints (paragraphs 3.4.2–3.4.3).</p> <p>The Applicant has also actively sought to minimise land take</p>

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				<p>through design iteration and has pursued voluntary agreements with landowners wherever possible (Sections 7.5 and 7.8). However, compulsory acquisition powers are required to ensure that all land necessary for the Scheme can be assembled and delivered (paragraph 1.4.5).</p> <p>Accordingly, the Applicant considers that the land and rights included within the Order Limits, including those required for construction compounds and access, are necessary, proportionate and justified, and satisfy the requirements of section 122 of the Planning Act 2008.</p>

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
JRE-010	Site Selection and Alternatives Description and DCO Process	Option Area	<p>3.1 Excessive "Option Area" Approach The inclusion of an "option area" approximately 70 acres, without a more defined layout of the final scheme footprint, is indicative of a precautionary or convenience-based approach, rather than one based on demonstrable need. The main components of the Development required in this area should be available to the Promoter at this stage of the project.</p> <p>The Promoters approach:</p> <ul style="list-style-type: none"> • Prevents proper scrutiny of impacts; • Unfairly transfers design risk from the promotor to the landowner; • Conflicts with the requirement to demonstrate that land is no more than is reasonably required. 	<p>The Applicant has responded to this exact comment under reference ID KMT-006 on page 849 of the Applicant's Response to Written Representations [REP2-039].</p> <p>As noted in the response provided in relation to compulsory acquisition above the extent of land sought reflects the need to retain flexibility at the detailed design stage, including the micro siting of infrastructure within defined corridors and the ability to respond to ground conditions and environmental constraints (paragraphs 3.4.2–3.4.3 of the Statement of Reasons [APP-018]).</p>

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
JRE-011	Site Selection and Alternatives Description and DCO Process	Necessity and Proportionality	<p>3.2 Failure to Demonstrate Necessity and Proportionality The Promoter has not demonstrated:</p> <ul style="list-style-type: none"> • Why each of the identified parcels is required to the extent proposed; • Why alternative, less intrusive solutions have not been adopted; • Why temporary use areas (e.g. compounds) cannot be reduced or relocated; • The scale of land included suggests that the draft DCO limits are compensating for a lack of design certainty, rather than reflecting a justified land requirement. 	<p>The Applicant has responded to this exact comment under reference ID KMT-007 on pages 853 to 860 of the Applicant's Response to Written Representations [REP2-039].</p> <p>The Statement of Need [REP1 085] explains why solar development is required at this scale to meet the Government's targets as set out in the Clean Power 2030 Action Plan. It is the Government's policy to support the development of large-scale schemes in order to meet the urgent need for unprecedented levels of clean electricity. Relevant planning policy (specifically NPS EN-1 paragraph 3.3.12) recognises that meeting the country's energy needs requires the use of largescale, centralised electricity generating facilities via a high-voltage transmission system, which enables the pooling of both</p>

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				<p>generation and demand, which in turn offers a number of economic and other benefits, such as more efficient bulk transfer of power and enabling surplus generation capacity in one area to be used to cover shortfalls elsewhere. NPS EN-3 paragraph 2.10.31 recognises that at this scale, solar development is likely to use some agricultural land.</p> <p>Regarding consideration of alternative solutions, the Applicant has considered alternative sites for solar (see ES Volume 3, Appendix 4-1: Site Selection Assessment Report [APP-185], and alternative technologies, as set out in ES Volume 1, Chapter 4: Alternatives and Design Evolution [APP-056]. Section 4.10 of ES Volume 1, Chapter 4: Alternatives and Design Evolution [APP-056] details the consideration of alternative</p>

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				<p>generation technologies. As the Applicant is a solar PV and energy storage developer, no alternative types of low carbon electricity generation have been considered in the development of the Scheme. However, it is considered that the Site would not be suitable for other forms of renewable energy generation at the same scale as the Scheme. For example, due to the Scheme's location away from the coast, tidal power and offshore wind are deemed unviable.</p> <p>The Applicant is supportive of smaller scale schemes (including rooftop and distributed schemes) but aligns with the Government's position, for reasons described in the Statement of Need [REP1-085] that such schemes are needed alongside, rather than as an alternative to, large scale schemes such as this Scheme.</p>

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				<p>Temporary Construction Compounds are necessary for the construction of the Scheme to store materials, house facilities for construction workers, and implement mitigation measures to manage construction work such as wheel washing facilities and storage bins for recyclables and other waste. Locating the Temporary Construction Compounds within the Scheme Site also minimises movement of personnel, equipment and materials between the Site and from offsite facilities if these were used as an alternative.</p> <p>The ES identifies the parameters used for the environmental impact assessment within ES Volume 1, Chapter 3: The Scheme [APP-055], including the construction compounds.</p> <p>Potential effects arising from construction compounds on</p>

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				<p>ecological features are assessed in ES Volume 1, Chapter 9: Ecology and Biodiversity [REP1-015]. The assessment concludes that no significant adverse effects on ecology and biodiversity are anticipated as a result of impacts associated with construction compounds. Construction compounds have been carefully sited to avoid sensitive habitats/areas for wildlife. For instance, as set out in ES Volume 1, Chapter 9: Ecology and Biodiversity [REP1-015] they will not be sited within any defined Wiltshire Impact Zones for Bats, which are areas considered to be of crucial importance for local populations of bats.</p> <p>The noise assessment makes the worst-case assumption that construction activities could take place in the compound areas. Even then, with best practice</p>

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				<p>mitigation measures in place, as described in Section 14.9 of ES Volume 1, Chapter 14 Noise and Vibration [REP1-021], no significant adverse effects from construction noise or vibration are expected.</p> <p>Measures to manage minimise construction effects are set out in the Outline CEMP [REP2-019]. Requirement 13 in Schedule 2 to the Draft DCO [REP1-007] secures that prior to construction, a CEMP must be submitted to and approved by the relevant planning authority, and that CEMP must be substantially in accordance with the Outline CEMP [REP2-019]. All construction works will be carried out in accordance with the approved CEMP.</p> <p>With regard to the scale of land within the DCO limits and design certainty, as set out in the Statement of Reasons [APP-018],</p>

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				<p>the Order Limits have been carefully defined to ensure that all land included is no more than is reasonably required for the construction, operation and decommissioning of the Scheme (see section 7.2). The Applicant has undertaken a detailed assessment of land requirements on a plot-by-plot basis and has limited the extent of land sought to that necessary to deliver the Authorised Development (paragraph 7.2.5). The Applicant has also adopted a proportionate approach to the type of powers sought. Where permanent rights are not required, only temporary possession powers are sought (section 5.5), thereby minimising permanent land take. In addition, the use of a wider construction corridor with subsequent narrowing of permanent rights (paragraph 5.5.3) ensures that only the</p>

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				<p>minimum area is retained following construction.</p> <p>Furthermore, the extent of land sought reflects the need to retain flexibility at the detailed design stage, including the micro siting of infrastructure within defined corridors and the ability to respond to ground conditions and environmental constraints (paragraphs 3.4.2–3.4.3).</p> <p>The Applicant has also actively sought to minimise land take through design iteration and has pursued voluntary agreements with landowners wherever possible (Sections 7.5 and 7.8). However, compulsory acquisition powers are required to ensure that all land necessary for the Scheme can be assembled and delivered (paragraph 1.4.5).</p> <p>Accordingly, the Applicant considers that the land and rights</p>

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				<p>included within the Order Limits, including those required for construction compounds and access, are necessary, proportionate and justified, and satisfy the requirements of section 122 of the Planning Act 2008.</p>
JRE-012	Description and DCO Process	Compensation	<p>3.3 Imbalance Between Rights Sought and Compensation Approach The proposed approach—where compensation is linked to the eventual easement width, while significantly wider areas are controlled and disrupted—creates a clear imbalance. The landowner is exposed to:</p> <ul style="list-style-type: none"> • Extensive temporary possession; • Operational disruption across multiple parcels; • Long-term effects from the Compulsory Acquisition rights contained in the DCO (even if not utilised) across the entire Title of 	<p>The Applicant has responded to this exact comment under reference ID KMT-008 on pages 853 to 860 of the Applicant's Response to Written Representations [REP2-039].</p> <p>In terms of compensation, the Statement of Reasons [APP-018] confirms that all persons affected by the exercise of compulsory acquisition or temporary possession powers are entitled to compensation. This includes compensation for both permanent acquisition of rights and for any loss or damage arising from temporary possession. Any disputes are capable of</p>

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			<p>the property, which will create extensive rights (or hold the threat of them) many years into the future.</p> <p>This further underlines the disproportionate nature of the Development.</p>	<p>determination by the Upper Tribunal (Lands Chamber), ensuring an independent and established mechanism for resolving such matters.</p> <p>The Applicant also notes that the inclusion of compulsory acquisition powers does not result in uncontrolled or indefinite impacts across landholdings. The exercise of such powers is governed by the Draft DCO [REP1-007], which clearly defines the extent, nature and duration (being 5 years from the date on which the Order comes into force) of the powers, as contained within Part 5 (Powers of Acquisition)</p>
JRE-013	Description and DCO Process	Voluntary Agreements and Landowner Engagement	<p>4. Failure to Genuinely Pursue Voluntary Agreement</p> <p>The Promoter asserts that attempts have been made to secure voluntary agreements. However, the nature and</p>	<p>The Applicant has responded to this exact comment under reference ID KMT-009 on pages 853 to 860 of the Applicant's Response to Written Representations [REP2-039].</p>

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			<p>substance of those discussions raise serious concerns. The engagement to date:</p> <ul style="list-style-type: none"> • Has not adequately reflected the scale of impact across parcels 05-43 and 06-001 to 06-006; • Has been based on incomplete information, particularly in relation to cable routing and construction use; • Has not meaningfully addressed the operational needs of the farming business. Offers and discussions have therefore been conducted in a context where: <ul style="list-style-type: none"> • The landowner cannot fully understand the extent of the impact; • The Applicant has retained maximum flexibility through wide Order limits; • The burden of uncertainty lies entirely with the landowner. In 	<p>The Applicant has undertaken a comprehensive programme of engagement and negotiation with landowners and occupiers, in accordance with the requirements of the Planning Act 2008 and relevant guidance. This has included a formal land referencing exercise, issue of Land Interest Questionnaires, and ongoing dialogue with affected parties to understand the impacts of the Scheme and seek to reach agreement wherever practicable.</p> <p>The Applicant has provided a response to the adequacy of the engagement with the respondent within JRE-005 and JRE-007 and negotiations to date are in pursuit of a voluntary agreement which include the assessment of the impact to plots 05-043 and 06-001 to 06-006.</p> <p>The Statement of Reasons [APP-018] confirms that negotiations are</p>

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			<p>these circumstances, it is reasonable to question whether these efforts constitute a genuine attempt to secure voluntary agreement, or whether they are primarily intended to demonstrate procedural compliance in support of compulsory acquisition powers.</p> <ul style="list-style-type: none"> • A genuine negotiation would be expected to include: • A more clearly defined scheme; • A demonstrably minimised land take; • Proper recognition of business and commercial impacts; • Iterative refinement in response to landowner feedback. <p>These elements have been notably absent thus far.</p>	<p>ongoing and that the Applicant will continue to seek to acquire land and rights by agreement alongside the application for compulsory powers. This approach is expressly supported by national guidance and reflects established practice for DCO projects, whereby compulsory acquisition powers are sought in parallel to negotiations to ensure deliverability.</p>
JRE-014	Construction and	Scheme Delivery	<p>5. Lack of Scheme Definition</p> <p>A fundamental issue remains the lack of clarity as to how the</p>	<p>The Applicant has responded to this exact comment under reference ID KMT-010 on pages</p>

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
	Decommissioning		scheme will be delivered across the affected parcels. Projects of this nature and construction elements of this type should be more mature by this stage of the Development.	<p>853 to 860 of the Applicant's Response to Written Representations [REP2-039].</p> <p>The full extent or 'worst-case' effects arising from the Scheme identified and reported in the Environmental Statement (ES) [APP-052 to APP-265 as updated by REP1-015 to REP1-084]. The ES has been undertaken adopting the principles set out in the Planning Inspectorate's Advice Note Nine: Rochdale Envelope. The advice note acknowledges there may be aspects of the Scheme design that are not yet fixed and, therefore, it may be necessary for the Environmental Impact Assessment (EIA) to assess likely worst-case variations to ensure all foreseeable significant environmental effects of the Scheme are considered. Considering a reasonable worst case is standard practice for EIA in</p>

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				<p>the UK. The ES identifies the worst-case parameters for solar PV panels used for the environmental impact assessment within ES Volume 1, Chapter 3: The Scheme [APP-055].</p> <p>Each technical chapter of the ES [APP-059 to APP-072 as updated by REP1-015 to REP1-084] has assessed the design of the solar PV panels identified to be the likely worst-case scenario for that discipline in order to determine effect significance. Where necessary and appropriate, the technical chapter also sets out mitigation measures that would be implemented as part of the Scheme to address the effects identified.</p> <p>Measures to manage and minimise effects are set out in the outline management plans [APP-277 to APP-287 as updated by REP1-096 to REP1-113 and REP2-019 to</p>

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				REP2-022] for the Scheme. The preparation, approval and implementation of detailed management plans, substantially in accordance with the outline plans, are secured through Schedule 2 of the Draft Development Consent Order (DCO) [REP1-007] , ensuring that effects associated with the Scheme are appropriately controlled.
JRE-015	Site Selection and Alternatives	Cable Route	<p>5.1 Cable Route Uncertainty</p> <p>The absence of a defined cable alignment within the relevant parcels prevents:</p> <ul style="list-style-type: none"> • Proper assessment of permanent land take; • Identification of the most sensitive areas of the holding; • Effective mitigation of impacts. 	<p>The Applicant has responded to this exact comment under reference ID KMT-011 on pages 853 to 860 of the Applicant's Response to Written Representations [REP2-039].</p> <p>The full extent or 'worst-case' effects arising from the Scheme identified and reported in the Environmental Statement (ES) [APP-052 to APP-265 as updated by REP1-015 to REP1-084]. The ES has been undertaken adopting the principles set out in the</p>

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				<p>Planning Inspectorate's Advice Note Nine: Rochdale Envelope. The advice note acknowledges there may be aspects of the Scheme design that are not yet fixed and, therefore, it may be necessary for the Environmental Impact Assessment (EIA) to assess likely worst-case variations to ensure all foreseeable significant environmental effects of the Scheme are considered. Considering a reasonable worst case is standard practice for EIA in the UK. The ES identifies the worst-case parameters for solar PV panels used for the environmental impact assessment within ES Volume 1, Chapter 3: The Scheme [APP-055], including those relevant to the Cable Route Corridor.</p> <p>Each technical chapter of the ES [APP-059 to APP-072 (as updated)] has assessed the design</p>

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				<p>of the solar PV panels identified to be the likely worst-case scenario for that discipline in order to determine effect significance. Where necessary and appropriate, the technical chapter also sets out mitigation measures that would be implemented as part of the Scheme to address the effects identified.</p> <p>Measures to manage and minimise effects are set out in the outline management plans [APP-277 to APP-287 as updated by as updated by REP1-096 to REP1-113 and REP2-019 to REP2-022] for the Scheme. The preparation, approval and implementation of detailed management plans, substantially in accordance with the outline plans, are secured through Schedule 2 of the Draft Development Consent Order (DCO) [REP1-007], ensuring that</p>

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				effects associated with the Scheme are appropriately controlled.
JRE-016	Transport and Access Construction and Decommissioning	Construction Access	<p>5.2 Construction Access</p> <p>There is no clear commitment to or limitation on:</p> <ul style="list-style-type: none"> • Movement of heavy plant and equipment; • Use of temporary access roads across the land; • Duration and phasing of construction activities. <p>There is a credible concern that the affected parcels will function as a primary construction corridor and construction compounds, significantly increasing disruption beyond what is currently disclosed.</p>	<p>The Applicant has responded to this exact comment under reference ID KMT-012 on pages 853 to 860 of the Applicant's Response to Written Representations [REP2-039].</p> <p>Movement of heavy plant and equipment will be limited by HGV delivery hours of set out in Section 3.4 of the Outline CTMP [REP1-112].</p> <p>The use of temporary access tracks across the land will be limited to construction hours of work set out in paragraph 3.4.20 to 3.4.23 in ES Volume 1 Chapter 3: The Scheme [APP-055]. The access tracks have been identified and assessed within the ES Chapters.</p> <p>The indicative construction programme is set out in Table 3-4</p>

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				of ES Volume 1 Chapter 3: The Scheme [APP-055] . The Applicant will also be providing more detailed construction phasing in accordance with Requirement 2 of the draft DCO [REP1-007] .
JRE-017	Transport and Access	Local Highway Constraints	<p>5.3 Local Highway Constraints</p> <p>The surrounding road network is not evidently suitable for the scale of construction activity implied. There are ditches, drains and culverts along the A429 that will be impeded by the Development and the DCO does not demonstrate that impacts on these can be safely or effectively managed.</p>	<p>The Applicant has responded to this exact comment under reference ID KMT-013 on pages 853 to 860 of the Applicant's Response to Written Representations [REP2-039].</p> <p>Where works interface with roadside ditches, drains or culverts, existing drainage function will be maintained. Any required protection, temporary works, replacement or reinstatement will be confirmed at detailed design stage and secured through the relevant approvals and construction controls, including the Outline CEMP [REP2-019] where</p>

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				<p>hydrology, flood risk or pollution prevention measures are required.</p> <p>The Scheme does not require the permanent obstruction of roadside drainage assets along the A429.</p>
JRE-018	Socio-Economics, Tourism and Recreation	Impact on Agricultural Operations	<p>6. Impact on Agricultural Operations The affected parcels form an integral part of a working agricultural unit. The proposed powers would:</p> <ul style="list-style-type: none"> • Disrupt farming operations across multiple seasons; 	<p>The Applicant has responded to comment previously under reference ID KMT-014 on pages 870 to 871 of the Applicant's Response to Written Representations [REP2-039].</p> <p>Disruption to agricultural land within the Cable Route Corridor will primarily be temporary and short-term, with soil excavated for cable trenches being reinstated as soon as possible and in agreement with the landowner, as noted in paragraphs 1.8.26-1.8.29 of the Outline Soil Resources Management Plan [APP-280]. The works would be scheduled following liaison between the contractor, landowner and a</p>

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				designated Agricultural Liaison Officer, with the aim of minimising disruption to the farming operations as far as possible. This is secured by Requirement 17 of Schedule 2 to the Draft DCO [REP1-007] .
JRE-019	Socio-Economics, Tourism and Recreation	Impact on Agricultural Operations	<ul style="list-style-type: none"> Disrupt the outcomes achieved under government backed environmental schemes (SFI and Countryside Stewardship); 	<p>The Applicant has responded to this exact comment under reference ID KMT-014 on pages 853 to 860 of the Applicant's Response to Written Representations [REP2-039].</p> <p>Where existing important habitats or features for wildlife have been established with the aid of environmental stewardship funding, these have been recorded as part of the baseline conditions underpinning the assessment within ES Volume 1, Chapter 9: Ecology and Biodiversity [REP1-015]. The Applicant has sought to avoid any existing areas currently</p>

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				<p>designated due to their high biodiversity value.</p> <p>The Outline CEMP [REP2-019] furthermore commits to the reinstatement of land (including any under environmental stewardship schemes) affected by temporary works as soon as practicable to allow for agricultural work on the land to recommence as usual as soon as construction of that section of cable route, or use of that access track is complete. This is secured by Requirement 13 of Schedule 2 to the Draft DCO [REP1-007].</p> <p>Soil structure and biological activity are expected to improve over the operational phase of the Scheme such that the effect is assessed as a significant benefit in ES Volume 1, Chapter 17: Soils and Agriculture [REP1-025]. The Outline Landscape and Ecological Management Plan</p>

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				[APP-283] similarly acknowledges that benefits to soil health and the adjacent agricultural land are anticipated to arise from converting the land in the Solar PV Sites from arable to grass. These outcomes are compatible with the aims of the SFI.
JRE-020	Transport and Access Soils and Agricultural	Access and Field Connectivity	<ul style="list-style-type: none"> • Restrict access and internal field connectivity; 	<p>The Applicant has responded to this exact comment under reference ID KMT-014 on pages 853 to 860 of the Applicant's Response to Written Representations [REP2-039].</p> <p>The Outline CEMP [REP2-019] confirms that existing access tracks would be utilised where possible, that any new tracks and compounds required would be sited on the lowest quality land available where practicable, and that site access points would be regularly cleaned and maintained,</p>

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				<p>to further minimise disruption and impacts on connectivity.</p> <p>Where any access points are temporarily impacted during the construction works, alternative access and crossing points will be maintained to ensure areas are not severed from agricultural operations.</p>
JRE-021	<p>Socio-Economics, Tourism and Recreation</p> <p>Soils and Agriculture</p>	Impact on Agricultural Operations	<ul style="list-style-type: none"> • Introduce uncertainty affecting cropping and land management decisions 	<p>The Applicant has responded to this exact comment under reference ID KMT-014 on pages 853 to 860 of the Applicant's Response to Written Representations [REP2-039].</p> <p>The Applicant is cognisant of uncertainty resulting from aspects of the Scheme not due to be reconsidered until the detailed design stage, following consent for the Scheme being given.</p> <p>Loss of agricultural revenue as a result of temporary works to construct the Cable Route Corridor</p>

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				<p>will be managed through negotiations with the affected owners. The Applicant continues to seek voluntary agreement for the acquisition of land and rights, including temporary rights, needed for the implementation of the Cable Route Corridor and the status of ongoing negotiations with affected owners is recorded in the Land and Rights Negotiation Tracker [REP2-006].</p> <p>Where there are reasonable and demonstrable damages experienced from the exercising of Project works, appropriate compensation will be available to those entitled under the Compensation Code. The Funding Statement [APP-019] confirms that the Applicant has sufficient funds to provide this compensation.</p>

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
JRE-022	Site Selection and Alternatives Construction and Decommissioning	Compounds and Temporary Works	<p>The use of land for compounds and temporary works is particularly harmful, as it extends both the geographic scope and duration of impact.</p> <p>These effects have not been properly quantified or addressed within the DCO.</p>	<p>The Applicant has responded to this exact comment under reference ID KMT-014 on pages 853 to 860 of the Applicant's Response to Written Representations [REP2-039].</p> <p>The Applicant is cognisant of uncertainty resulting from aspects of the Scheme not due to be reconsidered until the detailed design stage, following consent for the Scheme being given.</p> <p>However, the ES does recognise that temporary construction activities including construction compounds, can give rise to environmental effects and these elements have been fully considered within the assessment scope across the relevant technical chapters.</p>
JRE-023	Cultural Heritage	Assessments and Mitigation	<p>7. Heritage Considerations</p> <p>The local landscape and the village of Corston has historic context</p>	<p>The Applicant has responded to this exact comment under reference ID KMT-015 on pages</p>

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			<p>which may be adversely affected by extensive works proposed. Given the absence of detailed design information, it is not currently possible to conclude that:</p> <ul style="list-style-type: none"> • Heritage impacts have been properly assessed; • Adequate mitigation measures can be secured. 	<p>871 to 872 of the Applicant's Response to Written Representations [REP2-039].</p> <p>As stated in Section 6.2 of ES Volume 1, Chapter 6 Environmental Impact Assessment Methodology [APP-058], a 'Rochdale Envelope' approach has been applied within the ES to ensure a robust assessment of the likely significant environmental effects of the Scheme, in accordance with the Planning Inspectorate's Advice Note Nine: Using the Rochdale Envelope.</p> <p>ES Volume 1, Chapter 12: Cultural Heritage [APP-064], supported by detailed technical appendices in ES Volume 3, Appendices 12-1 to 12-7 [APP-219 to APP-231] has assessed the potential impact of the scheme on identified archaeological and built heritage assets. No harm was</p>

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				<p>identified to any heritage assets located within the village Corston (see Section 5.7 of ES Volume 3, Appendices 12-1 [APP-219]).</p> <p>Where required appropriate mitigation is proposed. Embedded mitigation measures to avoid or reduce harm to heritage assets are set out in Section 12.9 of ES Volume 1, Chapter 12: Cultural Heritage [APP-064], with additional mitigation detailed in Section 12.11. An overarching archaeological mitigation strategy is provided in ES Volume 3, Appendix 12-6: Outline Archaeological Mitigation Strategy [APP-230].</p>
JRE-024	Description and DCO Process	Conclusion and Summary	<p>8. Conclusion</p> <p>The inclusion of parcels 05-43 and 06-001 to 06-006 within the draft DCO exemplifies a broader issue with the application: an overly</p>	<p>The Applicant has responded to the detailed points raised above as well in the Applicant's Response to Written Representations [REP2-039].</p>

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			<p>extensive and insufficiently defined scheme, supported by wide-ranging compulsory acquisition powers. In summary:</p> <ul style="list-style-type: none"> • Consultation has been inadequate and ineffective; • The extent of land included is disproportionate and not justified; • The scheme lacks sufficient design maturity; • Attempts at voluntary agreement do not reflect a genuine or informed negotiation process. <p>The Promoter has therefore failed to demonstrate a compelling case in the public interest for the powers sought over Manor Farm. It is respectfully submitted that development consent should not be granted in respect of these parcels unless and until:</p> <ul style="list-style-type: none"> • The scheme is materially refined; 	<p>The Applicant maintains that the Scheme's use of land is appropriate for a Scheme of this scale and has engaged meaningfully with landowners throughout the process. It also welcomes the opportunity to further engage with landowners to negotiate and secure voluntary agreements.</p>

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			<ul style="list-style-type: none"> • Land requirements are demonstrably reduced to the reasonable minimum necessary; • A genuine and informed process of engagement with the landowner has been undertaken. 	

4.3 Roberts Berry Farm

Table 4-3: [AS-015](#)

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
Additional Submissions - Accepted at the discretion of the Examining Authority				
RBF-001	Socio-Economics, Recreation and Tourism	Impact on Agricultural Activities	The proposed cable route will have a significant detrimental impact on our farming activities during the construction period and beyond. It will cut through pasture land causing access issues for livestock.	<p>The Applicant has responded to representations made by the owners of Roberts Berry Farm in Section 4.20 of The Applicant's Response to Relevant Representations (Part 1) [PDA-009].</p> <p>The Applicant acknowledges that while some disruption to farming activities is anticipated, this is to be temporary during the construction phase and limited to the working width of the cable route corridor only, with working practices to enable continued access across the cable route corridor to be implemented. Restoration of the</p>

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				<p>land following construction works is secured through the Outline CEMP [REP2-019] and Outline SRMP [APP-280] by Requirements 13 and 17 in Schedule 2 to the Draft DCO [REP1-007].</p> <p>The Applicant seeks to continue to engage with landowners to compensate them through voluntary agreements or the compensation mechanisms available for the use of compulsory acquisition powers.</p>
RBF-002	Hydrology, Flood Risk and Drainage		Construction work will not be possible during winter as these pastures often flood.	<p>The Applicant does not agree that winter construction would not be possible. The submitted assessment recognises that parts of the Order Limits may experience flood risk, saturated ground or poor ground conditions during wetter periods. These matters are assessed in ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [REP1-</p>

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				<p>017] and the FRA and Drainage Strategy suite [REP1-037 to REP1-054]. Construction activities would be planned and managed having regard to prevailing ground, weather and flood conditions. Relevant controls, including construction drainage, soil compaction management, pollution prevention, material storage and emergency response measures, are secured through the Outline CEMP [REP2-019], Outline SRMP [APP-280] and Outline CTMP [REP1-112]. Works may be paused, adapted or re-sequenced during unsuitable conditions, but this does not mean winter construction is infeasible.</p>
RBF-003	Arboriculture Soils and Agriculture		<p>The chosen route will mean the destruction of mature trees as well as an established biomass crop. This crop will take 3 to 4 years to re establish. We had a previous compulsory order in 2017 from Wessex Water. Land from</p>	<p>The Applicant has responded to representations made by the owners of Roberts Berry Farm in Section 4.20 of The Applicant's Response to Relevant Representations (Part 1) [PDA-009].</p>

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			<p>this excavation is still estimated to be producing 50% in comparison to adjacent land that was not excavated. This project lacks foresight and is unwise. Please reject this application. Thank you.</p>	<p>The Applicant confirms no veteran or ancient trees are proposed to be removed to facilitate the Scheme, and all potential impacts on arboriculture are fully assessed in ES Volume 1, Chapter 10: Arboriculture [APP-062], finding no significant adverse residual effects.</p> <p>The Applicant acknowledges that some crop losses will occur within the working width of the cable route corridor.</p> <p>Land and soils subject to disturbance for the installation of the cables will be reinstated as soon as reasonably practicable and in agreement with the landowner, as secured through the Outline CEMP [REP2-019] and Outline SRMP [APP-280] by Requirements 13 and 17 in Schedule 2 to the Draft DCO [REP1-007]. Furthermore, loss of agricultural revenue as a result</p>

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				<p>of temporary works to construct the Cable Route Corridor can be compensated either through voluntary agreement with the Applicant, or through the application of compulsory acquisition powers.</p>

5 The Applicant's responses to members of the public and all remaining organisations and businesses

5.1 Joan Marie Bassler

Table 5-1: [REP2-053](#) and [REP2-055](#)

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
Comments on submissions received at deadlines 1 and 1A				
JMB-001	Description and DCO Process	Introduction	<p>Summaries of Submitted Documents</p> <p>Comments on the Applicant's Funding Statement</p> <p>This document reviews the Applicant's Funding Statement submitted at Deadline 1 and highlights the absence of secured funding, reliance on future financial arrangements, and lack of evidence demonstrating the Applicant's ability to deliver and maintain the Scheme. It raises concerns about financial resilience, long term liabilities, and the adequacy of the Applicant's assurances, noting that the</p>	<p>The Funding Statement [APP-019] submitted with the DCO application demonstrates that the Scheme is financially viable and adequately funded to deliver the Scheme in full. The current cost estimate to deliver the Scheme in its entirety is approximately £900m to £950m.</p> <p>The Statement has been produced pursuant to Regulation 5(2)(h) of the Infrastructure Planning (Applications: Prescribed Forms and Procedures) Regulations 2009 (Ref 2) (the APFP Regulations) and the Department of Communities and Local Government guidance 'Planning</p>

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			Funding Statement does not meet the level of certainty expected at DCO stage.	Act 2008: Guidance related to procedures for the compulsory acquisition of land' (September 2013) (Ref 3).
JMB-002	Description and DCO Process	Introduction	<p>Comments on the Applicant's Statement of Need</p> <p>This document comments on the Applicant's Statement of Need submitted at Deadline 1, identifying overstatements of urgency, misinterpretation of national policy, and a failure to justify why this specific location, scale, and configuration are required. It highlights gaps in the Applicant's reasoning and demonstrates that the claimed need does not override the unresolved environmental, land use, and community impacts.</p>	<p>Government's objectives for the UK energy system are to ensure that supplies always remain secure, reliable, affordable and consistent with meeting the UK's legally binding target to cut GHG emissions to net zero by 2050. Section 2.9 of the Statement of Need [REP1-085] describes the Government's Clean Power 2030 Action Plan which sets challenging ranges for the future capacity of operational clean power sources. These include 45-47GW of solar by 2030 and 45-69GW by 2035. Capacity ranges are also included for other clean power sources.</p> <p>Government has established that there is a Critical National Priority for developments like the Scheme because of the national security, economic, commercial and net zero benefits they deliver, and</p>

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				<p>Paragraph 2.10.9 of NPS EN-3 (2023) confirms that solar is a key part of the Government's strategy for low-cost decarbonisation of the energy sector, and Paragraph 3.3.12 of NPS EN-1 (2023) recognises that smaller capacity schemes do bring forward policy benefits but not as an alternative to larger scale schemes because of the benefits arising from their development.</p> <p>While the Statement of Need [REP1-085] considers the strategic need for the Scheme in the context of national energy production, the requirement for the Applicant to consider local impacts is undertaken through the relevant assessments in the Environmental Statement [APP-052 to APP-265] (as amended).</p>
JMB-003	Description and DCO Process	Introduction	Comments on the Applicant's Statement of Reasons	As set out in the Statement of Reasons [APP-018] , the Order limits have been carefully defined to ensure that all land included is

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			<p>This document comments on the Applicant's Statement of Reasons submitted at Deadline 1, focusing on the lack of a fixed design, excessive land take, and insufficient justification for compulsory acquisition. It shows that the Applicant has not demonstrated that the land is necessary for the Scheme, nor that impacts have been minimised, making the case for compulsory acquisition incomplete and unproven.</p>	<p>no more than is reasonably required for the construction, operation and decommissioning of the Scheme (see section 7.2). The Applicant has undertaken a detailed assessment of land requirements on a plot-by-plot basis and has limited the extent of land sought to that necessary to deliver the Authorised Development (paragraph 7.2.5).</p> <p>The Applicant has also adopted a proportionate approach to the type of powers sought. Where permanent rights are not required, only temporary possession powers are sought (section 5.5), thereby minimising permanent land take. In addition, the use of a wider construction corridor with subsequent narrowing of permanent rights (paragraph 5.5.3) ensures that only the minimum area is retained following construction.</p> <p>Furthermore, the extent of land sought reflects the need to retain</p>

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				<p>flexibility at the detailed design stage, including the micro siting of infrastructure within defined corridors and the ability to respond to ground conditions and environmental constraints (paragraphs 3.4.2–3.4.3).</p> <p>The Applicant has also actively sought to minimise land take through design iteration and has pursued voluntary agreements with landowners wherever possible (Sections 7.5 and 7.8). However, compulsory acquisition powers are required to ensure that all land necessary for the Scheme can be assembled and delivered (paragraph 1.4.5).</p> <p>Accordingly, the Applicant considers that the land and rights included within the Order Limits, including those required for construction compounds and access, are necessary, proportionate and justified, and</p>

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				satisfy the requirements of section 122 of the Planning Act 2008.
JMB-004	Description and DCO Process	Introduction	<p>Environmental Statement Critique</p> <p>This document comments on the Applicant's Environmental Statement, highlighting major gaps and uncertainties caused by an unfixed Scheme and extensive post mitigation measures, and construction impacts remain unsettled, meaning the ES assesses assumptions rather than the real project. The Human Health chapter also relies on uncertain inputs and future plans, so it cannot demonstrate that impacts on residents have been minimised. Overall, the ES does not provide a sufficiently defined basis for assessing environmental effects or justifying compulsory acquisition.</p>	<p>The mitigation measures included in the Environmental Statement are listed in the Outline CEMP [REP2-019], Outline OEMP [REP2-021] and Outline Decommissioning Strategy [REP1-100]. These measures are not uncertain as they will be included in the detailed CEMP, detailed OEMP and detailed Decommissioning Statement, all of which are secured documents by the relevant requirements of the draft DCO [REP1-007]. The Applicant confirms that the assessment of human health effects in ES Volume 1, Chapter 18: Human Health [APP-070] is based on assumptions of the likely worst-case impacts arising from the Scheme, based on the parameters described in ES Volume 1, Chapter 3: The</p>

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				Scheme [APP-055] and secured through the Design Principles and Parameters [REP1A-008] by the relevant Requirements in Schedule 2 of the Draft DCO [REP1-007] .
JMB-005	Description and DCO Process	Introduction	<p>Evidence of Post Consent Deferral</p> <p>This document provides a consolidated review of the Applicant's Deadline 1 submissions, highlighting extensive post consent deferral of essential design detail and mitigation. Drawing on direct quotations from Chapters 3, 4, and 18, as well as the Outline CEMP and LEMP, it demonstrates that key elements of the Scheme — including infrastructure locations, cable alignment, construction management, and landscape and ecological mitigation — will only be finalised after the DCO is granted. This level of uncertainty prevents the Environmental Statement from</p>	<p>As set out in Design Principles and Parameters [REP1A-008], the Scheme has been designed, and the Environmental Impact Assessment has been undertaken taking account of design principles and parameters. The Environmental Impact Assessment undertaken has adopted the 'Rochdale Envelope' approach in accordance with the Planning Inspectorate's Advice Note Nine: Rochdale Envelope which provides guidance on the degree of flexibility that may be considered appropriate. The advice note also recognises that there may be aspects of the Scheme design that are not yet fixed, and therefore it may be necessary for the EIA to assess likely worst-case variations</p>

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			<p>assessing a fixed Scheme and undermines the reliability of the Applicant's impact assessments and justification for compulsory acquisition.</p>	<p>to ensure all foreseeable significant environmental effects of the Scheme are considered. Considering a reasonable worst case is standard practice for EIA in the UK.</p> <p>Each technical chapter in the ES has assessed the design identified to be the likely worst-case scenario for that discipline in order to determine the effect significance.</p> <p>Measures to manage and minimise effects are set out in the outline management plans [APP-277 to APP-287 and updated by REP1-100 to REP1-113 and REP2-019 to REP2-022] for the Scheme. The preparation, approval and implementation of detailed management plans, substantially in accordance with the outline plans, are secured through Schedule 2 of the Draft DCO [REP1-007], ensuring that effects associated with the Scheme are appropriately controlled.</p>

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				Paragraph 1.2.4 of the Design Principles and Parameters [REP1A-008] notes that it is necessary that there will be some flexibility built into the design of the Scheme in order that the detailed design of the Scheme can be informed by technical considerations, post-consent work, and take advantage of innovation in technology. This is of particular importance in order to maintain flexibility due to the rapid pace of change in solar PV and battery storage technology, whilst maintaining a robust and comprehensive assessment of potential effects.
JMB-006	Description and DCO Process	Note on AI Assistance	Note on AI Assistance: Microsoft Copilot was used to assist in reviewing the Applicant's Deadline 1 documents, extracting relevant text, and preparing comments. All judgments, conclusions, and submission decisions remain the	The Applicant notes this comment and acknowledges the use of AI Assistance by the submitting party.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			responsibility of the submitting party.	
JMB-007	Description and DCO Process	Funding Statement	<p>Comments on the Applicant's Funding Statement (EN010168-000536)</p> <p>1. Introduction I am not a planning lawyer or a financial analyst. I'm simply a local resident trying to apply ordinary common sense to what seems an extraordinary proposal. And from where I'm standing, the Applicant's Funding Statement reads less like a solid financial plan and more like the sort of pitch you'd get from a very enthusiastic car salesman who insists the engine "definitely works" but won't let you lift the bonnet. We are being asked to trust a company that has not secured funding, has not presented a financial track record, and is simultaneously juggling multiple billion-pound projects. It feels like putting all our national energy eggs in one basket</p>	<p>The Funding Statement [APP-019] submitted with the DCO application demonstrates that the Scheme is financially viable and adequately funded to deliver the Scheme in full. The current cost estimate to deliver the Scheme in its entirety is approximately £900m to £950m.</p> <p>The Statement has been produced pursuant to Regulation 5(2)(h) of the Infrastructure Planning (Applications: Prescribed Forms and Procedures) Regulations 2009 (Ref 2) (the APFP Regulations) and the Department of Communities and Local Government guidance 'Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land' (September 2013) (Ref 3).</p> <p>In the Statement it confirms that recently IGP's Cottam and West</p>

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			<p>— and then handing that basket to someone already sprinting down the road with a basket in each hand, so ours ends up balanced on their head. History is full of moments where people were dazzled by big promises and shiny ideas: Tulip Mania, the South Sea Bubble, the Dot-com boom. More recently we've seen Carillion, Thames Water, HS2, Bulb Energy, and the Horizon IT system at the Post Office. Big promises, glossy presentations, absolute confidence... right up until everything collapses. And when it does, it is always the public who picks up the pieces.</p> <p>Yet here we are being told to approve a project because the company has other schemes in the works and their consultants told them they "could" get funding. Enthusiasm is not evidence. And once a developer collapses mid-</p>	<p>Burton projects have received DCOs in September 2024 and January 2025. Additionally, Macquire Group has invested in the UK's green-energy sector since 2005 and in total has arranged or invested more than £60 billion in UK infrastructure since 1999, including renewable energy projects. In 2022 Macquire Group committed £12 billion of investment specifically for sustainable infrastructure which includes solar and battery storage projects. Since 2010 it has also invested £34 billion in funding, specifically in green energy projects since 2010.</p> <p>IGP is committed to funding the significant costs in taking the application through the DCO application process to determination of which Macquire is and will continue to contribute towards. Assuming development consent is granted it will then consult with a variety of professionals with extensive</p>

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			project — as we have seen in other sectors — the community is left with the mess, the cost, and the consequences. There is no magical “undo” button for torn-up countryside. And in this case, we are talking about more than 2,000 acres. Based on the Funding Statement, this feels far too much like a “pie in the sky” scheme being sold by people who will not be the ones picking up the pieces if it all goes wrong.	experience in financing major capital projects to fund the construction, a tried and tested approach in the market, as is common with privately funded infrastructure projects.
JMB-008	Description and DCO Process	The Applicant	<p>2. Systemic Risk:</p> <p>The Applicant Is Promoting Multiple NSIPs Simultaneously The Applicant (IGP) is currently promoting several large-scale solar NSIPs across the UK, each requiring very substantial capital expenditure. The Funding Statement does not explain how the Applicant or its parent companies will manage the cumulative financial exposure of</p>	The Applicant is owned by three investment funds managed by Macquarie on behalf of a range of investors, which importantly includes a number of UK pension funds. This ownership structure is not opaque, and is common in the energy sector which ensures the Scheme is securely financed privately, enabling the development of essential infrastructure without reliance on public funds.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			<p>these schemes. EN-1 requires applicants to demonstrate that their proposals are financially viable and deliverable (EN-1 §4.2.1).</p> <p>If even one project encounters financial difficulty, delay, or failure, the consequences would not be limited to a single location. Communities across several counties could be left with partially constructed or abandoned infrastructure, and the financial burden of remediation would fall on the public sector.</p> <p>Solar NSIPs of this scale involve irreversible land take and long-term landscape change. If a developer becomes insolvent mid-construction, the damage cannot be undone. The Funding Statement provides no assurance that the Applicant has the financial resilience to deliver multiple NSIPs concurrently, nor does it address the systemic risk of concentrating</p>	<p>Regardless of the corporate structure, the Applicant, and in the context of this response, the "undertaker"- "Lime Down Solar Park Limited" is the SPV which is bound by the legally enforceable requirements of the Development Consent Order (DCO) as set out in the Draft DCO [REP1-007]. These legally binding requirements are attached to the Scheme and pass directly to any new operator throughout the lifetime of operation and decommissioning. Under the Planning Act 2008, failing to comply with a DCO Requirement is a criminal offence.</p> <p>This provides the legal mechanism for the enforcement of responsibility directly on the project operator, irrespective of its corporate structure or parentage.</p> <p>For clarity, paragraph 4.2.1 of the Overarching National Policy Statement for Energy (EN-1) (November 2023) (NPS EN-1) does not set out a requirement for</p>

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			<p>several nationally significant energy schemes in the hands of a single private developer.</p>	<p>applicants to demonstrate that their proposals are financially viable and deliverable (rather, it states that the Government is committed to fully decarbonising the power system by 2025). Paragraph 4.1.21 of NPS EN-1 states that it is for the applicant to make a <i>“judgement on the financial and technical viability of the proposed development, within the market framework and taking account of government interventions.”</i> Paragraph 4.1.22 of NPS EN-1 goes on to state that <i>“Where the Secretary of State considers that the financial viability and technical feasibility of the proposal has been properly assessed by the applicant, it is unlikely to be of relevance in Secretary of State decision making.”</i></p> <p>The Funding Statement [APP-019] demonstrates that the Scheme is financially viable and adequately funded to be delivered in its entirety.</p>

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				Notably, the Applicant has a strong track record of developing NSIPs, notably the consented Cottom Solar Project and West Burton Solar Project, alongside a strong pipeline of further applications coming forward.
JMB-009	Description and DCO Process	The Applicant	<p>3. Macquarie Asset Management's Track Record in UK Infrastructure</p> <p>The Applicant relies heavily on the scale and reputation of Macquarie Asset Management as reassurance that the Scheme can be funded. However, Macquarie's track record in UK infrastructure raises serious concerns. During its ownership of Thames Water (2006–2017), debt reportedly rose from around £3.5 billion to approximately £11 billion, while the company was widely criticised for under-investment, leakage, and pollution. After Macquarie's exit, Thames Water was left in such a weakened financial position that</p>	<p>Please see response RS-003 within the Applicant's Response to Written Representations [REP2-039] for an explanation of how Macquarie's involvement in Thames Water has been repeatedly mischaracterised. Response RS-004 within the same document explains how the DCO is legally binding and therefore responsible stewardship is legally and financially secured throughout the lifetime of the Scheme.</p>

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			<p>government intervention — even temporary nationalisation — has been discussed. This pattern illustrates a model in which value is extracted for investors while financial and operational risks are ultimately borne by the public. The Funding Statement does not acknowledge this history or explain how similar outcomes will be avoided for Lime Down. EN-1 requires applicants to demonstrate that risks have been properly assessed and mitigated (EN-1 §4.4.2).</p> <p>If a Macquarie-backed project such as Lime Down were to encounter financial distress, the Thames Water precedent suggests that the public could again be left carrying the risks and costs. In the context of a solar NSIP, that would mean altered land, part-built grid infrastructure, and long-term environmental harm, with no</p>	

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			guarantee that the original developer would be there to remedy it.	
JMB-010	Description and DCO Process	Funding	<p>4. No Commitment from the Parent Company or Macquarie</p> <p>Although the Applicant repeatedly refers to the size and global reach of Macquarie Asset Management, no letter of support, guarantee, or binding commitment has been provided.</p> <p>There is no evidence that Macquarie has approved or agreed to fund this project, nor any indication that capital has been allocated or ring-fenced. Reliance on the reputation of a parent company is not evidence of funding availability. The 2013 Compulsory Acquisition Guidance</p>	<p>The Funding Statement [APP-019] submitted with the DCO application demonstrates that the Scheme is financially viable and adequately funded to deliver the Scheme in full. The current cost estimate to deliver the Scheme in its entirety is approximately £900m to £950m.</p> <p>IGP is committed to funding the significant costs in taking the application through the DCO application process to determination. Assuming development consent is granted it will then consult with a variety of professionals with extensive experience in financing major capital projects to fund the</p>

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			requires "reasonable certainty" that the project will be funded (CA Guidance §12–14). Lime Down provides none.	<p>construction, a tried and tested approach in the market, as is common with privately funded infrastructure projects.</p> <p>The Statement confirms that once the DCO for the Scheme is granted, the final investment decision would be made by the Applicant.</p>
JMB-011	Description and DCO Process	Funding Statement	<p>5. Reliance on Consultant Advice Instead of Financial Evidence</p> <p>The Funding Statement states that the Applicant is "confident" the Scheme is commercially viable because its advisors have said so. Reliance on consultant opinion is not a substitute for financial evidence. The Applicant has not provided a business case, revenue model, sensitivity analysis, or any demonstration of commercial viability. Assertions of confidence do not meet the evidential requirements of the Planning Act or EN-1's requirement for clear</p>	<p>Paragraph 4.1.22 of NPS EN-1 states that "Where the Secretary of State considers that the financial viability and technical feasibility of the proposal has been properly assessed by the applicant, it is unlikely to be of relevance in Secretary of State decision making." As is the widely accepted approach with solar NSIPs, the Applicant's Funding Statement [APP-019] demonstrates the funds are available and satisfy 4.1.22 of NPS EN-1.</p> <p>Additionally, paragraph 4.2.1 of NPS EN-1 does not set out a</p>

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			justification of project need and deliverability (EN-1 §4.1.4).	requirement for applicants to demonstrate that their proposals are financially viable and deliverable (rather, it states that the Government is committed to fully decarbonising the power system by 2025). Paragraph 4.1.21 of NPS EN-1 states that it is for the applicant to make a "judgement on the financial and technical viability of the proposed development, within the market framework and taking account of government interventions."
JMB-012	Description and DCO Process	Funding	<p>6. No Secured Funding for a £900–£950 Million NSIP</p> <p>The Applicant confirms that no funding has been secured for the Scheme. The Funding Statement states that the "final investment decision would be made after the DCO is granted."</p> <p>This means the Applicant is not committed to delivering the Scheme and has not demonstrated</p>	The Applicant considers it has appropriately responded to this comment in JMB-011 above.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			that it has the financial resources to do so. For a project seeking compulsory acquisition powers, this is a significant omission. The Secretary of State must be satisfied that the project is likely to be funded (CA Guidance §13). The Applicant has not provided the evidence required to reach that conclusion.	
JMB-013	Description and DCO Process	Funding	<p>7. The Applicant Company Appears to Have No Financial Standing</p> <p>Lime Down Solar Park Ltd is a special-purpose vehicle with no apparent assets, no revenue, and no track record. The Funding Statement provides no financial information for the Applicant or any company in the ownership chain.</p> <p>Without accounts, balance sheets, or evidence of liquidity, it is impossible to assess the Applicant's financial capacity. This</p>	<p>The Applicant is owned by three investment funds managed by Macquarie on behalf of a range of investors, which importantly includes a number of UK pension funds. This ownership structure is common in the energy sector which ensures the Scheme is securely financed privately, enabling the development of essential infrastructure without reliance on public funds or risk to the UK taxpayer.</p> <p>Regardless of the corporate structure, the Applicant, and in the context of this response, the</p>

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			<p>is particularly concerning given the scale of the Scheme and the request for compulsory acquisition powers. EN-1 requires clarity about who is responsible for delivering the project and evidence that they are capable of doing so (EN-1 §4.2.1).</p>	<p>"undertaker"- "Lime Down Solar Park Limited" is the SPV which is bound by the legally enforceable requirements of the Development Consent Order (DCO) as set out in the Draft DCO [REP1-007]. These legally binding requirements are attached to the Scheme and pass directly to any new operator throughout the lifetime of operation and decommissioning. Under the Planning Act 2008, failing to comply with a DCO Requirement is a criminal offence.</p> <p>This provides the legal mechanism for the enforcement of responsibility directly on the project operator, irrespective of its corporate structure or parentage.</p> <p>For clarity, paragraph 4.2.1 of the Overarching National Policy Statement for Energy (EN-1) (November 2023) (NPS EN-1) does not set out a requirement for applicants to demonstrate that their proposals are financially viable and deliverable (rather, it states that</p>

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				<p>the Government is committed to fully decarbonising the power system by 2025). Paragraph 4.1.21 of NPS EN-1 states that it is for the applicant to make a <i>“judgement on the financial and technical viability of the proposed development, within the market framework and taking account of government interventions.”</i> Paragraph 4.1.22 of NPS EN-1 goes on to state that <i>“Where the Secretary of State considers that the financial viability and technical feasibility of the proposal has been properly assessed by the applicant, it is unlikely to be of relevance in Secretary of State decision making.”</i></p> <p>The Funding Statement [APP-019] demonstrates that the Scheme is financially viable and adequately funded to be delivered in its entirety.</p> <p>Notably, the Applicant has a strong track record of developing NSIPs, notably the consented Cottom</p>

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				Solar Project and West Burton Solar Project, alongside a strong pipeline of further applications coming forward.
JMB-014	Description and DCO Process	Funding	<p>8. No Cost Breakdown or Evidence Base for the £900–£950m</p> <p>Estimate The Funding Statement provides a single headline figure for the cost of the Scheme but no breakdown of construction, grid connection, land acquisition, BESS, contingency, or inflation assumptions. Without this information, the estimate cannot be scrutinised for accuracy or robustness. The absence of a detailed cost breakdown is inconsistent with expectations for NSIPs of this scale and does not meet EN-1's requirement for clear, evidenced justification of project design and configuration (EN-1 §4.4.2).</p>	<p>For clarity, paragraph 4.4.2 of NPS EN-1 does not require evidenced justification of project design and configuration, (rather, it sets out what direct impacts on health may include). Paragraph 4.1.21 of NPS EN-1 states that it is for the applicant to make a <i>“judgement on the financial and technical viability of the proposed development, within the market framework and taking account of government interventions.”</i> Paragraph 4.1.22 of NPS EN-1 goes on to state that <i>“Where the Secretary of State considers that the financial viability and technical feasibility of the proposal has been properly assessed by the applicant, it is unlikely to be of relevance in</i></p>

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				<i>Secretary of State decision making."</i>
JMB-015	Description and DCO Process	Compulsory Acquisition Compensation	<p>9. No Mechanism for Funding Compulsory Acquisition Compensation</p> <p>The Applicant asserts that compensation can be paid but provides no mechanism, no ring-fenced security, no worst-case modelling, and no evidence of available funds. The Funding Statement does not explain how compensation liabilities will be met, nor does it provide safeguards to ensure that landowners and affected parties are protected. This is inadequate for a scheme seeking powers to acquire land compulsorily. The CA Guidance requires applicants to demonstrate that adequate funding will be available at the time it is required (CA Guidance §13–17).</p>	<p>The Funding Statement [APP-019] demonstrates that the Scheme is financially viable and adequately funded to be delivered in its entirety.</p>

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
JMB-016	Description and DCO Process	Funding Statement	<p>10. Comparison with Other Nationally Significant Energy Projects</p> <p>When you place Lime Down's Funding Statement alongside those submitted for other major energy NSIPs, the gap is not subtle — it is stark. Cleve Hill Solar Park, EA1N, and Rampion 2 all provided detailed, evidenced, and verifiable financial information. Lime Down provides almost none of it.</p> <p>10.1 What the other NSIPs provided — and Lime Down did not Across Cleve Hill, EA1N, and Rampion 2, the Examining Authority received:</p> <ul style="list-style-type: none"> • a clear and evidenced project cost • a breakdown of major cost components 	<p>The Applicant disagrees and considers the level of information provided is consistent with recently made solar DCOs, such as Cottam Solar Project and West Burton Solar Project.</p> <p>For clarity, sections 4.1 to 4.4 of NPS EN-1 cover the following key areas, and not the specific points listed in the comment provided:</p> <ul style="list-style-type: none"> • General Policies and Considerations • The critical national priority for low carbon infrastructure • Environmental effects/ considerations • Health <p>Furthermore, paragraphs 4.1.4, 4.2.1, 4.4.2 of NPS EN-1 similarly do not relate to the Funding Statement.</p> <p>Paragraph 4.1.21 of NPS EN-1 states that it is for the applicant to make a <i>“judgement on the financial and technical viability of the</i></p>

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			<ul style="list-style-type: none"> • audited accounts for the developer and parent companies • evidence of liquidity and financial resilience • secured or committed funding arrangements • accepted grid connection offers • construction and procurement strategies • corporate guarantees or letters of support • mechanisms for funding compulsory acquisition • a proven track record of delivering major UK infrastructure <p>These are the evidential foundations required by EN-1 (especially §§4.1–4.4) and by the CA Guidance.</p>	<p><i>proposed development, within the market framework and taking account of government interventions.</i>” Paragraph 4.1.22 of NPS EN-1 goes on to state that <i>“Where the Secretary of State considers that the financial viability and technical feasibility of the proposal has been properly assessed by the applicant, it is unlikely to be of relevance in Secretary of State decision making.”</i></p> <p>As explained in paragraph 1.2.2 of the Funding Statement [APP-019], it has been prepared because the DCO sought for the Scheme would authorise the compulsory acquisition of land or interests in land. This gives rise to the requirement under Regulation 5(2)(h) of the Infrastructure Planning (Applications: Prescribed Forms and Procedures) Regulations 2009 for the Applicant to provide a statement indicating</p>

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			<p>10.2 Lime Down's Funding Statement falls far below this standard</p> <p>Lime Down provides:</p> <ul style="list-style-type: none"> • a single round-number cost estimate with no breakdown • no secured funding • no financial information for the Applicant or ownership chain • no liquidity evidence • no parent-company guarantee • no grid connection certainty • no deliverability evidence • no mechanism for funding compulsory acquisition • no track record of delivering NSIPs <p>This is not compatible with EN-1's requirement for clarity, justification, and deliverability (EN-1 §§4.1.4, 4.2.1, 4.4.2) or with the CA</p>	<p>how the DCO containing these powers, is proposed to be funded.</p>

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			<p>Guidance's requirement for reasonable certainty of funding.</p> <p>10.3 A common-sense conclusion</p> <p>If three major NSIPs can provide full, transparent, and verifiable financial evidence, then Lime Down — a project of comparable scale — should be expected to do the same. Right now, it does not even come close.</p>	
JMB-017	Description and DCO Process	Conclusion	<p>11. Conclusion</p> <p>The Funding Statement never deals with the most obvious, common-sense risk: if the developer runs out of money halfway through, the land will already be dug up, the grid works half built, and the community will be left staring at the mess. This is not a far-fetched scenario — it happens in big projects more often than anyone likes to admit. And once the countryside is torn up, you cannot simply press a reset</p>	<p>The Applicant has responded to the detailed points raised in the comments above.</p> <p>The Applicant reaffirms that this is a privately funded infrastructure project with no government funding. it is bound by the legally enforceable requirements of the Development Consent Order (DCO) as set out in the Draft DCO [REP1-007]. These legally binding requirements are attached to the Scheme and pass directly to any new operator throughout the lifetime of operation and</p>

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			<p>button. What makes this even more worrying is that the same company already has two other huge solar projects on its plate. In ordinary life, most of us would struggle to juggle three major commitments at once — never mind three billion-pound infrastructure schemes. It seems only sensible to say: prove you can successfully build and connect the first two before you are handed a third. Right now, there are no safety nets. There are no guarantees and no real proof that the company behind this can actually see it through. If things go wrong, it will not be Macquarie or the Applicant dealing with the fallout — it will be the public. Until the developer can show they have the money, the backing, and the resilience to finish what they start — and until their other projects are actually up, running, and delivering power to the grid — this Funding</p>	<p>decommissioning. Under the Planning Act 2008, failing to comply with a DCO Requirement is a criminal offence.</p> <p>This provides the legal mechanism for the enforcement of responsibility directly on the project operator, irrespective of its corporate structure or parentage.</p>

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			Statement is simply not good enough for a project that wants the power to take people's land.	
JMB-018	Description and DCO Process	Note on AI Assistance	<p>Note on AI Assistance</p> <p>I used Microsoft Copilot to assist with reviewing publicly available documents for other Nationally Significant Infrastructure Projects (including Cleve Hill, EA1N and Rampion 2) in order to compare their Funding Statements with the Applicant's. Copilot helped me identify where those projects provided evidence required under EN-1 (particularly §§4.1–4.4), EN-3 (where relevant to solar generation infrastructure), and the 2013 Compulsory Acquisition Guidance (§§12–17). Copilot also assisted in organising this information into a comparison table and in refining the structure, clarity, and presentation of this submission. All arguments, concerns, and</p>	The Applicant notes the use of AI.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			conclusions expressed are entirely my own.	
JMB-019	Description and DCO Process	Introduction	<p>1. Introduction</p> <p>I have read the Applicant's Statement of Need, and as a layperson I am trying to understand how the conclusions they draw follow from the evidence they present. The more I read, the more I struggled to reconcile the Applicant's claims about "urgent national need" with the scale, location, land take, and impacts of the proposed Scheme.</p> <p>The government's Net Zero targets do not remove the requirement in EN-1 and EN-3 for Applicants to justify the specific scale, location, land take, and configuration of their proposal. National need does not override the need for evidence.</p> <p>The Applicant's Statement of Need skips the evidence and jumps straight to the conclusions. It</p>	<p>The Applicant notes this comment and has addressed relevant points against row JMB-002 above and where applicable also in rows JMB-0120 to JMB-029.</p> <p>The Applicant's responses confirm the support for large-scale solar offered by the National Policy Statements; the scope of the Climate Change assessment in relation to overseas sourcing as a worst-case scenario; the Applicant's consideration of local impacts as undertaken through the relevant assessments in the Environmental Statement [APP-052 to APP-265] (as amended; the need for smaller solar schemes alongside (not instead of) large-scale schemes; and the appropriateness of the Rochdale Envelope approach to assessing</p>

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			assumes the scale, the land, and the 500 MW — instead of proving any of them. My comments below are based on the Applicant's own text and on what EN-1 and EN-3 require a Statement of Need to demonstrate.	the impacts of the Proposed Development.
JMB-020	Climate Change and Energy Need	Statement of Need	<p>2. The Applicant treats “urgent national need” as if it overrides all other considerations</p> <p>The Statement of Need repeatedly states that the UK faces an “urgent need” for new low-carbon energy (§1.2–1.4), that the UK must “decarbonise rapidly” (§2.1–2.4), and that large-scale solar is “essential” to achieving Net Zero (§3.1–3.4). It also claims that this specific Scheme will “help meet urgent national need” (§5.1–5.3) and is “critical” to future Carbon Budgets (§6.1–6.3). I do not dispute the importance of decarbonisation. However, EN-1 is</p>	<p>The Statement of Need [REP1-085] describes how and why the Scheme addresses all relevant aspects of government policy and confirms the national policy position that substantial weight should be given to the need for low carbon generation schemes to which the NPSs are of relevance, such as the Scheme.</p> <p>Section 2.9 of the Statement of Need [REP1-085] provides information on the Government's capacity ranges for low-carbon generation schemes to deliver a Clean Power system, and provides evidence on the urgent requirement for unprecedented capacities of new low carbon</p>

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			<p>clear that national need does not override the requirement to justify:</p> <ul style="list-style-type: none"> • this location • this scale (500MW) • this land take (1,237 ha) • this design • this level of impact • or the use of compulsory acquisition <p>EN-1 §4.2.1 requires Applicants to demonstrate that the specific proposal is needed, not simply that "energy is needed." EN-1 §4.4.2 requires a balanced assessment of benefits and harms. EN-1 §4.1.4 requires clear justification for the chosen site and configuration. The Applicant has not done this. They use national policy as a blank cheque, as if quoting EN-1 automatically validates every aspect of the Scheme.</p>	<p>schemes to come forward. Chapter 7 of the Statement of Need [REP1-085] provides evidence on the suitability of the proposed location for large-scale solar.</p> <p>In decision making, S104 of the Planning Act 2008 provides that applications for development consent must be decided by the Secretary of State in accordance with any relevant National Policy Statement to the extent that one or more exceptions apply. This includes whether the adverse impacts of the Scheme would outweigh its benefits.</p> <p>The Applicant's consideration of the planning balance is set out in Section 9.4 of the Planning Statement [REP2-017] where it concludes that having regard to all important and relevant matters, it is concluded that there are no adverse impacts of sufficient weight, either on their own or collectively, that would mean the DCO should not be made. The</p>

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				<p>adverse impacts identified are clearly outweighed by the substantial public benefits that would arise from the provision of low carbon energy to meet the need identified in NPS EN 1.</p> <p>Furthermore, the Scheme's compliance with national policy, including NPS EN-1 is set out in Annex A of the Planning Statement [REP2-017].</p>
JMB-021	Climate Change and Energy Need	Carbon Assessments	<p>3. If the Applicant relies on Net Zero, why is there no assessment of the carbon value of the land as it currently exists?</p> <p>If the Scheme is justified on the basis of reducing carbon emissions (§2.1–2.4; §3.1– 3.4), then EN-1 requires a balanced assessment of:</p> <ul style="list-style-type: none"> • carbon stored in soils • carbon stored in hedgerows • carbon stored in grasslands 	<p>The Climate Change Chapter includes a whole-life greenhouse gas assessment encompassing emissions associated with the manufacture, transport, construction, operation, maintenance and decommissioning of the Scheme. This includes embodied carbon associated with imported materials and components. The assessment also considered the potential effects of land-use change.</p> <p>Whilst detailed quantification of soil carbon and sequestration rates</p>

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			<ul style="list-style-type: none"> greenhouse-gas processing capacity of farmland emissions released by disturbing 1,237 hectares of land emissions from manufacturing and shipping solar panels from overseas <p>EN-1 §5.2.2 requires Applicants to assess both carbon benefits and carbon losses. EN-1 §4.4.2 requires a "balanced view of the overall carbon impact." None of this appears in the Statement of Need. It feels as though the Applicant is counting only the carbon benefits of the Scheme, and none of the carbon losses. As a layperson, I cannot understand how this provides a balanced assessment.</p>	<p>was not undertaken due to the uncertainties associated with future land management practices and the absence of a recognised methodology proportionate to the assessment, the Scheme is anticipated to retain the majority of existing hedgerows and woodland and establish areas of low-input grassland. The assessment therefore provides a proportionate and balanced consideration of the Scheme's overall greenhouse gas impacts consistent with the requirements of NPS EN-1. The land use impacts have been further explained within the Climate Response to Wiltshire Council Appendix B of Written Rep and SLD Appendix J1 [EN010168/EXAM/9.33].</p>
JMB-022	Human Health	Impact on Local Community	4. Did the Applicant consider the well-being of the people who live here?	While the Statement of Need [REP1-085] considers the strategic need for the Scheme in the context of national energy production, the

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
	Landscape and Visual		<p>The Statement of Need focuses entirely on national-level benefits (§1.2–1.4; §5.1– 5.3). It does not address:</p> <ul style="list-style-type: none"> • the mental health impacts of industrialising a rural landscape • the loss of cultural identity tied to countryside and farmland • the effect on people's sense of place • the stress of living beside a 1,237-hectare construction site • the long-term impact of a 40-year industrial installation <p>EN-1 §4.2.1 and §4.4.2 require Applicants to consider local impacts, including:</p> <ul style="list-style-type: none"> • community well-being • landscape character • amenity 	<p>requirement for the Applicant to consider local impacts is undertaken through the relevant assessments in the Environmental Statement [APP-052 to APP-265] (as amended).</p> <p>Therein, matters in relation to community wellbeing, amenity and community culture and identity are assessed in ES Volume 1, Chapter 18: Human Health [APP-070], including, where appropriate, matters based on the assessment of impacts to the landscape character in ES Volume 1, Chapter 8: Landscape and Visual [APP-060]. With these matters taken into consideration, the assessment of health and wellbeing impacts finds no significant adverse effect to community or individual wellbeing and health at any phase of the Scheme. The Applicant is fully aware of these concerns for local people and is confident that the assessment undertaken is robust</p>

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			<ul style="list-style-type: none"> cultural identity <p>These are not abstract concerns. They are real, lived experiences for the communities affected. I cannot see where the Applicant has meaningfully considered them.</p>	<p>and comprehensive and in full compliance with the National Policy Statements for Energy.</p> <p>The Scheme's compliance with national policy, including NPS EN-1 is set out in Annex A of the Planning Statement [REP2-017].</p> <p>The Applicant's Response to the Local Impact Report [REP2-038] submitted at Deadline 2, provides detailed responses to concerns relating to local impacts.</p>
JMB-023	<p>Site Selection an Alternatives</p> <p>Climate Change and Energy Need</p>	Size and Scale	<p>5. Why a 500MW scheme? Why not a smaller, locally determined one?</p> <p>A solar scheme becomes an NSIP at 50MW. The Applicant chose ten times that threshold.</p> <p>EN-1 §4.1.4 requires Applicants to justify the scale of the development. EN-3 §2.48 requires Applicants to explain why the</p>	<p>Paragraph 3.3.12 of NPS EN-1 (2023) recognises that smaller capacity schemes do bring forward policy benefits but not as an alternative to larger scale schemes because of the benefits arising from their development. Section 6.3 of the Statement of Need [REP1-085] provides further details.</p> <p>Section 6.4 of the Statement of Need [REP1-085] explains that it is important for new schemes to</p>

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			<p>chosen scale is necessary to meet the stated need.</p> <p>The Statement of Need does not explain why this Scheme must be 500MW. It simply states that "large-scale solar" is needed (§4.1–4.5).</p> <p>If the Statement of Need is the justification, then I would expect to see:</p> <ul style="list-style-type: none"> • why 50MW was insufficient • why 100MW or 200MW was rejected • why a distributed set of smaller schemes was not considered • why this exact location must host a 500MW scheme <p>None of this is provided. It feels as though the scale was chosen first, and the justification added afterwards.</p>	<p>utilise existing and available grid infrastructure where possible. The existing Melksham 400kV substation has available grid connection capacity which the Scheme has contracted to use and is connected to an existing part of the NETS with sufficient capacity to transmit the energy the Scheme will generate to consumers nationally as well as into local distribution networks. This a key benefit of the Scheme within the context of challenging capacity ranges for new low-carbon generation schemes and a significant national need for new electricity networks infrastructure to connect them, and explains the rationale for the Applicant's approach to optimise use of the available grid connection capacity from the suitable land available to the scheme.</p> <p>ES Volume 1, Chapter 4: Alternatives and Design Evolution [APP-056] and ES</p>

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				<p>Volume 3, Appendix 4-1: Site Selection Assessment Report [APP-185] explains the methodology that has been applied when identifying and evaluating potential sites for the Scheme. It identifies a number of potential development areas for the Scheme and presents how each of those areas perform against a range of planning, environmental and operational constraints and opportunities. Therefore, the assessment of the Scheme's location and alternative locations does include an assessment of ecological and environmental factors. These have been considered in combination with other constraints when considering the suitability of the chosen site and other potential development areas. The Site Selection Assessment Report concludes that there are no more suitable and available locations within the search area than the proposed</p>

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				<p>location for the Scheme, based on the criteria identified.</p> <p>The Scheme's compliance with national policy, including NPS EN-1 is set out in Annex A of the Planning Statement [REP2-017].</p>
JMB-024	Climate Change and Energy Need	Statement of Need	<p>6. Did the Applicant consider that Net Zero is not achieved by exporting our carbon footprint?</p> <p>The Applicant's Statement of Need treats Net Zero as a simple matter of generating more low-carbon electricity (§2.1–2.4; §3.1–3.4). But the UK's emissions have fallen partly because we import high-carbon goods from countries with weaker environmental protections. A solar farm in Wiltshire does not change the UK's reliance on imported high-carbon goods, nor does it address the embedded emissions in the manufacture and shipping of solar panels from overseas.</p>	<p>The Applicant agrees that a wide range of low carbon technologies are needed to meet Net Zero, and also notes that it is the Government's view that "<i>A secure, reliable, affordable, net zero consistent system in 2050 is likely to be composed predominantly of wind and solar</i>" NPS EN-1 (2023) Paragraph 3.3.20.</p> <p>Further information on the Government's capacity ranges for different low carbon technologies is provided in Section 2.9 of the Statement of Need [REP1-085]. Section 8.5 of the Statement of Need [REP1-085] provides an analysis of how solar, together with other technologies, can contribute to an adequate and secure supply</p>

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			<p>EN-1 §5.2.2 requires consideration of life-cycle emissions, not just operational emissions. Yet the Statement of Need does not address the carbon cost of disturbing 1,237 hectares of farmland, removing hedgerows, altering soils, constructing access tracks, or importing industrial components. As a layperson, I am not disputing the importance of decarbonisation; I am questioning whether this particular Scheme meaningfully contributes to it in a way that justifies the scale of harm.</p> <p>The Statement of Need also presents the UK's energy challenge as if solar were the only meaningful pathway to Net Zero. In reality, the UK already uses a mix of renewables — including hydropower, tidal stream projects, and small river turbines — all of which contribute to grid stability and decarbonisation.</p>	<p>of low-carbon electricity for Great Britain.</p> <p>The Planning Statement [REP2-017] considers the adverse and beneficial effects of the Scheme in the application of the planning balance and concludes that the benefits of the Scheme outweigh the residual adverse impacts identified. The benefits of the Scheme are set out in Section 5.3 of the Planning Statement [REP2-017] and not only includes the delivery of large amounts of affordable, secure, and low carbon electricity which will help the UK to achieve net zero by 2050 but ecological and landscape enhancements, biodiversity net gain, permissive paths, employment generation, economic benefits and skills training.</p> <p>Section 4.10 of ES Volume 1, Chapter 4: Alternatives and Design Evolution [APP-056] details the consideration of alternative generation</p>

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			<p>EN-1 requires a balanced view of the energy system, yet the Applicant's document omits these existing technologies entirely, creating the impression that only a 500MW solar scheme on 1,237 hectares of farmland can meet national need. This is not an accurate or complete representation of the UK's energy landscape.</p>	<p>technologies. As the Applicant is a solar PV and energy storage developer, no alternative types of low carbon electricity generation have been considered in the development of the Scheme. However, it is considered that the site would not be suitable for other forms of renewable electricity generation at the same scale as the Scheme. For example, the site's location away from the coast makes tidal power and offshore wind unviable; and the site's topography makes onshore wind unsuitable, resulting in the likelihood of greater adverse visual effects.</p> <p>Section 7.10 of the ES Volume 1, Chapter 7:Climate Change [APP-059] provides an assessment of the global GHG emissions inclusive of embedded emissions on materials and shipping from overseas. The assessment includes a comparison with a 'do nothing' scenario where the</p>

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				Scheme does not go ahead and provides the amount of avoided emissions if the Scheme goes ahead. Further clarifications are included in the Climate Response to Wiltshire Council Appendix B of Written Rep and SLD Appendix J1 [EN010168/EXAM/9.33] .
JMB-025	Description and DCO Process Climate Change and Energy Need	Rochdale Envelope	<p>7. The Rochdale Envelope makes it even harder to understand the claimed "need"</p> <p>The Applicant keeps large parts of the Scheme undefined, yet relies on the Statement of Need to justify the maximum land take and the maximum flexibility</p> <ul style="list-style-type: none"> • EN 1 §4.2.1 requires clarity about what is being proposed. • EN 1 §4.4.2 requires a clear link between need and design. 	<p>As noted within ID reference JRE-003 the Rochdale Envelope approach has been applied in the assessment of the ES, adopting the principles set out in the Planning Inspectorate's Advice Note Nine: Rochdale Envelope.</p> <p>This approach is typical for NSIPs, and defines the maximum envelope of the Scheme's parameters and design optionality.</p> <p>The Statement of Need [REP1-085] notes that this approach allows the Applicant to secure necessary design flexibility to incorporate technological</p>

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			<ul style="list-style-type: none"> EN 1 §4.1.4 requires justification for the chosen configuration. <p>If the need is so urgent and so clear (§1.2–1.4; §5.1–5.3), why can't the Applicant say precisely what they intend to build in order to meet that need?</p> <p>In the absence of this clarity, it is impossible to understand how the claimed need translates into the specific amount of land, infrastructure, and flexibility being sought.</p> <p>The wide Rochdale Envelope makes it difficult for me to understand how the land take relates to the claimed need. EN 1 requires the Applicant to demonstrate the project-specific need for this development — why this project, in this location, at this scale, with this land take, in this</p>	<p>innovation and improvements, such as more efficient solar panel models, that may be available at the time of construction.</p> <p>A full description of the Scheme and its associated physical parameters are provided in Table 3-1 of ES Volume 1, Chapter 3: The Scheme [APP-055], and throughout Section 2: “Design Parameters and Commitments” of the Design Principles and Parameters [REP1A-008] where details of the technical specifications and maximum dimensions used to inform these worst-case scenarios for the environmental assessment are set out.</p>

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			<p>configuration, and with this level of flexibility.</p> <p>The wide Rochdale Envelope prevents any clear link between the claimed need and what the Applicant actually intends to build.</p>	
JMB-026	<p>Description and DCO Process</p> <p>Climate Change and Energy Need</p>	Conclusion	<p>8. Conclusion</p> <p>The Statement of Need is used by the Applicant to justify the scale, land take, compulsory acquisition, the Rochdale Envelope, and the lack of local consideration — but without providing the project-specific evidence that EN-1 and EN-3 require.</p> <p>Instead of assessing alternatives, the Statement of Need treats them as unnecessary; instead of explaining why 500MW is required, it simply asserts that “large-scale solar” is needed; instead of justifying the 1,237-hectare land take, it assumes it.</p>	<p>The Applicant notes these comments and has responded to relevant points in more detail, including where they are addressed in Application Documents, in row JMB-002 above and where applicable also in rows JMB-020 to JMB-029.</p> <p>The Applicant's responses confirm the support for large-scale solar offered by the National Policy Statements; the scope of the Climate Change assessment in relation to overseas sourcing as a worst-case scenario; the Applicant's consideration of local impacts as undertaken through the relevant assessments in the Environmental Statement [APP-052 to APP-265] (as amended; the</p>

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			<p>What the Statement of Need does not explain is:</p> <ul style="list-style-type: none"> • why this scheme must be 500MW • why it must be in this location • why it must take 1,237 hectares • why smaller or distributed schemes were not considered • why the carbon value of the land was ignored • why community well-being was not assessed <p>EN-1 requires the Applicant to demonstrate the project-specific need for this development — why this project, in this location, at this scale, with this land take, in this configuration, and with this level of flexibility. The Applicant has not done this. Instead, I am left with the impression that the Applicant</p>	<p>need for smaller solar schemes alongside (not instead of) large-scale schemes; and the appropriateness of the Rochdale Envelope approach to assessing the impacts of the Proposed Development.</p>

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			<p>needed the scheme to be here and then worked backwards, using broad policy statements, hedging, and caveats to justify a decision already made. This Statement of Need doesn't justify anything — it just assumes everything. It assumes the scale, assumes the land take, assumes the 500 MW, and assumes compulsory acquisition, without providing the project-specific evidence EN-1 and EN-3 require.</p> <p>Obviously, Island Green Power is a business out to make a profit so it can continue doing business. But so is any independent contractor hired to build a garden shed or put a solar panel on our roof — and those tradespeople shouldn't be knocking at our door telling us what we need and putting it where they want to put it, without proper justification. And we as consumers wouldn't accept a company</p>	

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			<p>installing a solar panel that required digging up our entire garden when all we needed was a small panel in the corner.</p> <p>I am not saying this to be confrontational – even though it may sound that way. I am saying it because the reasoning, as presented, does not make sense to me. It sounds like the Applicant is saying “the UK wants Net Zero — we can give you that,” but they are not giving us enough clear specifics of why it has to be so big, why they cannot tell us how big some components might be, or why it has to be here rather than closer to the actual power station.</p>	
JMB-027	Site Selection and Alternatives	Site Selection	<p>The solar array is spread across five land parcels within roughly a four-to-five-mile radius, and the cable corridor runs for around fourteen miles to Melksham. I genuinely do not understand why some of the panels or batteries</p>	<p>ES Volume 1, Chapter 4: Alternatives and Design Evolution [APP-056] sets out the consideration of alternatives and design evolution in relation to the Scheme.</p>

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			could not be placed along that route, or nearer the substation itself. Their reasoning is not set out.	<p>The Design Approach Document [APP-268] sets out the design vision and the design principles that have provided a clear framework for the evolution of the Scheme's design since inception to ensure that good design is embedded. It also sets out the design evolution of the Scheme from inception to DCO submission, detailing the design decisions which have been made at each step of the Scheme's development, including the rationale for these decisions.</p> <p>These documents outline the iterative process undertaken to identify the preferred location and layout for the Scheme, including the locations of the Solar PV Panels, BESS Area and Cable Route Corridor.</p>
JMB-028	Description and DCO Process	Conclusion	If we were having work done on our home, we would expect a clear explanation of what it will look like and why certain design decisions	As stated above in reference IDs JRE-003 and JMB-025, the Rochdale Envelope approach has been applied in the assessment of

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
	Climate Change and Energy Need		<p>were made. I do not feel the Applicant has provided that clarity. As a country, we are effectively the "customer" for this infrastructure. Why are we not asking multiple companies to present coordinated proposals for our national energy future, rather than assessing one venture-capital-backed scheme at a time? We need wind, solar, geothermal, and yes, even some fossil-fuel-based industry to produce the steel and components required for the transition. But we also need to focus on industries and supply chains that can be developed here in the UK. Self-reliance is more important than dependence on imports, and that principle should apply all the way down the chain. If we rely on foreign-made components, we are still relying on foreign energy systems. That is not true Net Zero</p>	<p>the ES which is industry standard for NSIPs. This approach allows the Applicant to secure necessary design flexibility to incorporate technological innovation and improvements, such as more efficient solar panel models, that may be available at the time of construction.</p> <p>The Design Approach Document [APP-268] sets out the design vision and the design principles that have provided a clear framework for the evolution of the Scheme's design since inception to ensure that good design is embedded. It also sets out the design evolution of the Scheme from inception to DCO submission, detailing the design decisions which have been made at each step of the Scheme's development, including the rationale for these decisions.</p> <p>NPS EN-1 (2023) Paragraph 3.2.3 explains that the UK's approach to the energy sector "<i>is for industry to</i></p>

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			<p>– it is simply exporting our carbon footprint.</p>	<p><i>propose new energy infrastructure projects that they assess to be viable within the strategic framework set by government.”</i></p> <p>The Applicant agrees that a mix of many low-carbon generation technologies is needed to meet Net Zero, as explained in Section 2.9 and Chapter 5 of the Statement of Need [REP1-085].</p> <p>A full carbon assessment of the Scheme has been provided in ES Volume 1 Chapter 7 Climate Change [APP-059] including global GHG emissions. Further clarifications are included in the Climate Response to Wiltshire Council Appendix B of Written Rep and SLD Appendix J1 [EN010168/EXAM/9.33] submitted at Deadline 3.</p> <p>The purpose of the Climate Chate Chapter is to assess the likely significant environmental effects arising from the construction, operation and decommissioning of</p>

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				<p>the Scheme. The Chapter therefore focuses on the greenhouse gas emissions associated with the Scheme and its contribution towards decarbonisation objectives in accordance with relevant legislation, policy and guidance.</p> <p>The Scheme has been assessed on the basis of a realistic and proportionate design at the current stage of development. As is typical for Nationally Significant Infrastructure Projects, detailed procurement decisions, including the selection of manufacturers, suppliers and specific products, will be determined at a later stage. Consequently, the assessment adopts generic and transparent datasets that are appropriate for Environmental Impact Assessment rather than relying on assumptions regarding future supply chains or specific manufacturers.</p>

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
JMB-029	Description and DCO Process Climate Change and Energy Need	Conclusion	Instead of explaining why this 500MW scheme must be built here, in this form, on this land, Applicant's Statement of Need simply repeats that "energy is needed" and treats that as permission. That is not compliance with EN-1 or EN-3 — it is a substitution of policy slogans for actual justification. This Applicant's Statement of Need skips the evidence and jumps straight to the conclusions. It assumes the scale, the land, and the 500 MW — instead of proving any of them.	<p>The Statement of Need [REP1-085] describes how and why the Scheme addresses all relevant aspects of government policy and confirms the national policy position that substantial weight should be given to the need for low carbon generation schemes to which the NPSs are of relevance, such as the Scheme.</p> <p>Section 2.9 of the Statement of Need [REP1-085] provides information on the Government's capacity ranges for low-carbon generation schemes to deliver a Clean Power system, and provides evidence on the urgent requirement for unprecedented capacities of new low carbon schemes to come forward. Chapter 7 of the Statement of Need [REP1-085] provides evidence on the suitability of the proposed location for large-scale solar.</p>

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
JMB-030	Description and DCO Process	Notes on AI Assistance	Note on assistance: In preparing this document, I used Microsoft Copilot to help me understand complex terminology, policy references, and technical passages in the Applicant's documents by explaining them in simpler, clearer language. Copilot also helped me interpret sections of EN-1, EN-3, and the Planning Act where the meaning was difficult to follow, and assisted me in organising my thoughts, structuring my comments, and improving clarity of expression. All substantive points, concerns, and conclusions are entirely my own.	The Applicant notes this comment.
JMB-031	Description and DCO Process	Environmental Statement	Comments on Applicant's Environmental Statement This document provides comments on the Applicant's Environmental Statement (ES) submitted at Deadline 1. It identifies significant gaps, uncertainties, and reliance on assumptions rather than a	The ES has been undertaken adopting the principles set out in the Planning Inspectorate's Advice Note Nine: Rochdale Envelope. The advice note acknowledges there may be aspects of the Scheme design that are not yet fixed and, therefore, it may be necessary for the Environmental

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			<p>defined project. Across multiple chapters, the ES does not assess a fixed Scheme, relies on mitigation that is not secured, and defers essential design detail to the post-consent stage. As a result, the ES does not provide a reliable basis for understanding the real environmental impacts of the proposed development.</p>	<p>Impact Assessment (EIA) to assess likely worst-case variations to ensure all foreseeable significant environmental effects of the Scheme are considered. Considering a reasonable worst case is standard practice for EIA in the UK.</p> <p>Measures to manage and minimise effects are set out in the outline management plans [APP-277 to APP-287 as updated by as updated by REP1-096 to REP1-113] for the Scheme. The preparation, approval and implementation of detailed management plans, substantially in accordance with the outline plans, are secured through Schedule 2 of the Draft Development Consent Order (DCO) [REP1-007], ensuring that effects associated with the Scheme are appropriately controlled.</p>

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
JMB-032	Description and DCO Process	Environmental Statement	<p>1. The ES Does Not Assess a Fixed Scheme</p> <p>The ES is built on a Scheme that is not yet finalised. Chapter 3 confirms that the detailed design will be informed by post-consent work, meaning the Applicant has not provided the actual project for examination. Key elements — including the number and location of Conversion Units, the alignment of the Grid Connection and Interconnecting Cables, and the placement of infrastructure within the Cable Route Corridor — will only be determined at the detailed design stage. This level of uncertainty is unusual for a solar NSIP and undermines the validity of the ES.</p>	<p>The Applicant confirms that the assessments in the ES are based on assumptions of the likely worst-case impacts arising from the Scheme, based on the parameters described in ES Volume 1, Chapter 3: The Scheme [APP-055] and secured through the Design Principles and Parameters [REP1A-008] by the relevant Requirements in Schedule 2 of the Draft DCO [REP1-007]. Where necessary, this draws on the other technical assessments in the Environmental Statement, which themselves are also assessed against the same Scheme description and defined parameters.</p> <p>This is an absolutely necessary process in undertaking an Environmental Impact Assessment, which is used to consider the likely reasonable worst-case effects on the environment, people and places,</p>

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				<p>ahead of any development being consented.</p> <p>The design parameters, and the mitigation measures set out in the relevant management documents are each secured by Requirements in the Draft DCO [REP1-007] and are thus legally tied to consent being granted. This is the mechanism by which the assessments in the Environmental Statement are able to 'rely' on those mitigation measures.</p>
JMB-033	Description and DCO Process	Environmental Statement	<p>2. Uncertainty Cascades Through All Technical Chapters</p> <p>Because Chapter 3 defines the design parameters used by all technical assessments, uncertainty here affects every dependent chapter. Noise, Air Quality, Transport, Landscape, Hydrology, and Human Health assessments all rely on inputs that are not fixed. The ES therefore assesses a</p>	<p>The Applicant is confident that the proposed management and mitigation measures set out in the ES [APP-052 to APP-265] (as amended) are comprehensive and robust and that the Scheme aligns with national and local planning policy; this is outlined in the Planning Statement (Rev 3) [REP2-017]. The ES [APP-052 to APP-265] (as amended) and environmental and ecological</p>

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			hypothetical worst-case scenario, not the actual Scheme that would be built. This prevents the Examining Authority from understanding the real impacts and from determining whether impacts have been minimised.	surveys have been undertaken by competent experts with considerable experience assessing similar schemes. Details are provided within ES Volume 3, Appendix 1-1 Statement of Competence [APP-180] .
JMB-034	Human Health	Human Health Assessment	<p>3. Human Health (Chapter 18) – Conclusions Built on Uncertain Inputs</p> <p>The Human Health chapter presents itself as a standalone assessment, but it is structurally dependent on the outputs of other ES chapters. The Applicant explicitly states that Human Health must be read in conjunction with Noise, Air Quality, Transport, Landscape, and other technical chapters. However, those chapters rely on unfixed design parameters and post-consent mitigation, meaning the Human Health</p>	The Applicant confirms that the assessment of human health effects in ES Volume 1, Chapter 18: Human Health [APP-070] is based on assumptions of the likely worst-case impacts arising from the Scheme, based on the parameters described in ES Volume 1, Chapter 3: The Scheme [APP-055] and secured through the Design Principles and Parameters [REP1A-008] by the relevant Requirements in Schedule 2 of the Draft DCO [REP1-007] . Where necessary, this draws on the other technical assessments in the Environmental Statement, which themselves are also assessed against the same

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			<p>conclusions are based on assumptions rather than evidence.</p> <p>Key Issues</p> <ul style="list-style-type: none"> • The chapter relies on the Outline CEMP and Outline LEMP, both of which will be replaced by detailed versions after the DCO is granted. • Dust, noise, construction traffic, PRow management, and community disturbance are all managed through future plans, not secured mitigation. • The 22 km cable corridor — with multi-year construction impacts — is not assessed in terms of stress, anxiety, disruption, or effects on vulnerable populations. • BESS fire risk, toxic plume scenarios, and emergency response capacity are not assessed. 	<p>Scheme description and defined parameters.</p> <p>This is an absolutely necessary process in undertaking an Environmental Impact Assessment, which is used to consider likely effects on the environment, people and places, ahead of any development being consented.</p> <p>The design parameters, and the mitigation measures set out in the relevant management documents are each secured by Requirements in the Draft DCO [REP1-007] and are thus legally tied to consent being granted. This is the mechanism by which the assessments in the Environmental Statement are able to 'rely' on those mitigation measures.</p> <p>Where the assessments find significant adverse effects, the assessments give recommendations for additional mitigation measures (in the case of</p>

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			<ul style="list-style-type: none"> Cumulative health impacts from multiple NSIPs in the region are not addressed. <p>Why This Matters</p> <p>Because the underlying technical chapters are uncertain, the Human Health chapter cannot demonstrate:</p> <ul style="list-style-type: none"> the true extent of health impacts whether vulnerable groups are affected whether construction disturbance is acceptable whether mitigation will be effective whether the Applicant has minimised harm <p>The chapter concludes “no significant effects,” but these conclusions are built on unfixed inputs, future mitigation, and assumptions, not evidence.</p>	<p>human health, this is Section 18.11 of ES Volume 1, Chapter 18: Human Health [APP-070]) which are then added to the relevant management documents (as has been referenced the Outline LEMP [APP-283] and Outline CEMP [REP2-019]) to be consented. Detailed version of these plans are secured by Requirements 7 and 13 respectively in Schedule 2 of the Draft DCO [REP1-007] that must legally be substantially in accordance with the outline versions, so that those mitigation measures proposed are properly detailed, agreed, and approved by the relevant authority.</p> <p>In respect of dust, noise, construction traffic, PRoW management, and community disturbance, these measures are secured through the Outline CEMP [REP2-019], Outline CTMP [REP1-112], and Outline PROWPPMP [REP1-104] by</p>

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				<p>Requirements 13, 15, and 16 respectively in Schedule 2 of the Draft DCO [REP1-007]. Should the Scheme be consented, the Applicant is legally bound to providing detailed versions of these mitigation measures substantially in accordance with the outline versions.</p> <p>Impacts to health and wellbeing along the Cable Route Corridor are integral to the assessment in ES Volume 1, Chapter 18: Human Health [APP-070], no significant adverse effects are considered likely.</p> <p>Impacts from BESS plumes are considered under the category 'air quality' in ES Volume 1, Chapter 18: Human Health [APP-070], to which no significant adverse effects are considered likely. BESS fires and emergency response is considered in Section 20.7: Major Accidents and Disasters in ES Volume 1, Chapter 20: Other Environmental Matters [APP-</p>

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				<p>072] which finds no significant adverse effects subject to the mitigation measures secured through the Outline BSMP [REP1-110] by Requirement 6 of Schedule 2 to the Draft DCO [REP1-007].</p> <p>Cumulative impacts to health and wellbeing are assessed at Section 18.13 in ES Volume 1, Chapter 18: Human Health [APP-070], no significant cumulative adverse effects are considered likely. No other NSIPs are located in the surrounding area of influence, with the nearest being the A417 Missing Link road scheme (near Gloucester), or Metrolink Phase 1 (Bristol to Portishead).</p> <p>The Applicant is therefore confident that the assessment in ES Volume 1, Chapter 18: Human Health [APP-070], is robust and comprehensive.</p>

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
JMB-035	Description and DCO Process	Mitigation Measures	<p>4. Mitigation Is Not Secured</p> <p>The ES relies heavily on mitigation that is not yet defined or secured. The Outline CEMP and Outline LEMP both state that detailed versions will be produced only after the DCO is granted. Construction traffic management, dust control, noise mitigation, PRoW management, and ecological measures are all deferred to future documents. This means the ES conclusions depend on mitigation that does not yet exist and cannot be enforced at DCO stage.</p>	<p>The Applicant disagrees with this comment. The approach taken is consistent with the Rochdale Envelope principle. The mitigation measures presented in the ES [APP-052 to APP-265] (as amended), Outline CEMP [REP2-019] and other associated documents set out clear mitigation principles, specific control measures and commitments to industry best practice measures. These provide a detailed basis to undertake a robust assessment of likely significant effects. The outline plans are secured through the DCO, with a requirement mandating that the detailed plans must be in accordance with the approved outline versions.</p>
JMB-036	Description and DCO Process	Post Consent Documents	<p>5. Key Chapters Depend on Post-Consent Documents</p> <p>Several ES chapters rely on management plans that will only be</p>	<p>Please refer to the response to 'JMB-034' above which sets out how the effects on human health have been assessed, and how</p>

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			<p>prepared post-consent. For example:</p> <ul style="list-style-type: none"> • Human Health depends on the future detailed CEMP and LEMP for dust, noise, and construction management. • Transport depends on a future Construction Traffic Management Plan. • Landscape and Ecology depend on a future detailed LEMP and planting plans. <p>This approach is inconsistent with the requirement for a sufficiently defined project at DCO stage.</p>	<p>management plans are secured through the DCO being consented.</p> <p>In relation to the level of detail provided, the information contained within the DCO application comprises an appropriate level of detail that is typical for NSIP projects of this scale and type. As set out in Design Principles and Parameters [REP1A-008], the Scheme has been designed, and the Environmental Impact Assessment has been undertaken taking account of design principles and parameters. The Environmental Impact Assessment undertaken has adopted the 'Rochdale Envelope' approach in accordance with the Planning Inspectorate's Advice Note Nine: Rochdale Envelope which provides guidance on the degree of flexibility that may be considered appropriate. The advice note also recognises that there may be aspects of the Scheme design that are not yet fixed, and therefore it</p>

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				<p>may be necessary for the EIA to assess likely worst-case variations to ensure all foreseeable significant environmental effects of the Scheme are considered. Considering a reasonable worst case is standard practice for EIA in the UK.</p> <p>Each technical chapter in the ES has assessed the design identified to be the likely worst-case scenario for that discipline in order to determine the effect significance.</p> <p>Measures to manage and minimise effects are set out in the outline management plans [APP-277 to APP-287 and updated by REP1-100 to REP1-113 and REP2-019 to REP2-022] for the Scheme. The preparation, approval and implementation of detailed management plans, substantially in accordance with the outline plans, are secured through Schedule 2 of the Draft DCO [REP1-007], ensuring that effects associated</p>

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				<p>with the Scheme are appropriately controlled.</p> <p>Paragraph 1.2.4 of the Design Principles and Parameters [REP1A-008] notes that it is necessary that there will be some flexibility built into the design of the Scheme in order that the detailed design of the Scheme can be informed by technical considerations, post-consent work, and take advantage of innovation in technology. This is of particular importance in order to maintain flexibility due to the rapid pace of change in solar PV and battery storage technology, whilst maintaining a robust and comprehensive assessment of potential effects.</p> <p>The preparation, approval and implementation of detailed landscape and ecological management plans, substantially in accordance with the Outline LEMP [APP-283] and EPMS</p>

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				[REP1-106] , are secured through requirements in Schedule 2 of the Draft Development Consent Order [REP1-007] , ensuring that the identified mitigation measures are delivered and maintained throughout the lifetime of the Scheme.
JMB-037	Site Selection and Alternatives	Design Evolution	<p>6. Alternatives and Design Evolution Remain Unsettled</p> <p>Chapter 4 confirms that the design continues to evolve.</p> <p>The Cable Route Corridor alignment remains subject to refinement, and construction compounds and Highways Improvement Areas have been moved or added during the process. This indicates that the Applicant has not finalised the Scheme and that the ES does not reflect a stable design.</p>	<p>ES Volume 1, Chapter 4: Alternatives and Design Evolution [APP-056] outlines the iterative process for the location of the Cable Route Corridor.</p> <p>This included the identification of search areas at different stages of the Scheme's design and the consideration of a range of factors. The final alignment of the Cable Route Corridor was designed to take a direct route whilst following existing features, such as roads, and avoiding sensitive receptors as far as practicable, such as habitat designations, residential and commercial properties, heritage</p>

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				<p>assets, and a large number of land interests.</p> <p>The Cable Route Corridor is the area within which the export connection cables (the 'Grid Connection Cables') would be located to connect the Solar PV Sites to the National Grid at the Existing National Grid Melksham Substation and the area within which cables connecting the Solar PV Sites would be located (the 'Interconnecting Cables'). The location of the Cable Route Corridor is set out on ES Volume 2, Figure 3-1: Indicative Site Layout Plan [APP-081].</p> <p>The actual route of the Grid Connection Cables and Interconnecting Cables within the Cable Route Corridor will be determined at detailed design stage. It is necessary to have some flexibility built into the design of the Scheme when submitting the DCO Application so that the</p>

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				<p>detailed design of the Scheme can be informed by technical considerations, post-consent work, and to take advantage of innovation in technology. Therefore, for the purposes of assessing the environmental effects of the Scheme, the technical assessments set out in the ES assess an 'envelope' (known as the Rochdale Envelope) within which the works would take place, based on maximum and minimum design parameters. Further details can be found in ES Volume 1, Chapter 3: The Scheme [APP-055].</p>
JMB-038	Description and DCO Process	Consequences for Examination	<p>7. Consequences for the Examination</p> <p>Because the ES does not assess a fixed Scheme, the Examining Authority cannot:</p> <p>understand the real environmental impacts</p>	<p>As stated above in reference IDs JMB-037, the Rochdale Envelope approach has been applied in the assessment of the ES which is industry standard for NSIPs. This approach allows the Applicant to secure necessary design flexibility to incorporate technological innovation and improvements at</p>

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			<p>determine whether impacts have been minimised</p> <p>rely on the Applicant's conclusions</p> <p>assess whether mitigation is adequate or secured</p> <p>determine whether the land sought for compulsory acquisition is necessary</p> <p>The ES therefore does not meet the standard required under the EIA Regulations or the expectations for a Nationally Significant Infrastructure Project.</p>	<p>the time of construction. The Applicant disagrees with the final statement, and is confident that the Environmental Statement [APP-052 to APP-265] (as amended) is compliant with The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 as expected for a Nationally Significant Infrastructure Project.</p>
JMB-039	Description and DCO Process	Conclusion	<p>Conclusion</p> <p>The Environmental Statement submitted at Deadline 1 is incomplete and unreliable. It assesses a Scheme that is not yet defined, relies on mitigation that is not secured, and defers essential design detail to the post-consent stage. As a result, the ES does not provide a sound basis for decision-</p>	<p>The Applicant disagrees with this comment and is confident that the Environmental Statement [APP-052 to APP-265] (as amended) provides a robust and comprehensive assessment of the likely environmental effects this Scheme would have.</p>

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			making, nor does it justify the environmental impacts or the land sought for compulsory acquisition.	
JMB-040	Landscape and Visual Human Health Socio-Economic, Tourism and Recreation	Local Impact	<p>In closing, I wish to emphasise that sprawling industrial-scale solar farms of this kind are not only environmentally disruptive but also detrimental to the wellbeing of rural residents and the cohesion of the communities who live among these landscapes.</p> <p>We cannot sacrifice our nation's countryside, food-producing land, and rural character in a blinkered race toward Net Zero. A sustainable future requires more than glass-covered fields; it requires investment in true home-grown industries, where components are manufactured here, skills are developed here, and long-term jobs are created here.</p>	<p>The Applicant is confident that the Environmental Statement [APP-052 to APP-265] (as amended) provides a robust and comprehensive assessment of the likely environmental effects this Scheme would have.</p> <p>Within this, the Applicant is confident that the assessment in ES Volume 1, Chapter 18: Human Health [APP-070] has robustly considered the likely effects on human health and community wellbeing, and finds no significant adverse effects.</p> <p>Furthermore, the Applicant has committed to long-term skills uplifting and economic enhancement, including seeking ways to promote local procurement and supply chains. These measures have been committed to so that the Scheme can have a</p>

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				<p>legacy effect on the local economy that is more positive than negative, and are secured in the Outline SSCEP [REP1-108] by Requirement 18 of Schedule 2 to the Draft DCO [REP1-007].</p> <p>The land will not be lost or sacrificed. The soils in the Solar PV Sites will mostly remain in-situ and undisturbed. All soil movements will be managed according to the best practice principles in the Outline Soil Resources Management Plan (SRMP) [APP-280], which will minimise the risk of any adverse effects on soil resources, and will be effective throughout the construction, operation and decommissioning phases. Benefits to soil health and to adjacent agricultural land are anticipated to occur, as set out in ES Volume 1, Chapter 17; Soils and Agricultural Land [REP1-025] and the Outline Landscape and</p>

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				Ecological Management Plan [APP-283].
JMB-041	Climate Change and Energy Need Soils and Agriculture	Energy Strategy	Relying on foreign-made components while covering agricultural landscapes is not a wise or resilient way forward. Britain needs an energy strategy that strengthens self-reliance, supports domestic industry, and protects the landscapes and communities that sustain us.	<p>The Applicant maintains that the Scheme is essential Critical National Priority (CNP) infrastructure that strengthens Britain's energy self-reliance and supports its legally binding net-zero targets by providing a secure, home-grown source of low carbon electricity. The Applicant confirms that relying on international supply chains is standard practice for large-scale UK infrastructure, noting that technical components including solar panels and are manufactured outside of the UK, to ensure delivery at the scale and maturity required for the national energy transition.</p> <p>Furthermore, the Applicant is a signatory of the Solar Energy UK Supply Chain Commitment, which ensures ethical sourcing through the Solar Stewardship Initiative (SSI)" ensuring sourcing of its</p>

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				panels from factories within countries that are SSI accredited.
JMB-042	Description and DCO Process	Post Consent Deferral	<p>Evidence of Post-Consent Deferral in the Applicant's ES</p> <p>The Applicant's Environmental Statement (ES) contains extensive evidence that essential elements of the Scheme design, mitigation, and assessment inputs will only be finalised after the DCO is granted. This level of post-consent deferral is unusual for a solar NSIP and prevents the ES from assessing a fixed project. The following examples are taken directly from the Applicant's Deadline 1 submissions.</p>	The design parameters, and the mitigation measures set out in the relevant management documents are each secured by Requirements in the Draft DCO [REP1-007] and are thus legally tied to consent being granted. This is the mechanism by which the assessments in the Environmental Statement are able to rely on those mitigation measures.
JMB-043	Description and DCO Process	Post Consent Deferral	<p>1. Chapter 3 – The Scheme (EN010168-000590) Integrated Analysis Chapter 3 contains some of the clearest admissions anywhere in the ES that the Scheme is not fixed, and that</p>	The Applicant confirms that the assessments in the ES are based on assumptions of the likely worst-case impacts arising from the Scheme, based on the parameters described in ES Volume 1, Chapter 3: The Scheme [APP-055] and secured through the

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			<p>essential design detail will only be finalised post-consent.</p> <p>Because Chapter 3 defines the parameters used by all technical chapters, uncertainty here cascades into uncertainty across the entire ES. Key Deferral Evidence</p> <ul style="list-style-type: none"> • The Applicant states that the detailed design will be informed by “post-consent work”, confirming that the final Scheme is not available at DCO stage. • The exact number and location of Conversion Units will be confirmed only at the detailed design stage. • The final locations of infrastructure such as fibre chambers and other components “will be determined at detailed design.” 	<p>Design Principles and Parameters [REP1A-008] by the relevant Requirements in Schedule 2 of the Draft DCO [REP1-007]. Where necessary, this draws on the other technical assessments in the Environmental Statement, which themselves are also assessed against the same Scheme description and defined parameters.</p> <p>This is an absolutely necessary process in undertaking an Environmental Impact Assessment, which is used to consider the likely reasonable worst-case effects on the environment, people and places, ahead of any development being consented.</p> <p>The design parameters, and the mitigation measures set out in the relevant management documents are each secured by Requirements in the Draft DCO [REP1-007] and are thus legally tied to consent</p>

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			<ul style="list-style-type: none"> • The exact alignment of the Grid Connection and Interconnecting Cables within the 50–665 m Cable Route Corridor “will be determined at the detailed design stage.” <p>Why This Matters</p> <ul style="list-style-type: none"> • These are fundamental elements of the Scheme. Their deferral means: • Noise, Air Quality, Transport, Landscape, Hydrology, and Human Health assessments are based on assumptions, not fixed inputs. • The ES cannot assess the actual project. • The Applicant cannot demonstrate that impacts have been minimised. • Compulsory acquisition cannot be justified because 	<p>being granted. This is the mechanism by which the assessments in the Environmental Statement are able to rely on those mitigation measures.</p>

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			<p>the land take is based on a non-finalised design.</p> <p>Chapter 3 therefore undermines the reliability of the entire ES.</p>	
JMB-044	Site Selection and Alternatives	Post Consent Deferral	<p>2. Chapter 4 – Alternatives and Design Evolution (EN010168-000591)</p> <ul style="list-style-type: none"> • While Chapter 4 does not use the exact phrase “if the DCO is granted,” it repeatedly confirms that the design is still evolving: • The design “has evolved iteratively” and continues to be refined. • The Cable Route Corridor alignment remains subject to further refinement. • Construction compounds and Highways Improvement Areas have been moved or added, indicating that the layout is not final. 	<p>Please refer to reference IDs JMB-005 and JMB-037 above which responds to these points.</p> <p>The Applicant's responses set out that the Environmental Impact Assessment has been undertaken in accordance with the Rochdale Envelope which is industry standard for Nationally Significant Infrastructure Projects, and defines the maximum envelope of the Scheme's parameters and design optionality. Furthermore, the actual route of the Grid Connection Cables and Interconnecting Cables within the Cable Route Corridor will be determined at detailed design stage. It is necessary to have some flexibility built into the design of the Scheme when submitting the</p>

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			This demonstrates that key design choices remain unsettled.	DCO Application so that the detailed design of the Scheme can be informed by technical considerations, post-consent work, and to take advantage of innovation in technology.
JMB-045	Human Health	Post Consent Deferral	<p>Chapter 18 – Human Health (EN010168-000605)</p> <p>The Human Health chapter relies on mitigation and management plans that are not yet written:</p> <ul style="list-style-type: none"> • It depends on the Outline CEMP and Outline LEMP, both of which will be replaced by detailed versions only after the DCO is granted. • Public health-related mitigation (e.g., construction management, PRow management, dust control, noise controls) is deferred to future documents. 	<p>Please refer to the response to 'JMB-034' above which sets out how the effects on human health have been assessed, and how management plans are secured through the DCO being consented.</p> <p>The Applicant is confident that the assessment in ES Volume 1, Chapter 18: Human Health [APP-070], is robust and comprehensive.</p>

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			This means the Human Health conclusions are based on assumptions, not secured measures.	
JMB-046	Construction and Decommissioning	Post Consent Deferral	<p>4. Outline CEMP (Deadline 1)</p> <p>The CEMP repeatedly defers essential mitigation:</p> <ul style="list-style-type: none"> • “A detailed CEMP will be produced prior to construction.” • The Construction Traffic Management Plan will be prepared following the grant of the DCO. • Contractor-specific mitigation will be developed post-consent. <p>Construction impacts are therefore not assessed against fixed, enforceable mitigation.</p>	<p>The preparation, approval and implementation of a detailed Construction Environmental Management Plan [REP2-019], which will be substantially based on the Outline Construction Environmental Management Plan [REP2-019], is secured through requirements in Schedule 2 of the Draft Development Consent Order [REP1-007], ensuring that the identified mitigation measures are delivered and maintained throughout the lifetime of the Scheme.</p>
JMB-047	Landscape and Visual	Post Consent Deferral	<p>5. Outline LEMP (Deadline 1)</p>	<p>The preparation, approval and implementation of detailed landscape and ecological</p>

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			<p>The LEMP contains explicit post-consent deferral:</p> <p>“Should the DCO be granted, a detailed LEMP will be produced prior to the start of construction.”</p> <p>Final planting plans and habitat creation measures will be confirmed post-consent.</p> <p>Landscape and ecological mitigation is therefore not secured.</p>	<p>management plans, substantially in accordance with the Outline LEMP [APP-283] and Outline EPMS [REP1-106], are secured through requirements in Schedule 2 of the Draft Development Consent Order [REP1-007], ensuring that the identified mitigation measures are delivered and maintained throughout the lifetime of the Scheme.</p>
JMB-048	Description and DCO Process	Conclusion	<p>Conclusion Across multiple Deadline 1 documents, the Applicant defers essential design detail, mitigation, and assessment inputs to the post-consent stage. This prevents the ES from assessing a fixed Scheme, undermines the reliability of the technical chapters, and affects the justification for compulsory acquisition. The evidence above demonstrates that the Application does not meet the requirement for</p>	<p>The Applicant notes this comment and has responded to the points raised in full above.</p>

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			a sufficiently defined project at DCO stage	
Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
Comments on Applicant Statement of Reason. Late submission accepted at the discretion of the ExA				
JMB2-001	Description and DCO Process	Introduction	<p>Introduction</p> <p>The Applicant presents the Lime Down Solar Scheme as a polished, technical, and inevitable piece of nationally significant infrastructure. Yet when the documents are read closely, a very different picture emerges. The Scheme is defined not by clarity, precision, or necessity, but by strategic vagueness, elastic design parameters, and an extraordinary land take that the Applicant has not justified. Almost every component is described in terms of "up to," "indicative," "anticipated," or "within</p>	<p>The Environmental Statement (ES) [APP-052 to APP-265 as updated by REP1-015 to REP1-084] identifies the 'worst-case' effects arising from the Scheme, adopting the principles set out in the Planning Inspectorate's Advice Note Nine: Rochdale Envelope. The advice note acknowledges there may be aspects of the Scheme design that are not yet fixed and, therefore, it may be necessary for the Environmental Impact Assessment (EIA) to assess likely worst-case variations to ensure all foreseeable significant environmental effects of the Scheme are considered.</p>

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			<p>which," leaving the Examining Authority and affected landowners with no clear understanding of what will actually be built, where, or why.</p>	<p>Considering a reasonable worst case is standard practice for EIA in the UK.</p> <p>As established in the Statement of Need [REP1-085], this approach allows the Applicant to secure necessary design flexibility to incorporate technological innovation and improvements, such as more efficient solar panel models, that may be available at the time of construction.</p> <p>A full description of the Scheme and its associated physical parameters are provided in Table 3-1 of ES Chapter 3: The Scheme [APP-055], and throughout Section 2 of the Design Principles and Parameters [REP1A-008] where details of the technical specifications and maximum dimensions used to inform these worst-case scenarios</p>

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				for the environmental assessment are set out.
JMB2-002	Description and DCO Process	Introduction	<p>This is not a minor drafting issue. It goes to the heart of the compulsory acquisition tests. The Planning Act 2008 requires a promoter to demonstrate that the land sought is necessary, that no more land than reasonably necessary is taken, that reasonable alternatives have been considered, and that the interference with private property rights is proportionate. A scheme defined only by maximum parameters and broad envelopes cannot satisfy these tests. A promoter cannot claim that land is "required" when the design itself is not fixed.</p>	<p>The Applicant has addressed concerns regarding the scale of the Scheme and the land required to deliver the Scheme on pages 211 to 212 of the Applicant's Response to Relevant Representations (Part 2) [PDB-004]. In summary, the Scheme has been designed to deliver the greatest practicable benefit from the available land and the available grid connection, whilst avoiding, minimising and/ or mitigating harmful environmental effects, in accordance with the mitigation hierarchy.</p> <p>The Applicant has assessed alternatives in ES Volume 3, Appendix 4-1: Site Selection Assessment Report [APP-185]. This sets out the six-stage approach used by the Applicant to identify the proposed location for the Scheme.</p>

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				<p>The Site Selection Assessment Report concludes that there are no obviously more suitable and available locations within the 20 km search area than the proposed location for the Scheme and that the Scheme's location is therefore assessed to be suitable for the scale of solar development proposed.</p> <p>The DCO provides a nuanced approach to managing interference in private rights and does not seek to automatically extinguish such rights under Article 25 of the draft DCO. The Applicant must serve a notice on the holder of the right in question, specifying the date from which extinguishment takes effect and any person who suffers loss from extinguishment of a private right or restrictive covenant is entitled to compensation. By allowing for this process to be engaged through provision of notice (rather than automatically as contemplated by</p>

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				<p>the model DCO provisions) this enables the Applicant to take a more proportionate approach to interference in property rights as and when this is required for the delivery of the Scheme.</p> <p>With regard to the use of the Rochdale Envelope approach, which defines the maximum envelope of the Scheme's parameters and design optionality, this approach is industry standard for NSIP projects. It allows applicants to define a design envelope (i.e. the parameters set out within ES Volume 1, Chapter 3: The Scheme [APP-055]) to assess a reasonable worst case so that detailed design can evolve within that envelope. It is typical for the detailed design process to enable opportunities for future refinement of the design to minimise interference in private rights (on the</p>

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				basis that, as noted above, the "worst case" has been assessed).
JMB2-003	Description and DCO Process	Developer	<p>There is also a wider national risk that cannot be ignored. Lime Down is one of more than a dozen UK solar and battery schemes promoted by Island Green Power, now wholly owned by Macquarie Asset Management. Together, these schemes represent over 15 GW of generation and storage capacity — all concentrated in a single overseas investment fund. Approving Lime Down would further consolidate control of critical grid-connected infrastructure in one corporate entity, creating a structural single-point-of-failure risk for the UK's energy system. No other sector — water, telecoms, or defence — would allow this level of concentration without scrutiny, yet the Applicant provides no assessment of the grid-level implications of placing such a large</p>	<p>The Applicant confirms that its parent company is wholly owned by funds managed by Macquarie Asset Management, following a two-stage acquisition process where an initial stake was purchased in the summer of 2022 and the remaining portion was acquired in May 2025. These funds are managed on behalf of a diverse range of investors, which importantly include a number of UK pension funds. This type of ownership structure is common across the energy sector and ensures the project is privately financed, allowing for the delivery of essential national infrastructure without relying on public funds or creating a financial risk to the UK taxpayer.</p> <p>Macquarie has a strong record of long-term investment in the United</p>

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			<p>share of future renewable capacity under one foreign-owned fund.</p>	<p>Kingdom, having invested more than £65 billion pounds into infrastructure since 1999. This history includes various energy projects and has supported more than 33,000 jobs. Macquarie provide the upfront equity capital to develop the Scheme which carry significant development risk, which creates a strong commercial incentive to ensure the scheme progresses successfully through the stages of development, planning, and operation.</p> <p>Regarding the concern of a structural risk to the UK electrical grid, National Energy System Operator (NESO) performs comprehensive studies for every proposed project to confirm that connections are technically feasible and compatible with requirements for system security and stability. The suggestion that multiple schemes being connected to the National Grid by one entity is</p>

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				<p>baseless, given there are a vast number of connections, with various entities and developers, across various technologies. Details of all connections made or with agreed connection agreements to the UK's transmission network via NESO can be found via their Transmission Entry Capacity (TEC) register on the NESO website.</p> <p>Furthermore, as part of NESO's connection reform activities and reprioritisation of the connection queue, the solar element of the Scheme has been re-prioritised as Gate 2 Phase 1 (in 2030 or earlier).</p> <p>The Applicant does not dispute it has a strong track record of developing Nationally Significant Infrastructure Project (NSIP) scale Schemes, notably the consented Cottam Solar Project and West Burton Solar Project, alongside a strong pipeline</p>

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				<p>of further applications coming forward.</p> <p>The delivery of this Scheme and others of a similar nature increases national resilience by providing secure, domestic sources of low-carbon electricity that reduces the country's exposure to volatile global fossil fuel markets.</p>
JMB2-004	<p>Description and DCO Process</p> <p>Site Selection and Alternatives</p>	Scheme Design	<p>The Applicant's approach reverses the proper order of decision-making. Instead of designing a scheme to fit the land, the Applicant seeks to acquire the land first and determine the design later. The result is a proposal that appears comprehensive at first glance but is, in reality, opaque, unfixed, and strategically imprecise. The Examining Authority is asked to grant the most intrusive powers available under the Planning Act — powers to take private land against the will of its owners — on the basis of a</p>	<p>The Applicant has taken a typical approach to site selection and alternatives, for a project of this type. The design process, summarised in ES Volume 1, Chapter 4: Alternatives and Design Evolution [APP-056] and explained in more detail in the Design Approach Document [APP-268], commences once the location of the Scheme has been confirmed.</p> <p>The Applicant adopted a staged approach to site assessment, taking</p>

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			scheme whose essential features remain undefined.	<p>into consideration a range of planning, environmental and operational factors. ES Volume 1, Chapter 4: Alternatives and Design Evolution [APP-056] and ES Volume 3, Appendix 4-1: Site Selection Assessment Report [APP-185] explains the methodology that has been applied when identifying and evaluating potential sites for the Scheme. It identifies a number of potential development areas for the Scheme and presents how each of those areas perform against a range of planning, environmental and operational constraints and opportunities. The report concludes that there are no more suitable and available locations within the search area than the proposed location for the Scheme, based on the criteria identified.</p> <p>With regards to compulsory acquisition, the Applicant has sought</p>

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				<p>to negotiate voluntary agreements with relevant landowners, so as to avoid the need to exercise the powers of compulsory acquisition included within the Draft Development Consent Order [REP1-007].</p> <p>While the Applicant is seeking to enter into voluntary agreements for the land and rights it requires, it remains necessary to include compulsory acquisition powers over this land even where a property agreement has been reached. This is to ensure the Scheme is deliverable without impediment. For example, in circumstances where the agreement falls away, such as the death or bankruptcy of a landowner, or if new interests come to light.</p> <p>It is confirmed that all the land within the Order limits is needed for the construction, operation and maintenance or decommissioning of</p>

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				the Scheme and that the Order land only relates to the land or interests required to be compulsorily acquired or temporarily possessed to implement the Scheme.
JMB2-005	Description and DCO Process	Scheme Design	This submission does not oppose renewable energy, nor the principle of solar generation. It challenges the way this particular Scheme has been presented: a project of unprecedented scale, dispersed across five separate land parcels and a 14-mile cable corridor, justified by broad assertions rather than evidence.	<p>The Applicant has addressed concerns regarding the scale of the Scheme and the land required to deliver the Scheme on pages 211 to 212 of the Applicant's Response to Relevant Representations (Part 2) [PDB-004]. In summary, the Scheme has been designed to deliver the greatest practicable benefit from the available land and the available grid connection, whilst avoiding, minimising and/ or mitigating harmful environmental effects, in accordance with the mitigation hierarchy.</p> <p>The Environmental Statement (ES) [APP-052 to APP-265] as updated by REP1-015 to REP1-084 identifies the 'worst-case' effects arising from the Scheme,</p>

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				adopting the principles set out in the Planning Inspectorate's Advice Note Nine: Rochdale Envelope. The advice note acknowledges there may be aspects of the Scheme design that are not yet fixed and, therefore, it may be necessary for the Environmental Impact Assessment (EIA) to assess likely worst-case variations to ensure all foreseeable significant environmental effects of the Scheme are considered. Considering a reasonable worst case is standard practice for EIA in the UK.
JMB2-006	Description and DCO Process	Compulsory Acquisition	The Applicant has not met the statutory tests for compulsory acquisition. The land sought is excessive, the design is unfixed, the alternatives unexplored, and the interference with private rights disproportionate.	The Applicant considers that it has demonstrated that all the land within the Order limits is needed for the construction, operation and maintenance or decommissioning of the Scheme and that the Order land only relates to the land or interests required to be compulsorily acquired or temporarily possessed to implement the Scheme. This

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				is demonstrated in the Statement of Reasons [APP-018] .
JMB2-007	Description and DCO Process	Scheme Description	<p>1. Weaknesses in the Applicant's Description of the Scheme</p> <p>The Description of the Scheme uses polished technical language but provides little meaningful clarity. Key elements are defined only as "associated development," "other infrastructure integral to the Scheme," or "areas within which cables would be located." These phrases give the Applicant maximum flexibility while giving the public minimal certainty.</p>	<p>As detailed within paragraph 1.3.2 of the Planning Statement [REP2-017], Section 115(1)(b) of the Planning Act 2008 provides that a DCO can include consent for 'associated development', which is development that is not an NSIP in its own right, but that is associated with the delivery of a NSIP. The elements of the Scheme that constitute the NSIP and the elements that constitute associated development are defined in Work Numbers 2 to 10 of Schedule 1 of the Draft DCO [REP1-007].</p> <p>The full extent or 'worst-case' effects arising from the Scheme are identified and reported in the Environmental Statement (ES) [APP-052 to APP-265] as updated by REP1-015 to REP1-084. The ES has been undertaken adopting the</p>

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				principles set out in the Planning Inspectorate's Advice Note Nine: Rochdale Envelope. The advice note acknowledges there may be aspects of the Scheme design that are not yet fixed and, therefore, it may be necessary for the Environmental Impact Assessment (EIA) to assess likely worst case variations to ensure all foreseeable significant environmental effects of the Scheme are considered. Considering a reasonable worst case is standard practice for EIA in the UK. The Rochdale Envelope approach allows applicants to define a design envelope (i.e. the parameters set out within ES Volume 1, Chapter 3: The Scheme [APP-055]) to assess a reasonable worst case so that detailed design can evolve within that envelope.
JMB2-008	Description and DCO Process	Scheme Description	The Applicant avoids stating the total land take, avoids explaining why five dispersed parcels are required, and	The Applicant has addressed concerns regarding the scale of the Scheme and the land required to

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			<p>avoids fixing the cable route. Essential detail is deferred to other documents, figures, or future design stages. The result is a description that is broad in scope but thin in substance, incompatible with the precision required to justify compulsory acquisition.</p>	<p>deliver the Scheme, which includes information on the land take required, on pages 211 to 212 of the Applicant's Response to Relevant Representations (Part 2) [PDB-004]. In summary, the Scheme has been designed to deliver the greatest practicable benefit from the available land and the available grid connection, whilst avoiding, minimising and/ or mitigating harmful environmental effects, in accordance with the mitigation hierarchy.</p> <p>The Environmental Statement (ES) [APP-052 to APP-265] as updated by REP1-015 to REP1-084 identifies the 'worst-case' effects arising from the Scheme, adopting the principles set out in the Planning Inspectorate's Advice Note Nine: Rochdale Envelope. The advice note acknowledges there may be aspects of the Scheme design that are not yet fixed and, therefore, it may be necessary for the</p>

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				<p>Environmental Impact Assessment (EIA) to assess likely worst-case variations to ensure all foreseeable significant environmental effects of the Scheme are considered. Considering a reasonable worst case is standard practice for EIA in the UK.</p> <p>As set out in section 1.67 of the Statement of Reasons [APP-018], the Applicant considers there is a strong justification for the inclusion of powers of compulsory acquisition of land and rights over land within the Draft Development Consent Order [REP1-007], and that there is a compelling case in the public interest for these compulsory acquisition powers to be granted.</p>
JMB2-009	Description and DCO Process	Compulsory Acquisition	Integrated deficiency: The SoR must show a clear idea of how the land will be used. Instead, the Applicant relies on the Rochdale Envelope to mask the absence of fixed layouts,	As set out in the Applicant's responses to JMB-007 and JMB-008, the Scheme has been assessed on the basis of defined parameters and a reasonable worst-

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			cable alignments, BESS configuration, construction compounds, and access arrangements. This fails the compulsory acquisition guidance.	<p>case scenario, in accordance with established EIA practice and the Planning Inspectorate's Advice Note Nine: Rochdale Envelope.</p> <p>The Applicant's position on the need for compulsory acquisition powers is set out in section 1.67 of the Statement of Reasons [APP-018]. The Applicant considers that there is a strong justification for the inclusion of powers to acquire land and rights over land within the Draft Development Consent Order [REP1-007], and that there is a compelling case in the public interest for those powers to be granted.</p>
JMB2-010	Site Selection and Alternatives	Land Use	<p>2. Failure to Demonstrate Necessity</p> <p>The Statement of Reasons repeatedly asserts that land is "required," but provides no evidence-based explanation for:</p>	<p>The Applicant has addressed concerns regarding the scale of the Scheme and the land required to deliver the Scheme on pages 211 to 212 of the Applicant's Response to Relevant Representations (Part 2) [PDB-004]. In summary, the Scheme has been designed to deliver the</p>

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			<ul style="list-style-type: none"> • why the Scheme must occupy five separate land parcels, • why the cable corridor must be 14 miles long and up to 665 metres wide, or • why the design must take this particular form. <p>The Applicant relies heavily on general policy support for renewable energy, but national need does not remove the statutory requirement to demonstrate project-specific necessity.</p> <p>Integrated deficiency: The SoR contains assertions instead of evidence. Statements that the Scheme is "necessary," "proportionate," or "in the public interest" are unsupported by quantified benefits, balancing exercises, or site-specific justification.</p>	<p>greatest practicable benefit from the available land and the available grid connection, whilst avoiding, minimising and/ or mitigating harmful environmental effects.</p> <p>The Scheme's compliance with both national and local policy is detailed within Annex A and Annex B of the Planning Statement [REP2-017].</p> <p>The government's objectives for the UK energy system, which are to ensure that the supply of energy always remains secure, reliable, affordable and consistent with meeting the UK's legally binding greenhouse gas emission reduction target.</p> <p>The Statement of Need [REP1-085] explains the need for new low-carbon infrastructure to come forward with pace and scale to meet the government's objectives.</p>

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				<p>The Statement of Need also explains that there are a limited number of available and timely connections for grid-scale developments, but that developments of this scale are needed alongside smaller (e.g. rooftop schemes) to meet the government's objectives.</p> <p>Therefore, maximising the utilisation of any such connections is consistent with the government's objectives.</p> <p>Further, reducing the scale of any scheme below that which is acceptable in an EIA sense, leaves available grid capacity unutilised, and increases the risk that the government's objectives (and therefore legal decarbonisation targets) will not be met (because other grid connections, which may not be available, would be required to connect the capacity not delivered</p>

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				<p>at a scheme which is has a lower capacity than that which could otherwise be accommodated.</p> <p>As set out in section 1.67 of the Statement of Reasons [APP-018], the Applicant considers there is a strong justification for the inclusion of powers of compulsory acquisition of land and rights over land within the Draft Development Consent Order [REP1-007], and that there is a compelling case in the public interest for these compulsory acquisition powers to be granted.</p>
JMB2-011	Site Selection and Alternatives	Land Use	<p>3. Failure to Demonstrate That No More Land Than Reasonably Necessary Is Required</p> <p>The land take is exceptionally large and unusually dispersed. Yet the Applicant provides no engineering, environmental, or operational justification for its extent. Examples include:</p>	<p>The Applicant has addressed concerns regarding the scale of the Scheme and the land required to deliver the Scheme on pages 211 to 212 of the Applicant's Response to Relevant Representations (Part 2) [PDB-004]. In summary, the Scheme has been designed to deliver the greatest practicable benefit from the available land and the available grid</p>

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			<ul style="list-style-type: none"> • a cable corridor 14 miles long and 50 metres wide, expanding to 665 metres with no explanation, • five separate solar parcels with no evidence that consolidation was considered, • a BESS footprint whose size and location are unexplained. <p>Because the design is defined only by maximum parameters and indicative locations, the Applicant cannot demonstrate that the land sought is the minimum reasonably necessary.</p> <p>Integrated deficiency: The SoR claims the land is “no more than reasonably necessary” but provides no minimisation exercise, no alternatives analysis, and no justification for the 1,237-hectare</p>	<p>connection, whilst avoiding, minimising and/ or mitigating harmful environmental effects.</p> <p>The reason for the choice of Cable Route Corridor and alternatives considered is set out in ES Volume 1, Chapter 4: Alternatives and Design Evolution [APP-056] (see section 4.6), with a preference to keep the route as direct a route as practicable whilst avoiding potential impacts on various constraints such as residential receptors, heritage assets, public rights of way and woodland. The reason for the difference in width (from 50m up to 665 metres) is explained in ES Volume 1, Chapter 2: The Order Limits [APP-054] (see paragraph 2.3.6), namely the width increases to 665 m in places to provide sufficient space for trenchless construction techniques and allow temporary construction compounds or to</p>

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			land take or the 463-hectare cable corridor.	<p>provide a wider area to allow space to avoid features such as trees, hedgerows and field boundaries.</p> <p>The justification for the location of the BESS is also addressed within the Applicant's Response to Relevant Representations (Part 2) [PDB-004] (please refer to pages 238 to 242).</p> <p>The full extent or 'worst-case' effects arising from the Scheme are identified and reported in the Environmental Statement (ES) [APP-052 to APP-265] (as updated). The ES has been undertaken adopting the principles set out in the Planning Inspectorate's Advice Note Nine: Rochdale Envelope. The advice note acknowledges there may be aspects of the Scheme design that are not yet fixed and, therefore, it may be necessary for the Environmental Impact Assessment (EIA) to assess likely worst</p>

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				<p>case variations to ensure all foreseeable significant environmental effects of the Scheme are considered. Considering a reasonable worst case is standard practice for EIA in the UK. The Rochdale Envelope approach allows applicants to define a design envelope (i.e. the parameters set out within ES Volume 1, Chapter 3: The Scheme [APP-055]) to assess a reasonable worst case so that detailed design can evolve within that envelope.</p> <p>As set out in section 1.67 of the Statement of Reasons [APP-018], the Applicant considers there is a strong justification for the inclusion of powers of compulsory acquisition of land and rights over land within the Draft Development Consent Order [REP1-007], and that there is a compelling case in the public</p>

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				interest for these compulsory acquisition powers to be granted.
JMB2-012	Site Selection and Alternatives	Cable Route Corridor	<p>4. Failure to Justify the Cable Route Corridor The Cable Route Corridor is one of the most intrusive elements of the Scheme, yet it is also one of the least justified. The Applicant has not:</p> <ul style="list-style-type: none"> • fixed the alignment, • explained the engineering need for the width, • provided comparative analysis of shorter or less intrusive routes, • demonstrated that sensitive areas could not be avoided, • provided criteria for when trenchless techniques would be used. <p>Integrated deficiency: The SoR contains no evidence of</p>	<p>The Applicant has responded to these points in relation to the Cable Route Corridor on pages 247 and 248 of the Applicant's Response to Relevant Representations (Part 2) [PDB-004].</p> <p>The reason for the choice of Cable Route Corridor and alternatives considered is set out in ES Volume 1, Chapter 4: Alternatives and Design Evolution [APP-056] (see section 4.6), with a preference to keep the route as direct a route as practicable whilst avoiding potential impacts on various constraints such as residential receptors, heritage assets, public rights of way and woodland.</p> <p>The reason for the difference in width (from 50m up to 665 metres) is explained in ES Volume 1, Chapter</p>

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			reasonable alternatives. Section 7.6, titled "Alternatives to the Scheme," contains no alternatives analysis at all.	<p>2: The Order Limits [APP-054] (see paragraph 2.3.6), namely the width increases to 665 m in places to provide sufficient space for trenchless construction techniques and allow temporary construction compounds or to provide a wider area to allow space to avoid features such as trees, hedgerows and field boundaries.</p> <p>In regard to the use of trenchless techniques, Section 3 of the Outline Construction Environmental Management Plan [REP2-019] sets out that trenchless technologies will be adopted for selected 'avoidance areas' within the Cable Route Corridor at particularly sensitive features, such as important watercourses, railway corridors and woodland. Section 1.5 of ES Volume 3, Appendix 3-2 Cable Route Construction Method Statement [APP-183] states that, where the need for trenchless technologies has</p>

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				been identified at crossing points for avoidance areas, feasibility studies will be carried out at the detailed design stage to identify the appropriate technology. Trenchless technologies may include tunnelling, HDD, Pipe Jacking and Horizontal Auger Boring.
JMB2-013	Site Selection and Alternatives	Consideration of Alternatives	<p>5. Failure to Consider Reasonable Alternatives</p> <p>The alternatives assessment is superficial and unsupported. The Applicant provides no evidence that it considered:</p> <ul style="list-style-type: none"> • smaller or consolidated layouts, • alternative BESS or substation locations, • shorter or less intrusive cable routes, 	<p>The Scheme has been developed through an iterative design process in response to consultation and in accordance with the mitigation hierarchy to avoid, reduce and mitigate adverse effects on the environment as detailed within ES Volume 1, Chapter 4: Alternatives and Design Evolution [APP-056] and the Design Approach Document [APP-268]. This included the consideration of alternative layouts, BESS locations and routes for the Cable Route Corridor.</p> <p>The Applicant has addressed points on the location of the BESS and the</p>

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			<ul style="list-style-type: none"> • reduced footprints, • phased or scaled-down schemes. <p>The Statement of Reasons simply presents the chosen configuration as inevitable. This is inconsistent with the requirement that compulsory acquisition be a last resort.</p> <p>Integrated deficiency: The SoR does not demonstrate that the Applicant attempted to reduce land take, modify the Scheme, or negotiate meaningfully with affected landowners.</p>	<p>Cable Route Corridor on pages 238 to 242 and page 247 of the Applicant's Response to Relevant Representations (Part 2) [PDB-004].</p> <p>The justification for the scale of the Scheme is also addressed within the Applicant's Response to Relevant Representations (Part 2) [PDB-004] (please refer to pages 225 to 227).</p> <p>With regards to compulsory acquisition, the Applicant has sought to negotiate voluntary agreements with relevant landowners, so as to avoid the need to exercise the powers of compulsory acquisition included within the Draft Development Consent Order [REP1-007].</p> <p>While the Applicant is seeking to enter into voluntary agreements for the land and rights it requires,</p>

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				<p>it remains necessary to include compulsory acquisition powers over this land even where a property agreement has been reached. This is to ensure the Scheme is deliverable without impediment. For example, in circumstances where the agreement falls away, such as the death or bankruptcy of a landowner, or if new interests come to light.</p> <p>It is confirmed that all the land within the Order limits is needed for the construction, operation and maintenance or decommissioning of the authorised development and that the Order land only relates to the land or interests required to be compulsorily acquired or temporarily possessed to implement the authorised development.</p>
JMB2-014	Description and DCO Process	Compulsory Acquisition	<p>6. Human Rights and Proportionality</p> <p>The Applicant has not demonstrated that compulsory</p>	<p>Section 9 of the Statement of Reasons [APP-018] sets out how the relevant articles of the European Convention on Human Rights</p>

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			<p>acquisition is compatible with Article 1 of Protocol 1 (A1P1). While renewable energy may serve a legitimate aim, the Applicant must still show that the specific interference with private property rights is necessary and proportionate.</p> <p>The Applicant has not:</p> <ul style="list-style-type: none"> • shown that less intrusive means were unavailable, • demonstrated that the land take is the minimum necessary, • provided evidence of site-specific benefits, • carried out a meaningful balancing exercise. <p>Integrated deficiency: The SoR's human rights section is generic boilerplate. It contains no</p>	<p>(articles 1, 6 and 8), have all been satisfied. The Applicant does not repeat what is set out within section 9 of the Statement of Reasons but considers that a fair balance has been struck between the need for renewable energy generation and the interference in private rights.</p> <p>The Statement of Reasons must be read together with the other supporting documents for the Scheme, including technical chapters of the Environmental Statement, the Planning Statement [REP2-017], and the Site Selection Assessment Report [APP-185].</p>

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			proportionality analysis, no assessment of individual impacts, and no explanation of why interference with property rights is justified.	
JMB2-015	Description and DCO Process	Developer	<p>7. Corporate Risk and Developer Reliability</p> <p>Lime Down Solar Park Ltd is a special-purpose vehicle with no trading history, no assets, and no long-term operational track record. Its parent company, Island Green Power, was recently acquired by Macquarie Asset Management — a fund whose UK infrastructure history (including Thames Water) raises concerns about debt loading and long-term stewardship. The use of SPVs allows ownership to be transferred without scrutiny. There is no guarantee that the entity acquiring the land will be the</p>	<p>The Applicant clarifies that the use of a special-purpose vehicle (SPV) for the delivery of the Scheme is standard industry practice for large-scale energy infrastructure. Regardless of the corporate structure or any future changes in ownership, the Scheme's operator remains legally bound by the requirements of the Development Consent Order (DCO), which are attached to the project itself. Compliance with these requirements is a statutory duty, and any failure to adhere to the environmental, operational, or decommissioning measures secured via the DCO constitutes a criminal offence under the Planning Act 2008. This statutory framework provides</p>

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			<p>entity operating or decommissioning the Scheme.</p> <p>Integrated deficiency: The SoR provides no evidence of corporate or financial resilience, no parent company guarantee, and no demonstration that the Applicant can deliver the Scheme or meet compulsory acquisition liabilities.</p>	<p>robust legal certainty that the scheme will be delivered and managed strictly within the assessed parameters, irrespective of the project operator's internal corporate history.</p> <p>The financial resilience of the project is demonstrated in the Funding Statement [APP-019], rather than the Statement of Reasons.</p> <p>The Funding Statement [APP-019] confirms that the scheme is financially viable and supported by experienced infrastructure investors who have arranged or invested more than £65 billion into United Kingdom infrastructure since 1999.</p> <p>Concerns regarding the stewardship of Thames Water are mischaracterised; during their 11 yr period of involvement, Macquarie managed funds oversaw £11 billion of investment, an increase in total assets, and substantial</p>

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				<p>reductions in water leakage. Furthermore, developing a new solar scheme involves significant upfront private equity risk, which creates a powerful commercial incentive for the developer and its backers to ensure the scheme progresses successfully through construction, operation and decommissioning.</p> <p>Regarding the ability to meet compulsory acquisition liabilities and decommissioning costs, the Applicant has confirmed through the Funding Statement [APP-019] that adequate funds are available to meet all compensation requirements for affected persons. Long-term decommissioning is secured not only through the binding Requirements in Schedule 2 of the DCO but also via private agreements with landowners that include specific decommissioning securities. These securities are regularly re-valued and</p>

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				topped up throughout the lifecycle of the scheme to ensure sufficient funds are always in place to restore the land to its original condition, removing any potential financial burden from the local authority or UK taxpayer.
JMB2-016	Description and DCO Process	Developer and National Security	<p>8. Concentration of Control and National Resilience</p> <p>Lime Down is one of more than a dozen UK solar and battery schemes promoted by Island Green Power, now wholly owned by Macquarie. This consolidates control of over 15 GW of solar and battery projects in a single overseas investment fund.</p> <p>This raises legitimate questions about:</p> <ul style="list-style-type: none"> • national resilience, • energy security, 	The Applicant draws attention to responses above at JMB2-003 and JMB2-015, where these comments have been addressed.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			<ul style="list-style-type: none"> supply chain vulnerability, the appropriateness of granting compulsory acquisition powers to a foreign-owned fund already controlling a significant portion of the UK's solar pipeline. <p>Energy infrastructure is strategically sensitive. Consolidating control in a single overseas entity is inconsistent with the Government's stated aim of building a secure, domestically anchored energy system.</p>	
JMB2-017	Description and DCO Process	Deliverability and Consents	<p>9. Deliverability and Related Consents</p> <p>The SoR states that no impediments to related consents are expected, but provides no evidence.</p> <p>There is no assessment of:</p>	<p>The comment is referring to section 11 of the Statement of Reasons [APP-018]. The Applicant does not accept that there has been no assessment of the matters listed.</p> <p>The Statement of Reasons is one of a number of documents that accompanies the Applicant's DCO application that need to be</p>

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			<ul style="list-style-type: none"> • highways consents, • drainage consents, • BESS fire safety requirements, • grid connection deliverability, • construction access constraints. <p>Integrated deficiency: The SoR relies on a Funding Statement that confirms no funding is secured, no investment decision has been made, and no parent guarantee exists. Without evidence of deliverability, compulsory acquisition powers cannot lawfully be granted.</p>	<p>read together as a whole (it does not contain any assessment of the matters listed because those have been considered elsewhere). Effects on highways and drainage, BESS Fire Safety, grid connection deliverability, and construction access have all been comprehensively assessed in the technical material of the Environmental Statement. This includes, among other things:</p> <ul style="list-style-type: none"> • Chapter 11 – Hydrology, Flood Risk and Drainage [REP1-017] and supporting documents. • Chapter 13 – Transport and Access [REP1-019] and supporting documents. • The Outline Construction Traffic Management Plan [REP1-112].

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				<ul style="list-style-type: none"> • The Outline Battery Safety Management Plan [REP1-110]. • The Grid Connection Statement [APP-270]. <p>Any matters not proposed to be authorised by the draft DCO that the Applicant considers may be required are either separately identified in the Consents and Agreements Position Statement [APP-272], disapplied or modified through Article 6 of the Draft DCO. The Applicant is confident that the other consents and agreements, if required, can be obtained and has demonstrated in its application material that there are no impediments to obtaining these.</p> <p>The Applicant confirms that the Funding Statement [APP-019] submitted with the</p>

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				<p>application demonstrates the Scheme is financially viable and adequately funded for full delivery. While it is standard practice for a final internal investment decisions to follow the granting of consent, the Funding Statement also confirms that, at the time of submission in September 2025, £7.9million had already been invested into the development of the Scheme, demonstrating the significant financial commitments already provided. This is further supported by the track record of experienced infrastructure investors who have arranged or invested more than £65 billion into UK infrastructure, with further recent evidence demonstrated by additional significant post-consent spending in order to work towards the release of the required funding for the construction of Island Green Power's already</p>

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				consented West Burton Solar Project.
JMB2-018	Description and DCO Process	Compulsory Acquisition	<p>10. Legally Flawed Justification for Compulsory Acquisition</p> <p>The SoR states that compulsory acquisition powers are needed "to protect against contracts not being adhered to." This is not a lawful justification. Compulsory acquisition powers cannot be used as insurance against commercial risk or to compensate for the Applicant's inability to secure voluntary agreements.</p>	<p>This is a reference to voluntary landowner agreements not being adhered to. The Applicant has sought to secure the necessary rights by voluntary agreement with landowners, but must rely on compulsory acquisition powers to provide certainty that the Scheme can be delivered where such voluntary agreements are not complied with or otherwise set aside. Examples of types of situations where a voluntary agreement could not be relied on are provided further in the paragraph referred to (5.1.3 of the Statement of Reasons). Examples include (i) freeholder owners of the land within the Order land (where agreement has been reached) do not grant a lease of the land in accordance with the terms of the completed option agreements; or (ii) the contracting</p>

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				party dies, is subject to divorce proceedings, or is declared insolvent.
JMB2-019	Description and DCO Process	Compulsory Acquisition	<p>Conclusion</p> <p>The Applicant has not met the statutory tests for compulsory acquisition. The Scheme is defined by vagueness, excessive land take, unfixed design, and a lack of alternatives analysis. The interference with private property rights is not justified, not proportionate, and not supported by evidence.</p> <p>The Statement of Reasons fails to demonstrate:</p> <ul style="list-style-type: none"> • a compelling case in the public interest, • that the land is no more than reasonably necessary, 	Please see response to JMB2-006.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			<ul style="list-style-type: none"> • that alternatives were properly considered, • that the Scheme is deliverable, • or that compulsory acquisition is a last resort. <p>For these reasons, the compulsory acquisition powers sought should not be granted.</p>	
JMB2-020	Description and DCO Process	AI Use	<p>Note on AI Assistance</p> <p>I used Microsoft Copilot to assist with reviewing and analysing the Applicant's documents and publicly available information relating to comparable Nationally Significant Infrastructure Projects. Copilot helped me identify weaknesses in the Applicant's Statement of Reasons, compare Lime Down with other NSIPs, and organise the material into a clear, structured submission. It also assisted in</p>	<p>The Applicant makes note of this comment and notes certain inaccuracies that have been generated via the use of AI (it is anticipated that this is because the AI has been fed individual documents that form part of the application without consideration of the application documents as a whole), nevertheless, answers are provided accordingly.</p>

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			<p>refining the wording, improving clarity, and ensuring that the arguments were presented coherently and consistently. All views, concerns, and conclusions expressed in this document are entirely my own.</p>	

5.2 Isabel Ross

Table 5-2: [AS-014](#)

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
Additional Submissions - Accepted at the discretion of the Examining Authority				
IR-001	Consultation and Engagement	Engagement with Landowners	Island Green Power are grossly misrepresenting the negotiations with us as landowners on the cable route. When approached by them, we consistently say that we are not willing to have the cable route destroy our land. When reporting how negotiations with landowners are proceeding, Island Green Power say they are going brilliantly. That is a lie. Their tactic is clearly to ignore us. Then wait.until the Secretary of State gives the project the green light. The result is that we are utterly powerless and unheard.	The Applicant notes the comments made by the Respondent. Based on the Respondent's representation at Open Floor Hearing 1 on 21 st April 2026, the Applicant understands the respondent to be connected to Plot 10-004 as detailed in the Book of Reference [REP1-011] . The Applicant will continue to engage and work with the Interested Parties of Plot 10-004, and the detail of those negotiations can be found in the Land and Rights Negotiations Tracker [REP2-006] .